

THE HORNELL AREA INDUSTRIAL DEVELOPMENT CORPORATION

CODE OF ETHICS

The members of the board (the “Board”) of the Hornell Area Industrial Development Corporation (the “Agency”), a duly established local development corporation of the State of New York (the “State”) in accordance with Section 2824 of the Public Authorities Law have established this Code of Ethics (this “Policy”) which shall apply to all members of the Board, the officers and staff of the Agency.

This Policy shall serve as a guide for official conduct and intended to promote honest and ethical conduct and professional performance of the Agency’s members, directors, officers and employees and to preserve public confidence in Agency’s mission.

Standards Established by the Public Officers Law:

No director, officer, or employee of the Agency shall: (1) accept other employment which will impair his or her independence of judgment in the exercise of his or her official duties; (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; (5) engage in any transaction as a representative or agent of Agency 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.

All directors, officers, or employees of the Agency shall endeavor to pursue a course of conduct which will not 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.

General Principles and Policies:

Officers, Directors and Employees shall comply with the following principles and policies:

- a. Performing the duties of his or her office impartially and diligently and disqualify him or herself in any matter in which his or her impartiality might be reasonably questioned.

- b. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- c. Comply with the rules and regulations of federal, state and local governments and other appropriate private and public regulatory agencies.
- d. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated.
- e. Respect and protect the confidentiality of information acquired in the course of professional activities, except when authorized or otherwise legally obligated to disclose such information.
- f. Promptly report to any member of the Board any violations of this Code by any Officer, Director and/or Employee of the Agency who is subject to this Code.

Violations

In addition to any penalty contain in any other provision of law any such member, officer, or employee who shall knowingly and intentionally violate any of the provisions of this section may be suspended or removed from office or employment.

Restated and Re-adopted this 19th day of March, 2026