

## 4.1 Conflicts of Interest

The Authority expects all employees to conduct themselves and company business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, and local laws and regulations. This includes exercising particular care that no detriment to the interests of the Authority (or appearance of such detriment) may result from a conflict between Authority interests and any private business interests.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises where there is a potential conflict of interest, the employee should discuss this with a manager and a representative from the Legal Department for advice and guidance on how to proceed.

The list below suggests some of the types of activity that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics:

- Solicit or accept, directly or indirectly, from, or offer to, customers, suppliers or others dealing with the Authority any kind of gift, compensation (monetary or otherwise), entertainment, travel or other personal, unearned benefits (other than non-monetary items of nominal intrinsic value);
- Have a financial interest in the Authority's competitors, customers, suppliers or others dealing with the Authority;
- Have a consulting, managerial or employment relationship in any capacity with a competitor, customer, supplier or others dealing with the Authority; or
- Acquire, directly or indirectly, real property, leaseholds, patents or other property or rights in which the Authority has, or the employee knows or has reason to believe at the time of acquisition that the Authority is likely to have, an interest.

Employees must avoid any investment, interest or association that interferes, might interfere, or might be thought to interfere, with the independent exercise of judgment in the Authority's best interest.

### **Outside Activities**

The Authority's officers, directors, managers and employees are expected to devote their full time and attention to Authority business during regular working hours and for whatever additional time may be required. Outside business activities can easily create conflicts of interest or diminish productivity and effectiveness. For these reasons, officers, directors, managers and employees should avoid outside business activities that divert their time and talents from the Authority's business. Although the Authority encourages professional activities and community involvement, special care must be taken not to compromise duties owed to the Authority. Officers, directors, managers and employees are expected to disclose the nature of any non-Authority activity for which compensation is received.

- Employees and officers must obtain approval from the Authority's Legal Department and

Executive Director before agreeing to serve on the board of directors or similar body of a for-profit enterprise or government agency. Serving on boards of not-for-profit or community organizations does not require prior approval. However, if service with a not-for-profit or community organization creates a situation that poses a conflict of interest with the Authority (for example, the organization solicits charitable contributions from the Authority or purchases significant services from the Authority), the Authority's Legal Department and Executive Director should be contacted for approval to continue such service. In addition, prior to seeking any election or appointment to public office, an employee or officer must notify the Legal Department to clarify the Authority's position in the event the candidacy is successful, or the appointment is made. Written approval must be obtained.

- No employee may use his/her Authority position or title, or any Authority equipment, supplies or facilities, in connection with outside activities, nor may any employee do anything that might infer sponsorship or support by the Authority of such activity, unless such use has been approved in writing by the Authority's Legal Department and Executive Director.
- Subject to the limitations imposed by this Policy, each employee and officer is free to engage in outside activities that do not interfere with the performance of his or her responsibilities or otherwise conflict with the Authority's interests. Where activities may be of a controversial or sensitive nature, officers, directors, managers and employees are expected to seek the guidance of the Legal Department or the Human Resources Department before engaging in such activities.
- In all instances where an actual conflict of interest or an appearance of a conflict of interest exists, employees must disclose the nature of the conflict to the Authority's Legal Department for interpretation and resolution prior to engaging in any activity that involves a conflict, or the appearance of a conflict of interest.

### **Reporting Violations**

Employees who suspect that there is a violation to this policy must immediately report such violation to the Legal Department, Internal Audit Department or the Human Resources Department. All efforts will be made to protect the confidentiality of any individual who reports violations and/or concerns regarding this Policy.

#### Violations

Violations of this Policy may result in, among other actions, suspension of work duties, diminution of responsibilities or demotion, and termination of employment, and where applicable, request for criminal investigation and prosecution.