

# HRPT CODE OF ETHICS

This Code of Ethics shall apply to all officers and employees of the Hudson River Park Trust (HRPT). These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of HRPT's directors and employees and to preserve public confidence in HRPT'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 could 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 that could create any conflict between their public duties and interests and their private interests.

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 HRPT. Note that pursuant to the 2011 Public Integrity Reform Act, Chapter 399 of the Laws of 2011, the provision of food or beverage valued at less than \$15 dollars is not considered a "gift." Pursuant to 2013 JCOPE proposed regulations, the provision of items valued at less than \$10 dollars, other than food or beverage, is not considered a "gift."

4. Directors and employees shall not use or attempt to use their official position with HRPT to secure unwarranted privileges for themselves, members of their family or others, including employment with HRPT or contracts for materials or services with HRPT.

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 HRPT's mission independent of any other affiliations or employment. Directors, including ex officio board members, and employees employed by more than one government

shall strive to fulfill their professional responsibility to HRPT without bias and shall support HRPT's mission to the fullest.

8. Directors and employees shall not use HRPT 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 HRPT's mission and goals.

9. Directors and employees are prohibited from appearing or practicing before HRPT for two (2) years following their engagement with HRPT, consistent with the provisions of Public Officers Law.

### **Implementation of Code of Ethics**

This Code of Ethics shall be provided to all HRPT directors and employees upon commencement of employment or appointment and shall be reviewed periodically by the Governance Committee.

The HRPT General Counsel is designated as HRPT's Ethics Officer, who shall report to the board and shall have the following duties:

- Provide counsel to HRPT 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 HRPT President or the Board.
- Record the receipt of gifts or gratuities of any kind received by a director or employee, who shall notify the Ethics Officer within 48 hours of receipt of such gifts and gratuities.

### **Penalties**

In addition to any penalty contained in any other provision of law, an HRPT 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 HRPT to the Ethics Officer. Employees and directors may file ethics complaints anonymously and are protected from retaliation by the policies adopted by HRPT.