



Kingston City Land Bank, Inc.

Code of Ethics, Conflict of Interest Financial Disclosure Form Whistleblower Policies

PROFESSIONAL RESPONSIBILITY

Core Principle

As land bank and housing professionals, we are responsible for adding value to the Kingston City Land Bank (KCLB) and contributing to the ethical success of this organization. We accept professional responsibility for our individual decisions and actions. We are also advocates for the KCLB by engaging in activities that enhance its credibility and value.

Intent

- To build respect, credibility and strategic importance for the land banking profession within our organizations, the business community, and the communities in which we work.
- To assist the KCLB we serve in achieving its objectives and goals.
- To inform and educate current and future practitioners, the organizations we serve, and the general public about principles and practices that help the profession.
- To positively influence workplace and recruitment practices.
- To encourage professional decision-making and responsibility.
- To encourage social responsibility.

Guidelines

1. Adhere to the highest standards of ethical and professional behavior.
2. Measure the effectiveness of our programs in contributing to or achieving organizational goals that are in line with our mission statement.
3. Comply with all laws.
4. Work consistent with the values of the profession.
5. Strive to achieve the highest levels of service, performance and social responsibility.
6. Advocate for the appropriate use and appreciation of human beings as employees.
7. Advocate openly and within established forums for debate in order to influence decision-making and results.
8. Assure representation of the people of Kingston in all decisions the KCLB makes.

PROFESSIONAL DEVELOPMENT

Core Principle

As professionals we must strive to meet the highest standards of competence and commit to strengthen our competencies on a continuous basis.

Intent

- To expand our knowledge of land banking and housing issues to further our understanding of how our organization functions.
- To advance our understanding of how organizations work, specifically as it pertains to land banks ("the business of the business").

Guidelines

1. Pursue formal academic opportunities in areas of community renewal and economic development,

- property ownership, affordable housing and housing rights.
2. Commit to continuous learning, skills development and application of new knowledge related to both human resource management and the people of Kingston who we serve.
 3. Contribute to the body of knowledge, the evolution of the profession and the growth of individuals through teaching, research and dissemination of knowledge about land banking.
 4. Pursue certification where available, or comparable measures of competencies and knowledge.

ETHICAL LEADERSHIP

Core Principle

KCLB staff and board members are expected to exhibit individual leadership as role models for maintaining the highest standards of ethical and moral conduct.

Intent

- To set the standard and be an example for others.
- To earn individual respect and increase our credibility with those we serve.

Guidelines

1. Be ethical which means to be trustworthy, honest, and responsible to the mission of the KCLB in every professional interaction.
2. Question pending individual and group actions when necessary to ensure that decisions are made in accordance with the mission of the KCLB and the public interest.
3. Seek expert guidance if ever in doubt about the ethical propriety of a situation.
4. Through teaching and mentoring, champion the development of others as ethical leaders in the profession and in organizations.

FAIRNESS AND JUSTICE

Core Principle

As professionals, we are ethically responsible for promoting and fostering respect, fairness, and justice for all employees and their organizations.

Intent

To create and sustain an environment that encourages all individuals and the KCLB to reach their fullest potential in a positive and productive manner and to respect differences and to reach consensus that is in the interest of all those involved in the decisions the KCLB makes wherever possible.

Guidelines

1. Respect the uniqueness and intrinsic worth of every individual.
2. Treat people with dignity, respect and compassion to foster a trusting work environment free of harassment, intimidation, and unlawful discrimination.
3. Ensure that everyone has the opportunity to develop their skills and new competencies.
4. Assure an environment of inclusiveness and a commitment to diversity in to those we serve.
5. Develop, administer and advocate policies and procedures that foster fair, consistent and equitable treatment for all.
6. Regardless of personal interests, support decisions made by our organization that are both ethical and legal.
7. Act in a responsible manner and practice sound management in the areas in which the KCLB operates.

CONFLICTS OF INTEREST

Core Principle

As land bank professionals, we must maintain a high level of trust with our stakeholders. We must protect the interests of our stakeholders as well as our professional integrity and should not engage in activities that create actual, apparent, or potential conflicts of interest.

Intent

To avoid activities that are in conflict or may appear to be in conflict with any of the provisions of this policy or our mission or with one's responsibilities and duties as a member of the not-for-profit land banking profession and/or as an employee of any organization.

Guidelines

1. Adhere to and advocate the use of published policies on conflicts of interest within your organization.
2. Refrain from using your position for personal, material or financial gain or the appearance of such.
3. Refrain from giving or seeking preferential treatment in the human resources processes.
4. Prioritize your obligations to identify conflicts of interest or the appearance thereof; when conflicts arise, disclose them to relevant stakeholders.

USE OF INFORMATION

Core Principle

Organization professionals consider and protect the rights of individuals, especially in the acquisition and dissemination of information while ensuring truthful communications and facilitating informed decision-making.

Intent

To build trust among all organizational constituents by maximizing the open exchange of information, while eliminating anxieties about inappropriate and/or inaccurate acquisition and sharing of information.

Guidelines

1. Acquire and disseminate information through ethical and responsible means.
2. Ensure only appropriate information is used in decisions affecting the employment relationship.
3. Investigate the accuracy and source of information before allowing it to be used in employment related decisions.
4. Maintain current and accurate HR information.
5. Safeguard restricted or confidential information.
6. Take appropriate steps to ensure the accuracy and completeness of all communicated information about HR policies and practices.
7. Take appropriate steps to ensure the accuracy and completeness of all communicated information used in HR-related training.
8. Complete and submit the annual financial disclosure form, attached here as Appendix A.

WHISTLEBLOWER POLICY AND PROCEDURES

Purpose:

It is the policy of the KCLB, Inc., to afford certain protections to individuals who in good faith report violations of the KCLB's Code of Ethics or other instances of potential wrongdoing within the KCLB.

This policy is adopted pursuant to New York Public Authorities Law Section 2824(1)€. The Whistleblower Policy and Procedures set forth below are intended to encourage and enable employees to raise concerns in good faith within the Land Bank and without fear of retaliation or adverse employment action.

Definitions:

“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.

“Employee”: All board members; officers; and staff employed at the KCLB whether full-time, part-time, employed pursuant to contract, employees on probation and temporary employees.

“Whistleblower”: Any KCLB employee who in good faith discloses information concerning wrongdoing by another KCLB employee, or concerning the business of the KCLB itself.

“Wrongdoing”: 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 a KCLB employee that relates to the Land Bank.

“Personnel action”: Any action affecting compensation, appointment, promotion, transfer, assignment, reassignment, reinstatement or evaluation of performance.

Section 1: Reporting Wrongdoing

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

1. The Employee shall disclose any information concerning wrongdoing either orally or in a written report to his or her supervisor, or to the KCLB's ethics officer, general counsel, human resources representative or to any member of the board of directors.
2. All Employees who discover or have knowledge of wrongdoing shall report such wrongdoing in a prompt and timely manner.
3. The identity of the whistleblower and the substance of his or her allegations will be kept confidential to the best extent possible.
4. The individual to whom the potential wrongdoing is reported shall investigate and handle the claim 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.
5. Should a Public Authority Employee believe in good faith that disclosing information within the Public Authority pursuant to Section 1.1 above would likely subject him or her to adverse personnel action or be wholly ineffective, the Public 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 2: No Retaliation or Interference

1. No Employee shall retaliate against any Whistleblower for the disclosure of potential wrongdoing, whether through threat, coercion, or abuse of authority. No Employee shall interfere with the right of any other Employee by any improper means aimed at deterring disclosure of potential wrongdoing.
2. No Employee who in good faith discloses potential violations of this Public Authority's Code of Ethics or other instances of potential wrongdoing shall suffer harassment, retaliation or adverse personnel action. Any attempts at retaliation or interference are strictly prohibited.
3. All allegations of retaliation against a Whistleblower or interference with an individual seeking to disclose potential wrongdoing will be thoroughly investigated by the KCLB.
4. Any Employee who retaliates against or attempts to interfere with any individual for having in good faith disclosed potential violations of the KCLB's Code of Ethics or other instances of potential wrongdoing is subject to discipline, which may include termination of employment.
5. Any allegation of retaliation or interference will be taken and treated seriously and, regardless of the outcome of the initial complaint, will be treated as a separate matter.

Section 3: Other Legal Rights Not Impaired

1. The Whistleblower Policy and Procedures set forth herein are not intended to limit, diminish or impair any other rights or remedies that an individual may have under the law with respect to disclosing potential wrongdoing free from retaliation or adverse personnel action.
2. Specifically, these Whistleblower Policies and Procedures are not intended to limit any rights or remedies that an individual may have under the laws of the State of New York.
3. With respect to any rights or remedies than an individual may have pursuant to Civil Service Law §75-b or labor Law §740, any employee who wishes to preserve such rights shall, prior to disclosing information to a government body, have made a good faith effort to provide the appointing authority or his or her designee the information to be disclosed and shall provide the appointment authority or designee a reasonable time to take appropriate action unless there is imminent and serious danger to public health or safety.

APPENDIX A



Kingston City Land Bank, Inc.

ANNUAL STATEMENT OF FINANCIAL DISCLOSURE FORM

Name (Please Print)

Position

Prior Calendar Year

To be completed and returned to the Office of the
 Kingston City Land Bank Executive Director at
 City Hall, 420 Broadway, Kingston, NY 12401,
 NO LATER THAN February 15th

A. <u>Individual</u>	<u>Name & Address of Income Source or Nature of Income</u>	<u>Employer</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

None (Check if applicable)

B. **If any individual listed in A above** is employed in the practice of law, is a NYS Department of State licensed real estate broker or agent, practices a profession licensed by the Department of Education, or if an individual practices with a firm or corporation and is a partner or shareholder of the firm or corporation, provide a general description of principal subject areas of matters undertaken by the firm or corporation. Do not list names of individual clients, customers or patients.

C. **Relatives in the Kingston City Land Bank (“KCLB”) and City of Kingston (“City”) service.** List each relative who is an officer or employee of the KCLB or City, whether paid or unpaid, including relative’s name, relationship to you, title and department. Relatives include your spouse, domestic partner, child, stepchild, grandchild, brother, sister, parent, stepparent, plus any person you claimed as a dependent on your latest income tax return and that dependent’s spouse or domestic partner.

None (Check if applicable)

<u>Name of Relative</u>	<u>Relationship to You</u>	<u>Title</u>	<u>Department</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

D. **Money you owe.** List any debts of \$10,000 or more that you owe to an officer or employee of the KCLB or City or anyone that you are aware of who does business with the KCLB or City. Do not list debts that you owe to banking companies that have an official banking relationship with the KCLB or City.

None (Check if applicable)

<u>Creditor</u>	<u>Type of Obligation</u>
_____	_____
_____	_____

Money owed to you. List any debts of \$10,000 or more that officers or employees of the KCLB or City or anyone that you are aware of who does business with the KCLB or City owes you.

None (Check if applicable)

<u>Debtor</u>	<u>Type of Obligation</u>
_____	_____
_____	_____

E. **Loans.** Describe all loans to you (and/or your spouse, and/or domestic partner, and/or dependent children) in excess of \$5,000. This does not include any loan issued in the ordinary course of business by a financial institution to finance educational costs, the cost of home purchase or improvements for a primary or secondary residence, or purchase of a personally owned motor vehicle, household furniture or appliances. If any such reportable loan has been guaranteed by any third party, list the liability and name of the guarantor.

None (Check if applicable)

<u>Name of Family Member</u>	<u>Name & Address of Creditor</u>	<u>Type of loan & collateral, if any</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

F. **Political Parties.** List any position you held as an officer of a political party, political committee or political organization within the last five years. The term “political organization” includes any independent body or any organization that is affiliated with or a subsidiary of a political party.

None (Check if applicable)

Certification:

I hereby certify under penalty of perjury, that I have received a copy of the KCLB Ethics policy and that the information disclosed on this form is true and complete to the best of my knowledge.

I hereby acknowledge my continuing responsibility to disclose any conflicts of interest or potential conflicts of interest and/or recuse myself from any act or action as required by the KCLB’s Ethics policy. I certify that I will undertake and carry out this responsibility to the best of my ability.

Signature

Date

State of New York }

County of _____} ss.:

On the _____ day of _____ in the year _____ before me the undersigned, a Notary Public in and for said State, personally appeared _____ personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he/she executed the same in his/her capacity and that by his/her signature on the instrument, the individual, or person upon behalf of which the individual acted, executed the instrument.

(Signature and Office of individual taking acknowledgement)

The deadline for filing is February 15th. Please return the completed for to the Office of the Executive Director of the KCLB at City Hall, 420 Broadway, Kingston, NY 12401.