


Code of Ethics - Policy

Note: Revision # should be listed in descending order starting with the most recent version at the top.

| Revision Date (For BCG Use Only) | Revision # | Description/Modification | Revision Section (s) | Author |
|----------------------------------|------------|-------------------------------------------------------------------------------------------------|----------------------|-------------------------------------------------------|
| 03/14/2018 | 1 | Revisions made throughout according to recommendation from NYPA Office of Ethics and Compliance | N/A | Lisa Wright Manager, Administrative Services |
| 2/27/2018 | 0 | Removed references to Thruway Authority and inserted correct titles and contact information | N/A | |

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|  <p style="text-align: center;">GENERAL POLICY</p> <p><i>Risa Com</i> <i>AT</i> 3/14/18 <small>Manager, Administrative Services</small> <small>DATE</small></p> | NUMBER: CGP-2018-016 |
| | SUBJECT: Code of Ethics |
| | DISTRIBUTION: All Employees |

This policy supersedes Thruway/Corporation General Policy 25-2-07

GENERAL POLICY

- A. It is the policy of the New York State Canal Corporation (Corporation) to govern and to have its employees govern themselves in an ethical manner consistent with the law, particularly the Ethics in Government Act, specifically, Section 94(15) of the Executive Law, Sections 73, 73-a and 74 of the Public Officers Law and the New York State Joint Commission on Public Ethics' regulations cited in 19 NYCRR (Volume 19 of the Official Compilation of Codes, Rules and Regulations of the State of New York) Part 930 et seq.
- B. The Corporation recognizes that the maintenance of the public confidence in the Corporation and of a high standard of integrity and conduct in Corporation operations is a responsibility of all of its employees.
- C. The Corporation will undertake, consistent with applicable statutes and regulations, such activities as it deems necessary or appropriate to maintain an environment where ethical conduct guides its operations and the conduct of its employees.
- D. Employees, where they have reason to believe that a conflict of interest may exist with their official duties, a particular activity or the Corporation's mission, are responsible for contacting their supervisors and the Ethics and Compliance Office for guidance.
- E. Nothing in the policy shall supersede or negate any laws, rules or regulations pertaining to ethical conduct promulgated by the Federal Government, the State of New York and/or the New York State Joint Commission on Public Ethics.