

CODE OF ETHICS

SLEEPY HOLLOW LOCAL DEVELOPMENT CORPORATION

The members of the Board of Directors (the “Board”) of the Sleepy Hollow Local Development Corporation (the “Corporation”), a duly established local development corporation created pursuant to Section 1411 of the Not-for-Profit Corporation Law of the State of New York (the “State”), along with the officers and staff of the Corporation, shall comply with and adhere to the provisions of the Not-For-Profit Corporation Law of the State.

For purposes of this Code of Ethics the term “Close Relative” shall mean a parent, spouse, domestic partner, child, sibling, niece, nephew, aunt, uncle, grandparent, and any person so related to an officer, director or employee’s spouse or domestic partner, and any person residing in an employee’s household whether the relationship is by blood, adoption or is created by the marriage of a parent, child or sibling.

No director, officer, or employee of the Corporation shall (1) accept other employment which will impair his or her independence of judgment in the exercise of his or her official duties nor recruit, interview, hire, process, evaluate, promote, discipline or terminate a Close Relative of such director, officer or employee for the Corporation; (2) accept employment or engage in any business or professional activity which will require him or her to disclose confidential information which he or she has gained by reason of his or her official position of authority; (3) disclose confidential information acquired by him or her in the course of his or her official duties nor use such information to further his or her personal interests; (4) use or attempt to use his or her official position to secure unwarranted privileges or exemptions for himself, herself or others including a Close Relative; (5) engage in any transaction as a representative or agent of Corporation with any business entity in which he or she has a direct or indirect financial interest that might reasonably tend to conflict with proper discharge of his or her official duties; (6) by his or her conduct, give reasonable basis for the impression that any person can improperly influence him or her or unduly enjoy his or her favor in the performance of his or her official duties, or that he or she is affected by the kinship, rank, position or influence of any party or person; (7) make personal investments in enterprises which he or she has reason to believe may be directly involved in decisions to be made by him or her or which will otherwise create substantial conflict between his or her duty in the public interest and his or her private interest; and (8) pursue a course of conduct which will raise suspicion among the public that he or she is likely to be engaged in acts that are in violation of his or her trust.

Further, no director, officer, or employee of the Corporation shall engage in any of the following activities: (i) abusive language towards a fellow director, officer, employee nor a member of the public; (ii) possession or use of alcoholic beverages or illegal drugs on the Corporation’s property or reporting to Corporation property while under the influence of drugs or alcohol; (iii) bringing onto Corporation property dangerous or unauthorized materials such as explosives, firearms, weapons or other similar items; (iv) verbal, physical or visual harassment of fellow director, officer, employee nor a member of the public; (v) actual or threatened violence toward any individual or group; and (vii) conduct endangering the life, safety, health or well-being of others.

As part of this Code of Ethics, all directors, officers, and employees of the Corporation shall disclose the employment of a Close Relative by the Corporation.

Approved and adopted January 13, 2022.

Approved and adopted March 20, 2023.