



**SYRACUSE REGIONAL AIRPORT AUTHORITY
CODE OF ETHICS**

ARTICLE I PURPOSE AND CONSTRUCTION

Section 1.1 This Code of Ethics is applicable to officers, members, staff and employees of the Syracuse Regional Airport Authority, is adopted as a supplement to the provisions of Article 18 of the New York General Municipal Law and the City of Syracuse Code of Ethics and shall be construed to give effect to that law and local law and its purposes.

ARTICLE II DEFINITIONS

Section 2.1 For purposes of this Code of Ethics, the following terms are defined as follows:

1. *Authority* shall mean the Syracuse Regional Airport Authority.
2. *City* shall mean the City of Syracuse.
3. *Officer, member, staff or employee* shall mean any officer, member, staff or employee of the Authority, paid or unpaid.
4. *Agency* shall include any board, commissioner, authority, office, committee, department, branch, bureau of other administrative subdivision of the Syracuse Regional Airport Authority.
5. *Relative* shall mean a spouse, child, parent, or sibling of the officer, member, staff or employee of the Authority, or a person claimed as a dependent on the officer's or employee's latest individual income tax return.
6. *Vendor* shall mean any individual, organization, or entity that has a contract to provide or perform services of any kind with the Syracuse Regional Airport Authority.

ARTICLE III CODE OF ETHICS

Section 3.1 There is hereby established and adopted a Code of Ethics containing standards of conduct for officers, members, staff and employees of the Syracuse Regional Airport Authority.

Section 3.2 All officers, members, staff or employees of the Authority shall adhere to the following standards:

1. *General prohibition.* Authority officers, members, staff or employees shall not use their official position or office, or take or fail to take any action, in a manner which they know or have reason to know may result in a personal financial benefit for any of the following persons:

a. The Authority officer, member, staff or employee;

b. The outside employer or business of an Authority officer, member, staff or employee if the officer, member, staff or employees outside employment compensation or business income would be affected by the action;

c. A relative, where the action would affect them to a greater degree than the general public or a class of individuals similarly situated, including in the process of employment, recruitment, hiring, promotion, and discipline.

2. *Secondary Employment.* Subject to the written approval of the Executive Director, which approval may be withdrawn at his or her discretion at any time, an Authority employee may be employed on a secondary work basis by a vendor or contractor engaged to perform services at the Airport.

3. *Disclosure and recusal.* Authority officers, members, staff or employees

a. To the extent they know or should know thereof, publicly disclose to the appropriate Authority officer or agency, the nature of any potential conflict of interest between their official duties with the Authority and any outside interest; and

b. Promptly recuse themselves from any debate, discussion, decisions or action of any matter before the Authority or agency when acting on the matter, or failing to act on the matter, could reasonably be expected to be more beneficial financially to any of the persons listed in Section 3.2(1) above, than it would be to any member of the general public.

4. *Revolving door.* Persons who have served as officers, members, staff or employees of the Authority shall neither, after the termination of such service or employment, appear before the Authority or any agency of the Authority, nor render

services on behalf of any person, firm, corporation or association, in relation to any case, proceeding or application with respect to which the officer, member, staff or employee was directly concerned or in which they personally participated during the period of their service or employment of which was under their active consideration, until the case, proceeding or application have been finally disposed of or for a period of two (2) years from the date of separation from Authority service or employment, whichever is earlier; nor shall the officer, member, staff or employee receive or agree to receive any compensation with respect to such matter.

5. *Gifts.*

a. No Authority officer, member, staff or employee shall directly or indirectly solicit any gift, or accept or receive any gift, having a value of seventy- five dollars (\$75.00) or more, whether the gift is in the form of money, property, service, loan, travel, entertainment, hospitality, thing or promise, or in any other form under circumstances in which it could reasonably be inferred that the gift was intended to influence them, or could reasonably be expected to influence them, in the performance of their official duties or was intended as a financial reward for any official action on their part.

b. This subsection shall not apply to the acceptance of free invitations to charitable fund-raising events, recognition dinners, or similar community events.

6. *Confidential information.* Authority officers, members, staff or employees shall not disclose confidential information acquired by them in the course of their official duties unless having first obtained proper authorization for use in official business purposes. Additionally, confidential information shall not be used to further their personal interests or those of the persons listed in Section 3.2(1), or used in a way that intentionally harms the financial interests of the Authority or its vendors. Confidential and proprietary information may include but is not limited to such things as pricing and financial data, customer names/addresses, private employee personnel data, including demographic and medical information, labor negotiations, information about current or prospective vendors, prospective air service development and marketing initiatives and other information not already made public.

7. *Representation.* Authority officers, members, staff or employees shall not:

a. Receive or enter into any agreement, express or implied, for compensation for services to be rendered in relation to any matters before any Authority agency of which they are an officer, member, staff or employee, or of any Authority agency over which they have jurisdiction, or to which they have the power to appoint any officer, member, staff or employee; or

b. Receive or enter into any agreement, express or implied, for compensation for services to be rendered in relation to any matter before any agency of the Authority, whereby their compensation is to be dependent or

contingent upon any action by the agency with respect to such matter. This subsection shall not prohibit the representation by an Authority officer, member, staff or employee before such other unaffiliated Authority agencies for fees based solely upon the reasonable value of the services.

ARTICLE IV CIVIL SERVICES EMPLOYEES

Section 4.1 This Code of Ethics shall not be deemed in any way to conflict with or modify any act of the Legislature of the State of New York relating to the civil service rights, privileges or status of any employees of the Authority and shall not apply wherever and to the extent that to do so would be to repeal or modify any such act or portion thereof.

ARTICLE V SEVERABILITY CLAUSE

Section 5.1 If any clause, sentence, paragraph, section or part of this Code of Ethics shall be adjudged by any court of competent jurisdiction to be invalid, such judgment shall not affect, impair or invalidate the remainder thereof, but shall be confined in its operation to the clause, sentence, paragraph, section or part thereof directly involved in the controversy in which such judgment shall have been rendered.

Adopted: November 18, 2011, Resolution No.: 2011-32
Revised: November 9, 2018, Resolution No.: 2018-37
Revised: March 15, 2019, Resolution No.: 2019-10
Revised September 24, 2021, Resolution No.: 2021-26