

**CITY OF MOUNT VERNON  
INDUSTRIAL DEVELOPMENT AGENCY**

**AMENDED AND RESTATED  
CODE OF ETHICS AND CONFLICT OF INTEREST POLICY**

The Code of Ethics and Conflict of Interest Policy (the "Policy") is adopted upon approve by the Board of Directors of the City of Mount Vernon Industrial Development Agency (the "Agency") have adopted this Code of Ethics (this "Code") in accordance with Section 2824 of the Public Authorities Law and applies to all members, directors, committee members, officers and employees of the Agency.

This Policy shall serve as a guide for official conduct and intended to promote honest and ethical conduct and professional performance of the Agency's members, directors, officers and employees and to preserve public confidence in Agency's mission.

**Standards Established by Public Officers Law**

Members, Officers and Employees shall at all times maintain and comply with ethical standards consistent with the requirements of Section 74 of the Public Officers Law, as it may be in effect from time to time, as if such standards are applicable to Members, Officers and Employees of the Agency.

**General Principles and Policies**

Officers, Directors and Employees shall comply with the following principles and policies:

- a. Performing the duties of his or her office impartially and diligently and disqualify him or herself in any matter in which his or her impartiality might be reasonably questioned.
- b. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- c. Comply with the rules and regulations of federal, state and local governments and other appropriate private and public regulatory agencies.
- d. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated.
- e. Respect and protect the confidentiality of information acquired in the course of professional activities, except when authorized or otherwise legally obligated to disclose such information.

- f. Promptly report to any member of the Board any violations of this Code by any Officer, Director and/or Employee of the Agency who is subject to this Code.

### **Conflicts**

No Member, Officer or Employee shall participate in the making of any decision by the Agency relating to any applicant or project with respect to which the Member, Officer or Employee has a pecuniary interest, or relating to which the Member, Officer or Employee stands to receive pecuniary gain.

### **Investments**

No Member, Officer or Employee shall make any personal investments in any project or entity that has a project before, or that he or she has reason to believe may have a project before, the Agency for consideration of financial assistance.

### **Confidential Information**

No Member, Officer or Employee shall use any confidential or inside information obtained during the course of his or her duties as a basis for personal gain by such Member, Officer or Employee, nor shall any Member, Officer or Employee make such information available to others for similar purposes.

### **Gratuities**

No Member, Officer or Employee shall accept or permit any member of his or her immediate family to accept, gifts or other favors from any applicant or person with matters before the Agency or reasonably expected to be before the Agency, or which might appear to be given for the purpose of improperly influencing the Member, Officer or Employee in the performance of his or her duties for the Agency. Further, no Member, Officer or Employee shall use his or her official position to secure privileges or exemptions not otherwise available equally to the general public.

### **Employment**

No Member, Officer or Employee shall accept employment with any entity (or any affiliate of that entity) that has or had a project before the Agency within one year following the later of (i) the cessation of such matter before the Agency, or (ii) the date of the last action taken by the Agency with respect to that entity.

### **Filings**

Each Member, Officer and Employee, to the extent required by Section 2825(3) of the Public Authorities Law, shall make the annual filings required thereby.

## **Relatives and Family Members**

As used in this policy, provisions relating to Member, Officer or Employee person benefit or gain shall include benefit that may accrue to any relative or family member.

## **Violations**

In addition to any penalty contained in any other provision of law any such Member, Officer, or Employee who shall knowingly and intentionally violate any of the provision of this section may be suspended or removed from office or employment.

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Reviewed and adopted this 10<sup>th</sup> day of March 2020  
by the City of Mount Vernon Industrial Development Agency.