NEW YORK STATE BRIDGE AUTHORITY
ANNUAL REPORT PER SECTION 2800 OF PUBLIC AUTHORITIES LAW
CODE OF ETHICS
YEAR ENDED 12/31/19

Purpose. The Authority Code of Ethics mirrors Section 74 of the Public Officers Law which, by statute, covers all Authority officers and employees and incorporates the recommendations of the Authority Budget Office. The purpose of this Code of Ethics is to serve as a guide for official conduct. It is intended to enhance the ethical and professional performance of the Authority's officers and employees and to preserve public confidence in the Authority's mission.

b. Definition. The term "Authority employee" shall mean any member, director, commissioner, officer or employee of the New York State Bridge Authority.

c. Rule with Respect to Conflicts of Interest. No Authority employee 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/her duties in the public interest.

d. Standards.

i. All Authority employees shall perform their duties with transparency, without favor, and refrain from engaging in outside matters of financial or personal interest. In this regard, no Authority employee shall accept other employment which will impair his/her independence of judgment or prevent the proper exercise of his/her official duties.
ii. No Authority employee should accept employment or engage in any business or professional activity which will require the employee to disclose confidential information which he/she has gained by reason of his/her official position or authority.
iii. No Authority employee shall directly or indirectly, make, advise, or assist any person to make any financial investment based upon information available through the employee's official position with the Authority that could create any conflict between the employee's public duties and interests and the employee's private interests. In this regard, no Authority employee shall disclose confidential information acquired by the employee in the course of his/her official duties nor use such information to further his/her personal interests.
iv. No Authority employee shall use, or attempt to use, his/her official position to secure unwarranted privileges or exemptions for him/herself, members of his/her family, or others, including employment with the Authority or contracts for materials or services with the Authority.
v. No Authority employee shall engage in any transaction as representative or agent of the Authority with any business entity in which he/she has a direct or indirect financial interest that might reasonably tend to conflict with the proper discharge of his/her official duties.

vi. An Authority employee shall conduct themself at all times in a manner that avoids any appearance that they can be improperly or unduly influenced, nor shall any Authority employee, by his/her conduct, give reasonable basis for the impression that any person can improperly influence such employee or unduly enjoy his/her favor in the performance of his/her official duties, or that he/she is affected by the kinship, rank, position or influence of any party or person.

vii. An Authority employee shall abstain from making personal investments in enterprises which he/she has reason to believe may be directly involved in decisions to be made by him/her or
which will otherwise create substantial conflict between his/her duty in the public interest and his/her private interest.

viii. An Authority employee shall endeavor to pursue a course of conduct which will not raise suspicion among the public that he/she is likely to be engaged in acts that are in violation of his/her public trust.

ix. No Authority employee employed on a full-time basis nor any firm or association of which such an employee is a member nor corporation, a substantial portion of the stock of which is owned or controlled directly or indirectly by such employee, shall sell goods or services to any person, firm, corporation or association which is licensed or whose rates are fixed by the authority in which such employee serves or is employed.

x. If any Authority employee should have a financial interest, direct or indirect, having a value of ten thousand dollars ($10,000) or more in any activity which is subject to the jurisdiction of a regulatory agency, he/she shall file with the Secretary of State a written statement that he/she has such a financial interest in such activity, which statement shall be open to public inspection.

xi. Authority employees shall not solicit, accept or receive any gift having more than a nominal value, or multiple gifts in one year collectively totaling more than nominal value, whether in the form of money, service, loan, travel, lodging, meals, refreshments, entertainment, discount, forbearance of an obligation or promise to pay, or in any other form. The term “nominal value” is defined here as having a fair market value of fifteen dollars or less. Notwithstanding the forgoing, any gift, regardless of value, that is intended to influence the employee in the performance of official business or is given as an appreciation for any official act by the individual is strictly prohibited and must be immediately declined and returned.

xii. Authority employees shall manage all matters within the scope of the Authority’s mission, independent of any other affiliations or employment. Directors, including ex-officio Board members, and employees employed by more than one government shall strive to fulfill their professional responsibility to the Authority without bias and shall support the Authority’s mission to the fullest.

xiii. Authority employees shall not use Authority 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 Authority’s mission and goals.

xiv. Authority employees are prohibited from appearing or practicing before the Authority for two (2) years following employment with the Authority, consistent with the provisions of the Public Officers Law.

e. Implementation of Code of Ethics. This Code of Ethics shall be provided to all Authority 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:
i. Counsel in confidence Authority employees who seek advice about ethical behavior.
ii. Receive and investigate complaints about possible ethics violations.
iii. Dismiss complaints found to be without substance.
iv. Prepare an investigative report of their findings for action by the Executive Director or the Board.
v. Record the receipt of gifts or gratuities of any kind received by an Authority employee, who shall notify the Ethics Officer within 48 hours of receipt of such gifts and gratuities.

f. Violations. In addition to any penalty contained in any other provision of law, any Authority 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 for by applicable law, rules or regulations.

g. Reporting Unethical Behavior. Authority Employees are required to report possible unethical behavior by any Authority employee to the Ethics Officer. Authority employees may file ethics complaints anonymously and are protected from retaliation by the policies adopted by the Authority.

h. NYS Joint Commission on Public Ethics (JCOPE) Outside Activity and Approval Procedures. The Authority has adopted an Outside Activity Policy for all compensated employees. All compensated Authority employees shall seek prior approval before engaging in:
i. outside employment;
ii. certain political activity;
iii. other activities that result in outside compensation as defined in the regulation;
iv. serving as a director or officer of a for-profit or not-for-profit entity; and,
v. any activity that may pose a conflict of interest or have the appearance of a conflict of interest with the mission of the Authority.
Depending on the nature of compensation and the employee's position with the Authority, approval of an outside activity by JCOPE may be required.
The Authority Outside Activity Policy is also intended to comply with JCOPE regulation Title 19 NYCRR Part 932 for Authority policy makers and heads of State Agencies.
In compliance with section 932.9, this Code of Ethics shall serve as the code of ethical conduct covering conflicts of interest and business and professional activities, including outside activities for uncompensated and per diem Directors, Members and Officer , and shall be filed with JCOPE.