

PROJECT SUNLIGHT COMPLIANCE PLAN

PROJECT SUNLIGHT LIAISON

DASNY's Project Sunlight Liaison shall be Karen Graber, Director, Procurement ("DASNY Liaison"). The DASNY Liaison will be responsible for regularly communicating with Project Sunlight, communicating Project Sunlight directives to DASNY personnel, and reporting regarding compliance. Questions from DASNY Employees regarding Project Sunlight Compliance shall be directed to the DASNY Liaison, who shall seek advice from Counsel's Office where necessary or appropriate.

TRAINING AND MONITORING

All current DASNY Employees and Board Members shall be trained annually regarding Project Sunlight Compliance utilizing the training materials provided by the Executive Chamber. This training shall be available on the DASNY Intranet for employees to take utilizing their DASNY personal computer.

When deemed necessary or appropriate by the DASNY Liaison, such training materials shall be supplemented with specific examples or information targeted specifically to DASNY.

DASNY's Information Services Department shall track the employees who have received training and the date the training occurred, and shall produce a list setting forth such information upon request. The Project Sunlight mailbox on the DASNY Intranet shall automatically generate a notice to each employee confirming that the required training has been completed.

DASNY's Training Unit shall maintain the master list of employees who have completed the training, and shall include such training on the annual training transcript provided to supervisors in connection with the annual performance review process.

Newly hired employees shall be required to take the Project Sunlight training.

The DASNY Liaison shall determine how many reporters will be responsible for entering contact information into the Project Sunlight database. The reporters shall be responsible for taking the Project Sunlight Technical training provided by the Executive Chamber and records regarding the technical training shall be maintained in the same manner as set forth above.

Additional training shall be conducted as deemed necessary and appropriate by the DASNY Liaison.

The Project Sunlight Liaison will provide a report to the President annually. Such report will include the number of covered individuals trained, re-trained and the number of substantive interactions reported during the period.

IMPLEMENTATION

This compliance plan shall be submitted to the Executive Chamber for approval.

Upon such approval, this compliance plan shall be posted on the DASNY Intranet.

The Project Sunlight Policy and FAQs provided by the Executive Chamber shall be posted on the DASNY Intranet.

A sign notifying DASNY guests and visitors of the requirements of the Project Sunlight legislation will be posted at the Security Desk in the entrance lobby and at the 6th Floor reception desk.

A Project Sunlight Intake Form shall be posted on the DASNY Intranet. In addition, Intake Forms shall be available at the Security Desk in the entrance lobby and on the 6th Floor reception desk for completion. Each employee or Board Member must complete this form in connection with each covered interaction. The completed form shall be provided to a Project Sunlight reporter within three (3) days of the interaction so that the reporter can enter the information into the Project Sunlight Database within five (5) days of occurrence.

The DASNY Liaison shall maintain a list of employees who are responsible for entering covered interactions into the Project Sunlight database. Currently, two individuals from Procurement; two individuals from Real Property; and two individuals from Executive Direction are authorized to enter this information. Employees will be notified of his or her designated reporter.

The DASNY Liaison shall periodically remind all employees of their responsibility to comply with the provisions of Project Sunlight.

FAILURE TO COMPLY/DISCIPLINE

Each Employee will be required to comply with Project Sunlight in the same manner as with other DASNY policies and procedures. Union Employees who fail to comply with the provisions of Project Sunlight shall be subject to discipline as set forth in the applicable collective bargaining agreement. Non-Union employees shall be disciplined in accordance with applicable policies and procedures.