

Reference : EXECUTIVE
Section : GOVERNANCE
Title : CODE OF CONDUCT
Policy Number : 01-04-05
Issue Date : 09/30/2004
Revision Date :

I PURPOSE

The Code of Conduct incorporates and further mandates standards of conduct contained in previously issued policies. The aim of the Code is to promote honest and ethical conduct by Authority officers and employees and to promote public confidence in the Authority. This Code of Conduct is applicable to all employees of Niagara Frontier Transportation Authority and each of its divisions, subsidiaries and operating units, including Niagara Frontier Transit Metro System, Inc.

II POLICY

All employees are required to abide by the policies set forth in Section III below, which together comprise the Authority's Code of Conduct. All employees are directed to familiarize themselves with these policies and conduct themselves and the business and affairs of the Authority in accordance with these policies. Employees are further directed to seek advice from the General Counsel's Office when confronted with business decisions involving a risk of violation of law or regulation if they have any questions about the proper course of action.

III COMPLIANCE REQUIREMENTS

NOTE: The policies referenced below are set forth in full in the Authority's Policies and Procedures Manual on the Company intranet and may be referenced by clicking on the applicable policy.

- [1-01-04 - Code of Ethics](#)
- [1-04-02 - Whistleblowers Policy](#)
- [1-04-03 - Fraud Hotline](#)
- [3-02-03 - Telephones - Personal Telephone Calls](#)
- [4-01-03 - Political Solicitation](#)
- [4-02-01 - Employment Practices - Hiring of Relatives](#)
- [4-03-01 - Sexual Harassment](#)
- [4-03-03 - Drug Free Workplace Act of 1988](#)
- [4-03-04 - Use of Alcohol and/or Drugs on the Job](#)
- [4-05-01 - TIMEKEEPING REQUIREMENTS](#)
- [4-05-02 - Employee Activity](#)
- [5-01-01 - Affirmative Action/Equal Opportunity Policy Employment Practices](#)
- [6-01-05 - Use of Internet](#)
- [6-01-09 - Lotus Notes Email](#)

IV ADMINISTRATION AND ENFORCEMENT

Nothing in this Code of Conduct is intended nor shall it be construed to provide any additional employment or contract rights to employees or other persons.

The Authority will attempt to communicate changes in the Code of Conduct prior to the implementation of such changes; however, the Authority reserves the right to modify, amend or alter the Code of Conduct without prior notice.

Copies of all policies referenced in this document are available on the Company intranet. Any employee who does not have access to the intranet and wishes to review a policy should contact his/her supervisor or the Human Resources Department.

Failure to abide by the Code of Conduct may lead to disciplinary action, criminal or civil prosecution and/or may result in civil liability.

Note: This was reviewed by the Audit and Governance Committee on September 23, 2004.