

Ethics & Compliance

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Ethics

Citizens' Ethics Officer is **Lacey Kantor**, who is within the Office of the General Counsel. In this role, Ms. Kantor is responsible for implementing Citizens' Ethics Program.

Goals of the Ethics Program

- Protect the public interest and integrity of the corporation
- Maintain Citizens as a trustworthy corporation
- Ensure that employees and members of Citizens' board do not use positions for personal gain
- Ensure compliance with applicable state laws.

Ethics Framework

The Ethics Officer is developing an updated Ethics Framework that better defines the Ethics Program.



Fostering a Culture of Compliance

The goal of implementing the Compliance Framework is to foster continued full compliance by Citizens to all relevant laws, rules, and regulations (LRRs). This is accomplished by using a systematic, documented, enterprise approach that retains operational flexibility.

This approach encompasses:

- Identification of all relevant LRRs
- Documentation of integration of LRRs into work processes, procedures, and corporate policies
- Education and training of appropriate staff
- Monitoring for adherence to LRRs
- Updating as requirements change
- Communicating changes to the appropriate staff
- Addressing areas of concern using a risk-based approach

The LRR Inventory

Compliance Elements	Count
 <p>Laws, Rules, Regulations (LRRs)</p> <p>All state, federal and local laws, rules, regulations, or other mandates carrying the force of law that Citizens is required to follow.</p>	271
 <p>Organizational Awareness</p> <p>These are laws, rules, regulations, best practices and industry standards that are either:</p> <ul style="list-style-type: none">• Informational in nature,• Don't rise to the level of significance to actively track compliance, or• Only require action when our current business processes align with the statute.	327

- The list of LRRs, which we refer to as our Inventory, contains nearly 600 entries.

- Each element is an implementable component of an LRR, based on business process or how it is implemented.

Compliance

Reasonable Assurance of Compliance

Annual Certification

- Monitoring Legislative Changes
- Updates to LRR Inventory
- Risk Evaluations
- Certification Tasks

Compliance Integrity Review

- Internal Controls
- Metrics/Data
- Documentation
- Interviews/Process Reviews

Compliance Certification

Annually, business area representatives complete a compliance certification for their respective LRRs.

Information collected includes:

- The business process(es) used to implement the LRR
- Monitoring activities
- Software systems, either internal or vendor-provided
- Third-party contractual responsibility
- Training for appropriate audiences

Compliance Integrity Reviews

The Compliance Team and Enterprise Risk & Internal Controls have developed a process that will leverage available tools and information and ensure a collaborative and coordinated approach when their respective activities overlap. This streamlined approach is customer-focused, reducing the need for multiple touch points with a business area for the same or similar information.

- Updated or modified internal controls
- Automated reports/metrics
- Readily available documents
- Interviews/Process Reviews