Employee Code of Ethics

IT ALL RIDES ON INTEGRITY
Our Commitment to Integrity – and to You

For nearly a century, the Port Authority of New York and New Jersey has worked at our core mission: keeping the region moving, on behalf of the hundreds of millions of people who rely on us each year. What we have built together — and what we will build together — is truly part of the circulatory system that enables the largest and most dynamic metropolitan region in the nation to function every day.

But the foundation of all that we do rests on our integrity. **What we do is enormously important. But nothing is as important as how we do it.**

The Port Authority was established in 1921, by a Compact between New York and New Jersey authorized by the United States Congress and the U.S. Constitution. The first sentence of the Compact speaks of integrity — of the stewardship of the Port District as a “high trust for the benefit of the nation,” and of a “pledge” of “faithful” action. As the Board of Commissioners has recently emphasized: “That high trust must be always earned, anew, as the Port Authority reaffirms its foundational pledge — to integrity and to ethics; to conduct that is always faithful.”

It is critical to recommit to the basic bedrock principle of our work together: **We fulfill our mission to the public when we honor the public trust, by conducting ourselves honestly and ethically.** The public expects integrity and excellence from us. And that is what we expect from each other.

We write to you — our colleagues — to ask you to join with us to re-establish the public’s trust in this agency’s commitment to act with integrity. A reputation for integrity is earned — act by act and day by day. You and we ARE the agency. Acting together, it takes years and years to build a reputation. It can be lost in a moment with one bad act by one — or a few — individuals.
So, on the one hand, we ask that each of you commit with us to make integrity a byword of everything we do. But we also write to emphasize that the agency will not tolerate violations. With integrity, it’s one strike and you’re out — meaning that violations will simply not be tolerated. Any violations will be dealt with promptly and will have serious consequences. No winks. No nods.

We are today issuing a consolidated Employee Code of Ethics that pulls together existing obligations from guidance and rules currently in effect. This Code, together with the various materials referenced in it, sets forth the Port Authority’s key integrity policies. You are responsible for knowing what the Port Authority requires of you. And you are responsible for making no compromises in fulfilling those obligations. The public we serve relies on each of us, personally, to take a stand for integrity and honesty and fair dealing. Do not allow anything, ever, to compromise your commitment to integrity. And know that when you do the right thing, when you stand up for integrity — we will always stand with you.

Kevin J. O’Toole
Chairman of the Board

Rick Cotton
Executive Director
The Port Authority Expects Your Best, At All Times

Every day, Port Authority employees come to work ready to exceed expectations and to overcome challenges. This Code sets out the principles which underlie how we work — the steps we take to ensure that we are acting with integrity and honesty; that we are treating each other with respect and decency; and that we are holding ourselves accountable for our actions.

This Code establishes a demanding and rigorous set of ethical standards. The Code will be published on the Port Authority’s external website so that everyone can see the high standards that we hold ourselves to.

What is expected of you?

First and foremost, the Port Authority expects you to read and understand this Code, and to comply with both the Code and the various detailed policies that it is based on. (Those policies are available to you on the Port Authority’s internal website, under “Employee Code of Ethics.”)

There can never be an excuse or justification for violating this Code. And no one, no matter who they are, can or should tell you otherwise.

If you’re not sure about what this Code requires of you in a given situation, raise your hand and ask. There are plenty of Port Authority people to seek out for help and guidance on ethical questions. Those people are resources for you, and they are listed on page 21 of this Code.

This Code asks you to join with the agency in creating a culture of compliance. The Code includes a duty to report; if you know something or learn something or see something, you need to say something. And if you do — we pledge that you will be protected from any retaliation. The Port Authority has a strong whistleblower protection policy. Please take a look at it. It’s available on our internal website, under “Employee Code of Ethics.”

Violation of the law or this Code is a serious matter. It may result in disciplinary action, up to and including termination of employment — and it may also result in civil or criminal penalties. Penalties may apply not only to employees who violate the law or this Code. Severe penalties will also apply to anyone who retaliates against those who report possible misconduct.

This Code applies to all Port Authority employees, and also to all employees of Port Authority subsidiaries, namely the Port Authority Trans-Hudson Corporation, the Newark Legal and Communications Center Urban Renewal Corporation, and the New York and New Jersey Railroad Corporation. When the words “Port Authority” are used in this Code, they apply to both the Port Authority and its subsidiaries.

Many Port Authority employees are covered by collective bargaining agreements. In the event of a conflict between the provisions of this Code and the terms of a collective bargaining agreement, the terms of the agreement will control.
Everyone Must Model the Ethical Behavior They Expect

**All Employees**

Employees are both encouraged and required to:

- Review and comply with this Code; and
- Ask questions if they are not sure how to apply the Code in specific instances.

**Supervisors**

Supervisors must be leaders of the Port Authority. That is a privilege, and it comes with special responsibilities. One of those responsibilities is working to create a **culture of integrity and compliance**. To accomplish this, supervisors must:

- Clearly and regularly communicate the importance of complying with the Code to everyone they work with;
- Exemplify personal commitment to integrity and ethical dealings through their own actions;
- Promptly make ample time for any employee who raises an ethical concern;
- Actively consider whether employees are acting ethically when formally evaluating their job performance and when informally providing feedback; and
- Find opportunities to ask questions focused on ethics during job interviews.
Our Core Responsibilities

**Guiding Principles**
- The foundation of all we do: obey the law and be honest and trustworthy.
- READ the Employee Code of Ethics and FOLLOW it.
- Complete the trainings assigned to you. They will explain our obligations under the Code.

**Fair Employment Practices**
- Follow the inclusionary workplace policies of the Port Authority.
- Do not discriminate.
- Do not engage in sexual harassment.
- Maintain a level playing field for all employees, without favoritism (no involvement in employment decisions involving family members).

**Financial Integrity and Improper Payments**
- Assure total integrity in all financial and contract transactions.
- Never solicit or accept improper payments or favors for work that the Port Authority does.
- Ensure that business and financial records you create, approve or review are accurate and complete to the best of your knowledge.
- Use Port Authority property for Port Authority business.

**Conflicts of Interest**
- Do not use your Port Authority position to achieve personal financial gain or other advantage, and avoid any appearance of doing so.

**Workplace Health and Safety and Environmental Regulatory Compliance**
- Always follow occupational safety and health standards.

**Confidentiality and Open Government**
- Keep confidential information appropriately confidential.

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**Your Personal Commitment**

Above all, public agencies must have the public’s trust. Trust is earned. And it is earned one person at a time and one day at a time. The Port Authority is the sum total of all of our individual actions.

Building a culture of integrity and compliance is something that each of us must actively participate in, no matter our position at the Port Authority. That is why every one of us must commit, personally, to adhering to this Code. Every year, you will be asked to certify that you have closely reviewed the Code, that you will abide by the Code, and that you will participate in ethics trainings as required, either in person or electronically.
This part of the Code sets out the Port Authority’s overarching General Policies. These General Policies cover five broad areas:

- Fair Employment Practices
- Financial Integrity and Improper Payments
- Conflicts of Interest
- Workplace Health and Safety and Environmental Regulatory Compliance
- Confidentiality and Open Government

For the areas that they cover, the General Policies help to make concrete and particular the meaning of Our Core Responsibilities, as set out on page 3.

The General Policies are based on detailed underlying Port Authority policies that already exist. These detailed policies (often in the form of Administrative Instructions) are available to you 24/7 on the Port Authority’s internal website, under “Employee Code of Ethics.” If you don’t have ready access to a computer, please let your supervisor know, so that you can get hard copies of the detailed policies. One way or another, please ensure that you have access to the detailed policies. Portions of these detailed policies will be referred to in the ethics training that you receive.
Port Authority employees depend upon each other every day. And on behalf of the Port Authority we all interact with customers, business partners, suppliers, vendors, consultants, and numerous other stakeholders. In all instances, in all interactions, we expect Port Authority employees to treat others with dignity and respect — and with an understanding that we all benefit from diversity, from respectfully interacting with a wide range of people, who bring different backgrounds, life experiences, ideas, and opinions to work. Our General Policy on “Fair Employment Practices” reflects our commitment to building and maintaining a safe, inclusive and fundamentally respectful atmosphere — where we all add value, and where we all can succeed.

Workplace Discrimination

The Port Authority prohibits discrimination on the basis of race, color, religion, age, gender, sexual orientation, pregnancy, gender identity, genetic information, national origin, disability, marital status, citizen status, veteran status, or military status. Ours is a proudly inclusive workplace. We honor diversity and we celebrate it.

There is, simply, no place for discrimination in our workplace or in our actions. There can be no discrimination in hiring or compensation or discipline. And there can be no discrimination in any job-related decisions.

Workplace Violence

Violence, or any threatening or abusive behavior, is wholly and entirely inconsistent with who we are. Such behavior has no place in the workplace, on or around Port Authority property, or wherever an individual is conducting Port Authority business. In addition, while special rules apply to law enforcement officers, firearms, explosives, or other weapons have absolutely no place in the workplace or on Port Authority property.

Sexual Harassment

The Port Authority prohibits sexual harassment of any kind. Sexual harassment is “unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature . . . when . . . submission to or rejection of such conduct is used as the basis for employment decisions.” Sexual harassment is also “conduct that has the purpose or effect of . . . creating an intimidating, hostile or offensive working environment.”

This means, among other things, that employment decisions — about raises, promotions, work assignments, or anything else — can never be made with any reference whatsoever to whether an employee complies with sexual advances, including requests for dates or propositions for sex.

This also means that a Port Authority workplace environment cannot be “intimidating, hostile, or offensive.” Some potential signs of an improper workplace environment are the visible presence of sexual materials (like pornography); unwanted touching or fondling; vulgar, lewd, or leering “jokes” or comments; or emails, texts, photographs, posters, voice mails, or drawings of a sexual nature.
Impairment and Substance Abuse

Employees may not come onto Port Authority premises, remain on Port Authority premises, or use company vehicles or equipment, if they are impaired in any way by either drugs or alcohol. In addition, employees may never use illegal drugs on Port Authority premises or while using company vehicles.

Employment of Relatives

The Port Authority is committed to a level playing field for all employees, without the sort of favoritism that one family member might show to another. To that end, a Port Authority employee must never participate in a hiring or other job-related decision that involves his or her relative.

In addition, relatives of senior level staff or members of the Human Resources Department cannot be hired by the Port Authority. There are some highly limited exceptions to this rule that senior level staff and HRD employees must familiarize themselves with. And even in those cases, favoritism is still prohibited, and a Port Authority employee may not be involved in any way in a hiring decision related to a relative.

Some other rules related to relatives of Port Authority employees:

- Employees and their relatives cannot work in the same unit, where one will supervise or in any way oversee the other.
- A Port Authority employee should never solicit a Port Authority business partner to hire his or her relative.

For all of the purposes set out above, a relative is a Port Authority employee’s spouse, child, sibling, parent, grandparent, grandchild, aunt, uncle, niece, nephew, first cousin, or domestic partner (or in-laws and step relations to the same degree).

The Special Interpersonal Obligations of Supervisors

Port Authority employees should never feel reluctant in discussing the workplace environment with any of the reporting resources listed on page 21. But sometimes these conversations can be difficult. Employees can be fearful. Supervisors are required to be attentive and respectful listeners — aware of the way employees behave at work, and sensitive to changes in performance or demeanor which could be caused by workplace problems. Supervisors must work to communicate that there is no tolerance at the Port Authority for discrimination or sexual harassment. And supervisors must work to foster an open and transparent atmosphere where employees are willing to raise concerns, even potentially uncomfortable ones.

Reporting

The Office of Equal Employment Opportunity Compliance serves as a resource for every employee, and coordinates a team of Employee Complaint Representatives located in every department of the Port Authority. The name and contact information for your Employee Complaint Representative can be found on our internal website, at “Employee Code of Ethics.” In addition, staff at the Office of Equal Employment Opportunity Compliance can also be contacted as indicated on page 21, with any questions or concerns.
Financial Integrity

It is fundamental to the Port Authority’s credibility that it properly accounts for its business assets and operations, accurately and timely reports on its financial condition, and holds its responsible employees accountable for understanding the nature and context of items that they approve. **All employees should perform their jobs in a manner which can help the Port Authority to comply with its reporting obligations.** Specifically:

- You should not sign or approve items unless you believe you personally have sufficient basis for doing so;
- You should not approve items that you are not authorized to approve;
- You should sign or approve documents only if they are accurate to the best of your knowledge;
- You should compile and present information and data in an accurate manner, to the best of your knowledge; and
- You should be honest and transparent in recording financial matters involving the Port Authority and should never falsify data or records.

**Offers to You**

It is critical that we do business on the merits, and only on the merits. **You should never engage in conduct that allows anyone to even begin to suggest that your honor and your integrity were sold — that you took something (like a favor, gift, or money) to influence how you do your job.**

Receiving, offering or giving a bribe is a very serious crime under federal, state, and local law. You must rigorously adhere to the law. In addition, **the Port Authority has a strict, zero-tolerance policy — that applies to vendors and other third-party businesses, and that goes much further than the law requires.** Under this zero-tolerance policy:

- You may not solicit and you may not accept gifts, discounts, or any other favors from our vendors or from third parties who are seeking to do business with the Port Authority.
- You may not accept payment — in any form — for any services done for anyone with whom the Port Authority does business or is likely to do business.
- You may not solicit and you may not accept either free or discounted entertainment, meals, or transportation from any tenant, concessionaire, vendor, or anyone else with whom we do business or are likely to do business.
- If it’s connected in any way to your Port Authority work, you may not solicit employment for yourself or any immediate family member from any party that the Port Authority does business with, or that is seeking to do business with the Port Authority.

There are some highly limited circumstances in which gifts of nominal value are acceptable. For example, employees may generally give gifts to one another that are appropriate for a business...
environment, and employees may accept modest snacks or non-alcoholic beverages offered at off-site meetings.

But in general, if a vendor offers you something — even offers to buy you lunch — you will need to say no, tactfully but firmly.

**Offers by You**

Although in business dealings it may sometimes appear courteous to provide modest gifts or gratuities, small payments are sometimes offered for bad reasons — to improperly curry favor, or to unlawfully influence a person’s actions. To avoid any appearance of impropriety, under the Port Authority’s zero-tolerance policy you may not offer, pay, or provide anything of value in connection with a business transaction. In addition, you may not offer gifts or gratuities to individuals or organizations with whom the Port Authority does business or is likely to do business.

There are some highly limited exceptions. For example, employees may generally provide Port Authority-branded promotional merchandise.

**Interpretation and Reporting**

One of the Designated Ethics Attorneys is always available to answer questions or to provide advice or guidance regarding the improper payments policy. However, the Office of Inspector General should be contacted to report any improper payments, offers of improper payments, or suspected “red flags” about such payments.

See page 21 for contact information for the Designated Ethics Attorneys and for the Office of Inspector General.

**Port Authority Property**

Employees have access to Port Authority property for work-related purposes — to get things done for the Port Authority. Use Port Authority property, including vehicles and computers and Port Authority letterhead stationery, only for Port Authority purposes.

This said, some minimal personal use of Port Authority phones and computers is permitted, within reason, to assist you in managing personal tasks during working hours. But it is expected that this type of use will be extremely limited. And you can never use Port Authority resources or property for any illegal purposes, or to try to generate income for anyone other than the Port Authority.

The Port Authority reserves the right, in accord with the law, to monitor the use of its property — including by monitoring Port Authority-provided computers and telephones.

You may not bid on, or acquire, Port Authority property at auction when you are aware that the items were previously owned by the Port Authority.
As an employee of the Port Authority, you have agreed to devote your working time to furthering the Port Authority’s business and operations, and to do so based on the merits — not compromised or influenced by any personal interests that you may have. **You are required to refrain from actions in which you have a conflict of interest.** You should not leave anyone with the impression that you can be improperly influenced in the performance of your job.

Impermissible conflicts can arise in several contexts, described below.

**The Basics**

To begin thinking about conflicts of interest issues, start by asking yourself two simple questions:

- First, will I personally gain or lose, or appear to gain or lose, depending on how things play out on a Port Authority matter I’m working on?

- And second, will a member of my immediate family gain or lose, or appear to gain or lose, depending on how things play out on a Port Authority matter I’m working on?

If the answer to either of these questions is “yes,” you may have a conflict of interest.

For example, let’s say that you’re working on a project to order new railcars. In that case, you likely have a conflict of interest:

- If you own stock in the major railcar manufacturer — because the stock price could go up if the Port Authority places an order.

- If your daughter is a senior executive at the railcar manufacturer — because her job stability could be enhanced if the Port Authority places an order.

- If you have applied for a job at the railcar manufacturer — because your likelihood of landing the job could be increased if the Port Authority places an order.

In each of these cases, your independence and objectivity in performing your duties in connection with the railcar order might be called into question.

**Conflicts Outside of Work**

**Special Permission for Outside Employment**

As a Port Authority employee, you should expect to focus on Port Authority work. And the expectation is that you will have no conflicts of interest, either at work or outside of work. Most Port Authority employees will not have paid work outside of the Port Authority. **Before accepting compensated work for an entity other than the Port Authority, you must**
annually obtain permission from your supervisor, the head of your Department, and the Chief of Human Capital. You must also get annual permission before embarking on any self-employment for which you expect to obtain compensation.

Political Activity

The Port Authority relies upon its employees to carry out their responsibilities in a non-partisan manner. To avoid any suggestion of partisanship, Port Authority employees must generally accept some limitations on political activities, including limitations on running for certain elected offices. Please consult a Designated Ethics Attorney before determining whether to run for elected office or to participate actively in the management of a political campaign.

Of course, you are entirely free to exercise your right to vote and your right to express your personal views. In expressing your personal views, you should express them for yourself — and should not leave the impression that you are speaking for the Port Authority.

Conflicts: Moving on After Port Authority Employment

To avoid any suggestion that Port Authority employees are trying to curry favor with potential future employers, there are strict limits on the work you may do after you leave the Port Authority. For example, after working at the Port Authority on a specific matter, an employee cannot leave Port Authority employment — and then go work, on that same matter, for a private-sector entity. Similarly, for the year after he or she leaves the Port Authority for another job, a former employee cannot work on a matter that the Port Authority is substantially involved with.

If and when you begin contemplating post-Port Authority possibilities, feel free to contact one of the Designated Ethics Attorneys. Their contact information is listed on page 21, and they can provide detailed advice on the governing rules.
The Port Authority has a long standing commitment to healthy, safe, and sustainable activities. Because it is engaged in construction and operation of complex infrastructure assets, the Port Authority relies on its employees to act in strict accordance with applicable laws, rules, and regulations to prevent accidents — and to keep us all safe. In addition, the Port Authority builds into its activities a focus on acting in an environmentally sustainable manner.

We can work together to meet these goals when you:

► Pay careful attention to on-site workplace health and safety rules promulgated under the Occupational Safety and Health Act, and closely follow supervisory instructions related to health and safety. No one can instruct you to work in an unsafe or unhealthy manner — you should report any request of this kind.

► Use industrial equipment carefully and in accordance with directions, and wear proper safety gear to prevent workplace injuries.

► Toxic and hazardous materials must be disposed of properly, and stored in a safe and lawful manner.

► Immediately notify your supervisor if you become aware of an unsafe or unhealthy condition, or a potential violation of environmental laws.

► Never work while using illegal drugs, or while impaired by drugs or alcohol.

Workplace Health and Safety and Environmental Regulatory Compliance

► Always follow occupational safety and health standards.

The General Policy on Workplace Health and Safety and Environmental Regulatory Compliance is based on a set of underlying policies, each of which is available on the Port Authority’s internal website, at “Employee Code of Ethics.”
Confidentiality and Open Government

Confidential Information

What is It?

Through work, Port Authority employees often learn information that is related to the business or operations of the Port Authority and that is not public. This is “confidential information,” and it must be closely controlled.

Some confidential information might be of a personal or private nature. An employee in the Human Resources Department, for example, might learn about a Port Authority colleague’s pension holdings, or the status of a medical evaluation conducted by the Office of Medical Services. And some confidential information might be of value to someone outside of the Port Authority looking to make a business decision. An employee in the Aviation Department, for example, might learn about the Port Authority’s plans, or an airline’s plans, for a certain parcel of property, or advance information about a Port Authority contract that could affect a company’s stock price.

The Primary Obligation

Our basic obligation is simple: confidential information must be kept confidential. Sharing or using confidential information to advance anyone’s personal interests (including your own) is a violation of this Code — and in some circumstances may also be a serious crime.

If you are not sure whether certain information may be confidential, do not describe or discuss the information, or even mention it, until you have had a chance to have a full discussion with your supervisor.

Sharing Confidential Information

There are circumstances in which sharing confidential information is perfectly appropriate. You may, for example, be permitted to share confidential information with a consultant that is doing work for the Port Authority.

You should not share confidential information with anyone outside of the Port Authority unless your supervisor determines that doing so is legitimate and appropriate, and advances the Port Authority’s interests. In cases that raise potential doubts, supervisors should themselves consult with a Designated Ethics Attorney, to ensure that sharing confidential information will not violate the law or this Code. And in cases that involve “protected information,” as defined by the Port Authority Information Security Handbook, supervisors should be ensuring that there is appropriate consultation with, and approval by, the Port Authority officials designated in the Handbook.

Procurement

Special care must be taken to protect the integrity of our procurement process. When it comes to an ongoing procurement, the Port Authority should be contacted by outside parties only through those Port Authority employees who have been explicitly designated by the Procurement Department. If you are contacted about a procurement, and you are not one of those specially designated employees — you should immediately let the Procurement Department know, and you should refer the person who contacted you to Procurement.

Keep confidential information appropriately confidential.
**Legal Process**

There are circumstances in which you may be legally required to share confidential information — as, for example, if you have received a subpoena. In those cases, you should consult in the first instance with both your supervisor and a Designated Ethics Attorney.

**Securities Laws**

Finally, you should be aware that federal and state securities laws impose strict limits on your ability to buy or sell stocks or to offer investment advice (i.e., to offer “tips” to others). For example, it may well be a federal crime to buy or sell a stock or a bond (or to advise someone else to do so) if you are aware of non-public information that may cause the price of the stock or bond to move up or down once the information becomes public. You are responsible for understanding and following federal and state securities laws.

**Open Government**

The Port Authority is committed to openness — to transparency-minded compliance with the New York and New Jersey laws that ensure that the public can view our records, including emails. In order to comply with these laws, we are sometimes required to compile all of our information on a given subject. If you receive from the Law Department (or another Port Authority department) a public records access request for certain documents, you must promptly provide all responsive materials to which you have access, including materials that are stored on computers or hard drives, or in hard copy files.
A Stronger Program
The Port Authority is issuing this Code as part of its re-commitment to ethical behavior. This Code is the foundation. You will also be expected to follow through in two additional respects: (1) by participating in all required training, and (2) by strictly adhering to additional integrity requirements that are particular to your job.

**Training**

Over the course of your time at the Port Authority, you will receive regular training on the subjects covered in this Code. Some of the sessions will focus in detail on areas that present recurring questions, like conflicts of interests, handling confidential information, and the zero-tolerance gifts policy. Your time is valuable, and so is the integrity training that we offer. The purpose of integrity training is simple: to ensure that there can be no misunderstanding about the meaning of the Code, and the importance of complying with it. **We are deeply committed to helping each employee to understand and embrace the Code and our ethics and integrity standards, until they become second nature.**

Training will focus on broadly recurring issues. But it will also be targeted to your job, with an emphasis on the integrity and legal issues you are most likely to encounter, and interactive — with real-world problems and practical, definitive answers. The Port Authority expects to digitize as much training as it can — to make it convenient to learn what we expect from our employees.

**Specialized Requirements**

This Code describes certain foundational ethical obligations that are common to all Port Authority employees. But certain employees are subject to additional restrictions. For example, members of the Procurement staff are required to adhere to strict limits on what they can communicate, and to whom — all to ensure the integrity of the procurement process. You must follow all ethical requirements that are particular to the job that you do, and you can expect targeted training on those requirements — so that there is no ambiguity about the specialized integrity rules that govern your conduct.
If You Have a Question: Ask

The Port Authority wants you to make the right choices — but sometimes those choices are not obvious, involving complex matters or unfamiliar legal or ethical standards.

If you are not sure if something violates this Code, ask a supervisor right away for advice and guidance — unless your supervisor is implicated in what you are concerned about, or you otherwise feel uncomfortable confiding in him or her.

If you don’t go to your supervisor, or if you are not fully convinced that he or she has given you a complete and thoughtful and reliable response, there are ample additional resources for you, set out in the chart on the following page. As you’ll see, from this chart, there are many choices — you should seek advice and guidance from the resource that is most comfortable for you.

If You Have Information: Report It

If you have concerns that a violation of the law or this Code may have occurred, you must take action to report those concerns — even if you are not sure a violation has occurred.

If you’ve learned something that causes you to be concerned that certain conduct could be viewed as dishonest, unethical, or unlawful — report it (anonymously, if you want).

Who To Go To

Everyone listed in the chart on the following page can offer guidance or advice if you need ethical questions answered — anonymously or confidentially. And everyone listed in the chart on the following page is someone you can report to if you’re concerned about unethical conduct.
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<th>Your Concern</th>
<th>Resource</th>
<th>Contact</th>
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<tbody>
<tr>
<td>Any possible violation of this Code or other misconduct</td>
<td>Office of Chief Ethics &amp; Compliance Officer</td>
<td>PHONE 212.435.6607</td>
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<td></td>
<td></td>
<td>EMAIL <a href="mailto:EthicsCompliance@panynj.gov">EthicsCompliance@panynj.gov</a></td>
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<td>MAIL 4 WTC, 150 Greenwich Street, 25th Floor, New York, NY 10007</td>
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<td>Any possible violation of this Code or other misconduct; improper payments;</td>
<td>Office of Inspector General</td>
<td>HOTLINE 973.565.4340</td>
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<td>criminal wrongdoing; workplace violence; whistleblower retaliation</td>
<td></td>
<td>FAX 973.565.4307</td>
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<td>EMAIL <a href="mailto:InspectorGeneral@panynj.gov">InspectorGeneral@panynj.gov</a></td>
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<td>MAIL P.O. Box 2018 Hoboken, NJ 07030</td>
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<td>Fair employment practices, including discrimination and harassment</td>
<td>Office of EEO Compliance</td>
<td>PHONE 212-435-6323</td>
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<td>EMAIL <a href="mailto:EEO@panynj.gov">EEO@panynj.gov</a></td>
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<td>MAIL 4 WTC, 150 Greenwich Street, 16th Floor, New York, NY 10007</td>
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<td>Questions as to the meaning of the various provisions of this Code, or the</td>
<td>Designated Ethics Attorney</td>
<td>PHONE 212.435.3484</td>
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<td>law</td>
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<td>EMAIL <a href="mailto:EthicsAttorney@panynj.gov">EthicsAttorney@panynj.gov</a></td>
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<td>MAIL 4 WTC, 150 Greenwich Street, 25th Floor, New York, NY 10007</td>
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<td>Questions or reports of any possible misconduct, discrimination, lack of</td>
<td>The Voice of the Employee (&quot;VOICE&quot;) helpline</td>
<td>PHONE 866.279.6844</td>
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<td>compliance or wrongdoing of any kind that conflicts with the standards of</td>
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<td>EMAIL <a href="mailto:panynjvoice@tnwinc.com">panynjvoice@tnwinc.com</a></td>
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<td>our agency</td>
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<td>ONLINE <a href="https://panynjvoice.tnwreports.com">https://panynjvoice.tnwreports.com</a></td>
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What Happens After You Report

Confidentiality

When you report an ethical concern, whether you report it anonymously or otherwise, the Port Authority will endeavor to keep the information you provide confidential to the extent permitted by law and by our responsibility to fully investigate the matter.

Feedback

You can be sure that all concerns will be carefully, promptly, and thoroughly reviewed. And, unless you have reported anonymously, you can be sure that you will receive feedback from the reviewers as soon as doing so makes sense.

No Retaliation

The Port Authority flatly and firmly prohibits any retaliation whatsoever against those who raise integrity concerns. Any retaliation will be severely punished, up to and including by termination of employment, and/or civil and criminal penalties.

Cooperation with Investigations

It is critical that the Port Authority be able to count on its employees to be honest and forthcoming when an investigation is being conducted into any integrity concerns. In the context of such an investigation, you must cooperate fully and provide complete and truthful information, to the best of your knowledge. You must also take care to preserve documentation or other materials related to an integrity investigation once you become aware that it is ongoing.

We believe that the resources above are ample — they give you plenty of people to look to. But sometimes there needs to be a backstop, and the top leadership at the Port Authority is closely focused on matters of integrity. When it comes to ethics, if you have a pressing problem or question and you are not getting a prompt response to your concern, you can also contact the Port Authority’s Inspector General; Chief of Human Capital; General Counsel; Chief Ethics & Compliance Officer; Executive Director; or any member of the Board of Commissioners.