



Ethics for Independent Adjusters

**No-Gift Rule
Conflicts of Interest**

May 8, 2008



What You'll Learn

- i Why Is This Important
- i How Does This Apply to Me
- i Code of Ethics – Basics
- i Four Rules
- i Consequences for Violations



Why Is This Important?

- i **Your actions affect Citizens, its reputation, its policyholders, and yourself.**
 - | Independent Adjusters are the public face of the company in the aftermath of a catastrophe.
 - | All Citizens' representatives will have greater credibility if they conduct themselves in an ethical and professional manner.
 - | Your job depends on you acting ethically.
 - | It's the law (See Rule 69B-220.201, FAC).



How does this apply to me?

- i Each IA Firm and each individual IA must abide by Citizens' Code of Ethics
- i Obligations contained in:
 - l IA Contract – applies to IA Firm
 - l “Ethics & Confidentiality Acknowledgment” form – applies to you (individual IA)



Citizens Code of Ethics - Basics

i Purposes:

- l Maintain Citizens as a trusted decision making entity
- l Protect public interest and resources and Citizens' integrity



Citizens Code of Ethics - Basics

- i Citizens has strong Code of Ethics
- i Code of Ethics implements our enabling law, section 627.351(6)(d), Florida Statutes
- i Code of Ethics covers:
 - | Gifts
 - | Conflicts of Interests
 - | Reasonable exceptions when permitted by law



Four rules

IA Firms and individual IAs:

- i No gift to Citizens' employees/Board
- i No gift from Citizens' claimant
- i No conflict relationship with Citizens' employees/Board
- i No representation both sides of same claim



“No Gift” Rule

- i IA shall not GIVE gift to a Citizens' employee or Board of Governors (BOG)
 - | Citizens' employees/BOG may not receive gifts from IAs and other vendors

- i IA shall not ACCEPT gift from claimant:
 - | that is (or could be interpreted to be) intended to influence handling of claim, or
 - | that could be interpreted as an expression of gratitude for handling of claim

“No Gift” Rule



Gift defined:

- i Something of value for which recipient does not pay or give something in return of equal or greater value to giver within 90 days of receipt of item or service





No Conflicts of Interest

- i IA may **NOT** have a business relationship with Citizens' employee or Board member that qualifies as conflict of interest
 - | See Code of Ethics for description of potential conflicts

- i IA may **NOT** represent Citizens' insured against Citizens on same claim that IA serviced on Citizens' behalf



Process for Exceptions

- i What should I do If I think I may have a Conflict of Interest?
 - | Refer matter to Citizens' Human Resources department
 - | Each matter will be reviewed to determine if conflict exists
 - | Citizens may make reasonable exceptions when permitted by law



Consequences:

- i **Violation of Code of Ethics:**
 - | Citizens could terminate contract with IA Firm
 - | Individual IA is subject to disciplinary action up to and including dismissal by IA Firm