



**CONFLICT OF INTEREST CODE FOR THE
ALAMEDA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

The Conflict of Interest Code is promulgated under the authority of the Political Reform Act, Government Code section 81000, *et seq.*, which requires all state and local government agencies to adopt and promulgate conflict of interest codes. Regulation 2 Cal. Code of Regs., section 18730, as adopted by the Fair Political Practices Commission contains the terms of a standard conflict of interest code; which may be incorporated by reference and may be amended by the Fair Political Practices Commission after public notice and hearing to conform to amendments in the Political Reform Act.

Therefore, the terms of 2 Cal. Code of Regs., section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with the attached Appendix in which employees are designated and disclosure categories are set forth, constitute the Conflict of Interest Code of the Alameda County Employees' Retirement Association.

Designated employees shall file their statements of economic interests with Angela Bradford, Legal Department, ACERA, who will make the statements available for public inspection and reproduction. (Gov. Code section 81008.)

APPENDIX A
DISCLOSURE CATEGORIES

1. Persons in this category must disclose all investments and business positions in business entities, sources of income and interests in real property.

2. Persons in this category must disclose investments and business positions in business entities, sources of income and interests in real property which provide or directly support or in the future may likely provide or directly support, the provisions of services, supplies, materials, machinery, or equipment to ACERA.

APPENDIX B
DESIGNATED POSITIONS, OFFICIALS AND CONSULTANTS

I. DESIGNATED POSITIONS

| Position | Disclosure Category |
|--|-------------------------|
| Assistant Chief Executive Officers | 1 and 2 |
| Chief Financial Officer | 1 and 2 |
| Chief Counsel | 1 and 2 |
| Benefits Manager | 1 and 2 |
| Associate Counsel | 1 and 2 |
| Project & Information Services Manager | 1 and 2 |
| Human Resources Officer | 1 and 2 |
| Internal Auditor | 1 and 2 |
| Consultants* | (Reference note below.) |

II. OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

It has been determined that the positions listed below manage public investments and will file a statement of economic interests pursuant to Government Code Section 87200:

Each ACERA Trustee
Chief Executive Officer
Chief Investment Officer

III. CONSULTANTS

*Only those consultants who perform one or more of the following functions shall be required to complete and file Conflict of Interest/Form 700 Statement of Economic Interests with the Legal Department:

- 1) Making a governmental decision;
- 2) Serve in staff capacity and participate in making a governmental decision; or
- 3) Serve in staff capacity and perform the same or substantially all the same duties that would otherwise be performed by an individual holding a designated position in the agency's Conflict of Interest Code.

Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category, which is category 1, in the Code subject to the following limitation:

The Chief Executive Officer may determine in writing that a particular consultant, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the disclosure requirements described in the section. Such written determination shall include a description of the consultant’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Chief Executive Officer’s determination is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code.