

PORT AUTHORITY OF ALLEGHENY COUNTY STANDARD OF CONDUCT

Employees, contractors, consultants and agents of the Port Authority of Allegheny County (Port Authority) hold jobs of public trust. As a special purpose governmental agency supported by tax dollars and the fares of the riding public, it is essential that Port Authority employees, contractors, consultants and agents conduct themselves with integrity in all aspects of their jobs and job-related activities. Port Authority employees, contractors, consultants and agents must avoid conflicts of interest, whether real or apparent, which would inhibit or give the appearance of inhibiting the performance of their jobs in a fair and impartial manner. As such, all Port Authority employees, contractors, consultants and agents must adhere to the following standards of conduct:

1. No employee, contractor, consultant or agent shall solicit any gratuity, favor or anything of monetary value from Port Authority employees, potential employees, contractors, consultants, potential contractors or consultants or other firms or individuals who provide services, materials or supplies to Port Authority.
2. No employee, contractor, consultant or agent shall accept gratuities, favors or anything of other than nominal intrinsic value from Port Authority employees, potential employees, contractors, consultants, potential contractors or consultants, or other firms or individuals who provide services, materials or supplies to Port Authority. The propriety of the acceptance of gratuities, favors or anything of even nominal intrinsic value shall be judged in part by considering the frequency and/or timing of such acceptance.
3. No employee of Port Authority shall have any substantial direct or indirect financial interest in any entity doing business with Port Authority. Any financial interest must be disclosed in writing to and evaluated by the Director of Internal Audit and the Chief Financial Officer prior to approval by the Chief Executive Officer.

An employee has a "financial interest" in any business entity when the employee or any member of his/her immediate family is an officer, director or owner of the business entity or the holder of stock of the business entity exceeding 5 percent in number of the shares outstanding or, in the case of a partnership, limited liability company or association, owns any equity interest.

An employee receives a financial benefit from a contract awarded by Port Authority when he/she or a business entity in which he/she has a financial interest as defined receives or expects to receive any part of the proceeds of such contract.

4. An employee's responsibilities to Port Authority are primary for any employee working full-time for Port Authority and any other employment in which such

an employee may engage is considered secondary employment. An employee is engaged in "secondary employment" when he or she is engaged in any other employment that produces income. Volunteer or *pro bono* work shall not be considered secondary employment.

A Port Authority employee may engage in secondary employment so long as such employment complies with the following:

- a. Any secondary employment must be lawful and not damage the reputation of Port Authority;
- b. Any secondary employment shall not, either directly or indirectly, create a conflict of interest with the employee's duties for Port Authority or otherwise violate the Standard of Conduct;
- c. Any secondary employment shall not impair, in any way, the employee's ability to perform all expected duties, to make decisions and to carry out in an objective fashion the responsibilities and duties of the employee's position with Port Authority; and
- d. An employee shall not utilize Port Authority's premises, resources (e.g., telephone, stationery, computer equipment, fax machines, cellular phones or other equipment or facilities), or information for or in the course of performing secondary employment or to help gain secondary or other employment.

All Port Authority employees shall be held to the same standards of performance and scheduling expectations, regardless of any secondary employment. If it is determined that any secondary employment is impacting a Port Authority's employee's performance or ability to fulfill his or her obligations to Port Authority, Port Authority may require the employee to terminate his or her secondary employment.

Each Port Authority employee shall submit a written request to, and shall have the written approval of, his or her department head, or other designee, before commencing any secondary employment. Approval of secondary employment may be withdrawn, at any time, by Port Authority if it has determined that any secondary employment has, or may have, an adverse impact on the employee's employment with Port Authority.

The requirements herein pertaining to secondary employment apply to all full-time, permanent employees of Port Authority who are not subject to a collective bargaining agreement. The requirements apply to both hourly and salaried employees.

5. No employee, contractor, consultant or agent shall use his or her office or association with Port Authority or confidential information gained through his

or her position or association with Port Authority to obtain personal financial gain other than compensation allowed by law.

6. No employee, contractor, consultant or agent of Port Authority shall cause any false, misleading, or artificial entries to be entered into the books or records of Port Authority, contractor, consultant or agent to be promulgated to financial institutions and/or to the public at large.
7. No employee, contractor, consultant or agent shall seek to influence the hiring or promoting of any individual by Port Authority other than through the normal and proper exercise of his or her job responsibilities. Nothing shall prohibit an employee, contractor, consultant or agent from writing a letter of recommendation or providing information deemed useful in evaluating a person for employment or promotion by Port Authority.
8. No employee, contractor, consultant or agent who is engaged in or responsible for the development of specifications or the award or administration of contracts, nor any member of the immediate family of any Port Authority employee, contractor, consultant or agent, nor his/her business partner, employee, agent, nor any organization that employs or seeks to employ any of the above, shall have any interest, direct or indirect, in any contract, purchase or other financial activity of Port Authority or the proceeds thereof. For Port Authority employees, this provision applies during the term of his/her employment and for a period of one year thereafter.
9. Port Authority as a self governing corporate body has the power to discipline employees, or impose sanctions on contractors, consultants or agents violating the above Standards of Conduct. Discipline or sanctions shall be in accordance with established Port Authority policies and may include suspension, discharge, contract termination or disbarment.
10. Alleged violations of the Standard of Conduct should be reported to the Assistant General Manager of Legal and Corporate Services, who will inform the Chief Executive Officer. If, however, an alleged violation pertains or relates to either of these individuals, the alleged violation should be reported to the Chairman of Port Authority's Board. A thorough investigation will be conducted and the results thereof will be reported to appropriate levels of management along with recommendations on courses of action.
11. Any disciplinary action by Port Authority will not preclude any legal remedies available to Port Authority for the redress of unlawful conduct.
12. In addition to the Standard of Conduct set forth herein, employees, contractors, consultants or agents shall adhere to and be bound by all other rules, regulations and requirements of Port Authority and any additional standards set forth in or required by United States Department of Transportation, Commonwealth of Pennsylvania or County of Allegheny as part of the terms and conditions of a grant or grant contract entered into by

Port Authority or set forth in any statute or regulations adopted by any legislative or regulatory body having jurisdiction over Port Authority or its activities.

ADOPTED BY BOARD RESOLUTION: December 20, 1985

AMENDED BY BOARD RESOLUTION: 2003

AMENDED BY BOARD RESOLUTION: February 25, 2011