



Ethics Policy

Revised 11/5/2025

PURPOSE:

SelectFlorida, Inc. (SF) employees are expected to maintain the highest ethical and legal standards in the conduct of SF's business affairs. The intent of this Ethics Policy is that each employee will conduct SF business with integrity, comply with all applicable laws and regulations, and avoid any circumstances that would cast doubt on an SF employee's ability to act with total objectivity and in SF's best interests. This Ethics Policy pertains specifically to SF employees; however, references are also made to the ethics requirements of SF Board Members and officers and members of boards affiliated with SF, which all employees should be mindful of while performing their duties on behalf of SF.

POLICY:

A. Avoiding the Appearance of Impropriety

Employees of SF must only use the powers and resources of SF and/or their respective Division to further SF and the public's interest and not for their own or another's financial or personal benefit other than salaried compensation and employer-provided benefits.

Employees are expected to safeguard their ability to make objective, fair and impartial decisions, and therefore may not accept benefits of any sort under circumstances in which it could be inferred by a reasonable observer that the benefit was intended to influence a pending or future decision of theirs, or to reward a past decision. Employees should avoid any conduct (whether in the context of business, financial or social relationships) that might undermine the public trust, whether that conduct is unethical or lends itself to the appearance of ethical impropriety.

B. Gifts Given to SF Employees or Board Members:

1. Pursuant to section 288.905, Florida Statutes, an employee or board member of SF may not accept or receive food, beverages, lodging, entertainment, or gifts from:

- A tourist or economic development entity that receives revenue from a tax imposed pursuant to sections 125.0104 (tourist development tax), 125.0108 (tourist impact tax), or 212.0305 (convention development tax);
or

- Any person, vendor, or other entity, doing business with SF, unless such food, beverage, lodging, entertainment, or gift is available to similarly situated members of the general public.

2. SF may not expend public funds for any food, beverages, lodging, entertainment, or gifts to SF employees or board members unless authorized pursuant to sections 112.061 or 288.905, Florida Statutes. (See section 288.905(6), Florida Statutes).

3. No employee of SF, including an officer or agent, the president, or the chief executive officer, may receive public compensation for employment that exceeds the salary and benefits authorized to be paid to the Governor. Any public payments of performance bonuses or severance pay to employees are prohibited unless specifically authorized by law. (See section 288.905(4), Florida Statutes).

4. Lodging expenses paid by SF for an employee of SF may not exceed \$225 per day, excluding taxes, unless SF is participating in a negotiated group rate discount or SF provides documentation of at least three comparable alternatives demonstrating that such lodging at the required rate is not available. However, an employee of SF may expend his or her own funds for any lodging expenses in excess of \$225 per day. (See section 288.905(5), Florida Statutes).

5. Gifts (regardless of value) received from personal friends in the ordinary course of friendship (including but not limited to birthday and/or anniversary gifts and gifts of hospitality), can be accepted, provided that any such personal friend is not:

- a person having a special pecuniary interest (either individually or through a corporation or organization) in a matter pending before SF or its Divisions;
- a person who (either individually or through a corporation or organization) is doing business with (providing goods or services to) SF or its Divisions under contract or agreement; or
- a person who (either individually or through a corporation or organization) is seeking to do business with SF or its Divisions.

6. Gifts received that help defray the cost of attendance at events or receptions, provided the employee's attendance at such event or reception is an appropriate exercise of the employee's official duties are permitted as long as the gift is not provided by a tourist or economic development entity that receives revenue from a tax imposed pursuant to sections 125.0104 (tourist development tax), 125.0108 (tourist impact tax), or 212.0305 (convention development tax) or a person, vendor, or other entity doing business with or seeking to do business with SF or its Divisions, unless such food, beverage, lodging, entertainment, or gift is available to similarly situated members of the general public or appropriate payment is made. (See section 288.905(6), Florida Statutes).

7. Gifts (regardless of value) made to SF or a Division thereof may be accepted by an employee on behalf of SF, provided the President/CEO or their designee has approved such acceptance.

8. Gifts (regardless of value) involving volunteer campaign-related travel, lodging, and/or food or beverage expenses (conducted on personal time), may be accepted, provided the Interim President or their designee has approved such acceptance.

What is a gift?

"Gift" is defined in section 112.312(12), Florida Statutes, to mean anything accepted by a person or on that person's behalf, whether directly or indirectly, for that person's benefit, and for which equal or greater consideration is not given within 90 days, including:

1. Real property.
2. The use of real property.
3. Tangible or intangible personal property.
4. The use of tangible or intangible personal property.
5. A preferential rate or terms on a debt, loan, goods, or services, which rate is below the customary rate and is not either a government rate available to all other similarly situated government employees or officials or a rate which is available to similarly situated members of the public by virtue of occupation, affiliation, age, religion, sex, or national origin.
6. Forgiveness of an indebtedness.
7. Transportation, other than that provided to a public officer or employee by an agency in relation to officially approved governmental business, lodging, or parking.
8. Food or beverage.
9. Membership dues.
10. Entrance fees, admission fees, or tickets to events, performances, or facilities.
11. Plants, flowers, or floral arrangements.
12. Services provided by persons pursuant to a professional license or certificate.
13. Other personal services for which a fee is normally charged by the person providing the services.
14. Any other similar service or thing having an attributable value not already provided for in this section.

What is NOT a gift?

A "gift" does **NOT** include:

1. Salary, benefits, services, fees, commissions, gifts, or expenses associated primarily with the donee's employment, business, or service as an officer or director of a corporation or organization.
2. Except as provided in s. 112.31485, contributions or expenditures reported pursuant to chapter 106, contributions or expenditures reported pursuant to federal election law, campaign-related personal services provided without compensation by

individuals volunteering their time, or any other contribution or expenditure by a political party or affiliated party committee.

3. An honorarium or an expense related to an honorarium event paid to a person or the person's spouse.

4. An award, plaque, certificate, or similar personalized item given in recognition of the donee's public, civic, charitable, or professional service.

5. An honorary membership in a service or fraternal organization presented merely as a courtesy by such organization.

6. The use of a public facility or public property, made available by a governmental agency, for a public purpose.

7. Transportation provided to a public officer or employee by an agency in relation to officially approved governmental business.

8. Gifts provided directly or indirectly by a state, regional, or national organization which promotes the exchange of ideas between, or the professional development of, governmental officials or employees, and whose membership is primarily composed of elected or appointed public officials or staff, to members of that organization or officials or staff of a governmental agency that is a member of that organization.

NOTE: There is no gift received if the employee pays in advance or reimburses the person or entity providing the gift for the cost of the item. Generally, this is measured as the cost of the item to the person providing it or the fair market value. While a membership fee required to use a golf course, tennis club, dining club or other private facility is not part of the reimbursable cost, the per ticket additional cost above the face value for seating at a skybox or other exclusive seating area at a sporting or theatrical venue is part of the reimbursable cost and must be included. Section 112.3148(7), of the Florida Statutes, and Rules 34-13.210 and 34.13.500, of the Florida Administrative Code, provide direction on how to value gifts and should be consulted when making payment for an event or item that otherwise would be prohibited absent payment of consideration. If in doubt about the appropriate amount of payment or consideration to provide, please consult with SF's Chief Operating Officer.

C. Other Ethical Requirements

As a matter of policy, all employees of SF are subject to sections 112.313(1)-(8), (10), (12), and (15); 112.3135; and 112.3143(2), of the Florida Statutes (portions of Florida's Code of Ethics) and are considered to be public employees and SF is considered to be their agency.

As a matter of law (see sections 288.901(1)(c) and 288.92(2)(b), Florida Statutes), the following are also subject to the same statutory requirements above and are considered to be public officers and employees and SF is considered to be their agency:

- President of SF;
- Chief Operation Officer
- VPs of SF;
- Members of SF Board of Directors,

- Officers and members of board of directors of Divisions of SF;
- Officers and members of board of directors of subsidiaries of SF;
- Officers and members of board of directors of corporations created to carry out the missions of SF;
- Officers and members of the board of directors of corporations with which a division is required by law to contract to carry out its missions.

The relevant provisions of Florida's Code of Ethics that employees of SF and officers and members of the Board of Directors of entities associated with SF are subject to include the following:

- Employees are prohibited from soliciting or accepting anything of value, such as a gift, loan, reward, promise of future employment, favor, or service that is based on an understanding that their official action or judgment would be influenced by such gift.
- Employees and their spouses and minor children are prohibited from accepting any compensation, payment, or thing of value when they know, or with the exercise of reasonable care should know, that it is given to influence their official action.
- Employees are prohibited from corruptly using or attempting to use their official positions to obtain a special privilege for themselves or others.
- Employees are prohibited from disclosing or using information not available to the public and obtained by reason of their SF position for the personal benefit of themselves or others.
- Employees acting in his or her official capacity are prohibited from directly or indirectly purchasing, renting, or leasing any realty, goods, or procuring contractual services for SF from a business entity in which they, their spouse, or child, or any combination of them, has a material interest (owns more than a 5% interest) or serves as an officer or director. Also, employees acting in a private capacity are prohibited from renting, leasing, or selling any realty, goods, or services to SF or any Division or entity affiliated with SF.
- Employees are prohibited from holding any employment or contract with any business entity or agency doing business with SF. Employees are also prohibited from holding any employment or having a contractual relationship which will pose a conflict between their private interests and employment duties or which will impede the full and faithful discharge of their employment duties.
- An employee who participates in the decision-making process involving a procurement, who influences the content of any specification or procurement standard, or who renders advice, investigation, or auditing, regarding SF's contract for services, is prohibited from being employed by a person holding such a contract with SF.

- Employees are prohibited from seeking for a relative any appointment, employment, promotion or advancement in the unit in which he/she is serving or over which he/she exercises jurisdiction or control.
- No employee may serve as a member of the SF Board of Directors while employed by SF.

For further discussion of these provisions refer to Chapter 112, Part III, Florida Statutes.

Note: Per section 288.901(1)(c), Florida Statutes, the exemption set forth in section 112.313(12) for advisory boards applies to the members of SF Board of Directors, as well as the exemption in section 112.313(15).

Note: Members of SF's Board of Directors, who are not otherwise required to file a "FORM 6- Full and Public Disclosure of Financial Interests" pursuant to Article II, section 8 of the Florida Constitution, must file a "FORM 1- Statement of Financial Interests" pursuant to section 112.3145, Florida Statutes. This means that every member of the SF Board of Directors is a "reporting individual" (i.e. required to file a full or limited financial disclosure) and thus subject to additional requirements under Florida's Code of Ethics, chapter 112, part III, including, but not limited to restrictions on accepting gifts and expenditures from registered executive branch lobbyists and principals and quarterly reporting permissible gifts in excess of \$100 in value received from non-relatives on a "FORM 9- Quarterly Gift Disclosure."

D. Conflicts of Interest:

SF employees should avoid any situation that involves or may involve a conflict between their personal interests and the best interests of SF. It is expected that all SF employees will use good judgment, high ethical standards and honesty in all business dealings. A conflict of interest is any circumstance that could cast doubt on your ability to act objectively regarding SF's interests, or any circumstance that benefits the employee to the detriment of SF. This includes potential conflicts arising from activities of a spouse, partner, immediate family members or any other person with whom an SF associate may have a personal relationship.

Any actions or interests that create even the appearance of conflict or impropriety fall within this Policy and must be avoided.

In addition to the statutory code of ethics, examples of activities that SF considers to be a potential conflict with SF's best interests and that are specifically prohibited include, but are not limited to:

1. Ownership or any significant interest by an SF associate or associate's immediate family in any enterprise or organization that does or seeks to do business with SF.

2. Acting in any capacity (such as employee, director, officer, partner, consultant, distributor, or agent) in any enterprise or organization that does or seeks to do business with SF.

3. Using or attempting to use your position or any property or resource of SF to develop outside business, employment or other personal interests.

4. Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving SF or its interests.

5. Use of SF's name to lend weight or prestige to an employee's personal endorsement of a candidate or political party or other political cause or to the endorsement of products or services of another enterprise or organization. This Policy shall not prohibit an SF employee from participating in approved projects with other organizations or enterprises through assigned SF employee participation.

6. Any other arrangements or circumstances, including family or other personal relationships, which might in any way dissuade the employee from acting in the best interests of SF.

E. Political Endorsements and Lobbying:

SF employees are prohibited from using their position with SF, SF's name, or any property or resource of SF to:

- (1) Endorse any candidate for any elected public office; or
- (2) Make contributions to the campaign of any such candidate.

Additional information can be found in the SelectFlorida Employee Handbook found on the SF intranet site, *"Participation In Political Activities."*

Please also keep in mind that SF is prohibited from using state funds to lobby the Florida legislature, the judicial branch, or any state agency. This does not prohibit SF from using state funds to pay for salaries, travel expenses, and per diem for full-time employees of SF who may be required by Florida law to register as lobbyists to represent SF before the state legislative or executive branches.

F. Notification:

Prior to engaging in an activity subject to this Policy, any conflict or potential conflict of interest must be immediately and fully disclosed to and approved by SF through notification to, and consent of, the SF Senior Vice President who will discuss with Human Resources and the Interim President.

G. Dual Employment:

No employee may have any on-going dual employment or dual compensation without prior approval from SF's Interim President.

H. Application for Exemptions:

There may be unique and/or compelling circumstances warranting exceptions to and/or waivers from these requirements established as a matter of policy in certain individual cases. In those instances, prior approval of SF's Sr.Vice President with consultation of SF's general counsel is required.

I. Training:

All employees are required to attend at least once annually ethics, public records, and sunshine law training provided by SF.

J. Compliance:

Any violation of this Policy will subject the SF employee to disciplinary action up to and including immediate termination. Any SF employee having knowledge of any violation of this Policy must promptly report such violation (See section K). Failure to report violations of this Policy will likewise subject an employee to discipline and even termination. Retaliation will not be tolerated against any SF employee or third party who claims or reports a violation.

K. Reporting:

If you have any questions or would like to report a potential violation of this Policy, please consult the Director, Human Resources.

Any employee who knowingly makes a false claim or report is subject to disciplinary action up to and including termination.

Acknowledgment Form

The Ethics Policy and Ethics Web page describe important information about this organization, and I understand that I am to comply with the Policy as outlined.

Since the information described in this Policy is subject to change, I acknowledge that revisions may occur. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate any or all of this policy as written. Only the Interim President or his or her designee has the ability to adopt any revisions to this Policy.

By signature below, I acknowledge that I have received a copy of the Ethics Policy, and I understand it is my responsibility to read and comply with the Policy and any revisions made to it. Should questions regarding appropriate behavior under this Policy arise during the course of my employment, I will seek guidance from SF SVP on how to handle the matter in question.

EMPLOYEE'S SIGNATURE:

DATE:

EMPLOYEE'S NAME:
(Typed or Printed)
