

ETHICS AND COMPLIANCE OFFICE: Annual Attestation Process

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Background

On or before July 1 of each year, employees of the corporation must sign and submit a statement attesting that they do not have a conflict of interest...

§627.351(6)(d)2, F.S.

Corporate Policy 101 - *Conflicts of Interest Policy* was adopted by the Board of Governors on March 18, 2015 clarifying what constitutes a prohibited conflict of interest. The policy is also incorporated into Citizens Code of Ethics.

Ethics Refresher and Attestation Course

- Partnership between the Ethics and Compliance Officer (ECO) and Human Resources, Learning and Development created the annual ***Mandatory Ethics Refresher and Attestation Online Course***
- ECO reviews and refreshes each year
- Contains audio and video and takes approximately 15-20 minutes to complete
- Contains an overview of Citizens' Code of Ethics with a strong emphasis on recognizing conflicts of interest

Selected Excerpts

2020 Mandatory Ethics Refresher and Attestation

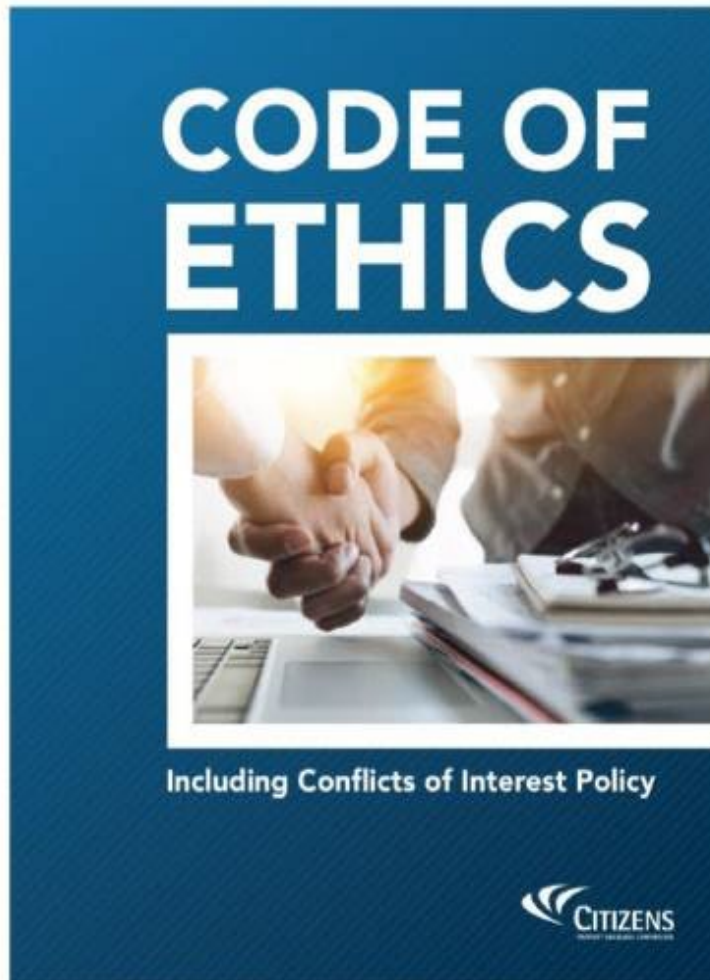
- ➡ Refresher of Citizens' Code of Ethics
- ➡ Conflicts of Interest Annual Attestation



This *Ethics Refresher* contains audio. Please adjust your headphones or speakers.

START ➤

Selected Excerpts



➔ Code of Ethics:

- Imposes conduct and reporting requirements
- Prohibits conflicts of interest
- Requires approval for secondary employment
- Prohibits gifts from external business partners which includes many different people and entities
- Requires external parties to register before lobbying Citizens

Selected Excerpts



Tickets to sporting events



Travel expenditures



Lodging in private residence



Food deliveries



Meals



Bottled water and coffee



Gift cards



Personal services



Flower arrangements

Selected Excerpts



➔ Common examples:

- Advocating for a relative to receive a benefit or employment
- Working on your (or a relative's) Citizens insurance policy or claim
- Having a relative who is employed by a current external business partner
- Unapproved secondary employment
- Having a material financial interest in an external business partner
- Using your Citizens position or confidential information for personal financial gain
- Asking for or accepting a gift from an external business partner
- Asking for or accepting a gift from a policyholder as an expression of gratitude or to influence an official action
- Exploring future employment opportunities with a current external business partner when you have influence over their Citizens work

Selected Excerpts

Conflicts of Interest Annual Attestation



Examples of situations that commonly cause conflicts of interest to arise:

- Advocating for a relative to receive a benefit or employment
- Working on your (or a relative's) Citizens insurance policy or claim
- Having a relative who is employed by a current external business partner
- Unapproved secondary employment
- Having a material financial interest in an external business partner
- Using your Citizens position or confidential information for personal financial gain
- Asking for or accepting a gift from an external business partner
- Asking for or accepting a gift from a policy holder as an expression of gratitude or to influence an official action
- Exploring future employment opportunities with a current external business partner (vendor) when you have influence over their Citizens work



Selected Excerpts

Conflicts of Interest Annual Attestation



If you are unsure whether you have a current or potential conflict of interest, or if you have a question you need to discuss before you can answer, submit your inquiry to AskEthics@citizensfla.com and you should then select the second statement on the attestation page.

A screenshot of the "Conflicts of Interest Annual Attestation" form. The form includes a header with the Citizens logo and a table with columns for "Section", "Required", and "Date". The main body of the form contains several sections of text, including a "Declaration" section where the user must affirm that they have read and understand the policy, and a "Signature" section where the user must sign and date the form. The form is titled "Conflicts of Interest Annual Attestation" and is dated "Page 1 of 1".

Click [Policy](#)

Click to view the Policy or click NEXT to move to the attestation page.

Selected Excerpts

Conflicts of Interest Annual Attestation



Select the appropriate statement below:

- ☒ I hereby swear or affirm that I *do not* have a conflict of interest as defined in Citizens' Conflicts of Interest Policy.

Under penalties of perjury, I declare that I have read and selected the statement above and the facts in the statement are true. By selecting the option above, I understand I am applying my electronic signature to the statement that *I do not have a conflict of interest* and agree to be bound by the statement.

- ☐ I am *unsure* whether I have a current or potential conflict of interest and have submitted my concerns via the AskEthics button for guidance.

Submit

Ethics Refresher and Attestation Course

Assigned to all employees on
April 8, 2020 and communicated
by a personal email from the ECO

8 Apr. 2020

15 May 2020

98% compliance as of May 15,
2020



Division of Legal Services and Purchasing

ETHICS AND COMPLIANCE OFFICE:

- **Nancy Staff**, Director of Ethics and Compliance Officer, J.D., CCEP
- **Chuck Bowen**, Senior Counsel-Privacy Officer, J.D., CIPM, CIPP, and IAPP Privacy Law Specialist
- **Lynn Hewitt**, Senior Counsel-Employment Law, J.D.