

**THE TOWN OF GLENVILLE LOCAL DEVELOPMENT CORPORATION,
SCHENECTADY COUNTY, NEW YORK**

CODE OF ETHICS

This Code of Ethics shall apply to all directors, officers and employees (each individually an “LDC Official” and collectively, “LDC Officials”) of the Glenville Local Development Corporation (the “LDC”). These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of LDC Officials and to preserve public confidence in the LDC’s mission.

Article I.

Responsibility of Directors and Employees

Section 1. LDC Officials 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.

Section 2. LDC Officials shall not directly or indirectly, make, advise, or assist any person to make any financial investment based upon information available through the LDC’s Official’s official position that could create any conflict between their public duties and interests and their private interests.

Section 3. LDC Officials 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 LDC.

Section 4. LDC Officials shall not use or attempt to use their official position with the LDC to secure unwarranted privileges for themselves, members of their family or others, including employment with the LDC or contracts for materials or services with the LDC.

Section 5. LDC Officials 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.

Section 6. LDC Officials 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.

Section 7. LDC Officials shall manage all matters within the scope of the LDC's mission independent of any other affiliations or employment. All LDC Officials, including *ex officio* directors, and employees who may also be employed by more than one employer, shall strive to fulfill their professional responsibility to the LDC without bias and shall support the LDC's mission to the fullest.

Section 8. LDC Officials shall not use LDC 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 LDC's mission and goals.

Section 9. LDC Officials are prohibited from appearing or practicing before the LDC for two (2) years following employment with the LDC, consistent with the provisions of Public Officers Law.

Article II.

Implementation of Code of Ethics

This Code of Ethics shall be provided to all LDC Officials upon commencement of employment, election or appointment and shall be reviewed annually by the Governance Committee. The board may designate an Ethics Officer, who shall report to the board and shall have the following duties:

- Counsel in confidence LDC Officials 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 Chairman or the board.
- Record the receipt of gifts or gratuities of any kind received by an LDC Official, who shall notify the Ethics Officer within 48 hours of receipt of such gifts and gratuities.

Article III.

Penalties

In addition to any penalty contained in any other provision of law, an LDC Official 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.

Article IV.
Reporting Unethical Behavior

Employees and directors are required to report possible unethical behavior by a director or employee of the LDC to the Ethics Officer. Employees and directors may file ethics complaints anonymously and are protected from retaliation by the policies adopted by the LDC.

Adopted _____, 2013

Kathleen M. Toombs, Secretary