



ERIE COUNTY WATER AUTHORITY
INTEROFFICE MEMORANDUM

To: Jerome D. Schad, Chair
Peggy A. LaGree, Vice Chair
Michele M. Ianello, Treasurer

Cc: Terrence D. McCracken, Secretary to the Authority
Joyce A. Tomaka, Chief Financial Officer
Charles E. Eaton, Chief Operating Officer
Leonard F. Kowalski, Executive Engineer
Raymond Herman, Ad Hoc Member
Robert C. Freeman, Ad Hoc Member
Anne E. Joynt, Ad Hoc Member

From: Mark S. Carney, General Counsel

Date: March 10, 2025

Subject: Independent Ethics Panel Recommendations for the 2024 Financial Disclosures

On February 11, 2025, the Independent Ethics Panel (the "IEP") held a meeting to review the following items, and subsequently forward their recommendations, to the Governance Committee and the Board of Commissioners:

- (1) ECWA Financial Disclosure Form for Calendar Year 2024;
- (2) Policy No. 11:
Code of Ethics & Conflict of Interest Policy;
- (3) Policy No. 16: Whistleblower Protection Policy
- (4) 2024 Vendor List;
- (5) Proposed employee letter sent via regular mail; and
- (6) Proposed employee mail.

A copy of each of the above documents, and the draft IEP meeting minutes, are attached to this memorandum for your review.

2024 Financial Disclosure Form

After discussion, the IEP recommends that the 2024 Financial Disclosure Statement includes a request for any changes made on the form by an employee be initialed by that employee.

The form has also been updated to reflect the current disclosure year of 2024.

There are no other recommendations for changes in the 2024 Financial Disclosure Statement.



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Policy No. 11 Code of Ethics & Conflict of Interest Policy

The IEP reviewed and discussed Policy 11, the Code of Ethics & Conflicts of Interest Policy, as amended on December 19, 2024. The Panel did not have any recommendations of changes to the Code of Ethics & Conflict of Interest Policy.

Policy No. 16 Whistleblower Protection Policy

No changes are recommended to Policy No. 16, Whistleblower Protection Policy.

2024 Vendor List

The Vendor List is sent to employees and others required to file an in-house financial disclosure, pursuant to Policy No. 11. All applicable filers will need to review the list to determine if they may have a potential conflict of interest that needs to be reported to the Authority. The Vendor List includes vendors receiving \$500.00 or more in the 2024 calendar year.

Employee Letter and Employee Email

The Authority notifies those required to file an in-house financial disclosure statement by both regular mail with a hard paper copy of all the necessary documents and by email with links to all the documentation necessary to complete the financial disclosure statement.

The Panel had no recommendations to change the employee letter and employee email.

Request for Approval of Financial Disclosure Packet

The Independent Ethics Panel and General Counsel agree recommending these changes to both the Governance Committee and the Board of Commissioners for the 2024 Financial Disclosure Packets to be distributed in April 2025.

MSC:mes

**ERIE COUNTY WATER AUTHORITY
AUTHORIZATION FORM
For Approval/Execution of Board Meeting Documents**

Document Name: _____ **Project No.:** _____

Description: _____

Item Description:

Choose one:

Other: _____

Action Requested:

Choose one:

Other: _____

Approvals Required:

APPROVED AS TO CONTENT:

Chief Financial Officer _____ Date: _____

Chief Operating Officer _____ Date: _____

Claims Rep. – Risk Manager _____ Date: _____

Comptroller _____ Date: _____

Director of Administration _____ Date: _____

Director of Distribution _____ Date: _____

Director of Human Resources _____ Date: _____

Director of IT _____ Date: _____

Director of Production _____ Date: _____

Director of Water Quality _____ Date: _____

Executive Engineer _____ Date: _____

General Counsel (Legal) _____ Date: 3/7/2025

Other: _____ Date: _____

APPROVED FOR BOARD RESOLUTION:

Secretary to the Authority  _____ Date: 3/11/25

Remarks: _____

Resolution Date: _____ **Item No:** _____

MINUTES and REPORT of the MEETING of the ERIE COUNTY WATER AUTHORITY'S INDEPENDENT ETHICS PANEL held in the first-floor conference room, 3030 Union Road, Cheektowaga, New York 14227 on the 11th day of February 2025.

**PRESENT: Raymond Herman, Ad hoc Member
Robert C. Freeman, Ad hoc Member
Anne Joynt, Ad hoc Member
Mark S. Carney, General Counsel
Mary Stepanik, Confidential Liaison**

CALL TO ORDER AT 9:14 a.m.

I.- ROLL CALL

ITEM 1-Election of IEP Chairperson

Motion by Robert Freeman and seconded by Anne Joynt to nominate and move to approve the election of Raymond Herman as Chairperson for the ensuing year.
Motion carried 3-0.

II. - READING OF MINUTES

Motion by Anne Joynt, seconded by Robert Freeman, to waive the reading of the Minutes of the Meeting held on July 2nd, 2024.
Motion carried 3-0.

III. - APPROVAL OF MINUTES

Motion by Anne Joynt, seconded by Robert Freeman to approve the Minutes of the Meeting held on July 2nd, 2024.
Motion carried 3-0.

IV. NEW BUSINESS

ITEM 1- Review and Discuss ECWA Financial Disclosure Statement form for Calendar Year 2024.

Discussion was had amongst the Panel, and it was determined the only change recommended and incorporated into the 2024 Financial Disclosure Form was the request for any corrections made by the employee on the form, be initialed. It was noted that the Panel has made edits in the past and believe the form is complete.

Motion by Raymond Herman and seconded by Anne Joynt to approve the financial disclosure statements with the updated changes to reflect the year of filing.
Motion carried 3-0.

ITEM 2- Review and Discuss the Code of Ethics & Conflicts of Interest Policy.

The Panel reviewed and discussed Policy 11, the Code of Ethics & Conflicts of Interest Policy. Discussion included the addition of new positions within the Authority that will be required to file a financial disclosure statement and are reflected in the Code of Ethics & Conflicts of Interest Policy. The three positions are: Director of Distribution (Water System), Director of Planning and Water Supply and Director of Production (Water System). The Board of Commissioner accepted the creation of these new positions and Amended the Code of Ethics & Conflict of Interest Policy on 12/19/2024. The Panel made no additional changes to the Code of Ethics & Conflicts of Interest Policy.

Motion by Robert Freeman and seconded by Raymond Herman to recommend no changes to the Code of Ethics & Conflicts of Interest Policy.
Motion carried 3-0.

ITEM 3- Review and Discuss the Authority's Whistleblower Policy.

The Panel reviewed and discussed Policy 16, the Whistleblower Policy. After discussion, it was determined that no changes would be recommended to the Policy.

Motion by Raymond Herman and seconded by Anne Joynt to recommend that no changes would be recommended to the Whistleblower Policy.
Motion carried 3-0.

ITEM 4- Review and Discuss the 2024 Vendor List

The 2024 Vendor List was reviewed and discussed amongst the Panel. Discussion included what vendors were included in the Vendor List. It was recognized that this list included vendors who paid more than \$500 in the calendar year 2024.

Motion by Robert Freeman and seconded by Raymond Herman recommend approval of the 2024 Vendor List.
Motion carried 3-0.

ITEM 5- Review and Discuss the Draft Employee Letter and Email to Employees.

The Panel reviewed and discussed the proposed employee letter and email sent out to notify employees of their obligation to file financial disclosure statements for 2024.

Motion by Anne Joynt and seconded by Robert Freeman to recommend the draft employee letter and email to employees with no applicable changes.
Motion carried 3-0.

ITEM 6- Discussion relating to new recommendations and report to the Authority's Board of Commissioners.

This item was previously discussed in Item 2

ITEM 7- Recommendations to Authority's Board of Commissioners.

The Panel discussed and agreed that the Board would receive recommendations in accordance with the above. The Confidential Liaison would send the IEP draft communications to the Chairperson of the Panel for his review prior to sending to Board.

ITEM 8- Set next meeting date

The Panel tentatively scheduled its next meeting for Tuesday, June 10, 2025, at 9:00 am in the first-floor conference room at the Service Center.

V. ADJOURNMENT

Motion to adjourn by Raymond Herman and seconded by Robert Freeman. Motion carried and meeting adjourned at 9:35 a.m.



Erie County Water Authority

295 Main Street • Room 350 • Buffalo, NY 14203-2494
716-849-8484 • Fax 716-849-8463

Independent Ethics Panel (IEP)

FINANCIAL DISCLOSURE STATEMENT For Calendar Year 2024

Name:

First

Middle

Last

Position:

Business Email:

Business Phone No:

Home Address:

Street

City

Zip

ACKNOWLEDGEMENTS

Please acknowledge the following statements by checking the appropriate boxes.

I hereby acknowledge receiving & reading a copy of Policy No. 11, entitled "Code of Ethics & Conflicts of Interest Policy" and Policy No. 16. "Whistleblower Protection Policy".

PLEASE NOTE: If you have any questions regarding Policy No. 11 you may email the Independent Ethics Panel (IEP@ecwa.org) or you may contact General Counsel, Mark S. Carney, at extension 8460 or by email at mcarney@ecwa.org.

I hereby acknowledge that I have complied with the provisions of Policy No. 11.

If you have not checked each box in this section, please give an explanation on page 6.

STANDARD OF CONDUCT

(ARTICLE II, § 3)

Please affirm the following statements by checking the appropriate boxes.

I affirm that I have endeavored and will endeavor to perform the duties of my position to the best of my ability and in a spirit of service to all persons and concerns for which the Erie County Water Authority ("ECWA") was created.

Name:

I affirm that I have upheld and will uphold the high standards of dedicated public service rendered over the years by ECWA members, officers and employees.

I affirm that I have supported and encouraged, and will support and encourage, my fellow employees in the proper execution of their duties.

I affirm that I will seek the advice of the Authority's General Counsel, or the members of the Independent Ethics Panel ("IEP") when I have a question of conduct or about the policy.

I affirm that I have not engaged in, and will not engage in, any conduct, at any time, which suggests or demonstrates I could be improperly or unduly, influenced to violate my public duty or the public trust.

I affirm and acknowledge my duty to immediately report to the Authority's General Counsel or to the IEP Chair gifts of any value, whether in the form of a promise or an offer to give money, services, a loan, or to provide lodgings, meals or entertainment.

I affirm that I have supported and will support the ECWA mission to the fullest, that I manage all matters within the scope of that mission independent of any other affiliations or employment, and that I strive to fulfill my professional responsibility to ECWA.

If you have not checked each box in this section, please give an explanation on page 7.

PROHIBITED CONDUCT

(ARTICLE II, § 4)

Please affirm the following statements by checking appropriate boxes.

PLEASE NOTE: You must review the Vendor List provided to you with this Financial Disclosure Statement before you complete the remaining sections of this form.

I affirm that I have **not**:

Directly or indirectly received any compensation or interest, financial or otherwise, or incurred any obligation, which would be a substantial conflict with the proper discharge of my duties.

Engaged in other employment that might impair the independence of my judgment in the execution of my ECWA duties.

Disclosed confidential information, acquired in the course of my official duties or used such confidential information to further a personal financial interest.

Name:

PLEASE NOTE: Personal financial interest means a financial interest benefiting you or an immediate family member. An immediate family member means any first-degree family member related by blood or marriage. First-degree family members mean parents, step-parents, children, step-children, and siblings, including half- and step-siblings

Directly or indirectly solicited, or accepted or received any gift, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment, or anything of value.

Arranged for the extension of credit or renewed an extension of credit in the form of a personal loan from the Authority.

Unless otherwise permitted by the Independent Ethics Panel or Ethics Committee, I affirm to the best of my knowledge:

No immediate family member has directly or indirectly solicited, accepted, or received any gift, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment, or anything of value.

Neither I nor any member of my immediate family has engaged in speculating or dealing in equipment, supplies or materials normally purchased by ECWA.

Neither I nor any member of my immediate family has borrowed money from ECWA, or any suppliers, significant commercial customers, individuals or firms with whom ECWA does business.

PLEASE NOTE: Loans or mortgages from banks or individuals doing business with the Authority are exempt if the terms are at current rates and the customary collateral for such transactions is provided.

Neither I nor any member of my immediate family has acquired an interest in real estate in which it is known that ECWA also has a current or anticipated interest.

Neither I nor any member of my immediate family has misused information to which I have had access by reason of my position – such as by disclosing confidential information of a technical, financial or business nature to others outside or inside ECWA regardless of whether such information was disclosed for my own interest or the interest of an immediate family member.

Neither I nor any member of my immediate family has solicited funds or other items of value from ECWA vendors, suppliers or consultants.

Neither I nor any member of my immediate family has served as an officer, director or manager with another company or business organization directly or indirectly doing business with ECWA without specific authorization from ECWA.

Name:

- Neither I nor any member of my immediate family legally represents, or exerts influence in favor of, a current or potential ECWA vendor including, but not limited to, assisting in the drafting of applications, plans or proposals for ECWA approval or submitting such applications, plans or proposals to ECWA.

If you have not checked each box in this section, please give an explanation on page 7.

**CONFLICTS OF INTEREST
(ARTICLE III § 3)**

PLEASE NOTE:

- The questions in this CONFLICT OF INTEREST section do not relate to a domestic or commercial ECWA water customer.
- Answer each question to the best of your knowledge after making a diligent inquiry of immediate family members.
- Any unanswered questions, will be treated as if you answered “Yes.”

Please check “Yes” or “No” to the following questions

YES NO

Do you or an immediate family member, have any ownership or investment interest in an entity with which ECWA does business or has entered into a transaction and/or business arrangement?

Are you or an immediate family member an officer, director, manager, consultant, volunteer, or an independent contractor of any entity or individual having business dealings with ECWA or having engaged in a transaction and/or business arrangement with ECWA?

Do you or an immediate family member hold any position with an entity or individual, doing business with ECWA or otherwise engaged in a transaction and/or business arrangement with ECWA?

Have you or an immediate family member accepted compensation from an entity with which, or individual with whom, ECWA has done any business or has engaged in a transaction and/or business arrangement?

Do you or an immediate family member, through business or investment, have a potential ownership or investment interest with an entity or individual, negotiating a transaction and/or business arrangement with ECWA?

Name:

YES NO

Do you or an immediate family member, through business or investment, have pending compensation arrangement with an entity or individual, negotiating a transaction and/or business arrangement with ECWA?

PLEASE NOTE:

- Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature.

- A personal financial interest is not necessarily a conflict of interest. No conflict of interest exists where a personal financial interest arises solely from an immediate family member that holds a clerical, ministerial or low-level management position with an existing or potential vendor, lacks the power to influence the relationship between the business and the Authority and did not obtain his or her position as a means to influence a member, ad hoc member, officer, or employee of the Authority.

- A person who has a personal financial interest may have a conflict of interest only if the Board determines that a conflict of interest exists pursuant to the enforcement and hearing procedures set forth in Article V, § 2 of Policy No. 11.

If you have answered “Yes” or failed to answer any question in this section, please give an explanation on page 7.

IF YOU ARE AN ATTORNEY LICENSED TO PRACTICE LAW IN THE STATE OF NEW YORK, PLEASE ANSWER THE FOLLOWING QUESTIONS:

YES NO

If you have a private practice, do you or any member of your firm, represent any county, city, town or village (i.e. municipal corporation), any Indian nation or tribe or any entity which conducts business with the Erie County Water Authority? If yes, please list which municipal corporation(s) and/or Indian nation(s) or tribe(s) you represent:

Name:

**NEPOTISM POLICY
(ARTICLE IV § 2)**

Please check “Yes” or “No” to the following questions

YES NO

Have any of your immediate family members worked for ECWA during the 2023 calendar year?

If you answered “Yes,” please answer the following:

YES NO

Did you have any role in approving or appointing an immediate family member to a position with ECWA?

Was the immediate family member appointed from a Civil Service list?

Do you directly supervise an immediate family member?

Is an immediate family member supervised by someone over whom you have direct or indirect supervision?

Does an immediate family member work in the same department as you?

Please list the names of any immediate family member who works or worked for ECWA in calendar year 2024.

ADDITIONAL INFORMATION

If necessary, you may attach additional pages

Acknowledgement Section:

Name:

Additional Ethical Concerns – Any other ethical issues/concerns not requested herein:

Standard of Conduct Section:

Prohibited Conduct Section:

Conflicts of Interest Section:

**ERIE COUNTY BOARD OF ETHICS
(ARTICLE VI§ 1)**

If you are a Commissioner, the Secretary of the Authority, the Chief Operating Officer, the Chief Financial Officer, General Counsel or Executive Engineer, please answer the following question.

Please check “Yes” or “No” to the following questions

YES NO

Have you filed with the Erie County Board of Ethics the Annual Statement of Financial Disclosure for the County of Erie for Calendar Year 2024?

Please indicate the date you filed:

Name:

Return this Financial Disclosure Statement by May 15, 2025.

I affirm, under penalty of perjury, all information in this financial disclosure statement is true to the best of my knowledge.

Date

Signature

Acknowledgment

I, _____, received the letter, dated April 1, 2025 from the Independent Ethics Panel (IEP), along with a copy of the 2024 ECWA Financial Disclosure Statement, Policy No. 16 (Whistle-blower Protection Policy, and Policy No. 11 (Code of Ethics & Conflicts of Interest Policy).

I affirm, under penalty of perjury, that I have reviewed and read the materials provided to me with this Acknowledgment.

Employee Signature _____ **Date** _____

Print Name: _____

ANY CHANGES MADE TO THIS FORM, MUST BE INITIALED BY APPLICANT.

For your convenience, this Financial Disclosure Statement may be filled out electronically but requires an original signature for submission. Please submit your statement in a sealed envelope to the Independent Ethics Panel, c/o Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203. Your name must be placed on the outside of the sealed envelope. All envelopes will be time-stamped when received. Envelopes will be open by members of the Independent Ethics Panel.

For IEP Use Only

Reviewed by: _____ Date Reviewed: _____ Needs Follow-Up: _____ Date Approved by IEP: _____

**ERIE COUNTY WATER AUTHORITY
HR Policies/Procedures**

**Re: CODE OF ETHICS &
CONFLICTS OF INTEREST
POLICY & PROCEDURES**

Policy No. 11

Application: All Employees

**Amended: 05/11/2006 01/21/2021
04/03/2008 03/25/2021
05/21/2009 10/20/2022¹
01/26/2012 09/20/2023
08/22/2013 02/22/2024
03/26/2019 12/19/2024
03/24/2020**

**ARTICLE I
DEFINITIONS**

Section 1 Definitions.

- (a) “Ad hoc member” means a committee member who is not a duly appointed Commissioner and who is appointed to serve as a non-voting committee member pursuant to the Authority’s By-laws.
- (b) “Authority” means the Erie County Water Authority.
- (c) “Board” means the Authority’s Board of Commissioners.
- (d) “Chief Operating Officer” means the individual whose position is defined under the job specifications for Executive Director.
- (e) “Code” means this Code of Ethics and Conflicts of Interest Policy.
- (f) “Employee” includes any Authority employee holding either a full-time position or a regular, part-time position.

- (g) “Ethics Committee” means a standing committee of the Board, as described in Article IV, section 4 of the Authority’s By-Laws.
- (h) “First-degree family members” mean parents, stepparents, children, step- children, and siblings, including half- and stepsiblings.
- (i) “General Counsel” means the individual whose position is defined under the job specifications for Attorney.
- (j) “Immediate family” means any first-degree family member related by blood or marriage.
- (k) “Interested Person” means any member, ad hoc member, officer, or employee who has a direct or indirect personal financial interest in any matter pending before the Authority.
- (l) “Independent Ethics Panel” or “IEP” means the entity whose powers are proscribed in Article VI, section 4, sub-section (e) of the Authority’s By- Laws.
- (m) “Members” mean the Authority’s Commissioners, duly appointed pursuant to Public Authorities Law § 1053(1).
- (n) “Officers” mean the Chair, Vice Chair and Treasurer and other officers as may be appointed pursuant to Public Authorities Law § 1053(3), including but not limited to the Secretary to the Authority.
- (o) “Personal financial interest” means a financial interest benefiting a member, ad hoc member, officer, or employee, and/or his/her immediate family.
- (p) “Personal loan” means a loan to the member, ad hoc member, officer, or employee, or member of his/her immediate family.

ARTICLE II CODE OF ETHICS

Section 1 Purpose.

As a public benefit corporation, the Authority must conduct its operations in a manner that best serves the interests of its customers and the public. Its mission is to provide the Authority's customers with a plentiful supply of safe, high quality and affordable drinking water through reliable infrastructure.

The Authority expects its members, ad hoc members, officers, and employees to observe high ethical standards of conduct in the performance of their duties, and in compliance with all laws and regulations governing the Authority's operation. This Code of Ethics shall serve as a guide for official conduct and is intended to enhance the ethical and professional performance of the Authority's members, ad hoc members, officers, and employees and to preserve the public confidence in the Authority's mission.

Section 2 Policy.

Members, ad hoc members, officers, and employees shall perform their duties with transparency and without favor and shall refrain from engaging in outside matters of personal financial interest or of personal interest, including other employment, which could impair their independence of judgment, or prevent the proper exercise of one's official duties.

This Code is in addition to all other laws, restrictions, standards, and provisions applicable to the conduct of the Authority's members, ad hoc members, officers, and employees.

Section 3 Standard of Conduct.

- (a) The Authority's members, ad hoc members, officers, and employees shall:
 - (1) Endeavor to perform the duties of their position to the best of their ability and in a spirit of service to all persons and concerns for which the Authority was created;
 - (2) Uphold the high standards of dedicated public service rendered over the years by Authority members, ad hoc

members, officers, and employees;

- (3) Support and encourage fellow employees in the proper execution of their duties;
 - (4) Address any question of conduct or regulation that may occur to either the Authority's General Counsel, or the Chair of the Independent Ethics Panel (IEP).
- (b) Members, ad hoc members, officers, and employees shall conduct themselves at all times in a manner that avoids an appearance that they can be improperly or unduly influenced, that they could be affected by the position of, or relationship with, any other party, or that they are acting in violation of the public trust.
- (c) Members, officers, and employees shall manage all matters within the scope of the Authority's mission independent of any other affiliations or employment. Members, including ad hoc members, officers, and employees shall strive to fulfill their professional responsibility to the Authority without bias and shall support the Authority's mission to the fullest.

Section 4 Prohibited Conduct.

- (a) The Authority's members, ad hoc members, officers, and employees shall not:
- (1) Directly or indirectly receive any compensation or interest, financial or otherwise, or incur any obligation, which would be a substantial conflict with the proper discharge of their duties with the Authority;
 - (2) Engage in other employment that might impair the independence of their judgment in the execution of their duties with the Authority;
 - (3) Disclose confidential information, acquired in the course of official duties, or use such confidential information to further personal financial interests;

- (4) Directly or indirectly solicit, accept, or receive any gift, whether in the form of a promise, money, services, a loan, lodging, meals, entertainment, or anything of value.
 - (5) Arrange for the extension of credit or renew an extension of credit in the form of a personal loan from the Authority.
- (b) Unless otherwise permitted by the IEP or the Ethics Committee, no immediate family member of a member, ad hoc member, officer, or employee may directly or indirectly solicit, accept, or receive any other items described in § 4(a)(4) of this Article.
- (c) Unless otherwise permitted by the IEP or the Ethics Committee, no member, ad hoc member, officer, employee nor an immediate family member of a member, ad hoc member, officer, or employee may engage in the following actions:
- (1) Speculating or dealing in equipment, supplies, or materials normally purchased by the Authority;
 - (2) Borrowing money from the Authority, suppliers, significant commercial customers, individuals, or firms with whom the Authority does business (loans or mortgages from banks or individuals doing business with the Authority are exempt if the terms are at current rates and the customary collateral for such transactions is provided);
 - (3) Acquiring an interest in real estate in which it is known that the Authority also has a current or anticipated interest;
 - (4) Misusing information to which the individual has access by reason of his or her position, including, but not limited to, disclosing confidential information (of a technical, financial, or business nature) to others outside or inside the business (whether or not a consideration is received), or using such information for one's own interest or the interest of an immediate family member;

- (5) Soliciting funds or other items of value from the Authority's vendors, suppliers, or consultants for self-interest or for the benefit of any other organization, club, or person, whether such other persons or entities are charitable, religious or profit-making;
 - (6) Serving as an officer, director, manager, consultant, volunteer, or an independent contractor with another company or business organization directly or indirectly related to the Authority without specific authorization from the Authority; and
 - (7) Legally representing or exerting influence in favor of a current or potential vendor, including but not limited to, assisting in the drafting of applications, plans or proposals for Authority approval or submitting such applications, plans or proposals to the Authority.
- (d) The prohibited actions and activities set forth in this section do not encompass every situation that may lead to a conflict of interest.

ARTICLE III CONFLICTS OF INTEREST POLICY

Section 1 Purpose.

- (a) The purpose of this Conflicts of Interest Policy is to protect the Authority's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a member, ad hoc member, officer, or employee of the Authority. This policy is intended to supplement, but not replace, any applicable state laws governing conflicts of interest applicable to the Authority.
- (b) A conflict of interest is just one example of a violation of ethical conduct. This policy is intended to complement the Authority's Code of Ethics by providing specific procedures to deal with conflicts of interest. To the extent that a matter falls within the scope of both this policy and the Authority's Code

of Ethics, the provisions of this Conflicts of Interest Policy shall govern.

Section 2 Prohibition against Conflicts.

- (a) Section 1068 of the New York Public Authorities Law sets forth the following requirements with respect to conflicts of interest:

It shall be a misdemeanor for any of the members of the authority, or any officer, agent, servant, or employee thereof, employed or appointed by them to be in any way or manner interested directly or indirectly in the furnishing of work, materials, supplies or labor, or in any contract therefor which the authority is empowered by this act to make.

- (b) In the event the Authority discovers a violation of the above provision, the Authority shall investigate and, if warranted, report the offense to the Inspector General of the State of New York.
- (c) This Conflicts of Interest Policy provides additional guidance regarding actual or potential conflicts of interest, including circumstances not within the scope of Public Authorities Law § 1068.

Section 3 Personal Financial Interest.

- (a) A person has a personal financial interest if the person has, directly or indirectly, through business, investment, or family:
- (1) an ownership or investment interest in, or employment with, any entity with which the Authority has a transaction or business arrangement; or
 - (2) a compensation arrangement with any entity or individual with which the Authority has a transaction or arrangement; or

- (3) a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Authority is negotiating a transaction or arrangement.
- (b) Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature.
- (c) A personal financial interest is not necessarily a conflict of interest. No conflict of interest exists where a personal financial interest arises solely from an immediate family member that holds a clerical, ministerial or low-level management position with an existing or potential vendor, lacks the power to influence the relationship between the business and the Authority and did not obtain his or her position as a means to influence a member, ad hoc member, officer, or employee of the Authority.
- (d) A person who has a personal financial interest may have a conflict of interest only if the Board determines that a conflict of interest exists pursuant to the enforcement and hearing procedures set forth in Article V, § 2 of this Code.

Section 4 Duty to Report.

- (a) A member, ad hoc member, officer, or employee must immediately report to the Authority's General Counsel or to the IEP Chair gifts of any value, whether in the form of a promise or an offer to give money, services, a loan, or to provide lodgings, meals, or entertainment.
- (b) An interested person must disclose the existence of his or her personal financial interest and all material facts surrounding the Financial Interest to the Authority's General Counsel and to the IEP.
- (c) If the Authority's General Counsel or the IEP have reasonable cause to believe an interested person has failed to disclose an actual or possible conflict of interest, they shall inform the interested person of the basis for such belief and afford him/her an opportunity to explain the alleged failure to disclose.

- (d) After disclosure of the personal financial interest, the General Counsel and the IEP will interview the interested person and conduct whatever investigation is warranted by the disclosure.
- (e) After exercising due diligence, the IEP will report its findings and recommendation to the Ethics Committee. The Ethics Committee will review such findings and recommendations. If the Ethics Committee determines further action should be taken, it will forward the matter to the Board.
- (f) If you are an attorney in private practice, you must disclose if you or any member of your practice represents any county, city, town or village (ie: municipal corporation), Indian nation or tribe or any entity which conducts business with the Erie County Water Authority.

Section 5 Standard of Review.

- (a) After exercising due diligence, if the Ethics Committee determines the Authority can obtain an equal or more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest, then it will forward the matter to the Board with its recommendation.
- (b) If the Ethics Committee determines an equal or more advantageous transaction or arrangement is not reasonably attainable under circumstances that would not give rise to a conflict of interest, then it will forward the matter for the Board to determine whether the transaction or arrangement should proceed or be terminated. A Board ruling to proceed shall include a determination that the transaction or arrangement is in the Authority's best interest, is done for its own benefit and is fair and reasonable to the Authority.

ARTICLE IV EMPLOYMENT RESTRICTIONS

Section 1 One-Year Moratorium.

- (a) No person who has served as a member, officer or employee of the Authority shall within a period of one year after the termination of such service or employment appear or practice before the Authority or receive compensation for any services rendered by the member, officer or employee through or on behalf of any person, firm, corporation or association in relation to any case or transaction with respect to which such person was directly concerned, or participated in, during the period of his or her service with the Authority.
- (b) Notwithstanding the foregoing, the one-year moratorium shall not apply to (i) normal business issues arising because of the person's status as a water customer of the Authority and (ii) professional services provided by such person pursuant to a written agreement with the Authority, to the extent such agreement is otherwise consistent with this Code of Ethics.

Section 2 Nepotism Policy.

- (a) In no event shall an immediate family member of a member be hired during the term of the member.
- (b) An immediate family member of an ad hoc member, officer, or employee may be considered for a permanent position only if all the following conditions are met:
 - (1) The ad hoc member, officer, or employee had no role in approving or appointing the immediate family member, pursuant to H.R. Policy No. 92 (Employment Policy and Procedures); and
 - (2) The immediate family member is an appointment from a Civil Service List; or
 - (3) There will be no supervisory relationship between the immediate family member and the related ad hoc member, officer, or employee, and the immediate family member and the related member, ad hoc member, officer, or employee will not work in the same department.

- (c) If current members, ad hoc members, officers, or employees marry, it may be necessary for the Authority to reassign one or both individuals, particularly in the case of close working, or direct supervisory relationships.
- (d) An immediate family member may be considered for summer or temporary employment only if all the following conditions are met:
 - (1) There will be no supervisory relationship between the immediate family member and the related ad hoc member, officer, or employee; and
 - (2) The immediate family member and the related ad hoc member, officer, or employee will not work in the same department.
- (e) In no event shall a related ad hoc member, officer, or employee participate in any decision to hire, promote, discipline, or discharge an immediate family member.
- (f) The effective date of this section is March 26, 2019. Immediate family members whose date of hire is before May 1, 2018, may continue in their current position or may be promoted despite the provisions set forth in this section.

ARTICLE V IMPLEMENTATION & ENFORCEMENT

Section 1 Distribution.

The Code shall be reviewed annually by the Board and posted on the Authority's website. All members, ad hoc members, officers, and employees shall be given a copy of this Code upon appointment or commencement of employment and thereafter annually.

Section 2 IEP & Ethics Committee.

- (a) The Board designates the ad hoc members of the IEP as its Ethics

Officers, who shall report to the Ethics Committee and Board.

- (b) The Ethics Committee shall prepare, review, update, and approve financial disclosure statements to be filed by members, ad hoc members, officers, and designated employees with the IEP.
- (c) The IEP shall have the following duties:
 - (1) Interpret and make recommendations regarding any questions or purported violations of this Code and any statutory ethical standards affecting members, ad hoc members, officers, employees or their immediate family;
 - (2) Counsel in confidence all members, ad hoc members, officers, employees, and their immediate family, who seek advice about ethical behavior;
 - (3) Receive and investigate complaints about possible conflicts of interest and ethics violations;
 - (4) Recommend the dismissal of any complaint found to be without substance;
 - (5) Prepare an investigation report of its findings and recommendations for the Ethics Committee to consider and to recommend such further action be taken by the Board;
 - (6) Record the receipts of gifts or gratuities of any kind, received by any member, ad hoc member, officer, employee, or immediate family member, who shall notify the IEP within 48 hours of receipt of such gifts and gratuities.
- (d) Any reports or recommendations made by the IEP must list those ad hoc members who concur or dissent with the report or recommendation.
- (e) Members, ad hoc members, officers, and employees are

required to report possible unethical behavior by a member, ad hoc member, officer, or employee to the IEP and the Authority's General Counsel. Such a complaint may be filed anonymously and protects the reporting member, ad hoc member, officer, or employee from retaliation. Any form of retaliation is prohibited under this Code and constitutes an ethical violation of this Code.

- (f) At its discretion, the Ethics Committee may recommend to the Board appropriate disciplinary action, which may include, but is not limited to, a reprimand, suspension, or termination. No disciplinary action may be taken without affording the person due process to be heard and to respond to the complaint of unethical behavior. This hearing may also be subject to the applicable provisions, if any, of Civil Service Law § 75 or any applicable provisions of a collective bargaining agreement.

Section 3 Records of Proceedings.

The IEP shall keep records of all proceedings, including:

- (a) Names of the persons who disclosed or otherwise were found to have a personal financial interest in connection with an actual or possible conflict of interest, the nature of the personal financial interest, any action taken to determine whether a conflict of interest was present, and the Board's ruling, if any, as to whether a conflict of interest in fact existed.
- (b) Names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken, or written rulings made in connection with the matter.

ARTICLE VI FINANCIAL DISCLOSURE STATEMENTS

Section 1 Erie County Board of Ethics.

- (a) Pursuant to Public Authorities Law § 2825 (3) and Article 18 of the General Municipal Law, members, officers, and

designated employees must file an annual financial disclosure statement with the Erie County Board of Ethics on or before the fifteenth day of May with respect to the preceding calendar year.

- (b) A member, officer, or designated employee who has timely filed an application for automatic six-month extension with the Internal Revenue Service (“IRS”) may file a supplemental statement of financial disclosure seven days after the expiration of the six-month automatic extension with the IRS. This six-month extension does not extend the May 15th deadline but does allow an individual to file a supplemental financial statement, correcting any representations made in the initial financial statement.
- (c) The following members, officers, and employees are required to file annual disclosure statements with the Erie County Board of Ethics: Commissioners, the Secretary of the Authority, the Chief Operating Officer, the Chief Financial Officer, the General Counsel, and Executive Engineer.
- (d) The following members, officers, and employees are required to file an Employee Disclosure Form with the Erie County Board of Ethics within ten (10) days of appointment: Commissioners, the Secretary of the Authority, the Chief Operating Officer, the Chief Financial Officer, the General Counsel, and Executive Engineer.

Section 2 In-House Financial Disclosure Statements.

- (a) The members, ad hoc members, officers, and designated employees are required to file an in-house financial disclosure statement with the Authority’s IEP within ten (10) days of appointment or commencement of employment and thereafter annually.
- (b) In-house financial disclosure statements shall be filed by all members, all employees holding an “exempt” job title, and other employees holding certain job titles:
 - (1) Exempt Job Titles

- i. Associate Attorney;
- ii. Associate Attorney RPT;
- iii. Chief Financial Officer;
- iv. Chief Operating Officer;
- v. Comptroller;
- vi. Comptroller (Part time);
- vii. General Counsel;
- viii. Executive Engineer;
- ix. Secretary to the Authority;
- x. Senior Associate Attorney

(2) Designated Job Titles

- i. Administrative Assistant;
- ii. Assistant Business Office Manager;
- iii. Assistant Manager of Accounting Services;
- iv. Automotive Mechanic Crew Chief;
- v. Business Office Manager;
- vi. Cash Manager;
- vii. Chemist and Chief Water Treatment Plant Operator;
- viii. Chief Business Officer Manager Budget Director;
- ix. Chief Customer Service Representative;
- x. Chief Instrument and Control System Specialist;
- xi. Claims Representative Risk Manager;
- xii. Construction Inspector;
- xiii. Coordinator of Employee Relations;
- xiv. Deputy Administrative Director;
- xv. Deputy Associate Attorney;
- xvi. Deputy Director/Chief Financial Officer;
- xvii. Director of Administration;
- xxviii. Director of Cybersecurity and Information Technology;
- xix. Director of Distribution (Water System);
- xx. Director of Employee Relations;
- xxi. Director of Equal Employment Opportunity (ECWA);
- xxii. Director of Human Resources;
- xxiii. Director of Planning and Water Supply;
- xxiv. Director of Production (Water System);
- xxv. Director of Purchasing & Inventory Management;
- xxvi. Director of Operations;
- xxvii. Director of Water Quality;
- xxviii. Distribution Engineer;
- xxix. Electrical Engineer;
- xxx. Employee Benefits Specialist;
- xxxi. Manager of Accounting Services;
- xxxii. Municipal Liaison ECWA (Part time);
- xxxiii. Production Engineer;

- xxxiv. Production Technician;
- xxxv. Security Officer (ECWA);
- xxxvi. Senior Distribution Engineer;
- xxxvii. Senior Micro Technical Support Specialist (ECWA);
- xxxviii. Senior Production Engineer;
- xxxix. Senior Stores Clerk;
 - xl. Any Authority personnel overseeing a bid opening; and
 - xli. Any other position designated by Board resolution.

- (c) The General Counsel or the Independent Ethics Panel may direct any other employee who procures goods and services on the Authority's behalf to file a financial disclosure statement.
- (d) All members, ad hoc members, officers, and designated employees have the ongoing obligation to immediately report any conflict of interest that may arise for them or for any of their immediate family members.
- (e) Members, ad hoc members, officers, and designated employees must annually file an in-house financial disclosure statement with the IEP on or before the fifteenth day of May with respect to the preceding calendar year. In-house financial disclosure statements shall be placed in a sealed envelope and addressed to the Independent Ethics Panel, c/o Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203.
- (f) The Authority shall retain all in-house financial disclosure statements for a period of seven years from the required filing date.

**ERIE COUNTY WATER AUTHORITY
HR Policies/Procedures**

Re: WHISTLEBLOWER PROTECTION POLICY & PROCEDURES **Policy No. 16**

Application: All Employees

**Amended: 01/26/2012
03/24/2020
10/20/2022¹
09/20/2023**

PURPOSE

The Erie County Water Authority requires members, ad hoc members, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Authority, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

As part of our ethical responsibility, any alleged corruption, fraud, criminal or unethical activity, misconduct, waste, conflict of interest, intentional reporting of false or misleading information, or abuse of authority engaged in by an Authority Employee (as defined herein) that relates to the Authority shall be reported to the appropriate individuals as set forth herein.

POLICY

Section 1 Reporting Responsibility.

It is the responsibility of all members, ad hoc members, officers, and employees to comply with Policy No. 11 Code of Ethics & Conflict of Interest Policy and to report violations or suspected violations in accordance with this Whistleblower Protection Policy.

Section 2 No Retaliation.

No member, ad hoc member, officer, or employee who in good faith reports a violation of Policy No. 11 Code of Ethics & Conflict of Interest Policy shall suffer harassment,

¹ This Whistleblower Protection Policy & Procedures restates and replaces H.R. Policy No. 16.0 (Whistleblower Protection Policy).

retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns within the Authority prior to seeking resolution outside the Authority.

Section 3 Reporting Violations.

All Authority Employees who discover or have knowledge of potential wrongdoing concerning board members, ad hoc members, officers, or employees of this Authority; or a person having business dealings with the Authority; or concerning the Authority itself, shall report such activity in accordance with the following procedures:

- (a) The Authority Employee shall disclose any information concerning wrongdoing either orally or in a written report to his or her supervisor, or to the Authority's General Counsel, the Director of Human Resources, or any member of the Independent Ethics Panel.
- (b) All Authority Employees who discover or have knowledge of wrongdoing shall report such wrongdoing in a prompt and timely manner.
- (c) The identity of the whistleblower and the substance of his or her allegations will be kept confidential to the best extent possible.
- (d) Any report of potential wrongdoing shall be investigated and handled in a timely and reasonable manner, which may include referring such information to the Authorities Budget Office or an appropriate law enforcement agency where applicable.
- (e) Should an Authority Employee believe in good faith that disclosing information within the Authority pursuant to Section 3(a) above would subject him or her to adverse personnel action or be ineffective, the Authority Employee may instead disclose the information to the Authorities Budget Office or an appropriate law enforcement agency, if applicable. The Authorities Budget Office's toll-free number (1-800-560-1770) should be used in such circumstances.

Section 4 Compliance Officials.

The Office of the Secretary and the Independent Ethics Panel with assistance from the Authority's Legal Department are responsible for investigating and resolving all reported complaints and allegations concerning violations of Policy No. 11 Code of Ethics & Conflict of Interest Policy and will report, on a confidential basis, all allegations to the Board of Commissioners (the "Board"). The Board has the authority to provide funds for investigations as required.

Section 5 Acting in Good Faith.

Information concerning potential wrongdoing is disclosed in “good faith” when the individual making the disclosure reasonably believes such information to be true and reasonably believes that it constitutes potential wrongdoing.

Section 6 Confidentiality.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Section 7 Handling of Reported Violations.

The Authority’s General Counsel, the Director of Human Resources, a supervisor, or any member of the Independent Ethics Panel to whom notice of the reported violation or suspected violation was given will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Section 8 Employees.

All board members, and officers and staff employed at the Authority whether full-time, part-time, employed pursuant to contract, employees on probation and temporary employees and former employees shall be considered employees for the purposes of applicability of this policy.

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V7867	716 SITE CONTRACTING, INC.	137,611.45
V0095	ABC LOCKSMITH SERVICE, INC.	2,000.82
V3380	ACR OF WNY, INC.	2,007.09
V3389	AD SPECIALTY SOLUTIONS, LLC	957.50
V3352	ADIRONDACK ENVIRONMENTAL SERVICES, INC.	1,331.10
V3216	ADMAR SUPPLY CO INC	7,573.23
V4330	ADVANCED ANALYTICAL SOLUTIONS, LLC	25,417.00
V3427	AEGEUS INSPECTION SOLUTIONS, INC.	7,252.25
V8737	AIRGAS USA, LLC	4,465.59
V4481	ALEXANDER CHEMICAL CORPORATION	1,001,252.66
V2238	ALLEGION ACCESS TECHNOLOGIES, LLC.	1,471.15
V3287	ALLSTATE INSURANCE COMPANY	4,246.49
V3404	ALP STEEL CORP.	8,388.50
V4232	ALRO STEEL CORPORATION	2,442.60
V8444	ALTA CONSTRUCTION EQUIPMENT NEW YORK LLC	36,528.62
V3398	AMAZON.COM	33,177.25
V4325	AMERICAN CONTRACTING & ENVIRONMENTAL INC	10,676,189.45
V3219	AMERICAN ROCK SALT COMPANY, LLC	2,969.70
V0022	AMERICAN WATER WORKS ASSOCIATION	25,605.00
V3277	AMSTAR OF WESTERN NEW YORK,INC.	1,848,023.97
V0445	ANALYTICAL WEST, INC.	760.00
V1681	ANDERSON EQUIPMENT COMPANY	13,696.15
V0182	APPLIED INDUSTRIAL TECHNOLOGIES, INC.	12,657.67
V3332	APPLIED SPECIALTIES INC	1,486.80
V3407	ARCADIS U.S.,INC.	1,600,516.07
V3172	ASHLAND PEST CONTROL, INC.	2,290.00
V0081	ASSOCIATION OF METROPOLITAN WATER AGENCI	12,700.00
V3256	ATLAS PAINTING & SHEETING CORP	325,155.00
V2241	ATLAS-SSI, INC.	556.00
V3238	AUTOMATECH INC - GE FANUC	41,122.52
V3093	AUTOMATED BUSINESS FORMS	525.00
V4425	AYYEKA, INC.	79,100.80
V3409	AZTECA SYSTEMS, INC.	98,280.00
V3443	AZUGA, INC.	11,866.53
V3971	B&H PHOTO-VIDEO	52,336.17
V3851	BACH'S TOWING, LLC	1,666.10
V0221	BARBERS CHEMICALS, INC.	1,415.70
V3959	BARCLAY DAMON, LLP	62,283.34
V3790	BARTON & LONGUIDICE	13,767.50
V0289	BASIL FORD INC (QUICK LANE TIRE & AUTO)	47,557.33
V0111	BEE PUBLICATIONS, INC	5,661.75
V4584	BENCH STRENGTH PARTNERS, INC.	6,169.40
V0115	BIEL'S INFORMATION TECHNOLOGY SYSTEMS	631.87
V3657	BISON LABORATORIES, INC..	40,410.00
V3699	BLACKBURN MANUFACTURING, CO.	5,099.00
V0155	BLAIR SUPPLY CORPORATION	62,105.45
V2232	BOB JOHNSON WEST	90,094.16
V4237	BROWN AND CALDWELL	323,390.32
V0298	BUFFALO & PITTSBURGH RAILROAD, INC	19,896.00
V0220	BUFFALO BUSINESS FIRST	562.85

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V9317	BUFFALO LIFT TRUCKS	604.00
V0313	BUFFALO WATER	127,649.48
V8432	CALERO SOFTWARE, LLC	964.11
V2534	CAMPIONE SAFETY	19,894.75
V0467	CARASOFT TECHNOLOGY CORPORATION	10,324.00
V0446	CARDMEMBER SERVICE	3,642.93
V8641	CARUS CORPORATION	6,932.52
V2819	CASULLOS AUTOMOTIVE	5,432.40
V2593	CATCO	2,609,021.54
V2532	CDW GOVERNMENT	75,206.55
V4587	CENTRAL POLY-BAG CORP.	798.00
V1267	CERTSTAFFIX TRAINING	9,095.00
V2821	CHA CONSULTING, INC.	122,192.31
V1107	CHEMTRAC, LLC.	2,555.00
V0494	CHILD & FAMILY SERVICES	4,320.00
V2604	CINTAS CORPORATION	28,507.61
V6479	CITY OF LACKAWANNA	43,255.00
V8498	CITY OF TONAWANDA	186,585.60
V8814	CLEARVIEW MAINTENANCE CORP.	3,240.00
V2292	CLEVE-HILL TIRE BDC	8,217.96
V0322	COMMERCIAL PIPE & SUPPLY CORP	7,921.05
V2233	CONSILIO, INC.	919.90
V2229	COOK'S DIRECT, INC.	8,208.59
V7962	CORE & MAIN LP	241,955.46
V4499	CORRPRO COMPANIES, INC.	9,997.29
V0347	COUNTY LINE STONE CO., INC,	489,025.77
V2454	COUNTY OF ERIE COMPTROLLER	19,672.20
V8631	CSEA EMPLOYEE BENEFIT FUND	136,764.06
V0331	CSI GROUP, LLC - CORP SCREENING & INVEST	7,566.20
V0427	CSX TRANSPORTATION	1,230.11
V4880	DADSWELL SERVICE INC	575.00
V0528	DELACY FORD INC	369,717.45
V4799	DELL MARKETING L.P.	19,098.35
V4731	DELTA SONIC CARWASH SYSTEMS, INC.	1,260.00
V4811	DIDONATO ASSOCIATES PE PC	19,148.20
V4376	DIGITAL SURVEILLANCE SOLUTIONS, INC.	5,054.01
V0520	DIVAL SAFETY EQUIPMENT INC.	49,582.26
V4456	DJM CONTRACTING, INC.	296,864.50
V4821	DLT SOLUTIONS, LLC	8,074.46
V4452	DN TANKS, LLC.	2,597,958.15
V0508	DOBMEIER JANITOR SUPPLY INC	1,152.70
V4844	DRESCHER & MALECKI, LLP	38,239.00
V0700	E & R GENERAL CONSTRUCTION, INC.	3,632,000.85
V2134	E.H. WACHS	11,740.98
V2405	E3 COMMUNICATIONS, INC.	159,008.68
V2422	EASTCOM ASSOCIATES, INC.	6,810.00
V5187	EATON CORPORATION	17,587.74
V4590	EL-DON BATTERY POST AND GOLF CART CENTER	816.00
V5189	EL-DON BATTERY POST INC	16,314.00
V2261	ELLEN ZIEGLER	4,920.00

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V1903	ELLICOTT GROUP, LLC	271,906.57
V5042	EMERSON LLLP	7,656.09
V4419	ENVIRO SAFETY PRODUCTS	3,747.76
V2412	ENVIRONMENTAL PROTECTION AGENCY	12,700.00
V5102	ENVIRONMENTAL SYSTEMS RESEARCH INST INC	69,491.55
V4248	EPLUS TECHNOLOGY INC	353,373.01
V0615	ERB CO., INC.	4,616.00
V5185	ERIE COUNTY DEPT OF PUBLIC WORKS	2,318,288.75
V5198	ERIE COUNTY DEPT OF PUBLIC WORKS	706,665.89
V2474	ESC ENVIRONMENTAL	65,559.42
V6880	EUROFINS EATON ANALYTICAL, LLC.	2,682.00
V2445	EVANS ACE HARDWARE	671.34
V0671	E-Z PASS NEW YORK	3,600.00
V4435	F & F INDUSTRIAL EQUIPMENT CORP.	619.00
V8310	F.W. WEBB CO. -WATERWORKS	917.19
V0786	FASTENAL COMPANY	77,297.27
V0740	FEDEX	2,122.33
V5300	FELLING TRAILERS INC	637.04
V5279	FERGUSON ELECTRIC, INC.	689,533.56
V4222	FERGUSON WATERWORKS	243,205.83
V5350	FERRELLGAS LP	1,285.91
V3063	FERRY INC	1,204.32
V5357	FILTREC CORPORATION	1,203.96
V0708	FISHER SCIENTIFIC COMPANY	32,956.95
V1318	FIVE STAR EQUIPMENT, INC.	33,045.30
V2015	FLEETPRIDE (UNIVERSAL JOINT SALES CO INC)	745.66
V0721	FLUID KINETICS, INC.	83,977.86
V5228	FM COMMUNICATIONS, INC.	13,956.77
V3054	FORTRA, LLC.	26,186.89
V0723	FREDERICK MACHINE REPAIR INC	72,892.09
V5376	FREY HEAVY DUTY	3,211.23
V5427	GALLAGHER PRINTING INC	567.00
V5588	GEITER DONE OF WNY, INC.	180,488.47
V5702	GENESEE VALLEY FORD,LLC	98,200.38
V5577	GHD CONSULTING ENGINEERS, LLC.	333,850.01
V4368	GLASS AMERICA LLC	704.53
V5591	GLOBAL INDUSTRIAL	4,663.67
V5697	GLOBAL SIGNAL ACQUISITIONS LLC	9,600.68
V0838	GOODYEAR SERVICE STORES	37,569.05
V5462	GOVERNMENT FINANCE OFFICERS ASSOCIATION	740.00
V0815	GRAINGER	261,665.19
V0819	GRAYBAR ELECTRIC COMPANY, INC.	59,232.98
V5565	GREATER NIAGARA MECHANICAL INC	246,288.89
V4385	GREEN MOUNTAIN ELECTRIC SUPPLY INC.	12,039.87
V5536	GREENMAN - PEDERSON, INC.	386,730.84
V0817	GROVE ROOFING SERVICES, INC.	7,706.39
V5562	GZA GEOENVIRONMENTAL OF NEW YORK	164,055.46
V4363	H.R. DILS SALES & SERVICE INC.	4,581.20
V0934	HACH COMPANY	186,968.21
V4409	HAMBURG FLOOR COVERING, INC.	12,908.28

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V7042	HANES SUPPLY, INC.	15,962.38
V7945	HARRINGTON INDUSTRIAL PLASTICS, LLC.	2,661.43
V0990	HARRIS BEACH PLLC	168,142.70
V0989	HAZEN AND SAWYER	462,241.12
V7045	HEALTHWORKS-WNY, LLP	34,434.15
V7135	HERC RENTALS, INC.	22,942.00
V4351	HI-TEC COMPUTER POWER, INC.	26,847.92
V4277	HJS SUPPLY CO.	4,687.25
V7136	HODGSON RUSS ATTORNEYS LLP	18,855.00
V7067	HOHL INDUSTRIAL SERVICES INC	705,945.42
V2306	HRRG	731.40
V0447	HUNT ENGINEERS, ARCHITECTS & SURVEYORS	47,099.50
V1057	HUNT UNDERWATER SPECIALITIES, LLC.	9,999.00
V5822	IDEXX DISTRIBUTION INC.	70,878.63
V1063	INFRAPLAN, LLC.	231,226.37
V5938	INGENIOUS, INC.	1,092.50
V5876	INNER-TITE CORP	6,600.00
V4364	INNOMOTICS, LLC.	65,860.86
V5905	IRON MOUNTAIN INFORMATION MANAGEMENT INC	17,739.74
V5936	IRTH SOLUTIONS, LLC	13,561.67
V4469	J. O'CONNELL & ASSOCIATES, INC.	48,200.00
V6069	JACKSON WELDING & GAS PRODUCTS	5,115.88
V0472	JAMES J CONNORS	9,639.10
V5131	JAMES M ELARDO	10,202.40
V1056	JAMESTOWN COMMUNITY COLLEGE	9,495.00
V3666	JANNE L BATTAGLIA	9,515.67
V1053	JCI JONES CHEMICALS, INC.	257,161.76
V7693	JEFFREY R SYLVESTER	8,000.00
V4288	JM DAVIDSON ENGINEERING, D.P.C.	72,364.00
V4278	JOBENA CORPORATION	1,292.00
V0255	JOE BASIL CHEVROLET, INC.	20,139.35
V4867	JOHN DEERE COMPANY	3,202.10
V4589	JOHN G. SCRIANDRA	4,693.92
V0577	JOHN W. DANFORTH COMPANY	1,725,643.65
V4931	JOHNSON CONTROLS	67,866.36
V1062	JOHNSON CONTROLS, INC	49,321.16
V1101	K & S CONTRACTORS SUPPLY, INC.	383,012.17
V6126	KAMINSKI & SONS TRUCK EQUIPMENT	7,088.75
V1121	KANDEY COMPANY, INC.	1,260,456.69
V6208	KANTOLA PRODUCTIONS, LLC.	6,311.25
V6002	KAREN L. BYRNE	8,000.00
V6209	KEMIRA WATER SOLUTIONS INC	795,587.82
V6205	KENWORTH NORTHEAST GROUP, INC.	363,627.11
V6200	KEYBANK NATIONAL ASSOCIATION	37,478.71
V6190	KINSLEY POWER SYSTEMS	23,488.60
V6114	KOESTER ASSOCIATES INC.	47,173.05
V0462	KOOLTRONIC, INC.	5,734.60
V1158	KRACKELER SCIENTIFIC, INC	5,449.11
V6162	KRAVITCH MACHINE COMPANY	7,155.90
V1138	KURK FUEL COMPANY	252,951.31

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V1254	LABELLA ASSOCIATES DPC	539,926.31
V6449	LABOR-MANAGEMENT HEALTHCARE FUND	5,786,380.57
V4494	LANDPRO EQUIPMENT, LLC	1,914.09
V1221	LAWLEY SERVICE INC	1,602,962.02
V6245	LAWSON PRODUCTS, INC.	6,265.88
V6493	LEDGE CREEK DEVELOPMENT, INC.	598,208.06
V4580	LEE ENTERPRISES, INC.	7,780.42
V1326	LINDE GAS & EQUIPMENT, INC.	518.17
V3355	LINEAGE	562.44
V4944	LIPPES MATHIAS, LLP.	3,300.00
V1214	LOCK CITY SUPPLY INC	13,592.00
V6453	LOWES COMPANIES INC	12,114.74
V1358	MANUFACTURERS & TRADERS TRUST COMPANY	10,500.00
V2832	MARK CERRONE, INC.	1,424,230.88
V6990	MASIELLO, MARTUCCI & ASSOCIATES	60,000.00
V6513	MATRIX IMAGING SOLUTIONS, LLC.	79,379.55
V6804	MCCARTHY TIRE SERVICE, CO.	5,192.21
V1299	MCKAYS CLOTHING & EMBROIDERY	2,695.00
V6996	METRO CONTRACTING & ENVIRONMENTAL INC	35,947.63
V6721	MICRO MOTION INC.	25,610.41
V4315	MICRO STRATEGIES, INC.	3,793.71
V6642	MIDCITY OFFICE FURN-NIGHTINGALE/ALLSTEEL	1,620.01
V6811	MIDWAY INDUSTRIAL SUPPLY	5,134.80
V4908	MILTON-CAT	164,184.93
V6752	MKS PLUMBING CORP.	8,697.09
V6666	MODERN DISPOSAL SERVICES, INC.	55,300.38
V6505	MOHAWK, LTD.	7,422.76
V1102	MOTION AI	125,127.35
V6887	MOTION INDUSTRIES, INC.	2,016.78
V6864	MSC INDUSTRIAL SUPPLY CO, INC.	42,838.14
V0856	NAPA AUTO PARTS - GENUINE PARTS COMPANY	4,165.83
V1401	NATIONAL FUEL GAS CORPORATION	153,997.32
V8506	NATIONAL OVERHEAD DOOR INC	20,747.09
V1415	NATIONALGRID	949,381.37
V1403	NEPTUNE TECHNOLOGY GROUP INC	1,475,177.40
V4512	NEW FRONTIER EXCAVATING & PAVING, INC	2,172,072.50
V1461	NEW YORK SECTION AWWA	6,710.00
V1410	NEW YORK STATE DEPT OF ENVIRONMENTAL	5,157.72
V1407	NEW YORK STATE ELECTRIC & GAS CORP	499,026.49
V4304	NEW YORK STATE FENCE INC	7,523.16
V1795	NEW YORK STATE INSURANCE FUND	8,176.42
V8054	NEW YORK STATE THRUWAY AUTHORITY	3,100.00
V8549	NIAGARA COATINGS SERVICES, INC.	107,475.46
V8588	NIAGARA SCIENTIFIC PRODUCTS	4,159.62
V4574	NIAGARA TRUCK EQUIPMENT	2,116.59
V8093	NIBSCO AUTOMATION, INC.	905.00
V1494	NOCO ENERGY CORP	169,788.74
V1445	NORTH STAR SUPPLY CO INC	1,558.58
V4509	NORTHEAST BATTERY & ALTERNATOR, LLC.	1,925.00
V1424	NUSSBAUMER & CLARKE, INC.	148,915.40

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V1408	NYS & LOCAL EMPLOYEES RETIREMENT SYSTEM	3,571,886.88
V8524	NYS INDUSTRIES FOR THE DISABLED, INC.	428,582.07
V1430	NYS UNEMPLOYMENT INSURANCE	7,469.31
V1049	NYSPSP	776.47
V5658	O'CONNELL ELECTRIC CO, INC	2,249,619.79
V5667	ODP BUSINESS SOLUTIONS (OFFICE DEPOT)	1,676.42
V4299	ONSOLVE LLC	23,460.00
V1546	ORFFEO PRINTING & IMAGING, INC.	1,249.50
V5676	OSC EQUIPMENT SERVICES INC	63,550.00
V4138	P&A ADMINISTRATIVE SERVICES, INC.	2,460.10
V2244	PATTERSON PUMP COMPANY	22,115.96
V4284	PEAK SCIENTIFIC, INC.	5,494.21
V4471	PERMA	2,059,790.00
V1610	PERTECH	68,429.87
V4475	PHAROS MARINE AUTOMATIC POWER LOUISIANA	1,614.00
V4407	PHILADELPHIA INSURANCE COMPANIES	15,000.00
V1586	PHILIPPS BROS. SUPPLY INC.	23,263.90
V7154	PHILLIPS LYTLE, LLP	4,480.00
V1557	PITNEY BOWES, INC.	32,795.54
V1559	POLLARDWATER	19,109.18
V1580	POSTMASTER BUFFALO NEW YORK	6,341.63
V2243	PPG ARCHITECTURAL FINISHES, INC.	2,828.61
V7189	PRECISION SCALE & BALANCE	6,872.00
V4490	PREMIUM PARKING OF BUFFALO, LLC.	5,457.93
V1593	PRENTICE OFFICE ENVIRONMENTS	2,685.00
V6907	PROCESS CONTROL, INC.	965.36
V4427	PROFOUND LOGIC SOFTWARE, INC.	86,315.62
V0169	PVS NOLWOOD CHEMICALS, INC.	309,221.09
V9308	R.C. FIRE EQUIPMENT, INC.	2,435.85
V1666	R.M. HEADLEE CO., INC	3,181.81
V7226	RAFTELIS ENVIRONMENTAL CONSULTING GROUP	49,011.25
V7319	RAZ-LEE SECURITY	11,961.00
V5046	RED WING SHOES	3,032.95
V7133	REGIONAL INTERNATIONAL OF WNY INC	6,485.24
V7249	REXEL INC.	11,341.95
V8096	RICOH USA, INC.	6,720.58
V5055	RITEC	78,420.21
V7332	RMF PRINT MANAGEMENT GROUP INC	2,677.50
V1671	ROSS VALVE MANUFACTURING CO INC	49,848.21
V7320	ROUTE 5 BOOTS & SHOES	10,471.55
V3254	RS AMERICAS, INC.	3,750.52
V1683	RUSINIAKS SERVICE INC	3,517.50
V7286	RUSSO DEVELOPMENT INC	3,684,624.40
V7854	SAFE DRIVER ACADEMY	2,223.00
V4988	SAF-GARD SAFETY SHOE COMPANY	10,145.50
V4900	SAMPO	1,325.00
V1751	SCHAEFER PLUMBING SUPPLY CO., INC.	739.80
V0876	SEASONAL LAWN CARE, INC.	1,452.90
V0287	SECURITAS TECHNOLOGY CORPORATION	37,502.00
V4485	SEL ENGINEERING SERVICES, INC.	79,820.00

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V7560	SHANOR ELECTRIC SUPPLY COMPANY, INC.	20,681.80
V4992	SHI INTERNATIONAL CORP.	75,776.52
V1858	SIEWERT EQUIPMENT COMPANY, INC.	58,133.18
V8164	SIMCONA ELECTRONICS CORP	4,392.13
V4963	SIMMERS CRANE DESIGN & SERVICES CO.	19,752.33
V4968	SIRIUS COMPUTER SOLUTIONS INC	425,045.98
V7624	SKILLPATH SEMINARS INC	1,046.00
V7864	SKYWORKS, LLC	3,954.00
V4953	SLACK CHEMICAL COMPANY INC	15,237.77
V1763	SNAP-ON TOOLS CORPORATION	6,240.29
V4588	SOFTCHOICE CORPORATION	14,850.00
V4426	SOUTHSIDE TRAILER SERVICE, INC.	2,303.48
V7873	SOUTHTOWN SUPPLY INC.	13,890.00
V1768	STAPLES BUSINESS ADVANTAGE	13,068.23
V1473	STATE OF NEW YORK DEPARTMENT OF HEALTH	8,141.44
V7833	STC CONSTRUCTION INC	190,946.46
V7816	STEELCASE	2,990.11
V3690	STEPHEN BATTAGLIA	8,000.00
V4542	STEVEN NOYES	8,000.00
V1922	STRAIT-O-FLEX CORPORATION	2,530.00
V7880	SUBCARRIER COMMUNICATIONS INC.	21,745.08
V1787	SUNOCO CREDIT CARD CENTER	9,259.53
V1853	SUPERIOR LUBRICANTS CO. INC.	1,193.21
V4399	SYSTEMS PERSONNEL, INC.	16,404.96
V6767	T. MINA SUPPLY, INC.	70,611.67
V2234	TAB PRODUCTS CO., LLC.	945.66
V8484	TALLEY, INC.	5,531.10
V4121	TEAM EJP E.J. PRESCOTT	419,906.05
V4266	TENACITY, INC,	3,900.00
V5125	THE ENVIRONMENTAL SERVICE GROUP (NY) INC	17,787.50
V7925	THE HON COMPANY	5,366.65
V5889	THE NELAC INSTITUTE	640.00
V8558	THE NOTABLE CORPORATION	1,009.40
V4101	THE PUMP DOCTOR INC	838.80
V0873	THE REMI GROUP, LLC	45,296.91
V8168	THE SAFETY & HEALTH TRAINING CENTER INC	18,545.00
V1845	THE SHERWIN WILLIAMS COMPANY	6,757.32
V1145	THE TEWKSBURY LODGE	3,650.24
V8128	THE UNITED STATES POSTAL SERVICE	539,509.48
V1983	THERMO ELECTRON NORTH AMERICA LLC.	68,383.06
V1905	THOMAS SCIENTIFIC, LLC	1,579.24
V2113	THOMSON REUTERS - WEST	17,493.08
V2714	TIME WARNER CABLE - SPECTRUM BUSINESS	230,232.90
V2778	TK ELEVATOR CORPORATION	12,217.37
V1921	TONAWANDA TOWN CLERK	2,014.09
V2738	TOSHIBA INTERNATIONAL CORPORATION	57,800.00
V3282	TOWN OF AMHERST	3,738.00
V2641	TOWN OF CHEEKTOWAGA	3,986.25
V0685	TOWN OF EVANS	1,359,759.61
V1149	TOWN OF TONAWANDA WASTEWATER TREATMENT	153,034.67

VENDOR ANALYSIS - PAID IN 2024

VENDOR NUMBER	VENDOR NAME	TOTAL PAID
V2777	TRACEY ROAD EQUIPMENT, INC.	86,379.96
V1941	TRANSCAT INC	24,849.97
V8490	TRAVELERS INDEMNITY AND AFFILIATES	5,943.00
V0935	TRUCKPRO, LLC	1,355.10
V8467	TWENTY FIRST CENTURY PRESS	2,209.00
V2240	ULINE, INC.	1,239.11
V2009	UNION CONCRETE & CONSTRUCTION CORP.	1,119,160.92
V4285	UNITED AUTO SUPPLY OF SYRACUSE WEST INC.	43,132.49
V2019	UNITED BUSINESS SYSTEMS	62,514.32
V0709	UNITED RENTALS NORTH AMERICA, INC.	44,348.32
V3674	UPSTATE EQUIPMENT BOBCAT OF BUFFALO	4,855.23
V4623	US TRAFFIC CONTROL, LLC.	212,956.65
V8131	USA BLUEBOOK	8,684.23
V4663	UTILIS INC. DBA ASTERRA	345,000.00
V8410	VALLEY FAB AND EQUIPMENT, INC.	2,970.12
V1411	VERIZON	186,104.72
V3919	VILLAGE OF BLASDELL	276,975.09
V2054	VILLAGE OF WILLIAMSVILLE WATER DEPT	244,889.54
V2073	VISION SERVICE PLAN	19,579.40
V2083	VISONE CONSTRUCTION INC	997,097.22
V2062	VOLLAND ELECTRIC EQUIPMENT, CORP.	38,718.48
V2050	VWR INTERNATIONAL LLC	6,710.76
V6507	W.B. MASON CO.,INC.	6,073.36
V8357	WATERISAC	3,470.00
V8366	WATTS, ARCHITECTS & ENGINEERS	24,227.68
V8381	WAYPOINT TECHNOLOGY GROUP, LLC	20,878.83
V2168	WELLINGTON LABORATORIES LLC	1,750.00
V8336	WENDEL	491,565.41
V2117	WESCO DISTRIBUTION, INC.	59,004.39
V2290	WHITE CAP, LP	929.19
V5554	XYLEM, INC	6,529.45
V4318	Y & S TECHNOLOGIES, INC.	34,735.00
V0781	YOKOGAWA FLUID IMAGING TECHNOLOGIES INC	7,950.00
V8703	ZEND TECHNOLOGIES USA, INC.	9,649.75

TO: Applicable ECWA Members, Officers, and Employees
FROM: Independent Ethics Panel
DATED: April 1, 2025
RE: 2024 ECWA Financial Disclosure Statement

As part of the Erie County Water Authority's Code of Ethics Policy, you are required to file an in-house financial disclosure statement with the Authority's Independent Ethics Panel within ten days of appointment or commencement of employment and thereafter annually. **This includes retirees and/or any person that was employed at the Authority in any part of the year 2024.** In that regard, enclosed please find the following:

1. Policy No. 11 - Code of Ethics & Conflict of Interest Policy.
2. Policy No. 16 - Whistleblower Protection Policy
3. 2024 ECWA Financial Disclosure Statement, with a PDF fillable form available online for you to complete, print and sign. Electronic signatures are NOT acceptable.
4. 2024 ECWA Vendor List

PLEASE NOTE: If you have any questions regarding Policy No. 11 you may email the Independent Ethics Panel (IEP@ecwa.org) or you may contact General Counsel, Mark Carney by leaving a message at extension 8460 or by email at mcarnev@ecwa.org. If you leave a voice message, please give your name, phone number and the best time to return your call.

You are required to return your completed 2024 ECWA Financial Disclosure Statement no later than May 15, 2025.

ANY CHANGES MADE ON THE FINANCIAL DISCLOSURE FORM, MUST BE INITIALED BY THE APPLICANT.

Enclosed please find a return envelope in which you are to place and seal your **completed, signed financial disclosure statement**. It is very important **your name is written or typed in the top box for each page**. If you make a change to your disclosure form, please initial the change. Return the financial disclosure statement in the sealed envelope and return it to work, or mail and postmark it no later than May 15, 2025 to the **Independent Ethics Panel, c/o Legal Department, 295 Main Street, Room 350, Buffalo, New York 14203**. **All Financial disclosure forms must be date stamped, so if you plan to drop off your Financial Disclosure Statement to the Service Center or Ellicott Square office, please hand deliver the statements directly to the Reception/Switchboard Operator on duty, so they can be processed correctly.**



Erie County Water Authority

295 Main Street • Room 350 • Buffalo, NY 14203-2494
716-849-8484 • Fax 716-849-8463

Independent Ethics Panel

Raymond C. Herman, Ad Hoc Member

Robert C. Freeman, Ad Hoc Member

Anne E. Joynt, Ad Hoc Member

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