

ENERGY FLORIDA, INC.

POLICY TITLE: Conflict of Interest

Date Effective: 10/01/2011

Reviewed/Revised: 12/13/2013

POLICY NUMBER: ADMIN 11-01

Approved by: Michael Aller

APPLICATION

To all Energy Florida, Inc. (EF) employees, Officers, and Members.

OBJECTIVE

To set forth corporate policy and guidance regarding any conflict of interest whether, financial or otherwise in accordance with applicable laws and regulations.

POLICY

Pursuant to Federal Law and Regulation, no officers, employees, agents or board members of Energy Florida (EF) shall have any interest, financial or otherwise, direct or indirect; engage in any business transaction or professional activity; or incur any obligation of any nature which is in substantial conflict with the proper discharge of his or her duties in the public interest.

Also, no officers, employees, agents or board members, of Energy Florida shall vote in his or her official capacity upon any measure which may be to his or her private gain, or shall knowingly vote in his or her official capacity upon any measure which is to be of special gain of any principal other than Energy Florida which he or she is serving. No officers, employees, agents, or board members of Energy Florida shall attempt to influence a vote of others if it is to his or her private gain.

No officers, employees, agents or board members of Energy Florida or his or her spouse or children shall at any time accept any gift or compensation, payment or thing of value when such person knows, or with the exercise of reasonable cause, should know, that it was given to corruptly influence a vote or other action in which the officers, employees, agents or board members of EF were expected to participate in their official capacities.

Additionally, no officers, employees, agents or board members of Energy Florida or his or her spouse or children shall at any time accept any gift or compensation, payment or thing of value except as outlined below:


Gifts:

- Gifts valued at \$25 or less may be accepted, however no gifts of any value may be accepted from any contractor or vendor.
- Gifts must be immediately reported to the Energy Florida Executive Director.
- Gifts valued at more than \$25 must be returned within 30 days of receipt.
- Perishable gifts valued at more than \$25 may be kept; however the recipient must notify the

sender of our policy and request that no further gifts be sent.

ACTION

All officers, employees, or board members of Energy Florida will adhere to the above policy and will be required to complete the "Financial and Organizational Disclosure Statement" form with an update annually. Immediate and full disclosure shall be given where a conflict of interest exists or appears to exist.



Michael Aller
Executive Director

Dec 13, 2013
Date Signed