

Conflict of Interest Code of
the

LACERA WHOLLY-OWNED TITLE HOLDING COMPANIES

Incorporation of FPPC Regulation 18730
(2 California Code of Regulations, Section 18730) by Reference

The Political Reform Act (Government Code Section 81000, *et seq.*) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Regs. Section 18730), which contains the terms of a standard conflict of interest code. After public notice and hearing, it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730, and any amendments to it duly adopted by the Fair Political Practices Commission, are hereby incorporated by reference into the LACERA Wholly-Owned Title Holding Companies' ("Agency") Conflict of Interest Code. This regulation and the attached Exhibits designating officials and employees and establishing economic disclosure categories shall constitute the conflict of interest code of this Agency.

Place of Filing of Statements of Economic Interests

All officials and employees required by this Conflict of Interest Code to submit a Statement of Economic Interests ("Statement") shall file their Statements with the President and Treasurer (Chief Executive Officer) of the Agency, or his or her designee.

The Agency shall retain the originals of Statements for all Designated Positions named in this Conflict of Interest Code and for positions listed under "Officials Who Manage Public Investments". All retained Statements, original or copied, shall be available for public inspection and reproduction (Gov. Code Section 81008).

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EXHIBIT "A" – DISCLOSURE CATEGORIES

CATEGORY 1

Persons in this category shall disclose all interest in real property if the property or any part of it is located within the jurisdiction or twenty-five miles of any real property owned or operated by the Agency.

Persons are not required to disclose a residence, such as a home or vacation cabin, used exclusively as a personal residence; however, a residence in which a person rents out a room or for which a person claims a business deduction may be reportable.

CATEGORY 2

Persons in this category shall disclose all investments and business positions.

CATEGORY 3

Persons in this category shall disclose all income (including gifts, loans and travel payments) and business positions.

CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts and loans) received from business entities that manufacture, provide or sell services and/or supplies of a type utilized by the Agency and associated with the job assignment of designated positions assigned to this disclosure category.

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EXHIBIT “B” – DISCLSoure BY DESIGNATED POSITIONS

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Director, Chairman of the Board	1, 2, 3
President and Treasurer (Chief Executive Officer)	1, 2, 3
Vice President	1, 2, 3
Vice President and General Counsel	1, 2, 3
Vice President, Assistant Secretary and Assistant Treasurer	1, 2, 3
Vice President, Secretary and Assistant General Counsel	1, 2, 3
Operations Manager	1, 4
Assistant Operations Manager	1, 4
Consultants/New Positions*	

* Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in this code, subject to the following limitations:

The President and Treasurer (Chief Executive Officer) or his or her designee may determine in writing that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with disclosure requirements in this section. Such written determination shall include a description of the consultant’s or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The President and Treasurer (Chief Executive Officer) or his or her designee’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. (Gov. Code Section 81008.)

Individuals who perform under contract the duties of any designated position shall be required to file Statements disclosing reportable interest in the categories assigned to that designated position.

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Public Officials Who Manage Public Investments

It has been determined that the position listed below manages public investments and will file a Statement pursuant to Government Code Section 87200 et seq.

Chief Investment Officer

The Agency's independent contractors, consultants, and any of their employees, who pursuant to a contract with THCs, manage public investments by performing the same or substantially all the same functions as the Chief Investment Officer or Principal Investment Officer.

EFFECTIVE DATE: 10/1/2025