

Sawmill Community Land Trust
CONFLICT OF INTEREST POLICY

It is the policy of Sawmill Community Land Trust (Land Trust) to prevent employees, volunteers, consultants, directors, or officers from using their position with the organization for purposes that are, or appear to be, motivated by a desire for private financial gain to themselves, family members, or business associates. This policy also applies to the procurement and disposition of all real property, equipment, supplies, and services. Accordingly, the Land Trust shall expect individuals to comply with the following rules of conduct during his/her tenure of employment or affiliation and for one year thereafter.

Gifts: No employee, volunteer, consultant, director or officer shall request, receive, or accept a gift or loan for himself/herself if it tends to influence him/her in the discharge of his/her official acts on behalf of the Land Trust. No employee, volunteer, consultant, director, or officer involved in an official act affecting the Land Trust's donors, lenders, or business associates shall request, receive or accept a gift or loan from those parties within the period defined in this policy. "Official act" shall mean any decision, recommendation, approval, or other action involving the use of discretionary authority.

This section does not apply in the case of:

- (1) An occasional non pecuniary gift, insignificant in value;
- (2) An award publicly presented in recognition of public service; or
- (3) A commercially reasonable loan made in the ordinary course of business by an institution authorized by the laws of the state to engage in the business of making loans.

Disqualification: An employee, volunteer, consultant, director, or officer shall disqualify himself/herself from participating in any official act directly affecting a business in which he/she has a financial interest.

Confidential Information: No employee, volunteer, consultant, director, or officer shall use confidential information acquired by virtue of his/her employment or affiliation with the Land Trust for his/her or another's private gain.

Employment: No member of the immediate family of an employee, volunteer, consultant, director, or officer shall be employed by the Land Trust as other than a non-compensated volunteer. However, if the best interests of the organization so require, the Executive Director may submit a request to the board or executive committee to make an exception to this policy requirement. A full disclosure of the relationship, the position, the salary, and the justification for the requested relationship shall be submitted to each member of the board.

Political Activity: An employee, consultant, director, or officer of the Land Trust may engage in political activity within their capacity as an individual, but must carefully distinguish between their individual conduct and their actions on behalf of the organization. Before becoming actively involved in a political campaign or activity, the employee, consultant, director, or officer should discuss with the Land Trust's Executive Director and/or Board of Directors appropriate actions to avoid or minimize the risk of personal actions being attributed to the organization. IRS regulations contain strict prohibitions against political activities of nonprofit organizations.

Disclosures: Every employee, volunteer, consultant, director, or officer who has a financial interest that he/she believes or has reason to believe may be affected by his/her actions taken on behalf of the Land Trust shall disclose the precise nature of that interest. The disclosure shall be made upon the initial employment or affiliation with the organization and as necessary thereafter. For directors, officers, and senior management disclosure shall be made in writing annually.

Approved by the Board of Directors 5/12/2009
Amended "Political Activity" language approved 9/10/2009

Any violation of this conflict of interest policy shall immediately be brought to the attention of the Executive Director and reported to the board at its next regularly scheduled meeting. Depending upon the nature of the violation and any extenuating or mitigating circumstances, the board may authorize action to be taken against the offender, such as oral and/or written reprimand, reassignment, demotion, termination or removal from office.

My signature below indicates my receipt and understanding of the conflict of interest policy. I also verify that I have been provided with the opportunity to ask questions about the policy.

During the term of my employment, contract, or office with Sawmill Community Land Trust, I agree to abide by the policy.

Name (please print)

Signature

Date

Title of Position _____

Sawmill Community Land Trust
CONFLICT OF INTEREST ANNUAL DISCLOSURE

1. Are you aware of any relationship between Sawmill Community Land Trust and yourself or a member of your family as defined by the letter or spirit of the organization's conflict of interest policy that may represent a conflict of interest or the appearance of a conflict of interest?

YES NO

If yes, please list such relationships and the details of annual or potential benefit as you can best estimate them.

2. During the past 12 months, did you or a member of your family receive any gifts, compensation, services, materials, entertainment, or loans from any source from which the Land Trust purchases goods or services, or otherwise has significant business dealings? Gifts, compensation, services, materials, or entertainment that are occasional or insignificant in value are excluded from this policy.

YES NO

If yes, please list the item(s), the source, and the approximate value.

Item	Source	Approximate Value
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

I certify that I have read and understand the organization's conflict of interest policy and certify that the disclosure information provided is true and complete to the best of my knowledge.

Name (please print)

Signature

Date

Title of Position _____