



<b>Series</b>	Compliance	
<b>Policy Name</b>	<b>Business Ethics</b>	
<b>Policy Number</b>	<b>1502</b>	
<b>Origination Date</b>	11/1/2013	Revised 3/5/2024
<b>Regulation</b>	Chapter 409.987, F.S. Chapter 112, F.S.	

## **Background/Purpose**

It is the intent of Communities Connected for Kids (CCKids) that officers, employees, and volunteers (herein referred to as "representative" or "representatives") will conduct CCKids business with integrity, in compliance with applicable laws, and without consideration to personal benefit. All reasonable steps are to be taken to avoid conflicts of interest, actual or perceived, between personal interests and official duties. Strict adherence to this policy should protect CCKids and its representatives from criticism, embarrassment, and/or litigation that might result from alleged or real conflicts of interest or unethical practices. This policy addresses, in summary form (1) gifts, favors, entertainment, and payments given or received by representatives, (2) potential conflicts of interest, and (3) certain other matters.

## **Policy**

### **1. Gifts to CCKids Representatives**

CCKids representatives shall neither seek nor accept for themselves or others personal gifts, favors, entertainment, loans, unpaid services, or other types of gratuities or hospitality from any person or entity doing business or in competition with CCKids co-workers, individuals served, families of individuals served or referral sources. However, the acceptance of an occasional gift or entertainment of nominal value, which does not create a corrupting influence, is acceptable.

### **2. Gifts or payment to CCKids business partners or their representatives**

- a. Gifts, favors, and entertainment may be given to others at CCKids expense if they meet all the following:
  - 1) Consistent with customary business practices.
  - 2) Not excessive in value.
  - 3) Could not be interpreted as graft or an inducement.
  - 4) Within the boundaries of legal and ethical standards.
  - 5) Will not embarrass CCKids or their representative if publicly disclosed.



- 6) Credits, allowances, rebates, and discounts may be paid only on accounts where related revenue was originally recorded. They may be paid only to the specific business entity or account with which CCKids has a contractual agreement, and not their representative. All such transactions shall be fully documented.
- 7) Payment by CCKids for goods and services rendered to CCKids will only be made to sole proprietorships, partnerships and corporations and will comply with all CCKids accounting and operational procedures. Appropriate 1099 forms must be filed in Accounts Payable.

### 3. Conflicts of Interest

- a. CCKids representatives interacting with children, parents, guardians, vendors, competitors, or anyone who does or seeks to do business with CCKids are to act in CCKids best interests, excluding any personal preference or advantage. Representatives shall make prompt and full disclosure to his/her manager and to the Chief Executive Officer via the CCKids of Interest Disclosure form of any prospective or actual situation that involves, may involve, or might appear to involve a conflict of interest.
- b. Members of the same family or living within the same domicile may be employed by CCKids in the same department unless the Chief Executive Officer or department head finds such employment is not in CCKids best interest. Relatives of senior management or board members as well as those working in Human Resources and Payroll shall not be hired by CCKids in any capacity unless approved in advance by the Chief Executive Officer.
- c. The term "conflict of interest" is defined as "a conflict, or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust." An actual, potential, or perceived conflict of interest occurs when an employee or member of the board is in a position to influence a decision that may result in a personal gain for that employee/Board Member or for a relative as a result of business dealings. For these purposes, a relative is defined as any person who is related by blood or marriage, or whose relationship with the employee is like that of persons who are related by blood or marriage.
- d. Examples of potential conflicts include:
  - 1) Ownership or financial interest by a representative or family member in any business partner or competitor of CCKids.
  - 2) Having a financial or other interest in the assets, leases, business transactions, or professional services of the agency.
  - 3) Serving as an officer, director, employee, consultant, or agent to any business partner or competitor of CCKids.
  - 4) Acting as a broker, finder, or any other intermediary for the benefit of a third party in a transaction potentially involving CCKids.
  - 5) Accepting favors, gifts, gratuities, or taking part in any activities or transactions that relate to, effect or influence decisions made for, regarding, or on behalf of CCKids.
  - 6) Using donor information or relationships inappropriately or in ways that might damage donor confidentiality and/or relationships with CCKids.
  - 7) Steering or accepting referrals of applicants or persons served to a private practice in which employees, consultants, or the immediate families of employees or consultants are engaged.
  - 8) Preferential treatment of covered persons when applying for and receiving the CCKids services.
  - 9) Nepotism



#### **4. Disclosure of non-public information**

Representatives shall not give or release any data or information of a confidential nature, whether verbal, written or electronic, to any non- CCKids entity without proper authorization. They also shall not use non-public information about CCKids or their business partners for personal profit or benefit. Examples of this are:

1. Trading or providing information for others.
2. Selling lists of individuals served by, employees of, or business partners of CCKids.

#### **5. Political Contributions**

Representatives shall not make any contribution of CCKids assets to any government official, candidate, political party, or committee of any government (local, state, national, or foreign) or any lobbying activity without the prior approval of the CEO.

#### **6. Accounting Standards**

All accounts and records shall be documented in a manner that clearly identifies the true nature of all business transactions, assets, liabilities, and fund balances. CCKids will remain in full compliance with Generally Accepted Accounting Principles (GAAP). No record, entry, or document shall be false, distorted, misleading, misdirected, deliberately incomplete, or suppressed.

#### **7. Violations of Policy**

Representatives shall report perceived or apparent violations of this policy to the CEO or Human Resources Director.

### **Procedures**

#### **Employee Procedures**

1. Newly hired employees in all job categories will be required to complete the Conflict of Interest and Disclosure Statement at the time of hire.
2. Annually, The HR Director or designee will ensure that a copy of the Business Ethics policy and a Conflict of Interest and Disclosure Statement form is provided to officers, directors, and other key personnel that participate in purchasing, contract negotiation and/or authorization of funds for specific purposes. The form must be signed and returned to Human Resources within 30 days.
3. Failure to comply or falsification of disclosure may result in disciplinary action, including possible dismissal.



## Board of Directors Procedures

1. CCKids CEO will ensure agency compliance with FL statutes regarding Board Conflict of Interest disclosures.
2. CCKids' CEO or designee will provide written notice to the Board of Directors outlining proposed subcontracts, prior to execution of said contracts.
3. Annually, CCKids CEO or designee will provide a copy of the Business Ethics policy and a Conflict of Interest Disclosure form. Board Members are requested to return within 30 days.
4. CCKids' Board Members and officers have an affirmative obligation to disclose a potential conflict of interest to the board. Board Members and officers of CCKids shall disclose to the board any activity that may reasonably be construed to be a conflict of interest before such activity is initially considered and approved or a contract is renewed by the board and shall recuse themselves from participation in discussion or vote taken with respect to these interests.
5. CCKids CEO or designee will annually provide to DCF a certification that the Board is free from conflicts.
6. All Annual Conflict of Interest Disclosure Statements identifying a conflict or potential conflict will be reported to the CCKids Board of Directors.
7. CCKids Compliance Officer or designee will notify Sunshine Health/Centene within 5 business days of discovery of the following instances:
  - a. The name of any officer, director or agent who is an employee of the State of Florida, or any of its agencies.
  - b. The name of any State employee who owns, directly or indirectly, an interest of five percent (5%) or more in your organization or any of its affiliates
  - c. The name of any AHCA or Department Of Elder Affairs (DOEA) employee who owns, directly or indirectly, an interest of one percent (1%) or more in your organization or any of its affiliates.

Approved: DocuSigned by:  
*Carol Deloach*  
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Carol Deloach, CEO  
3/13/2024