

Introduction

The Albany Parking Authority (the "Authority"), a public-benefit corporation, expects its members, officers and employees and the many contractors, bankers, bond counsels, consultants and vendors with whom the Authority interacts - its Working Partners - to adhere to the highest ethical standards. The Authority, by mandate of its Board, has established a comprehensive corporate integrity program to ensure that Authority members, officers and employees at all levels perform their official duties consistent with the requirements of the New York State Public Officers Law and other applicable laws, rules, and regulations and the policies of the Authority.

The Authority encourages and supports a fair, open and honest business relationship with its Working Partners based on quality, service and price. The Authority believes that this objective can be achieved only if working relationships between the Authority and its Working Partners are fair, open and honest and all participants adhere to ethical business practices.

To promote a working relationship with the Authority based on ethical business practices, our Working Partners are expected to:

- Furnish all goods, materials and services to the Authority as contractually required and specified
- Submit complete and accurate reports to the Authority and its agents as required
- Not seek, solicit, demand or accept any information, verbal or written, from the Authority or its agents that provides an unfair advantage over a competitor
- Not engage in any activity or course of conduct that restricts open and fair competition on Authority-related projects and transactions
- Not engage in any course of conduct with Authority employees or its agents that constitutes a conflict of interest, in fact or in appearance
- Not offer any gifts or gratuities to Authority employees (including meals, tickets to special events or other items of value) or engage in other conduct that violates this Code of Business Ethics, law or regulation
- Report to the Authority any activity by an Authority employee or Working Partner that is inconsistent with the Authority's Code of Business Ethics, law or regulation

Conduct of Authority Members, Officers and Employees

Authority employees are expected to conduct business with our Working Partners in a fair, consistent and professional manner. The Authority's Code of Business Ethics and Employee Conduct guides the manner in which Authority employees are to interact with Working Partners. The Authority has also adopted a Code of Ethics to which the members of the Authority must adhere. In addition, the New York State Public Officers Law sets forth standards governing the acceptance of gifts by public officers and conflicts of interest involving members, officers and employees of the Authority.

Limits on Gifts to Authority Employees

The Authority strongly discourages Working Partners from offering or giving anything of value to Authority employees under circumstances which may constitute, or even suggest, impropriety. A Working Partner shall not, under any circumstances, give cash including gift certificates, in any amount, to an Authority employee. Section 73(5) of the Public Officers Law expressly prohibits any firm or its agents, either doing or seeking to do business with the Authority, from directly or indirectly offering or giving any gift having a value of \$75 or more to an Authority employee under circumstances in which it:

- could be reasonably inferred the gift was intended to influence the employee in the performance of their official duties, or
- could reasonably be expected to influence the employee in the performance of their official duties, or
- was intended as a reward for the employee's official action.

For purposes of determining compliance with the \$75 limit, all gifts to an Authority employee during any 12-month period are aggregated. Also, even if a particular gift would not exceed the \$75 limit, the offering or giving of a gift of

any value to an Authority employee may be considered inappropriate because the nature of pending matters may give rise to the appearance of impropriety (e.g., gifts given during the contract procurement process). Violations of these gift provisions may be grounds for immediate contract termination and/or referral for civil action or criminal prosecution.

Questions

Questions relating to these guidelines should be directed to the responsible Authority Director (518-434-8886), or via the feedback section of the Authority website at www.ParkAlbany.com. When in doubt, please seek guidance.