

CENTRAL FLORIDA EXPRESSWAY AUTHORITY

Ethics Policy Compliance Review

January 2021

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Overview

The Central Florida Expressway Authority (“CFX”) operates for the benefit of the public. As such, CFX strives to conduct business in accordance with the highest standard of ethics. The CFX Code of Ethics governs board members, committee members, employees, and consultants in the performance of their duties and obligations to CFX and serves as the standard for official conduct.

As part of a three-year audit cycle outlined in the 2021 Internal Audit Plan, Internal Audit has completed a review of CFX’s compliance with the Code of Ethics. Internal Audit last reviewed the compliance with the Code of Ethics in January 2018.

After the January 2018 review, the Code of Ethics was modified in April 2018 to prohibit consultants from holding conflicting employment or contractual relationships.



Objectives, Scope, and Approach

The objectives of this audit were to (1) review CFX’s ethics compliance process and related monitoring controls for design and operating effectiveness, and (2) assess CFX board and committee member, employee, and consultant compliance with the Code of Ethics.

The Ethics Policy Compliance Review was performed using the following approach:

1. Conducted interviews with CFX management regarding policy, applicable Florida Statutes, procedures, key personnel, and compliance reporting;
2. Reviewed the Code of Ethics and the following Florida Statutes to identify compliance requirements:
 - a. Chapter 112, Part III
 - b. Chapter 348.753
 - c. Section 104.31;

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3. Evaluated CFX's processes for monitoring compliance with the Code of Ethics and related internal controls for design effectiveness. Processes evaluated included the following areas:
 - a. Communication and Awareness
 - b. Training and Reinforcement
 - c. Change Management
 - d. Conflicts of Interest and Financial Disclosure Monitoring
 - e. Violation Monitoring
 - f. Penalties and Enforcement;
4. Performed operating effectiveness testing for identified key internal controls for the period February 1, 2018 through July 31, 2020;
5. Reviewed CFX board and committee member, employee, and consultant compliance with the Code of Ethics for the period February 1, 2018 through July 31, 2020; and
6. Identified opportunities and developed recommendations for improving the Authority's ethics compliance management process and internal controls.

Face the Future with Confidence

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