

# Serving Responsibly

A corporate guide to business  
ethics and employee conduct

*Prepared by the Office of Professional Integrity*



**DASNY**



# Introduction

Dear Colleague:

To maintain the confidence of the public and clients we serve, it is essential that all officers and employees of the Dormitory Authority of the State of New York (DASNY), a public benefit corporation, adhere to a code of conduct that demonstrates the highest standards of business ethics and employee conduct. This booklet, *Serving Responsibly*, summarizes certain basic standards that are necessary to achieve this goal. These standards should be applied with common sense, reason and sound professional judgment. Numerous resources are available within DASNY to assist you in meeting the complex challenges and responsibilities of your official duties. Any questions or doubts that may arise regarding a particular situation should immediately be brought to the attention of supervisory personnel, the DASNY Ethics Officer, the Ombuds Officer, Office of Professional Integrity or other appropriate DASNY officials. This document can be easily accessed on-line through DASNY's Intranet. Also, the Employee Handbook is available on the Intranet to direct you to specific policies and procedures that provide detailed guidance and direction.

We must all strive to create a work environment based on trust, respect, integrity, responsibility and honesty. Together, we can make DASNY an even better place to work and to serve our clients and the people of the State of New York.

# Promote fair, open and ethical business relationships

Contractors and other suppliers must be selected through fair and open competition based on quality, service and price. You must conduct business with our clients in an honest, direct and fair manner. To achieve these objectives, you must:

- Never furnish information, verbal or written, to any contractor/ vendor or service provider that gives them an unfair advantage over a competitor.
- Never agree with a contractor/ vendor or service provider to unfairly restrict competition by specifying unique products/ services.
- Never arbitrarily refuse to deal with or purchase goods or services from a specific contractor/ vendor or service provider.
- Never require or encourage clients to obtain a service from us that they don't want in exchange for a service they do want.
- Be accurate and truthful in all dealings with clients and be careful to accurately represent the quality, features and availability of DASNY expertise and services.
- Never engage in industrial espionage or commercial bribery.
- Comply with all provisions of law, DASNY's Procurement Contract Guidelines and applicable policies and procedures regarding procurements, the award of contracts and change orders.
- Comply with all provisions of law concerning the disclosure and reporting of individuals or entities attempting to influence the procurement process.
- Discuss your concerns with the appropriate person(s) within DASNY.



## Comply with applicable laws, rules and regulations

You must comply with all applicable laws and regulations of every jurisdiction in which DASNY operates. Each of us is charged with the responsibility of acquiring sufficient knowledge of applicable laws and regulations relating to our duties to recognize potential ethical issues and to know when to seek advice. Laws governing ethical conduct include the provisions of the Public Officers Law governing the conduct of public employees. Laws governing the procurement of goods and services by DASNY include provisions of the Public Authorities Law and federal securities laws, which prohibit insider trading and other conduct. Information about these laws and regulations may be obtained from your supervisor or unit director, or directly from DASNY's Ethics Officer at 518-257-3120, or Office of Professional Integrity at 1-866-750-7867. You may also contact the Joint Commission on Public Ethics at 518-408-3976 regarding the ethics laws.

It is also incumbent upon each of us to be knowledgeable in the other areas of law that relate to our job responsibilities. It is for this reason that DASNY actively supports training opportunities for its employees. You should feel free to discuss with your



supervisor those areas of training that you believe will better assist you in understanding those laws and regulations that relate to your job responsibilities.

## Do not engage in discriminatory practices or harassment

All employees of DASNY are entitled to a work place where they feel appreciated and respected and which is free from discrimination, harassment and related retaliation. We must foster a work environment that treats all of us with dignity and respect. It is the policy of DASNY to provide for and promote equal opportunity in employment, compensation and other terms and conditions of employment without discrimination. Therefore, discrimination against any DASNY employee, volunteer, appointed official, and non-employees, such as vendors, consultants, and customers on the basis of a protected status such as race, creed, color, religion, sex, sexual orientation, genetic predisposition or carrier status, national origin, age, disability, marital status, or an individual's status in any class protected by federal, state, or local law is prohibited and will not be tolerated. This policy also applies to qualified persons with disabilities and DASNY will provide, if necessary, reasonable accommodations in the work place to ensure equal opportunity. DASNY also provides reasonable accommodation for religious practices and observances.

Harassment is a form of discrimination. Workplace harassment consists of unwelcome conduct, whether verbal, visual, or physical that is based on an individual's protected status and results in a tangible employment action or that is severe or pervasive enough so

as to unreasonably interfere with an individual's work performance or to create an intimidating, coercive, hostile, or offensive working environment. The most common form of harassment is sexual harassment (whether the victim is of the same or opposite sex as the harasser). Harassment, however, based on any protected status, is prohibited.



Of equal importance, harassment of any nature in the workplace, including abusive language, whether it is on the basis of race, creed, color, religion, sex, sexual orientation, genetic predisposition or carrier status, national origin, age, disability, marital status, or an individual's status in any class protected by federal, state, or local law, is strictly prohibited. Retaliation against any employee reporting discriminatory or harassing behavior will not be tolerated and will be strongly sanctioned by DASNY.

## **Unprofessional Conduct/Policy Violations**

Conduct of one individual or employee toward another that may not constitute discrimination, harassment or retaliation based upon a protected class status, but nonetheless creates a degree of hostility or intimidation that adversely affects the work environment is also prohibited. Such conduct will be considered unprofessional conduct and is deemed inconsistent with the requirement that courtesy and respect for others must be observed wherever DASNY business is conducted. Therefore, DASNY encourages any employee who believes he or she has been subject to inappropriate conduct by another employee to report such conduct, even if such conduct may not be discrimination or harassment per se.

Violation of DASNY policies (including, but not limited to, policies addressing travel, time and attendance, and email) may also be considered unprofessional conduct. Violations will be the basis for sanctions, including disciplinary action. Assistance in resolving situations involving discriminatory practice, harassment, related retaliation, or unprofessional conduct should be brought to the attention of your immediate supervisor, any higher-level supervisor in your chain of command or the Ombuds Officer or the Affirmative Action Officer ("AAO"). Specific policies and procedures in these matters are available on DASNY's Intranet.

Please note that anyone who falsely or maliciously files a complaint will be subject to appropriate disciplinary action.

## Non-fraternization

You must respect and be courteous to all individuals being served at facilities operated by our clients. This includes students and patients, as well as those in our clients' custodial care. You must maintain an arms-length relationship with these individuals and avoid any social relationship with them either at or away from the facility.

## Exercise Common Sense: Apply the S.L.I.P. Test

You must conduct yourself in a way that avoids even the appearance of impropriety. This standard of conduct is especially important in your dealings with entities and persons with whom you conduct official DASNY business. Therefore, when conducting business on behalf of DASNY, you should apply the following criteria:

**Scrutiny** - Will my actions withstand public, media, legal and/or organizational scrutiny?

**Legal** - Will my actions violate applicable laws, regulations and/or DASNY rules or policies?

**Interests** - Are my actions in the best interest of DASNY and the public? Will any party, including myself, stand to gain an undue advantage or unwarranted privilege?

**Performance** - Are my actions consistent with the proper performance of my official duties?

**Think before you act.**



## Avoid conflicts of interest



As a public employee, you are bound by Sections 73 and 74 of the Public Officers Law, including regulations promulgated thereunder, and should endeavor to pursue a course of conduct which will not raise suspicion among the public that you are likely to be engaged in acts in violation of the public trust. You should not use your official position to secure special privileges for yourself or others. You should also not engage in outside employment or business activities that might interfere with or compromise your ability to perform your official DASNY duties or that will raise suspicion among the public and DASNY

clients that you are engaged in activities in violation of the public trust.

A potential conflict of interest exists for any employee whose job involves making decisions that allow them to give preference or favor to a firm doing business with DASNY in exchange for anything of personal benefit to themselves, friends or families. There are also other situations that could give rise to a conflict of interest or the appearance of a conflict under the law.

The most common situations giving rise to a conflict of interest are:

- (i) accepting gifts or other things of value from contractors, suppliers or registered lobbyists;
- (ii) accepting a second job from a consultant or other person or entity that does business with DASNY;
- (iii) having an interest in a firm that does business with DASNY, or providing goods or services to another State agency or public authority other than through a competitive process;

- (iv) having family or other relationships with suppliers or other vendors selected by DASNY and failing to disclose those relationships to your supervisor; and
- (v) receiving compensation for services provided in connection with certain matters before DASNY or other agencies, such as obtaining grants or loans from DASNY or other agencies or the purchase, sale, rental or lease of real property, goods or services to or from DASNY or other agencies.
- (vi) acceptance of a gift of money or loan between two DASNY employees, particularly when the relationship involves a superior and a subordinate. Acceptance of such a gift or loan may cause an improper appearance, a conflict of interest, or otherwise impact your official position with DASNY.

Actual or potential conflicts of interest must be avoided as they may interfere with your ability to make judgments solely in DASNY's best interest and, in some instances, may be prohibited by law.

Actual or potential conflicts of interest should be disclosed to supervisory personnel immediately. You must disclose to your supervisor those instances where you have knowledge that your relative has an interest, including employment, in a firm doing business with DASNY. Both the relative's relationship to you and the nature of the relative's interest must be disclosed. You must not participate, directly or indirectly, in the administration or award of any contract in which your relative has an interest unless a waiver has been obtained from the President.

### **Maintain arm's-length relationships.**

## Prohibition on Gifts

Section 73(5) of the Public Officers Law prohibits any employee from soliciting, accepting, or receiving any gift having more than a nominal value, whether in the form of money, service, loan, travel, lodging, meals, refreshments, entertainment, discount, forbearance or promise, or in any other form, under circumstances in which it could reasonably be inferred that the gift was intended to influence the employee, or could reasonably be expected to influence the employee, in the performance of his or her official duties, or was intended as reward for any official action on the employee's part.

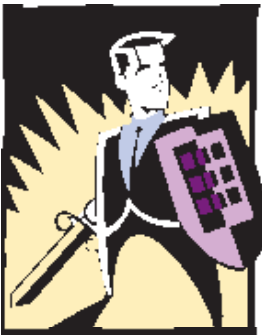


In Advisory Opinion No. 08-01, the former NYS Joint Commission on Public Integrity concluded that with limited exceptions, gifts from certain sources can per se be inferred to be intended to influence or reward official action. Such sources are referred to as “disqualified sources.” A disqualified source is defined as an individual acting on his or her own behalf or on behalf of a non-governmental entity, or a non-governmental entity acting on its own behalf, when the person or entity:

1. is regulated by, or regularly negotiates with, appears before other than in a ministerial matter, does business with, seeks to contract with or has contracts with the State agency with which the State officer or employee is employed or affiliated; or
2. lobbies or attempts to influence action or positions on legislation or rules, regulations or rate-making before the State agency with which the State officer or employee is employed or affiliated; or
3. is involved in litigation, adverse to the State, with the State agency with which the State officer or employee is employed or affiliated, and no final order has been issued; or
4. has received or applied for funds from the State agency with which the State officer or employee is employed or affiliated, including participation in a bid on a pending contract award, at any time during the previous year up to and including the date of the proposed or actual receipt of the gift; or

5. seeks to contract with or has contracts with a State agency other than the agency with which the State officer or employee is employed or affiliated when the officer or employee's agency is to receive the benefits of the contract.

Therefore, you are prohibited from soliciting, accepting or receiving from a disqualified source gifts, whether in the form of cash or cash equivalents (such as vouchers, gift certificates and gift cards), use of credit cards, charitable donation, service, loan, travel, lodging, meals, refreshments, entertainment, tickets, use of property, articles of clothing or other personal apparel, discount, forbearance or promise, or in any other form.



Employees intentionally violating these requirements are subject to disciplinary action initiated by DASNY. In addition, the Joint Commission on Public Ethics, upon a referral by DASNY, may impose a civil penalty of up to forty thousand dollars and the value of any gift, compensation or benefit received in connection with such violation. In lieu of a civil penalty, a violation may be referred to a prosecutor and upon such conviction such violation is punishable as a Class A misdemeanor.

You are required to immediately notify your supervisor or the Office of Professional Integrity of any circumstance in which a disqualified source, directly or indirectly, offers or makes any such gift to you or any other DASNY employee or its representative. In addition, gifts to members of your family on your behalf are strictly prohibited. A member of your family includes, for this purpose, a spouse, son, daughter, father, mother, sister, brother, aunt, uncle, niece, nephew, first cousin or grandparent by blood relationship or by marriage or any person living in the same household.

Acceptance of a gift from a disqualified source with whom you have a personal or family relationship may be deemed a "Permissible Gift" as set forth in Advisory Opinion No. 08-01 and is not necessarily prohibited. However, discretion should be exercised to ensure that the acceptance does not create an improper appearance or otherwise impact your official position with DASNY.

Under certain circumstances and with prior management approval, you may attend as the guest of a disqualified source an event of a business nature, such as a professional conference, training seminar or professional awards ceremony, if deemed a “Permissible Gift” and in the best interest of DASNY. When deemed appropriate, DASNY may reimburse the disqualified source for the cost of your attendance.

For more guidance concerning the acceptance of gifts, contact DASNY’s Ethics Officer at 518-257-3120 or Office of Professional Integrity at 1-866-750-7867.

## **Beware the bearer of gifts**

Situations may arise during the course of your employment when someone may seek to influence your official conduct by offering you a thing of value. This conduct is called bribery and is formally defined as receiving or soliciting, as well as offering or giving, a thing of value to influence an official act. Bribery schemes may begin with small, innocuous gifts and then escalate. Bribery is a criminal act under Article 200 of the New York State Penal Law punishable by substantial fines and/or lengthy terms of imprisonment. DASNY will seek the job termination and criminal prosecution of any employee found to have participated in a bribery scheme.

If offered a thing of value or even a small gift, under questionable circumstances, do the following:

- Clarify the offer. (A bribe attempt may be subtle and often is not blatant.)
- Decline it.
- Advise the party that it is inappropriate.
- Report it immediately to supervisory personnel and to the Office of Professional Integrity (OPI).
- Submit a detailed written report to supervisory personnel immediately.
- Do not discuss the matter with anyone else.

- If a gift, including money or anything of value, in any amount, is received and circumstances preclude its immediate return (left on desk, delivered to your home, received by mail), do the following:
- Keep the envelope or item as intact as possible. Do not tamper with it.
- Contact supervisory personnel and OPI immediately and await instructions.
- Submit a written report to supervisory personnel immediately.
- Do not let anyone else take possession of the impermissible gift or money until turned over to supervisory personnel or the OPI.



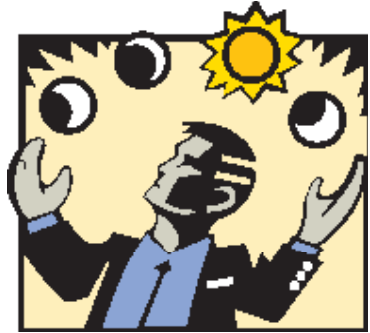
**You can – and should – always say “no.”**

## **Honoraria**

An honorarium is a payment, fee or other compensation you receive for a speech or other service unrelated to your official duties when made as a gratuity or an award of honor. Honoraria may also include payments for the cost of related travel or lodging. An honorarium may only be accepted in accordance with the regulations of the New York State Joint Commission on Public Ethics and after obtaining prior written approval from the President or his or her designee.

## Disclose outside employment and business activities.

You may not engage in outside employment or business activities which would either conflict with your scheduled work hours or which would impair your judgment or compromise or interfere with your ability to properly perform your responsibilities as an employee of DASNY. You may not use DASNY time, materials, information or other assets in connection with outside employment or business activities.



You are required to disclose and renew approval by your Managing Director of all outside employment and business activities no later than May 15 of each year. Also, before accepting or undertaking outside employment or outside business activities, you must first obtain the authorization of your Managing Director. The Employee Handbook will direct you to the specific filing instructions.

You must obtain prior approval from DASNY before engaging in any outside activity, including the following types of outside employment and business activities:

- Any public office or public employment for which compensation, direct or indirect, is received.
- Any private employment, profession, business or other activity from which compensation, direct or indirect, is derived.
- Service as a director or officer of any profit-making corporation or institution.
- Service as a director or officer of any non-profit corporation or institution doing business with DASNY.

If approved, you must conduct your outside employment and business activities so as not to give the impression that you are doing so in your official capacity with DASNY. You must maintain a clear separation between your official duties and outside activities at all times.

In addition to the above requirements of DASNY, officers and employees who are designated policy-makers are required to obtain the approval of the Joint Commission on Public Ethics before engaging in certain outside activities and when these employees anticipate receiving more than \$4,000 in compensation annually. These employees, along with employees who earn more than the “filing rate,” are also required to annually file Financial Disclosure Statements with the Joint Commission on Public Ethics.

## **Employment of relatives**

Relatives of active employees will not be employed on a permanent or temporary basis. A relative is defined as a spouse, son, daughter, father, mother, sister, brother, aunt, uncle, niece, nephew, first cousin or grandparent by blood relationship or by marriage or any person living in the same household.



## **Post-employment restrictions**

As a general rule, former employees of DASNY may neither appear nor practice before DASNY nor receive compensation for services rendered on a matter before DASNY for a period of two years following their separation from DASNY service. This prohibition, which is contained in the Public Officers Law, is known as the “revolving door” provision.

In addition, former employees are subject to a “lifetime bar” from appearing before DASNY or receiving compensation for services regarding any transaction in which they personally participated or which was under their active consideration during their tenure with DASNY. These restrictions do not apply to former employees working for other governmental entities. You are strongly



encouraged to seek guidance regarding these post-employment restrictions from the DASNY Ethics Officer or the Joint Commission on Public Ethics before accepting any employment with a firm that does or is seeking to do business with DASNY.

## **Do not share confidential information or engage in insider trading**

Confidential, privileged or non-public information shall not be disclosed or used to further others' personal interests, except as required in the course of your official duties and authorized by law. Information subject to this prohibition includes any personal or private information of, or relating to, client agency records, fellow employees, other persons or firms with which you do business and other information obtained by virtue of your position. Some examples are:



- Selling or otherwise divulging or transmitting confidential DASNY information;
- Using confidential DASNY information to knowingly convert a DASNY business opportunity for personal use;
- Using confidential DASNY information to acquire real estate which the employee knows is of interest to DASNY and/or its clients; or
- Using, divulging or transmitting confidential DASNY information in the course of outside employment or other relationship or any succeeding employment or other relationship at any time.

Federal law prohibits trading in securities based on information, which has not been disclosed to the public or divulging such non-public information to others. You, therefore, should not trade in securities issued by DASNY or its clients based upon non-public or confidential information. You also should not disclose such non-public information to others except as required by your official duties. You should utilize appropriate safeguards to preserve confidential or privileged information obtained by you in the course of your employment. Confidential information should only be shared with those having a need to know.

You are prohibited from participating in any: (a) contracting decision involving the payment to you, any relative, or any entity in which you or any relative has a financial interest; or (b) any decision to invest funds on behalf of DASNY in any security of any entity in which you or any relative has a financial interest, is an underwriter, or receives any brokerage, origination or servicing fees.

## **Do not abuse alcohol or controlled substances**

The sale, attempt to sell, possession, or purchase of controlled substances while at the workplace or while performing in a work-related capacity will subject you to criminal and disciplinary penalties. Such illegal acts, even if engaged in while you are off-duty, may result in disciplinary action.



On-the-job use of alcohol or controlled substances or performing job functions while under their influence is strictly prohibited. Similarly, you must not drive corporate vehicles or operate corporate equipment while under the influence of alcohol or controlled substances. Should you have problems with the use of controlled substances or alcohol, you are encouraged to access the professional services of the Employee Assistance Program (1-800-777-6531 or 518-465-3813).

## Keep accurate and complete records

To avoid any question or suspicion of impropriety, all financial transactions must be conducted in accordance with established DASNY procedures. Compliance with prescribed accounting procedures is required at all times. Those having control over DASNY assets and transactions must ensure that all transactions are executed in accordance with management's authorization. All transactions should be accurately and fairly recorded in reasonable detail in DASNY's accounting records.



## Use of DASNY Assets

DASNY supplies, equipment, computers, personnel and other resources shall not be utilized for non governmental purposes, including for personal purposes or for outside activities of any kind. This prohibition includes but is not limited to the following:

- **Software and Computers** – You should adhere to DASNY's Acceptable Use of Personal Computer (PC) Hardware and Software Policy (PC Use Policy). Computerized information and software, although intangible, are valuable assets that must be protected from misuse, fraud, loss and unauthorized use or disposal. Use of hardware, peripherals, or software not authorized or installed by the Office of Information Services is prohibited. You may not use DASNY hardware, peripherals, and software for any illegal purpose; for private purposes such as marketing or business transactions; for solicitation for religious and political causes; for unauthorized not-for-profit business activities; for any activity meant to foster personal gain; for outside employment activities or for accessing applications or data that is not pertinent to your position at DASNY.

Misappropriation of computer hardware and software includes, but is not limited to, operating a computer in an unauthorized mode or intentionally causing any kind of operational failure. You also must adhere to DASNY's policies on use of the Internet and electronic mail. DASNY computers may be used for incidental

and necessary personal purposes, such as sending personal electronic mail messages, provided that such use is in a limited amount and duration, does not conflict with the proper exercise of your duties, and is not otherwise deemed inappropriate by DASNY.

- **Supplies and Equipment** – The personal use of DASNY supplies, equipment and resources is prohibited. Official mail, postage, internal office mail, or inter city couriers may not be used for non governmental purposes.
- **Official Stationery** – Official DASNY stationery may not be used for non governmental purposes, nor may DASNY resources be used to mail personal correspondence.



- **Telephones or Other Similar Devices** – DASNY telephones, including assigned cellular phones are for business purposes, and personal use should be kept to a minimum. Personal long distance calls are not permitted without prior permission from the employee's supervisor, when possible. You are required to promptly reimburse DASNY for all personal long distance or other billable calls. If possible, personal phone calls should be made during the lunch period or authorized breaks. It is DASNY's intent to allow staff on official travel status the same access to telephone calls as the employee would have at the employee's official station. However, abuse of the services and equipment may result in disciplinary action.
- **Credit Cards** – Corporate credit cards are issued on a limited basis to authorized DASNY employees for business expenses where the use of a credit card is necessary. Credit cards must never be used for unauthorized purchases, including personal expenses, as provided in the Credit Cards Policy and all credit card purchases must be accompanied by appropriate documentation/receipts.

- **Fleet Vehicles** – DASNY fleet vehicles are made available to employees for business use and such use must be in accordance with the Transportation/Vehicle Use Policy. You are required to have, among other things, a valid driver's license and are expected to obey all traffic laws and drive courteously when operating DASNY vehicles. You will not be allowed to drive a fleet vehicle if your license is suspended, revoked or expired and you must immediately report such a change in status to your supervisor.
- **Scrap Items** – You may not request nor accept building materials, furniture, equipment or other items deemed worthless and to be disposed of by DASNY's clients.
- **Expense Reimbursement** – Expenses incurred by you in performing corporate business must be documented on expense reports in accordance with DASNY procedures. You may seek reimbursement only for those expenses for which reimbursement is permitted under DASNY guidelines.

## **Do not possess firearms or illegal weapons**

The possession of firearms or illegal weapons of any type on DASNY premises, in DASNY vehicles or while on DASNY business is prohibited. This prohibition applies even for those legally permitted or licensed to carry weapons, excluding law enforcement officials.

## **Illegal betting or gambling is prohibited**

You are prohibited from engaging in illegal betting or gambling in the workplace or while performing in a work-related capacity.

## No political contributions or activity during the course of official business

Contributions to political parties or candidates on behalf of, or in the name of DASNY is strictly prohibited. DASNY funds

may not be used for the purposes of

making contributions to political parties

or candidates. The term “political

contributions” includes, in addition to

direct cash contributions, the donation of

property or services and the purchase of

tickets to fund-raising events. You may

not use your position within DASNY to solicit

political contributions from another employee or any firm doing business with DASNY for the purpose of supporting a political party or candidate.

The term "political activity" means doing something in active support of or opposition to a political party, a candidate for partisan political office (e.g., President, senator, representative, state or local legislature or office), or a partisan political group.

There must be a clear separation between any political activities conducted by you in your personal capacity and the proper discharge of your duties as a DASNY employee. Engaging in political activity on DASNY premises or during work hours is strictly prohibited. DASNY resources, such as staff time, telephones, copy machines, computers and fax machines may not be used in the furtherance of political activity. You are prohibited from circulating a candidate’s nominating petition within the office. Should you intend to accept or run for public office, you should obtain your supervisor’s concurrence that the public office to be sought will not interfere with your official duties with DASNY. Policy-makers seeking public office must first obtain the approval of the Joint Commission on Public Ethics. Subject to certain restrictions applicable to managerial employees of DASNY, personal contributions may be made to candidates of the employee’s choosing but such contributions are not reimbursable by DASNY.



## **Political Affiliation Inquiry Restrictions**

You are prohibited from asking a current or prospective DASNY grantee, contractor, or vendor, or any officer, director or employee thereof, to disclose: (i) the political party affiliation of such grantee, contractor or vendor, or any officer, director or employee thereof; (ii) whether such grantee, contractor or vendor, or any officer, director or employee thereof, has made campaign contributions to any political party, elected official, or candidate for elective office; or (iii) whether such grantee, contractor or vendor, or any officer, director or employee thereof, cast a vote for or against any elected official, candidate or political party.

You are prohibited during the consideration of an employment decision from asking any applicant for DASNY employment to disclose: (i) the political party affiliation of the applicant; (ii) whether the applicant has made campaign contributions to any political party, elected official, or candidate for elective office; or (iii) whether the applicant cast a vote for or against any elected official, candidate or political party.

## **Report Violations to Management**

We must all remain alert to possible violations of law, rule, or regulation, anywhere in DASNY. You are required to report such violations promptly to supervisory personnel, the Ombuds Officer, the Office of Professional Integrity, the Ethics Officer or elsewhere as the circumstances dictate. The Office of Professional Integrity must be contacted regarding any suspected or known fraudulent or other illegal acts involving DASNY. Instances of harassment, discrimination, or retaliation must be reported promptly to the Ombuds Officer. The Ombuds Officer also must be contacted regarding any unprofessional conduct involving DASNY employees, violations of DASNY policy and procedure, and other employee conflicts. As a DASNY employee, you are required to fully cooperate in any official investigation of violations by DASNY, its representatives or law enforcement.

Upon request, DASNY will keep confidential the identity of anyone reporting a possible violation. Reprisal against any employee who has, in good faith, reported a violation or suspected violation is strictly prohibited.



## **Look before you leap**

You're Approaching an Ethical Dilemma When You Hear ...

**“I’m just getting what I deserve.”**

“Why not, everyone does it.”

**“Let’s keep this just between you and me.”**

“Hey, no one will get hurt by this.”

**“Don’t worry. They don’t care how we do it, as long as it gets done.”**

“OK, maybe just this one time.”

“This is the way business is really done.”

**“Make sure the files disappear.”**

“I need a little favor.”

**“I can make this worth your while.”**

“What will it take for this little problem to go away?”

**“What’s in it for me?”**

**When in doubt, just don’t do it.**

# Resources available to you

## INTERNAL

### Ethics Officer

R. Nadine Fontaine  
518-257-3120

### Office of Professional Integrity

1-866-750-7867  
integrity@dasny.org

### Affirmative Action Officer

Nairobi Vives  
518-257-3435

## EXTERNAL

### Employee Assistance Program

1-800-777-6531  
or 518-465-3813

### Joint Commission on Public Ethics

518-408-3976

### NYS Office of Inspector General

1-800-367-4448

You may also access  
*Serving Responsibly*  
via office computer on  
the Intranet.

## Whistleblower Intake Portal

DASNY is committed to creating an environment where each team member feels respected and inspired by other team members. You may make complaints by calling (844) 796-1285; visiting <https://dasny.navexone.com>; or by using the QR code below, to file a report electronically. You will be given the option to remain anonymous.



**DASNY**

WE FINANCE, DESIGN AND BUILD NEW YORK'S FUTURE

515 Broadway  
Albany, New York 12207-2964  
T 518.257.3000  
F 518.257.3100  
[www.dasny.org](http://www.dasny.org)