

**ST. LAWRENCE COUNTY INDUSTRIAL DEVELOPMENT AGENCY
CIVIC DEVELOPMENT CORPORATION**

CODE OF ETHICS

Approved and Adopted on May 12, 2010 (Reviewed 12/20/2011)

This Code of Ethics shall apply to all directors, officers and employees of the St. Lawrence County Industrial Development Agency Civic Development Corporation (hereinafter the "Corporation"). These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of the Corporation directors, officers and employees, and to preserve public confidence in the Corporation's mission.

1. No director, officer, or employee of the Corporation shall accept other employment which will impair his or her independence of judgment in the exercise of his/her official duties.
2. No director, officer, or employee of the Corporation shall accept employment or engage in any business or professional activity which will require him/her to disclose confidential information which he/she has gained by reason of his/her official position of authority.
3. No director, officer, or employee of the Corporation shall disclose confidential information acquired by him/her in the course of his/her official duties nor use such information to further his/her personal interests.
4. No director, officer, or employee of the Corporation shall use or attempt to use his/her official position to secure unwarranted privileges or exemptions for himself/herself or others.
5. No director, officer, or employee of the Corporation shall engage in any transaction as a representative or agent of Corporation with any business entity in which he/she has a direct or indirect financial interest that might reasonably tend to conflict with proper discharge of his/her official duties.
6. A director, officer, or employee of the Corporation shall not by his/her conduct give reasonable basis for the impression that any person can improperly influence him/her or unduly enjoy his/her favor in the performance of his/her official duties, or that he/she is affected by the kinship, rank, position or influence of any party or person.
7. A director, officer, or employee of the Corporation should abstain from making personal investments in enterprises which he/she has reason to believe may be directly involved in decisions to be made by him/her or which will otherwise create substantial conflict between his/her duty in the public interest and his/her private interest.
8. A director, officer, or employee of the Corporation shall endeavor to pursue a course of conduct which will not raise suspicion among the public that he/she is likely to be engaged in acts that are in violation of his/her trust.

Any and all previously-approved Code of Ethics of the Corporation are hereby rescinded.