

ANTHEM PARK COMMUNITY DEVELOPMENT DISTRICT
ETHICS POLICY
CODE OF CONDUCT FOR SUPERVISORS
Adopted March 13, 2020

The Board of Supervisors of Anthem Park Community Development District (“District”) has adopted the following ethics policy for its Supervisors (“Ethics Policy”). This policy is intended to provide guidance with ethical issues and a mechanism for addressing unethical behavior. Members of the Board of Supervisors of the District are “Public Officers” as described in Sections 112.311-3261, Florida Statutes (“Code of Ethics”) and are subject to the provisions thereof. In the event of any conflict between the Code of Ethics and this Ethics Policy, the Code of Ethics shall control.

A. BOARD RESPONSIBILITIES

The general duties of Supervisors are set forth in Chapter 190, Florida Statutes. To fulfill this duty, Supervisors must:

- Regularly attend Board meetings.
- Review material provided in preparation for Board meetings.
- Be prepared to discuss agenda items.
- Make reasonable inquiry before making decisions.

B. PROFESSIONAL CONDUCT OF SUPERVISORS

1. Self-Benefits. Supervisors are prohibited from making any decisions that materially benefit themselves or their family members. Accordingly, no Supervisor may:

- Solicit or receive any compensation from the District for serving on the Board, except that Board Supervisors are entitled to receive compensation as set forth in Fla. Stat. §190.006(8).
- Make promises to any vendor without prior approval of the Board. Supervisors shall not separately negotiate with vendors and instead, permit District Management and staff to interact with and manage vendor solicitations and vendor contracts.
- Solicit or receive any gift, gratuity, favor, entertainment, loan or any other thing of value for themselves or their relatives from any person or company who is seeking a business or financial relationship with the District.
- Seek preferential treatment for themselves or others.
- Use District property, services, equipment or business for the specific gain or benefit of themselves or their relatives, except as is provided for all residents of the District.

2. Public Records; Confidential Information. Florida has a broad public records law set forth in Chapter 119, Florida Statutes. Supervisors are obligated to comply with such provisions with regard to public records in their custody and should make sure that the District Manager, as custodian of public records, is provided copies of all public records that come into the Supervisors' possession. Public records include, but are not limited to, emails, text messages, voice mail messages, letters and any other documents pertaining to the District. Chapter 119 creates limited exceptions from disclosure and treats only certain matters as confidential. The Supervisors should consult with and refer questions on disclosure of public records to the District Manager and District Counsel.

3. Sunshine Law. The business of the District must be conducted in accordance with Chapter 286, Florida Statutes, commonly referred to as the Sunshine Law. The Sunshine Law prevents Supervisors from conducting public business of the District other than at duly noticed meetings open to the public. As such, Supervisors should not discuss public business likely to come before the Board in any other forum, including email and social media. Supervisors should refer any questions about the Sunshine Law to District Counsel.

4. Misrepresentation. Supervisors may not knowingly misrepresent facts. All District data records and reports must be accurate and truthful and prepared in a truthful manner.

5. Interaction with Others. To ensure efficient management operations, avoid conflicting instructions from the Board and District Management and to avoid potential liability, Supervisors shall observe the following guidelines:

- The chairperson of the Board shall serve as liaison between the Board and District Management and provide direction on day-to-day matters. Supervisors may contact District Management to obtain documents and other data necessary to make informed decisions and carry out assigned liaison duties.
- The chairperson of the Board and the District Manager shall serve as liaison with District Counsel regarding all legal matters pertaining to the District. Supervisors may contact District Counsel with questions regarding their own conduct as it pertains to the District. In general, projects in which District Counsel is expected to devote substantial time, including all litigation matters, should come at the direction of the majority of the Board during a public meeting.
- Except for the chairperson when directed by the Board, Supervisors shall not give direction to District management or vendors. Further, as per Section 190.007, Florida Statutes, the District Manager is responsible for hiring and terminating the employment of vendors for professional, maintenance, supervisory, and other services as authorized by the Board. Supervision of vendors shall be conducted by the District Manager and the Amenities Center Manager.
- Supervisors are prohibited from harassing, intimidating or threatening District vendors, management, other Supervisors, and residents, whether verbally, physically or otherwise.

- When interacting with residents, individual Supervisors may not make any commitments or decisions on behalf of the Board without prior approval by Board action.

6. Proper Decorum. Supervisors are obligated to act with proper decorum. Although they may disagree with the opinions of others on the Board, they must act with respect and dignity and not make personal attacks on others. Accordingly, Supervisors must focus on issues, not personalities, and should conduct themselves with courtesy towards each other, towards District Management, managing agents, District Counsel, vendors and members of the District. Supervisors shall act in accordance with collective Board decisions and shall not act unilaterally or contrary to the Board's decisions.

All correspondence regarding the Board's position on a matter shall either come from the chairperson, District Manager or if necessary, District Counsel, after consultation with the Board at either a regular or special meeting.

7. Conflicts of Interest. Supervisors must immediately disclose any conflict of interest, whether their own or others to the District Manager. Supervisors must withdraw from participation in decisions in which they have a material interest. Supervisors are directed to the provisions of the Code of Ethics when determining if a conflict of interest exists in a particular situation. Additional questions can also be directed to District Counsel.

C. ATTENDANCE

Supervisors are required to attend all Board meetings. Supervisors cannot be absent from more than three (3) Board meetings in one calendar year. Supervisors' ability to attend Board meetings by telephone is limited to three (3) times in one calendar year.

D. VIOLATIONS

Supervisors who violate the District's Ethic Policy are deemed to be acting outside the course and scope of their authority. Any Supervisor in violation of this policy will first receive a warning letter from District Council. Further or continued violations may subject the Supervisor to public reprimand, immediate censure by the Board and/or referral to the Florida Commission of Ethics where appropriate.

E. PLEDGE

I have read the above Ethics Policy. I pledge to act in accordance with my obligations as described above.

Signature: _____ Date: _____

Print Name: _____