

JACKSONVILLE COMMUNITY LAND TRUST (JCLT)

Conflict of Interest Policy (HOME & Local Compliance Aligned)

1. Purpose

The purpose of this Conflict of Interest Policy is to ensure that all decisions made by the Jacksonville Community Land Trust, Inc. ("JCLT") are conducted with integrity, transparency, and in full compliance with applicable federal, state, and local regulations.

This policy aligns with:

- HOME Investment Partnerships Program (24 CFR Part 92)
- City of Jacksonville funding requirements (including SHIP and related programs)
- Florida nonprofit governance standards

This policy prohibits both actual conflicts of interest and the appearance of conflicts of interest.

2. Applicability

This policy applies to:

- Board of Directors
- Officers
- Employees
- Committee Members
- Volunteers with decision-making authority
- Contractors or consultants acting on behalf of JCLT

3. Definition of Conflict of Interest

A conflict of interest exists when an individual has a financial, professional, or personal interest that could influence—or appear to influence—their ability to act in the best interest of JCLT.

4. HOME Program Requirements (24 CFR Part 92)

No covered individual may obtain a financial interest or benefit from a HOME-assisted activity, including development, contracts, or proceeds tied to such activities.

5. City of Jacksonville / SHIP Compliance

JCLT adheres to all City of Jacksonville and SHIP requirements including transparency, fair procurement, and documentation.

6. JCLT Internal Standards

A. Mandatory Disclosure: Individuals must disclose any financial or relational interest.

B. Required Recusal: Individuals must disclose, step out, not vote, and not influence.

C. Documentation: All conflicts must be recorded in minutes and maintained in records.

7. Examples of Conflicts of Interest

Prohibited Conflicts include:

- Board member owning a contractor
- Staff selecting related vendors
- Board/staff benefiting from JCLT homes

Disclosure Required:

- Employer relationships
- Family connections
- Indirect benefits

8. Financial Institution / Mortgage Lender Disclaimer

JCLT does not endorse specific lenders. Buyers choose independently. Board members affiliated with lenders must disclose and recuse.

9. Annual Disclosure Requirement

All individuals must complete annual disclosure forms and update as needed.

10. Enforcement

Violations of this policy may result in:

- Removal from the Board of Directors
- Termination of employment or contractual relationship
- Reporting to funding agencies
- Financial repayment if required
- Any other corrective action deemed necessary by the Board

11. Acknowledgment

All individuals must acknowledge receipt, understanding, and compliance.