

CODE OF ETHICS

Effective: April 1, 2022

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Policy Statement

This Code of Ethics is based upon the Public Officers Law and the Procurement Lobbying Law and shall apply to all employees of the Capital District Transportation Authority (CDTA) and its subsidiaries. These CDTA specific principles are intended to enhance the ethical and professional performance of CDTA's employees and to preserve public confidence in CDTA's mission.

- a. Employees must not engage in outside activities, including other employment, which could impair independence of judgment, or prevent the proper exercise of one's official duties.
- b. Employees must not accept employment, business or professional activity that makes use of confidential information obtained while working at CDTA.
- c. Employees must not disclose confidential information acquired in the course of their official duties nor use such information to further personal interests.
- d. Employees must not use or attempt to use their official position to secure gifts, unwarranted privileges or exemptions for themselves or others.
- e. Employees are prohibited from accepting gifts from an individual or non-governmental entity that does (or seeks to do business) with CDTA. The prohibition regarding the acceptance of gifts applies to both perishable/consumable and non-perishable gifts, including gifts sent as a courtesy or common practice, or during the holiday season. Employees receiving any such gifts should follow the procedures detailed below.
- f. Employees are prohibited from accepting meals, or payment for meals, from individuals or non-governmental entities that do (or seek to do) business with CDTA. On occasion, employees may share meals with such entities – however, CDTA employees must pay for their own actual share of the meal and must retain written documentation for our records. The foregoing also applies during conferences, trade shows, and the like.
- g. Employees must not do business with any contractor or vendor in which they have a direct or indirect financial interest that might reasonably tend to conflict with the proper discharge of their official duties.
- h. Employees must avoid giving the impression that anyone could improperly influence or improperly favor any contractor in the performance of their official duties. With limited exceptions, employees are prohibited from attending holiday, celebratory, or social functions sponsored by an individual or entity that does (or seeks to do) business with CDTA.
- i. Employees must avoid giving the impression that they are improperly affected by the kinship, rank, position or influence of any party or person.
- j. Employees must not make personal investments with businesses or contractors that could reasonably taint CDTA decisions or processes or create a conflict of interest with their duties at CDTA.
- k. Employees must pursue a course of conduct that will not raise suspicion among the public that they are likely to be engaged in acts that are in violation of their public trust.
- l. Employees must not sell goods or, services to any person, firm, corporation or association which is licensed by or, whose rates are fixed by CDTA.
- m. Employees must use CDTA property, including equipment, telephones, vehicles, computers, or other resources in the course of their official duties and in a manner consistent with State or local law, and any applicable policies of CDTA.
- n. Employees are prohibited from appearing or practicing or rendering services for compensation on matters before the Authority for two (2) years following employment with the CDTA.
- o. Employees must report all contacts concerning CDTA procurements to the Ethics Officer.
- p. Employees must report potentially unethical behavior by any employee of the CDTA to the Ethics Officer. Employees may file ethics complaints anonymously and are protected from retaliation by the policies adopted by the CDTA.
- q. Certain employees must not engage in certain political activities.
- r. All employees are required to exercise discretion to ensure the proper use of CDTA funds. All expenditures must be made in accordance with CDTA policy and must be directly related to CDTA's core business of the provision of public transportation. Employees are prohibited from using CDTA funds for personal (non-business) uses. Expenditures that result in benefits to select individuals should be justified and the rationale should be carefully documented.



PROCEDURES:

1. **All employees must obtain permission prior to commencing any outside employment activities ('side jobs'). Employees must submit a written request to the Ethics Officer, prior to engaging in any other employment.** Employees seeking to engage in political activity should seek detailed guidance from the Ethics Officer.
2. When an employee receives a 'gift' (of any sort) from an individual or entity that does (or seeks to do) business with CDTA, the following procedures must be followed: (1) if the item is perishable/consumable, it must be placed in a common area (break room, lunchroom) and the person or entity sending the gift must be notified, in writing, that gifts may not be sent or accepted in the future. (2) If the item is not perishable/consumable, the employee must return the gift, along with written notification that gifts may not be sent or accepted in the future. Copies of all written notification must be retained for our records.
3. In the general course, Employees are prohibited from receiving travel/expense reimbursement from sources other than CDTA. Limited exceptions apply. Employees must request approval from the Ethics office prior to accepting any travel/expense reimbursement from an outside entity.
4. Any questions or concerns regarding the Code of Ethics, New York State law, or this Policy should be directed to the Ethics Officer for clarification.

REQUIRED REPORTING:

You are required by the law and regulations to report any and all solicitations, offers or acceptance of gifts, honoraria, outside business activity, conflicts of interest, or procurement contacts. Such reports must be made to the Ethics Officer. Certain employees may be subject to other mandatory reports, as required by law.

VIOLATIONS:

In addition to any criminal or civil penalty contained in any law, employees who knowingly and intentionally violate any provision of this policy may be fined, suspended or terminated from employment.



Carm Basile
Chief Executive Officer