

# VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

## CONFLICT OF INTEREST CODE

The Political Reform Act, Government Code Section 81000 et seq., requires local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted a regulation (Cal. Code of Regs., tit. 2, sec. 18730) which contains the terms of a standard Conflict of Interest Code ("standard code"), which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings.

The terms of California Code of Regulations, title 2, 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 A, Appendix B, and Appendix C in which trustees, employees and consultants are designated and disclosure categories are set forth, constitute the Ventura County Employees' Retirement Association (VCERA) Conflict of Interest Code.

Pursuant to section 4 of the standard code, designated employees who do not file statements pursuant to Government Code section 87200 shall file Statements of Economic Interest with the VCERA Retirement Administrator. These statements shall be retained by VCERA.

The Board shall review this code at least every two (2) years to ensure that it remains relevant and appropriate.

7/11/22  
Approved Date

  
Authorized Signature  
Ventura County Employees' Retirement Association

**VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

**CONFLICT OF INTEREST CODE**

APPENDIX A

DESIGNATED POSITIONS

| <u># OF POSITIONS</u> | <u>POSITION TITLE</u>          | <u>DISCLOSURE CATEGORY</u> |
|-----------------------|--------------------------------|----------------------------|
| 12                    | Director (Board Member)        | 1*                         |
| 1                     | Retirement Administrator       | 1*                         |
| 1                     | Chief Financial Officer        | 1*                         |
| 2                     | Investment Consultant          | 1*                         |
| 1                     | Investment Counsel             | 1*                         |
| 1                     | Chief Investment Officer (CIO) | 1*                         |
| 1                     | General Counsel                | 1*                         |

\* It has been determined that Board Members, the Retirement Administrator, the Chief Financial Officer, Investment Counsel and the Investment Consultants are positions that "manage public investments" and are required to file statements of economic interest pursuant to Government Code section 87200 et seq. No additional filing requirements for these positions are established by this code. See APPENDIX C.

**VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

**CONFLICT OF INTEREST CODE**

APPENDIX B

DISCLOSURE CATEGORIES

Subject to the definitions set forth in the Political Reform Act and applicable regulations:

Category 1

Full Disclosure:

All investments, business positions and sources of income, including gifts, loans and travel payments, as directed on Form 700.

**VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION**

**CONFLICT OF INTEREST CODE**

**APPENDIX C**

**AGENCY POSITIONS THAT MANAGE PUBLIC INVESTMENTS  
FOR PURPOSES OF SECTION 87200 OF THE GOVERNMENT CODE.**

|                                |    |
|--------------------------------|----|
| Director (Board Members)       | 12 |
| Retirement Administrator       | 1  |
| Chief Financial Officer (CFO)  | 1  |
| Investment Consultant          | 2  |
| Investment Counsel             | 1  |
| Chief Investment Officer (CIO) | 1  |
| General Counsel                | 1  |