

## CONFLICT OF INTEREST

BBP requires that its employees be bound by the restrictions set forth in Chapter 68 of the New York City Charter that prohibit an officer or employee from having an interest in a firm which such officer or employee knows is engaged in business dealings with the City or BBP. Employees are responsible for reading and complying with these restrictions. A copy of Chapter 68 of the New York City Charter can be found on the City's website at <https://www1.nyc.gov/site/coib/the-law/the-law.page>. For further information in any situation involving a potential conflict of interest or restricted activity, please contact the General Counsel or contact the New York City Conflict of Interest Board ("COIB") at (212) 442-1400.

## ANNUAL FINANCIAL DISCLOSURES

The COIB requires certain BBP employees to file annual financial disclosure forms. Such employees, once notified by COIB, are responsible for following COIB's annual disclosure procedures, which includes filing such forms directly with COIB and penalties for late filing with respect to annual disclosure forms.

Generally, COIB requires the following BBP employees to file annual financial disclosure reports:

- All employees with the title of Vice President and above.
- All employees who hold a policymaking position.
- Other employees as deemed appropriate by COIB.

Employees who are required to prepare financial disclosure forms and who leave BBP are required to file their reports for the period(s) not previously reported, as required by COIB. Exiting employees are responsible for contacting COIB directly to arrange receipt of their filing packets.

The COIB filing, pursuant to Section 12-110 of the New York City Administrative Code, requires financial disclosure which will be open to public inspection.

## OUTSIDE EMPLOYMENT

Employees are hired and continue in BBP's employment with the understanding that BBP is their primary employer and that other employment or commercial involvement, which is in conflict with the business interests of BBP, is strictly prohibited. Written approval must be obtained from the General Counsel prior to engaging in any outside employment.

## ACCEPTANCE OF GIFTS

Employees are not permitted to accept gifts, favors or entertainment from active or potential vendors, clients, contractors, or other persons with whom the City or BBP does business where the combined value of the gifts, favors, or entertainment received from the source within a 12-month period is \$50 or more. For these purposes, a source includes not only the vendor, client, contractor, or other person, but also any relative or domestic partner of the source and any director, trustee, or employee of the source and any firm affiliated with the source. While limited, exceptions are allowed in accordance with the rules and opinions of the COIB, these exceptions are read narrowly, and an employee is responsible for making sure that any acceptance falls within an exception. If an employee is unsure of policy guidelines, contact the General Counsel or COIB for guidance.

Impermissible gifts should be refused and/or returned to the sender, at once. If the gift is perishable (food) and impractical to return, it should be opened and shared by all BBP employees.