

**SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM
CONFLICT OF INTEREST CODE**

APPENDIX A

Designated Positions

<u>Position</u>	<u>Duties</u>	<u>Category</u>
1. <u>Members of the Retirement Board also known as "Trustees"</u>	Board Members/Trustees exercise responsibility for the management of public investments, and are identified in SDMC sections 27.3503, 27.3510 as statutory filers to Government Code section 87200.	Form 700 (Government Code § 87200)
2. <u>Chief Executive Officer ("CEO")</u>	Under policy direction of SDCERS' Board of Administration ("Board"), the CEO manages the routine affairs of retirement office and staff; directs SDCERS staff; sets policy direction for staff; counsels and informs employees regarding options and benefits; has primary responsibility to deal with actuaries; and provides assistance and recommendations to the Board and its committees.	Form 700 (Government Code § 87200)
3. <u>Deputy Chief Executive Officer</u>	Under the direction of the CEO, the Deputy CEO assists the CEO in managing routine affairs of the retirement office and staff; provides assistance and recommendations to the Board and its committees; oversees operations; and coordinates projects with the actuary.	Form 700 (Government Code § 87200)
4. <u>General Counsel / Chief Compliance Officer</u>	Under the direction of the CEO, the General Counsel provides legal representation, advice, and recommendations to the Board and staff; directs and reviews the work of SDCERS' Legal Services Division and outside legal firms. Under the direction of the Board, the Chief Compliance Officer develops and maintains procedures to prevent illegal, unethical, or improper conduct; develops and updates ethics standards for the Board and staff; ensures compliance with federal tax laws; monitors	1 – Form 700 (Local Code Filer Under San Diego Municipal Code §27.3503; Government Code§87300)

compliance with local, state, and federal laws; and conducts investigations as required.

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| 5. <u>Chief Investment Officer</u> | Under the direction of the CEO, the Chief Investment Officer prepares recommendations regarding investment policy, practices, allocations, and instruments; coordinates and participates in the review, selection, evaluation, and termination of investment managers; and negotiates contracts for investment managers and other investment-related activities. | Form 700
(Government
Code § 87200) |
| 6. <u>Associate General Counsel / Assistant General Counsel</u> | Under the direction of the General Counsel, the Associate General Counsel/Assistant General Counsel acts on behalf of the General Counsel when necessary and provides legal representation, advice, and recommendations to the Board and staff. | 1 |
| 7. <u>Member Services Director</u> | Under the direction of the Chief Benefits Officer, the Member Services Director oversees customer service functions, including the call center, direct correspondence, and meetings with Members; resolves complex Member benefit issues and directs all Member counseling, education, and outreach activities; and oversees the Communications Manager and communications with Members. | 1 |
| 8. <u>Benefits Administration Director</u> | Under the direction of the CEO, the Benefits Administration Director oversees benefits administration, and directs and manages benefits administration staff in the delivery of services and benefits to SDCERS' Members, including calculating and preparing pension payments, administering health benefits, processing enrollments and terminations, tracking service credit and Member contributions, reconciling deceased Member accounts, and processing beneficiary payments. | 1 |

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| 9. <u>Chief Information Officer/Chief Information Security Officer</u> | Under the direction of the CEO, the Chief Information Officer/Chief Information Security Officer directs and manages information technology (“IT”) security, staff, contractors, consultants, vendors, and technical services contracts; manages technical infrastructure and facilities, desktop services, application support, SDCERS Help Desk, IT procurement and system implementation and integration projects; manages Board audio/video production; develops and manages division budget to support business operations; develops and implements IT strategic initiatives to support SDCERS’ business objectives; and develops, implements, and enforces organizational IT policies and procedures. | 1 |
| 10. <u>Senior Investment Officer</u> | Under the direction of the Chief Investment Officer, the Senior Investment Officer advises and makes recommendations to the Chief Investment Officer, CEO, and the Board by conducting research and investigations and preparing or presenting reports and/or analyses; and acts as back-up to the Chief Investment Officer when the Chief Investment Officer is unavailable. | 1 |
| 11. <u>Investment Officer</u> | Under the direction of the Chief Investment Officer, the Investment Officer advises and makes recommendations to the Chief Investment Officer, CEO, and the Board by conducting research and investigations and preparing or presenting reports and/or analyses. | 1 |
| 12. <u>Assistant Investment Officer</u> | Under the direction of the Chief Investment Officer, the Assistant Investment Officer is responsible for the management of SDCERS’ operational, audit, and cash management functions and serves as a resource for the Investment Division. | 1 |

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| 13. <u>Internal Auditor</u> | Under the direction of the Board and Audit Committee, the Internal Auditor plans, conducts, and reports on internal audit projects; evaluates SDCERS' internal control procedures and processes; evaluates compliance with governing laws, policies, and procedures; coordinates audit efforts with external auditors; assists the Audit Committee in its review of the Comprehensive Annual Financial Report; and performs investigations or other duties as requested by the CEO or Audit Committee. | 1 |
| 14. <u>Disability Review Officer</u> | Under the direction of the Chief Benefits Officer, the Disability Review Officer reviews disability applications for compliance with medical and administrative requirements and makes recommendations to the Board and the Disability Committee regarding eligibility for disability retirements by preparing or presenting reports and analyses. | 1 |
| 15. <u>Finance Director</u> | Under the direction of the CEO, the Finance Director directs and manages finance and accounting staff and budget operations; develops and administers department budgets; prepares financial reports for the Board; prepares financial analyses for management, actuaries, plan sponsors, and consultants as assigned; implements department goals, objectives, policies, and procedures; oversees the maintenance of accounting system and related interfaces; oversees the preparation of the annual state comptroller's report; and coordinates preparation of the annual financial report and interactions with the independent auditor. | 1 |
| 16. <u>Communications Manager</u> | Under the direction of the Member Services Director, the Communications Manager ensures the accuracy, consistency, timeliness, and functionality of SDCERS' broad range of communication responsibilities to its membership, plan sponsors, media, and general public; manages the budget for communications; and is responsible for procurement | 1 |

of contracts necessary to complete their duties such as, but not limited to, contracts related to printing services, mailing services, web site design, and other vendors and consultants.

17. **Consultant / Investment Manager** An individual who, pursuant to a contract with SDCERS: (1) authorizes SDCERS to enter into, modify, or renew a contract requiring agency approval, (2) grants agency approval to a contract requiring agency approval, or (3) serves in a staff capacity and, in that capacity, performs duties that would otherwise be performed by a designated position without supervision of that designated position. Consultant shall be included in the list of designated employees and shall disclose pursuant to category 1, subject to the following limitation: The CEO may determine in writing that a particular consultant is hired to perform a range of duties that is limited in scope and thus, is not required to fully comply with the disclosure requirement in this 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 CEO'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. 1

18. **Independent Non-Board Members of the Audit or Investment Committees** Audit Committee Independent Non-Board Member: Oversees financial reporting processes, systems of internal controls, audit process, and process for monitoring compliance with laws, regulations, and internal financial policies and procedures. 1

Investment Committee Independent Non-Board Member: Develops investment guidelines; monitors investment transactions and performance, market conditions, and recommends changes as needed; recommends investment managers and consultants; and develops proxy voting guidelines.

19. **Independent Non-Board Members of the Audit or Investment Committees**
- Audit Committee Independent Non-Board Member: Oversees financial reporting processes, systems of internal controls, audit process, and process for monitoring compliance with laws, regulations, and internal financial policies and procedures. 1
- Investment Committee Independent Non-Board Member: Develops investment guidelines; monitors investment transactions and performance, market conditions, and recommends changes as needed; recommends investment managers and consultants; and develops proxy voting guidelines.
20. **New Positions**
- An individual hired to a new position not yet covered under this conflict of interest code that makes or participates in making governmental decisions must file Form 700. However, the CEO may determine that the new position is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the new position's duties and, based upon that description, a statement of the extent of disclosure requirements. The CEO'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. 1

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APPENDIX B

Disclosure Categories

Category 1 Investments or business positions in any business entity that supplies goods or services to SDCERS.

Income and gifts from any person or business entity that supplies goods or services to SDCERS or that may be reasonably anticipated to do business with SDCERS.

Interests in real property.

For the purposes of this Appendix, an “interest in real property” is any real property located in or within two miles of the City of San Diego, or within two miles of any land owned by SDCERS as set forth in the Attachment to this Appendix, which lists the real properties owned by SDCERS in its direct and co-investment real estate portfolio. A copy of this Attachment is also on file at the SDCERS office.



Direct Real Estate Holdings as of July 12, 2024

	PROPERTY NAME	PROPERTY TYPE
1.	None	None