

**Albany Parking Authority (“APA”)
Code of Ethics**

This Code of Ethics shall apply to all directors and employees of the APA. These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of the APA's directors and employees and to preserve public confidence in the APA's mission.

Responsibility of Directors and Employees

1. Directors and employees shall perform their duties with transparency, without favor and refrain from engaging in outside matters of financial or personal interest, including other employment, that would impair independence of judgment, or prevent the proper exercise of one's official duties.
2. Directors and employees shall not directly or indirectly, make, advise, or assist any person to make any financial investment based upon information available through the director's or employee's official position.
3. Directors and employees shall not accept or receive any gift or gratuities where the circumstances would permit the inference that: (a) the gift is intended to influence the individual in the performance of official business or (b) the gift constitutes a tip, reward, or sign of appreciation for any official act by the individual. This prohibition extends to any form of financial payments, services, loans, travel reimbursement, entertainment, hospitality, thing or promise from any entity doing business with or before the APA.
4. Directors and employees shall not use or attempt to use their official position with the APA to secure unwarranted privileges for themselves, members of their family or others, including employment with the APA or contracts for materials or services with the APA.
5. Directors and employees must conduct themselves at all times in a manner that avoids any appearance that they can be improperly or unduly influenced, that they could be affected by the position of or relationship with any other party, or that they are acting in violation of their public trust.
6. Directors and employees may not engage in any official transaction with an outside entity in which they have a direct or indirect financial interest that may reasonably conflict with the proper discharge of their official duties.
7. Directors and employees shall manage all matters within the scope of the APA's mission independent of any other affiliations or employment. Directors and employees employed by more than one government shall strive to fulfill their professional responsibility to the APA without bias and shall support the APA's mission to the fullest.
8. Directors and employees shall not use APA 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 local law or policy and the APA's mission and goals.

It is recognized that directors and employees may encounter both apparent and actual conflicts of interest in a matter related to the APA – in such instances, the director and/or employee so affected should inform the General Manager or the other Board Members (as appropriate) of the existence of such conflict and recuse himself/herself from any decision-making/decision-influencing role in the matter.

Implementation of Code of Ethics

This Code of Ethics shall be provided to all directors and employees upon commencement of employment or appointment and shall be reviewed annually by the Governance Committee. The board designates the APA General Counsel as Ethics Officer, who shall report to the board as directed and shall have the following duties:

- Counsel in confidence APA directors and employees who seek advice about ethical behavior.
- Receive and investigate complaints about possible ethics violations.
- Dismiss complaints found to be without substance.
- Prepare an investigative report of their findings for action by the Board.
- Record the receipt of gifts or gratuities of any kind received by a director or employee.

Penalties

In addition to any penalty contained in any other provision of law, an APA director or employee who knowingly and intentionally violates any of the provisions of this code may be removed in the manner provided for in law, rules or regulations.

Reporting Unethical Behavior

Employees and directors are required to report possible unethical behavior by a director or employee of the APA to the Ethics Officer. Employees and directors may file ethics complaints, anonymously, to the APA General Counsel as Ethics Officer and are protected from retaliation by the policies adopted by the APA