



**VISIT FLORIDA**  
**EMPLOYEE CODE OF ETHICS**

**PURPOSE**

It is essential that VISIT FLORIDA, a direct-support organization created by law and funded by state tax dollars as well as private investment, conduct its affairs honorably and in accordance with the highest ethical principles. To conform fully to the letter and spirit of legislative policy, and to further strengthen the faith and confidence of Floridians in VISIT FLORIDA, the following standards of conduct are required of every employee.

(1) Acceptance of Food, Beverages, Lodging, Entertainment, and Gifts

No VISIT FLORIDA employee shall 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 s. 125.0104 (Tourist Development Tax a.k.a. the “Bed Tax”), s. 125.0108 (Tourist Impact Tax), s. 212.0305 (Convention Development Tax), or from any person, vendor, or other entity, doing business with VISIT FLORIDA unless such food, beverage, lodging, entertainment, or gift is available to similarly situated members of the general public.

Explanation

VISIT FLORIDA employees may not accept food, beverages, lodging, entertainment, or gifts (anything of value) from a Florida destination marketing organization (DMO) or local economic development entity, VISIT FLORIDA vendors, or VISIT FLORIDA partners unless the item is available to similarly situated members of the general public or the employee pays the fair value of the item within ninety (90) days. For purposes of this policy, members of the “general public” are not “similarly situated” by virtue of occupation or industry alone. Items available to “similarly situated” members of the “general public” are items that are available to all people within an area—ordinary people that are not members of a particular organization or possess a special status, privilege, or knowledge that confers special treatment.

**For example:** You attend an event hosted by a DMO and the event is open to anyone that wishes to attend. Food and beverages are available.

- You may accept.

**For example:** You attend a conference, convention, luncheon, or other similar event hosted by a DMO or entity doing business with VISIT FLORIDA and a registration fee is paid (note: VISIT FLORIDA may pay or reimburse employees for expenses incurred in

the performance of their duties). The registration fee covers entrance, food, beverages, lodging, entertainment, and/or gifts received in connection with the event.

- You may accept. You should not seek reimbursement from VISIT FLORIDA for meals provided at the event since they are included in the registration fee.

**For example:** You attend a conference, convention, luncheon, or other similar event hosted by a DMO or entity doing business with VISIT FLORIDA and there is a registration fee. Your registration fee is waived because you have agreed to actively participate in hosting the event (e.g., as a speaker or panel member). The registration fee covers entrance, food, beverages, lodging, entertainment, and/or gifts received in connection with the event.

- You may accept. Any other support personnel that have an actual need to attend the event to support your participation, even if not directly participating themselves, may also accept. Support personnel must have a real and justifiable need to attend the event for the purpose of supporting your participation.

**For example:** You work closely with a DMO. The entity provides you a gift bag in appreciation of your efforts.

- You must politely decline.

**For example:** You attend a meeting at the office of a DMO and are offered snacks.

- You must politely decline.

**For example:** A VISIT FLORIDA vendor 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. If you are otherwise eligible for meal reimbursement pursuant to VISIT FLORIDA's travel policy you may be reimbursed for the meal in accordance with that policy.

**For example:** You plan to attend a conference, convention, luncheon, or other similar event hosted by a DMO to represent VISIT FLORIDA and/or sell VISIT FLORIDA products or partnerships. There is no registration fee but other tourism industry stakeholders are invited and in attendance.

- If you plan to eat the lunch you must provide a personal check in the most professional and unobtrusive manner possible. If you are otherwise eligible for meal reimbursement pursuant to VISIT FLORIDA's travel policy you may be reimbursed for the meal in accordance with that policy.

**For example:** You are offered an opportunity to visit a Florida attraction, restaurant, or location for free or at a reduced rate to increase your awareness and knowledge of the business or location. This offer is made so that you may better communicate and/or sell the Florida experience to visitors and/or potential visitors when serving them at Welcome Centers, planning marketing strategies, developing creative content, or otherwise contributing to tourism promotion for the state.

- You must decline.

**For example:** VISIT FLORIDA's public relations or travel trade professionals have identified and recruited a number of travel journalists, influencers, tour operators, travel agents, or similar entities to participate in a familiarization tour. The tour will showcase

several Florida locations and directly benefit many VISIT FLORIDA partners and Florida businesses. You are assigned to work on the tour and create the itinerary, greet the guests, organize travel between competing regions of the state, and accompany the guests on the trip to ensure the experience is positive and results in increased Florida travel stories or sales. Your attendance and interaction with the guests assists participating partners and is also critical to your role at VISIT FLORIDA because your job as a public relations or travel trade professional is to influence media and sales of Florida tourism products and to speak as an authoritative agent of the state's tourism industry. In connection with the trip, VISIT FLORIDA's participating partners offer free entrance, food, beverages, lodging, entertainment, and/or gifts in consideration of the media and/or sales opportunity.

- You may attend all stages of the familiarization tour as assigned. However, when eating at a restaurant you must pay for your meal and seek reimbursement within the parameters of VISIT FLORIDA's travel policy (any payment in excess of allowable amounts must be paid personally). You may accompany the guests to their hotel, but may not stay at the hotel yourself unless you pay for the room and the rate is within the parameters of VISIT FLORIDA's travel policy (or you personally pay the difference). You may, for the sole purpose of coordinating, hosting, and working the familiarization tour, accept free entrance to locations the guests attend to allow for the performance of your job duties. You should not accept free entrance to locations if it is not connected to your job duties.

**For Example:** VISIT FLORIDA is limited to paying lodging rates no greater than \$150 in most circumstances. VISIT FLORIDA seeks to negotiate with hotels to obtain a rate within the allowable range. A hotel chain is willing to offer a rate to VISIT FLORIDA that is comparable to the rate offered to government employees and other similarly situated members of the general public that have a similar demand for lodging.

- This is allowable.

## (2) Doing Business with VISIT FLORIDA

No VISIT FLORIDA employee acting on behalf of VISIT FLORIDA shall, either directly or indirectly, purchase, rent, or lease any realty, goods, or services for VISIT FLORIDA from any business entity of which the employee or the employee's spouse or child is an officer, partner, director, or proprietor or in which such employee or employee's spouse or child, or any combination of them, has a material interest. Nor shall any VISIT FLORIDA employee, rent, lease, or sell any realty, goods, or services to VISIT FLORIDA.

### *Explanation*

If you are responsible for purchasing things on behalf of VISIT FLORIDA, always consider any personal connection you may have with prospective service providers or vendors. If you have a conflict, disclose the conflict and remove yourself from the decision-making process. Additionally, do not attempt to sell things to VISIT FLORIDA.

**For example:** You are responsible for the selection of a vendor to provide VISIT FLORIDA services. Your daughter 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 that your daughter may not be considered—it simply means that you may not be involved with the selection.

### (3) Prohibition of Unauthorized Compensation

No VISIT FLORIDA employee, or his or her spouse or minor child shall, at any time, accept any compensation, payment, or thing of value when the employee knows, or, with the exercise of reasonable care, should know, that it was given to influence any action in which the employee was expected to participate in his or her capacity as a VISIT FLORIDA employee.

#### *Explanation*

Simply put, do not take a bribe. Importantly, this applies to spouses and minor children.

### (4) Misuse of Position

No VISIT FLORIDA employee shall corruptly use or attempt to use his or her position, or any property or resource of VISIT FLORIDA which may be within his or her trust, or perform his or her duties, to secure a special privilege, benefit, or exemption for himself, herself, or others.

#### *Explanation*

Avoid using your position, or VISIT FLORIDA resources under your control, to benefit others in any way that could be perceived as wrong.

**For example:** You have the keys to a VISIT FLORIDA van. You allow your son to use the van on the weekends to get around.

- You have misused your position.

**For example:** VISIT FLORIDA is conducting a competitive solicitation. You are not an authorized procurement liaison and choose to discuss the solicitation with interested parties while the competitive process is ongoing.

- You have misused your position by conferring a benefit (inside information) on select vendors.

### (5) Conflicting Employment or Contractual Relationship

No VISIT FLORIDA employee shall have or hold any employment or contractual relationship with any business entity or agency which is doing business with VISIT FLORIDA. Nor shall any employee of VISIT FLORIDA have or hold any 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 VISIT FLORIDA duties, or that would impede the full and faithful discharge of his or her VISIT FLORIDA duties.

All outside employment must be approved by the President of VISIT FLORIDA. Outside employment includes any regularly performed activity from which an employee receives

income. It also includes non-paying positions an employee may hold with an organization (e.g., a non-paying position on the board of directors for a nonprofit).

Requests for approval of outside employment should be directed to the General Counsel. The General Counsel or President will notify employees of the President's approval in writing.

#### *Explanation*

Seek approval prior to accepting outside employment through the General Counsel. If proposed outside employment will cause a conflict with your VISIT FLORIDA duties, it will not be approved.

#### (6) Disclosure or Use of Certain Information

No VISIT FLORIDA employee shall disclose or use information not available to members of the general public and gained by reason of his or her position for his or her personal gain or benefit, or for the personal gain or benefit of any other person or business entity.

#### *Explanation*

The vast majority of VISIT FLORIDA records are public by virtue of Florida's public records laws. However, to the extent that you are exposed to records that are not public, or information that is not contained within a record and is proprietary or confidential, you should not use it to benefit yourself or others.

**For example:** Solely as a result of working at VISIT FLORIDA, you learn the specific details of a certain organization's sensitive business information. This information is not public. You should not use this information for your own benefit, and you should not disclose this information to others for their benefit.

#### (7) Nepotism

No VISIT FLORIDA employee may appoint, employ, promote, advance, or advocate for the appointment, employment, promotion, or advancement of, a relative into a position over which the employee exercises control. Mere approval of budgets is not an exercise of control.

Relative means: father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, half-sister, grandparent, great grandparent, grandchild, great grandchild, step grandparent, step great grandparent, step grandchild, step great grandchild, person who is engaged to be married to the employee or who otherwise holds himself or herself out as or is generally known as the person whom the employee intends to marry or with whom the employee intends to form a household, or any other natural person having the same legal residence as the employee.

### *Explanation*

Do not attempt to help your relatives obtain employment in a position over which you have control.

**For example:** VISIT FLORIDA is in the process of selecting an intern. You should not advocate for your son to be selected. You may forward his application to the decision-maker but you should not apply pressure or take any further action beyond that point.

#### (8) Use of VISIT FLORIDA Funds on Food, Beverages, Lodging, Entertainment, or Gifts.

VISIT FLORIDA funds may not be expended for food, beverages, lodging, entertainment, or gifts for employees of the corporation, board members of the corporation, or employees of a tourist or economic development entity that receives revenue from a tax imposed pursuant to s. 125.0104 (Tourist Development Tax a.k.a. the "Bed Tax"), s. 125.0108 (Tourist Impact Tax), s. 212.0305 (Convention Development Tax), except as authorized by VISIT FLORIDA's travel policy.

### *Explanation*

VISIT FLORIDA employees with spending authority must ensure that corporate funds are not spent on food, beverages, lodging, entertainment, or gifts (anything of value) for VISIT FLORIDA employees, board members, or employees of a DMO or local economic development entity. VISIT FLORIDA employees may be reimbursed in accordance with its travel policy.

**For Example:** VISIT FLORIDA hosts an event. There is a registration fee which covers the cost of attendance, food, beverages, lodging, entertainment, and/or gifts associated with the event.

- DMO employees may pay the registration fee and participate fully in the event.

**For Example:** VISIT FLORIDA hosts an event. There is a registration fee which covers the cost of attendance, food, beverages, lodging, entertainment, or gifts associated with the event. A DMO employee is engaged to participate in hosting the event (e.g., speaking or participating on a panel). Similar participants are provided free entrance to the event to allow for their participation.

- VISIT FLORIDA may waive the registration fee to allow for the DMO employee to participate actively in hosting the event and as consideration for the services provided.

**For Example:** VISIT FLORIDA hosts an event attended by people that are not employees of a DMO. There is no registration. Food, beverages, lodging, entertainment, and/or gifts are provided in connection with the event.

- This is allowable. The items provided should be consumed by attendees (e.g., media personnel, travel trade professionals, etc.) and not VISIT FLORIDA employees.

**For Example:** VISIT FLORIDA provides food, beverages, lodging, entertainment, or gifts at a trade show for the purpose of competing to attract tour operators, consumers, media or other similar attendees to its booth. VISIT FLORIDA has sold space within the booth to both private businesses and DMOs (which in turn have resold space to private entities). As a result, the booth contains a mix of VISIT FLORIDA employees, DMO employees, private businesses partnering with VISIT FLORIDA, and trade show attendees.

- This is allowable. VISIT FLORIDA is not prohibited from expending funds in this way. Best practice in this situation would be to display a professional note near the items welcoming trade show attendees to accept the offering.

**For Example:** VISIT FLORIDA is having a board meeting. It is customary for organizations to provide food and beverage to volunteer board members at meetings.

- VISIT FLORIDA funds should not be used to provide food or beverages for employee or board members.

### COMPLIANCE

The failure of a VISIT FLORIDA employee to adhere to these standards of conduct may result in disciplinary action, up to and including termination. Any questions should be directed to the General Counsel of VISIT FLORIDA.