

This Code of Ethics shall apply to all directors, officers and employees of the County of Lewis Industrial Development Agency (hereinafter the "LCIDA"). These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of the LCIDA directors, officers and employees, and to preserve public confidence in the LCIDA's mission.

1. No director, officer, or employee of the LCIDA shall accept other employment which will impair their independence of judgment in the exercise of their official duties.
2. No director, officer or employee of the LCIDA shall accept employment or engage in any business or professional activity which will require them to disclose confidential information which they have gained by reason of their official position of the LCIDA.
3. No director, officer or employee of the LCIDA shall disclose confidential information acquired by them in the course of their official duties nor use such information to further their personal interests.
4. No director, officer, or employee of the LCIDA shall use or attempt to use their official position to secure unwarranted privileges or exemptions for themselves or others.
5. No director, officer or employee of the LCIDA shall engage in any transaction as a representative or agent of the LCIDA with any business entity in which they have a direct or indirect financial interest that might reasonably tend to conflict with proper discharge of their official duties.
6. A director, officer or employee of the LCIDA shall not by their conduct give reasonable basis for the impression that any person can improperly influence them or duly enjoy their favor in the performance of their official duties, or that they are affected by the kinship, rank, position or influence of any party or person.
7. 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 LCIDA. A “gift” is defined as set forth in Legislative Law Section 1-c(j).

8. Nominal gifts or equivalent set forth in Title 19 Part 933 of the New York Codes, Rules and Regulations shall be exempt.
9. A director, officer, or employee of the LCIDA should abstain from making personal investments in enterprises which they have a reason to believe may be directly involved in projects or decisions which the LCIDA might be involved with, or which will otherwise create substantial conflict between their duty in the public interest and their private interest.
10. A director, officer, or employee of the LCIDA shall endeavor to pursue a course of conduct which will not raise suspicion among the public that they are likely to be engaged in acts that are in violation of public trust.
11. Directors and employees shall not use the LCIDA 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 State or local law or policy and the LCIDA’s mission and goals.
12. Directors and employees are prohibited from consulting, providing services, acting on behalf of an entity seeking benefits, or interacting with the LCIDA in a manner that could be deemed inappropriate for two (2) years following employment with the LCIDA, consistent with the provision of Public Officers Law. On a case by case basis, the LCIDA Board can overrule this restriction by motion and unanimous vote.
13. It is the responsibility of each director of the Corporation to disclose any actual or perceived conflict in writing to the Board and then recuse himself/herself from all discussion of the transaction and abstain from voting. It is the responsibility of each employee of the Corporation to disclose any actual or perceived conflict in writing to his/her immediate supervisor and then recuse himself/herself from any discussion or activity on such matter. The *Acknowledgement of Fiduciary Duties and Responsibilities* (ABO 10-01) will be provided to each director annually, to be completed and returned to the Corporation.



Subject: Code of Ethics  
Board Approval: 05/01/2025

14. Directors, officers and employees of the Corporation may request a Conflicts of Interest Opinion from the Corporation's counsel in order to determine whether a certain set of facts may be an actual or perceived conflict of interest and the actions that must or should be taken, if any

Any and all previously-approved Code of Ethics of the County of Lewis Industrial Development Agency are hereby rescinded.