



ROCHESTER LAND BANK CORPORATION STAFF CODE OF CONDUCT

For the purpose of this Staff Code of Conduct, individuals who are paid employees of the Rochester Land Bank Corporation (“Land Bank”) shall be considered “employees.” The term “employee” shall not include directors, vendors, service providers, or other independent contractors, nor shall the term “employee” include any City of Rochester employee providing services to the Land Bank. The term “staff” shall not include any City of Rochester employee providing services to the Land Bank.

At the time of adoption of this Staff Code of Conduct, the Land Bank does not have any employees and has no staff. The Executive Director is a City of Rochester employee compensated by the City of Rochester. The Corporation Counsel of the City of Rochester is Counsel to the Land Bank and may assign municipal attorneys to advise and represent the Land Bank. Neither the Corporation Counsel nor any such municipal attorney(s) are employees of the Rochester Land Bank Corporation.

This policy is adopted to apply to such time as the Land Bank may hire employee(s).

I. INTRODUCTION

This Employee Code of Ethics and Conduct (“Code”) details the Land Bank’s policies for employees. The Land Bank is committed to maintaining a reputation that values integrity, respect and truthfulness, and a strong commitment to the highest ethical standards. These principles apply to employee interactions with coworkers, vendors, government and regulatory agencies and the general public. This Code applies to the Land Bank’s employees and staff. The Land Bank’s employees must be familiar with this Code and adhere to its guidelines.

This Code is not a comprehensive guide of all ethical issues that employees may face, but merely highlights specific problems. In dealing with ethical problems not detailed in this Code, employees are expected to use common sense and their best moral judgment. If an employee has ethical questions, please contact the Executive Director, or to the Chair of the board of directors in the case that the Executive Director is involved. This policy may be modified or updated at any time. The Land Bank welcomes employee suggestions on changes in this Code.

II. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS



The Land Bank has a policy to observe all laws, rules, and regulations of government agencies and authorities. If federal, state or local law exists that is either contradictory or stricter than this policy, employees must apply the law.

III. CONFLICTS OF INTEREST

The Land Bank employees must avoid having a personal, business, financial, or other interest, activity, or relationship, outside the Land Bank that has or may be in conflict with the Land Bank. Any material transaction or relationship that may give rise to an actual or perceived conflict of interest should be discussed with the Executive Director.

Conflicts of interest may include, but are not limited to, the following situations:

- Outside Employment- employees should not perform work or render direct consulting or managerial services for an organization that does business with the Land Bank without appropriate approval from management.
- Managers or supervisors may not engage in a sexual, romantic, or dating relationship with subordinate employees.
- Accepting loans or gifts of entertainment, food, or cash of \$25 or more from regulatory agencies or any outside concern that does or seeks to do business with the Land Bank.
- Obtaining a personal financial benefit in any sale or loan of Land Bank property.
- Using or disclosing any confidential information gained during employment for an employee's personal benefit or the benefit of others, including a future employer.

IV. EMPLOYMENT PRACTICES

Discrimination and Harassment

- The Land Bank prohibits discrimination and harassment of employees whether or not the incidents occur on the Land Bank premises and whether or not the incidents occur during business hours.
- The Land Bank follows federal, state, and local law to ensure equal recruitment, employment, compensation, development and advancement opportunity for all qualified



individuals, and prohibits deliberate harassment based on federally protected categories of race, color, religion, sex, national origin, age, or disability.

Workplace Violence- The Land Bank does not tolerate workplace violence including threats, threatening behavior, harassment, intimidation, assaults or similar conduct.

V. BOOKS AND RECORDS

Accurate and Complete Business Records - Employees must act in good faith not to misrepresent material facts in the Land Bank's books and records or in any internal or external correspondence, memoranda, or communication of any type, including telephone or electronic communications.

Financial Reporting- All the Land Bank funds, assets, liabilities and receipts must be recorded in accordance with generally acceptable accounting procedures. There cannot be any "off the books" accounts.

Proper Maintenance of Records- The Land Bank maintains documents in accordance with all applicable laws and regulations. If the Land Bank employees receive a subpoena, a request for records or other legal papers or if we have reason to believe that such a request or demand is likely, the law requires the Land Bank to retain all relevant records and contact the Executive Director.

Cooperation with Auditors- The Land Bank employees must cooperate fully with internal and outside auditors during examination of the Land Bank's books, records, and operations.

VI. USE OF LAND BANK RESOURCES

Equipment and Supplies- All equipment and supplies owned by the Land Bank remain the Land Bank property, including but not limited to office supplies, office furniture, fax machines, computers, software, hardware, supplies and equipment, and may not be used by the Land Bank employees for personal reasons.

Non-work Related Interests- The Land Bank employees may not use the Land Bank facilities to promote non- the Land Bank or non-work related interests of the employee or of third parties without prior consent of the Rochester Land Bank Corporation's Executive Director.

Proper Use of Organizational Assets- Rochester Land Bank Corporation employees may only use, transfer, or dispose of funds or assets for the lawful and legitimate business purposes as



approved by the Rochester Land Bank Corporation's Executive Director or the Rochester Land Bank Corporation Board of Directors.

VII. COMPLIANCE WITH THE CODE

All the Land Bank employees must know this Code and adhere to its guidelines. If questions arise please contact the Executive Director.

Supervisors- Supervisors must take reasonable care to assure that subordinate employees are complying with these guidelines. Supervisors are responsible for misconduct by employees if the supervisor orders such misconduct; ratifies such misconduct, even by inaction; the supervisor has direct authority and knows of such misconduct but fails to act appropriately; or should have known with reasonable diligence that such misconduct has occurred.

VIII. REPORTING ACTUAL OR SUSPECTED VIOLATIONS OF THE CODE

Requirement to Report Actual or Suspected Violations of the Code: Employees must report any actual or suspected violations of this Code to the Executive Director, or to the Chair of the board of directors in the case that the Executive Director is involved. Failure to report any actual or suspected violations of the Code is in itself a violation of this Code.

Non-Retaliation Policy: Employees will not be retaliated against or subject to any form of reprisal for raising a good faith concern under this policy or participating in an investigation into any such concerns. Retaliation is a serious violation of this Code and should be reported immediately.

Investigation of Alleged Violations of the Code: All inquiries, complaints, and reports will be promptly investigated. Employees are expected to cooperate in the investigation. Reasonable measures will be taken to preserve confidentiality of the claim and the identity of anyone who reports a suspected violation or participated in the investigation. If you are unsure whether a violation has occurred, the Land Bank encourages you to seek advice from the Executive Director, or to the Chair of the board of directors in the case that the Executive Director is involved, before acting.

ACKNOWLEDGEMENT FORM FOR CODE OF CONDUCT AND ETHICS

I have read and am familiar with the Rochester Land Bank Corporation. I will comply with and enforce the policies in this Code in its entirety.



I understand my responsibility to promptly report any incident of misconduct or perceived misconduct that I may experience or witness.

By signing this acknowledgement I am indicating that I have read and will abide by the Rochester Land Bank Corporation's Staff Code of Conduct.

Employee Signature

Employee name (printed)