

**A RESOLUTION IMPLEMENTING A CODE OF ETHICS FOR THE LAND
BANK**

WHEREAS, on December 21st, 2016 the Board of Directors of the Nassau County Land Bank Corporation duly convened a meeting and a quorum existed, and;

WHEREAS, the Board of Directors was requested to approve a resolution adopting a Code of Ethics as required by the New York Public Authorities Law, including but not limited to mandating that Directors and employees of the Land Bank must recuse themselves in any matters perceived to be a conflict of interest, prohibiting Directors and staff from appearing or practicing before the Land Bank as more particularly stated in the Code of Ethics; and;

WHEREAS, the Board of Directors members then present voted affirmatively and unanimously in favor to adopt said Code of Ethics; now, therefore, be it

RESOLVED, that effective immediately the Nassau County Land Bank Corporation has adopted the Code of Ethics attached hereto:



NASSAU COUNTY

LAND BANK CORPORATION

CODE OF ETHICS

This Code of Ethics shall apply to all directors of the Board and employees of the Nassau County Land Bank Corporation (“Land Bank”). These policies shall serve as a guide for official conduct and are intended to enhance the ethical and professional performance of the directors and employees and to preserve public confidence in the Land Bank’s mission. This code is adopted pursuant to New York Public Authorities Law Section 2824 and Sections 73 and 74 of the New York Public Officers Law.

DEFINITIONS

As used in this policy:

“**Director**” shall mean a member of the Board of Directors of the Nassau County Land Bank Corporation who in this capacity is also deemed to be a state director of a local public authority under Section 1605 of the Not-for-Profit Corporation Law (“the Land Bank Act”) and as such is subject to the ethical responsibilities of Sections 73 and 74 of the Public Officers Law and also New York Public Authorities Law Section 2824.

“**Employee**” shall mean a non-volunteer employee of the Nassau County Land Bank Corporation who in this capacity is also deemed to be a state employee of a local public authority under Section 1605 of the Land Bank Act and as such is subject to the ethical responsibilities of Sections 73 and 74 of the Public Officers Law and also New York Public Authorities Law Section 2824.

CONFLICT OF INTEREST POLICY

No director or employee of the Land Bank should have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction or professional activity or incur any obligation of any nature, which is in substantial conflict with the proper discharge of his or her duties in the public interest. Directors and employees must recuse themselves from deliberations, votes, or internal discussion on matters relating to any organization, entity or individual where their impartiality in the deliberation or vote might be reasonably questioned, and are prohibited from attempting to influence other board members or employees in the deliberation and voting on the matter.

STANDARDS

1. Directors and employees shall perform their duties with transparency, without favor and refrain from engaging in outside matters of financial or personal interest, including other

employment, that could impair independence of judgment, or prevent the proper exercise of one's official duties.

2. Directors and employees shall not directly or indirectly, make, advise, or assist any person to make any financial investment based upon information available through the director's or employees' official position that could create any conflict between their public duties and interests and their private interests.

3. Directors and employees shall not accept or receive any gift or gratuities where the circumstances would permit the inference that: (a) the gift is intended to influence the individual in the performance of official business or (b) the gift constitutes a tip, reward, or sign of appreciation for any official act by the individual. This prohibition extends to any form of financial payments, services, loans, travel reimbursement, entertain, hospitality, or thing or promise from any entity doing business with or before the Land Bank.

4. Directors and employees shall not use or attempt to use their official position with the Land Bank to secure unwarranted privileges for themselves, members of their family or others, including employment with the Land Bank or contracts for materials or services with the Land Bank.

5. Directors and employees must conduct themselves at all times in a manner that avoids any 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 their public trust.

6. Directors and employees may not engage in any official transaction with an outside entity in which they have a direct or indirect financial interest that may reasonably conflict with the proper discharge of their official duties.

7. Directors and employees shall manage all matters within the scope of the Land Bank's mission independent of any other affiliations or employment. Directors, and employees employed by more than entity shall strict to fulfill their professional responsibility to the Land Bank without bias and shall support the Land Bank's mission to the fullest.

8. Directors and employees shall not use Land Bank property, including equipment, telephones, vehicles, computers, or other resources, or disclose information acquired in the course of their official duties in a manner inconsistent with State or local law or policy and the Land Bank's mission and goals.

9. Directors and employees are prohibited from appearing or practicing before the Land Bank for two (2) years following employment with the Land Bank, consistent with the provisions of Public Officers Law.

IMPLEMENTATION

This Code of Ethics shall be provided to all directors and employees upon commencement of employment or appointment and shall be reviewed annually by the Governance Committee. The board may designate an Ethics Officer who shall report to the board and shall have the following duties:

- Counsel in confidence with the Land Bank directors and employees who seek advice about ethical behavior.
- Receive and investigation complaints about possible ethics violations.
- Dismiss complaints found to be without substance.
- Prepare an investigation report of their findings for action by the request of the Executive Director or the board of directors.

- Record the receipt of gifts or gratuities of any kind received by a director or employee who shall notify the Ethics Officer within 48 hours of receipt of such gifts and gratuities.

PENALTIES

In addition to any penalty contained in any other provision of the law, directors or employees who knowingly and intentionally violates any of the provisions of this code may be removed in the manner provided for in law, rules or regulations, and the Land Bank By-Laws.

REPORTING UNETHICAL BEHAVIOR

Directors and employees are required to report possible ethical behavior by a director or employee of Land Bank to the Executive Director, to the duly appointed Ethics Officer, or to the Chair of the Board, or the Vice Chair of the Board, or to Land Bank Counsel. Directors and employees may file ethics complaints anonymously and protection from retaliation by the policies adopted by the Land Bank.