

Cohoes Industrial Development Agency

CODE OF ETHICS

This Code of Ethics shall apply to all directors of the Board and employees of the Cohoes Industrial Development Agency (“the Cohoes IDA”). These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of the directors and employees and to preserve public confidence in the Cohoes IDA’s mission. This code is adopted pursuant to New York Public Authorities Law section 2824(1)(d) and section 73 and 74 of the New York Public Officers Law.

DEFINITIONS

As used in this policy:

“**Director**” shall mean a member of the Board of Directors of the Cohoes Industrial Development Agency who in this capacity is also deemed to be a state director of a local public authority under section 1605(l) of the Not-for-Profit Law (“the Cohoes IDA Act”) and as such is subject to the ethical responsibilities of section 73 and 74 of the Public Officers Law and also New York Public Authorities Law section 2824(1)(d).

“**Employee**” shall mean a non-volunteer employee of the Cohoes Industrial Development Agency who in this capacity is also deemed to be a state employee of a local public authority under section 1605(l) of the Not-for-Profit Law (“the Cohoes IDA Act”) and as such is subject to the ethical responsibilities of section 73 and 74 of the Public Officers Law and also New York Public Authorities Law section 2824(1)(d).

No director or employee of the Cohoes IDA 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

1. Directors and employees shall perform their duties with transparency, without favor and refrain from engaging in outside matters of financial or personal interest, including other employment, that could impair independence of judgment, or prevent the proper exercise of one’s official duties.
2. Directors and employees shall not directly or indirectly, make, advise, or assist any person to make any financial investment based upon information available through the director’s or employees’ official position that could create any conflict between their public duties and interests and their private interests.
3. Directors and employees shall not accept or receive any gift or gratuities where the circumstances would permit the inference that: (a) the gift is intended to influence the

individual in the performance of official business or (b) the gift constitutes a tip, reward, or sign of appreciation for any official act by the individual. This prohibition extends to any form of financial payments, services, loans, travel reimbursement, entertain, hospitality, or thing or promise from any entity doing business with or before the Cohoes IDA.

4. Directors and employees shall not use or attempt to use their official position with the Cohoes IDA to secure unwarranted privileges for themselves, members of their family or others, including employment with the Cohoes IDA or contracts for materials or services with the Cohoes IDA.
5. Directors and employees must conduct themselves at all times in a manner that avoids any appearance that they can be improperly or unduly influenced that they could be affected by the position of or relationship with any other party, or that they are acting in violation of their public trust.
6. Directors and employees may not engage in any official transaction with an outside entity in which they have a director or indirect financial interest that may reasonably conflict with the proper discharge of their official duties.
7. Directors and employees shall manage all matters within the scope of the Cohoes IDA's mission independent of any other affiliations or employment. Directors, and employees employed by more than one entity shall be strict to fulfill their professional responsibility to the Cohoes IDA without bias and shall support the Cohoes IDA's mission to the fullest.
8. Directors and employees shall not use Cohoes IDA property, including equipment, telephones, vehicles, computers, or other resources, or disclose information acquired in the course of their official duties in a manner inconsistent with State or local law or policy and the Cohoes IDA's mission and goals.
9. Directors and employees are prohibited from appearing or practicing before the Cohoes IDA for two (2) years following employment with the Cohoes IDA, consistent with the provisions of Public Officers Law.

IMPLEMENTATION

This Code of Ethics shall be provided to all directors and employees upon commencement of employment or appointment and shall be reviewed annually by the Governance Committee.

The board may designate an Ethics Officer who shall report to the board and shall have the following duties:

- Counsel in confidence with the Cohoes IDA directors and employees who seek advice about ethical behavior.
- Receive and investigate complaints about possible ethics violations.
- Dismiss complaints found to be without substance.

- Prepare an investigation report of their findings for action by the Executive Director or the board.
- Record the receipt of gifts or gratuities of any kind received by a director or employee who shall notify the Ethics Officer within 48 hours of receipt of such gifts and gratuities.

PENALTIES

In addition to any penalty contained in any other provision of the law, directors or employees who knowingly and intentionally violates any of the provisions of this code may be removed in the manner provided for in law, rules or regulations, and the Cohoes IDA Bylaws.

REPORTING UNETHICAL BEHAVIOR

Directors and employees are required to report possible ethical behavior by a director or employee of Cohoes IDA to the Ethics Officer, if one has been appointed, or to the Chairman of the Board, or the Vice Chairman of the Board. Directors and employees may file ethics complaints anonymously and protection from retaliation by the policies adopted by the Cohoes IDA.