

APPENDIX B

OLYMPIC REGIONAL DEVELOPMENT AUTHORITY

CODE OF ETHICS POLICY

GENERAL

It is the policy of the Olympic Regional Development Authority (ORDA or Authority) to maintain the highest standards of integrity in the conduct of business. No action shall knowingly be taken to compromise the integrity or the reputation of ORDA, its Directors, or its staff members.

It is the duty of each Director and staff member to:

- respect the nature of privileged or confidential information regarding the Authority, its Directors, or its staff.
- not use information obtained in the conduct of ORDA business for personal or business advantage.
- be certain that a position held with ORDA is never used to obtain unauthorized, illegal or questionable benefit as it would apply to a sponsor, supplier or other party doing business with this Authority.

ORDA employees are subject to the ethics provision set forth in Public Officers Law §§73, 73-a and 74.

CONFLICTS OF INTEREST

It is the duty of Directors and staff members of this Authority to remain free of any conflict of interest or the appearance of any such conflict which might tend to, in any degree, prejudice the independent exercise of judgment in handling the affairs of ORDA.

Among the activities which would be considered violations of this policy are:

(Appendix B, Code of Ethics, continued)

- accepting or receiving any gift whether in the form of money, service, loan, travel, entertainment, hospitality, thing or promise or in any other form, under circumstances in which it could reasonably be inferred that the gift was intended to influence him or her, or could reasonably be expected to influence him or her, in the performance of official duties or was intended as a reward for any official action. Any person who accepts a gift valued at \$75.00 or more under such circumstances is guilty of a misdemeanor. The New York State Ethics Commission has interpreted the \$75.00 to mean a cumulative total of gifts over a twelve month period from a single source.
- soliciting or obtaining significant interest or investment in sponsors' businesses other than those already held prior to becoming a Director or staff member of ORDA.

Each Director and staff member occupies a position of trust and responsibility as a result of his or her association with this Authority. This policy prohibits the use of the position to seek or receive any personal advantage from a sponsor or supplier.

When in doubt, a test of the acceptability of any particular situation should be the individual's willingness to discuss the issue with the individual's supervisor, or in the case of a Director, with an entire board; and the Authority's willingness to discuss the matter publicly. When questions arise as to the interpretation of policy on business ethics, it is recommended the matter be discussed with the supervisor in charge of the venue or unit. Should there be a need for further interpretation, the supervisor in charge of the venue or unit should refer the issue to the Chief Executive Officer or his designee for further discussion and resolution. Every effort should be made to make such disclosures in advance of actions which would raise questions that require interpretations or

(Appendix B, Code of Ethics, continued)

exceptions; if this is not possible, timely disclosures should be made after the fact.

Matters involving suspected criminal activity shall be reported immediately to the Chief Executive Officer who shall in turn review the matter with Corporate Counsel to determine appropriate action.

POLITICAL ACTIVITIES

Staff members of ORDA are encouraged to take an interest in political affairs, to participate on their own time, or contribute, if they wish, to parties or candidates of their choice.

Staff members should be aware of the fact that there are legislative issues at both the local and state levels in which this Authority has a legitimate interest which may affect the interests of ORDA. Employees and Directors shall not represent their association with ORDA in taking a public position.

OUTSIDE EMPLOYMENT/ACTIVITIES

The Authority will adhere to the Public Officers Law which holds that no public employee shall have any outside business connection, transaction or employment, or engage in any activity which would conflict with the public interest, or which would reflect adversely on the integrity of the employee or the operations of ORDA. No outside employment activity shall take place during normal work hours or using Authority premises, supplies, or equipment.

POLICY-MAKERS

The Board of Directors will, on an annual basis, identify the staff members who are designated as policy-makers for ORDA.

(Appendix B, Code of Ethics, continued)

Staff members who are deemed policy-makers must adhere to additional reporting requirements administered by the New York State Ethics Commission. Under 19 NYCRR Part 932, no salaried individual designated as a policy-maker may spend time or engage in a private, outside activity, profession or business, or other public employment for which more than \$1,000 is received without obtaining prior approval from their appointing authority. If more than \$4,000 is received, they also must obtain prior approval of the New York State Ethics Commission. In addition, this regulation requires that salaried individuals designated by the Board of Directors as policy-makers must obtain prior approval from the New York State Ethics Commission before holding any public office, regardless of compensation.

FINANCIAL DISCLOSURE

Under Public Officers Law §73-a, all staff members who receive annual compensation in excess of \$55,298 (as of May 1993), or who hold policy-making positions regardless of annual compensation, shall file an annual Statement of Financial Disclosure on or before the fifteenth day of May with respect to the preceding calendar year with the New York State Ethics Commission. Questions on disclosure may be directed to the Ethics Commission, 39 Columbia Street, Albany, New York 12207 (1-800-873-8442).

RESPONSIBILITY OF REPORTING QUESTIONABLE PRACTICES

Each Director and staff member may report questionable activities or practices which would appear to be in violation of the Code of Ethics to the New York State Inspector General or the New York State Ethics Commission, whether or not the occurrence is within his or her own sphere of immediate activity.