

Code of Ethics

Rule with respect to conflicts of interest:

No officer, Member of the Board or employee of the Agency should have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction or professional activity or incur any obligation of any nature, which is in substantial conflict with the proper discharge of his or her duties in the public interest.

Standards:

- A. No officer, Member of the Board or employee of the Agency should accept other employment which will impair his or her independence of judgment in the exercise of his or her official duties.
- B. No officer, Member of the Board or employee of the Agency should accept employment or engage in any business or professional activity which will require him or her to disclose confidential information which he or she has gained by reason of his or her official position or authority.
- C. No officer, Member of the Board or employee of the Agency should disclose confidential information acquired by him or her in the course of his or her official duties nor use such information to further his or her personal interests.
- D. No officer, Member of the Board or employee of the Agency should use or attempt to use his or her official position to secure unwarranted privileges or exemptions for himself, herself or others.

- E. No officer, Member of the Board or employee of the Agency should engage in any transaction as representative or agent of the Agency with any business entity in which he or she has a direct or indirect financial interest that might reasonably tend to conflict with the proper discharge of his or her official duties.

- F. An officer, Member of the Board or employee of the Agency should not by his or her conduct give reasonable basis for the impression that any person can improperly influence him or her, unduly enjoy his or her favor in the performance of his or her official duties, or that he or she is affected by the kinship, rank, position or influence of any party or person.

- G. An officer, Member of the Board or employee of the Agency should abstain from making personal investments in enterprises which he or she has reason to believe may be directly involved in decisions to be made by him or her, or which will otherwise create substantial conflict between his or her duty in the public interest and his or her private interest. Nothing contained within this Policy however, shall prohibit an officer, member of the board, or employee of the Agency from obtaining interests in mutual funds which may include within its investment portfolio, bonds, debentures, notes or other evidence of indebtedness of the Agency; provided however, that the Agency's bonds, debentures, notes or other evidence of indebtedness may not make up more than ten percent (10%) of the mutual fund's total portfolio and the officer, Member of the Board, or employee of the Agency may not exercise any discretion with respect to the investments made by the mutual fund company.

- H. An officer or employee of the Agency should endeavor to pursue a course of conduct which will not raise suspicion among the public that he or she is likely to be engaged in acts that are in violation of his or her trust.

- I. No officer or employee of the Agency employed on a full-time basis, nor any firm or association of which such an officer or employee is a member, nor any corporation a substantial portion of the stock of which is owned or

controlled directly or indirectly by such officer, member of the board or employee, should sell goods or services to any person, firm, corporation or association which receive financial assistance from the Agency.

- J. If an officer, Member of the Board or employee of the Agency shall have a financial interest, direct or indirect, having a value of ten thousand dollars or more in any activity which is the subject of an Agency Project (as such term is defined in Article 18-A of the General Municipal Law, he or she must file with Agency a written statement that he or she has such a financial interest in such activity which statement shall be open to public inspection.
- K. No officer, Member of the Board or employee of the Agency shall accept or arrange for any loan or extension of credit from the Agency or any affiliate of the Agency.

Violations:

In addition to any penalty contained in any other provision of law any such officer, member of the board or employee who shall knowingly and intentionally violate any of the provisions of this Code of Ethics may be fined, suspended or removed from office or employment in the manner provided by law.

Honoraria

No Agency employee may accept an honoraria. An honoraria is defined as a payment received for making a speech, publishing an article, or attending any public or private conference, convention, meeting, social event, meal or similar gathering.

Gifts

No Agency employee shall accept gifts exceeding one hundred dollars (\$250) in value in a calendar year. No Agency employee shall accept any gifts from a bidder or proposer on an Agency Contract.

Any Agency employee, who receives a gift in excess of the limitations in this section, must either return the gift or donate it to a charity within thirty (30) days after receipt. Agency employees should keep a log of all gifts received and the value, source, and disposition of gifts.

Confidential Information

Agency employees shall maintain the confidentiality of any confidential information relating to contracts, procurement, litigation strategy, personnel files, employee medical information, or other proprietary information to which they have access through their employment with the Agency. Such confidentiality shall be maintained during and after such employment with the Agency. Agency employees shall not use confidential information for any purpose other than in the performance of their job for the benefit of the Agency. Confidential information shall only be disclosed to authorized persons.

Use of Agency Assets

Agency employees shall not use any Agency assets for personal gain or any other purpose other than Agency business. Agency assets include, but are not limited to, time, facilities, equipment, stationary, records, mailing lists, supplies, prestige or influence.

Agency telephones, computers, e-mail and Internet access are provided for the purpose of conducting Agency business. Subject to the restrictions in this section and if permitted by the Chief Executive Officer, some occasional and limited personal use is allowed so long as it does not interfere with the performance of the employee's Agency duties and does not result in additional expense to the Agency. However, Agency telephones, computers, e-mail and Internet access shall not be

used for chain emails, religious or political advocacy, excessive personal communication, personal financial gain, to seek outside employment, for any purpose that would reasonably be viewed as abusive, harassing, hostile or intimidating to Agency clients or employees, to access entertainment or sexually explicit sites, or for any use otherwise prohibited by law. The Agency reserves the right to monitor and review all records of usage by Agency employees of any Agency assets. No use of Agency telephones, computers, email or Internet access, or use of any other Agency asset, shall be private to the employee, and no Agency employee shall be given any basis for an expectation of privacy in any such use.

Political Activity

Members and employees of the Agency may be engaged as private individuals in political activity. However, they must be extremely cautious to keep those activities separate from the affairs of the Agency to avoid misrepresentation or public confusion between private behavior and public actions on the part of the Agency. Members and employees are advised to express such personal opinions with prudence as they may likely be afforded special significance in terms of public influence. When speaking in public, members and employees should strive to separate a discussion of issues from an assertion favoring or opposing candidates for office. Members and employees are not authorized to employ the name or image of the Agency for campaign purposes.

No member or employee may represent the opinion of the Agency or offer public comment on an issue that may be construed to represent the opinion of the Agency without the prior knowledge and consent of the Agency. Members and employees may make comments that represent personal opinions on public issues, but they must be qualified as personal comments and not representative of the viewpoint of the Agency.

Agency funds for advertising or promotional materials shall not depict elected government officials in either print or electronic media.

Equal Employment Opportunity

The Agency provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, sex national origin, age, disability or genetics. In addition to federal law requirements, the Agency complies with applicable state and local laws governing nondiscrimination in employment in every location in which the Agency has facilities. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

The Agency expressly prohibits any form of workplace harassment based on race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status. Improper interference with the ability of the Agency's employees to perform their job duties may result in discipline up to and including discharge.

Any employee or potential employee who believes the Agency has not followed this policy should immediately report such to the Chairperson of the Board of Directors.

Sexual Harassment

It is the policy of the Agency that all employees are responsible for ensuring that the workplace is free from sexual harassment. Because of the Agency's strong disapproval of offensive or inappropriate sexual behavior at work, all employees must avoid any action or conduct that could be viewed as sexual harassment.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexually harassing nature, when: (1) submission to the harassment is made either explicitly or implicitly a term or condition of employment; (2) submission to or rejection of the harassment is used as the basis for employment decisions affecting the individual; or (3) the harassment has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Any employee who has a complaint of sexual harassment at work by anyone, including supervisors, co-workers or visitors, should first clearly inform the harasser that his/her behavior is offensive or unwelcome and request that the behavior stop. If the behavior continues, the employee must immediately bring the matter to the attention of the Chief Executive Officer. If the Chief Executive Officer is involved in the harassing activity, the violation should be reported to the Chairperson of the Board of Directors.

If the Chief Executive Officer or the Chairperson knows of an incident of sexual harassment, they shall take appropriate remedial action immediately. If the alleged harassment involves any types of threats of physical harm to the victim, the alleged harasser may be suspended with pay. During such suspension, an investigation will be conducted by the Agency. If the investigation supports charges of sexual harassment, disciplinary action against the alleged harasser will take place and may include termination. If the investigation reveals that the charges were brought falsely and with malicious intent, the charging party may be subject to disciplinary action, including termination.

If an employee is dissatisfied with management's response to his/her complaint, he/she may contact the NYS Department of Labor, Division of Equal Opportunity Development at (518) 457-1984.

Readopted: June 19, 2019