

**CODE OF ETHICS**  
**Hope Florida Foundation, Inc.**

**Definitions**

**1. Officer** – The Board of the Hope Florida Foundation, Inc. (“the Hope Florida Foundation”) and any officer appointed by the Board.

**2. Employee** – Any person, other than an officer, who is employed by the Hope Florida Foundation, whether for compensation or on a volunteer basis.

**3. Relative** – Any person who is an immediate family member of an officer or employee. An immediate family member is a spouse, child, parent, or sibling of the officer or employee, including any stepfamily members.

**4. Gift** – Anything accepted by a person, whether directly or indirectly by another, for that person’s benefit and for which no payment is made. A gift may include real property or its use; tangible or intangible personal property or its use; a preferential rate or terms on a transaction not available to other similarly situated; forgiveness of a debt; transportation; lodging; parking; food or beverage; dues, fees and tickets; plants and flowers; personal services for which a fee is normally charged by the provider; and any other thing or service having an attributable value.

**Acceptance of Gifts**

No officer, employee, or relative shall knowingly accept or receive any gift from a vendor that does business with the Hope Florida Foundation or has applied to do business with the Foundation or from any person or entity that has applied to receive or is expected to receive a grant or donation from the Foundation unless such gift is available to similarly situated members of the general public.

**Scenario 1:** You attend an event hosted by a non-profit entity that is under consideration for a grant from the Hope Florida Foundation, and the event is open to anyone who wishes to attend. Food and beverages are available.

- You may accept the food and beverage.

**Scenario 2:** You work closely with a non-profit entity that is expected to receive a grant from the Hope Florida Foundation and are offered snacks or a gift bag.

- You must politely decline.

**Scenario 3:** A vendor doing business with the Hope Florida Foundation offers to take you to lunch or bring food to a meeting or presentation.

- You must politely decline or personally pay for your own meal.

**Conflict of Interest**

No officer or employee shall participate in any decision to select a vendor for the Hope Florida Foundation or to award a grant or donation to an entity if a relative of the officer or employee is an officer, partner, or director of, or otherwise has a material interest in, such vendor or entity.

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**Scenario:** You are responsible for selecting a vendor to provide goods or services to the Hope Florida Foundation. Your child is one of the service providers competing for the contract.

- You should disclose the conflict and remove yourself from the decision-making process. This does not mean your child's company or product is excluded; it simply means that you may not be involved with the selection.

**Prohibition of Unauthorized Compensation**

No officer, employee, or relative shall, at any time, accept any compensation, payment, or thing of value when such officer, employee, or relative knows, or should have known, that it was given to influence any action in which the officer or employee was expected to participate in his or her official capacity.

**Misuse of Position**

No officer or employee shall corruptly use or attempt to use his or her position, or any property or resource of the Hope Florida Foundation, or perform his or her duties, to secure a special privilege, benefit, or exemption for him- or herself or others.

**Conflicting Employment or Contractual Relationship**

No officer or employee shall have or hold any employment or contractual relationship with any vendor doing business with the Hope Florida Foundation or with any entity that has applied to receive or is expected to receive a grant or donation from the Foundation. Nor shall any officer or employee have or hold any other employment or contractual relationship that will create a continuing or frequently recurring conflict between his or her private interests and the performance of his or her duties, or that would impede the full and faithful discharge of his or her duties.

**Violations**

The failure of an officer or employee to adhere to this Code of Conduct may result in disciplinary action, up to and including termination. Any violation of this Code must be reported to the President of the Hope Florida Foundation, outside counsel for the Foundation, or the General Counsel of the Department of Children and Families.