

**CONFLICT OF INTEREST CODE
OF
SAN DIEGO CONVENTION CENTER CORPORATION, INC.**
as amended October 30, 2024

1. **Standard Code of FPPC** The Political Reform Act of 1974 (Government Code section 81000, et seq.) requires each state and local government agency to adopt and promulgate a conflict of interest code. San Diego Convention Center Corporation, Inc. has heretofore adopted such a code. This code applies to the San Diego Convention Center Corporation, Inc. The Fair Political Practices Commission (FPPC) has promulgated a regulation (2 Cal. Code of Reg. § 18730) which contains the terms of a standard conflict of interest code and can be incorporated by reference as an agency's code. After public notice and hearing the standard code may be amended by the FPPC to conform to amendments in the Political Reform Act.

2. **Adoption of Standard Code of FPPC** The terms of Title 2, California Code of Regulations, Section 18730 and any future amendments thereto duly adopted by the FPPC are hereby incorporated by reference. This regulation and the Appendices attached hereto designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of San Diego Convention Center Corporation, Inc. This code shall take effect when approved by the City of San Diego and shall thereupon supersede all prior codes adopted by San Diego Convention Center Corporation, Inc.

3. **Filing of Statements of Economic Interests**

Pursuant to Section 4 of the standard code, persons holding the positions designated in **Appendix A**, attached hereto, shall file statements of economic interests with the Clerk of the City of San Diego, which will make the statements available for public inspection and reproduction (Government Code section 81008). The statements of economic interests must disclose investments and business positions, income and gifts, and interests in real property in accordance with the filer's disclosure category (set forth in Appendix A) and the disclosure requirements listed in **Appendix B**, attached hereto. Members of the Board of Directors shall be responsible for filing their statements with the City Clerk but may also provide the statements to the Office of the President & CEO (Executive Offices), who will make and retain copies and forward the originals to the City Clerk if provided with the statements in advance of the filing deadline. Employees and consultants shall file their statements with the corporation's Executive Offices, who shall make and retain copies and forward the originals of these statements to the City Clerk.

Adopted by the Board of Directors of San Diego Convention Center Corporation, Inc. on October 30, 2024.


Alyssa Turowski, Secretary

Agenda Item 3.A

CERTIFICATION

The foregoing revision to the Conflict of Interest Code was prepared by San Diego Convention Center Corporation, Inc. after a fair opportunity was offered to all employees and officials designated herein, and the public, to present their views.

Dated: 10-30-24



Clifford Rippetoe
President and Chief Executive Officer

Agenda Item 3.A

APPENDIX A

Jurisdiction, Designated Positions and Disclosure Categories

Jurisdiction

The jurisdiction applicable to those persons required to file Statements of Economic Interest pursuant to this Conflict of Interest Code is as follows:

- For directors, employees and consultants of the San Diego Convention Center Corporation the jurisdiction is the San Diego Convention Center

Designated Positions/Disclosure Categories

The following designated positions are required to disclose economic interests according to the categories assigned.

Position	Disclosure Category
Officer or Member of Board of Directors	Category 1
President and Chief Executive Officer	Category 1
Chief Operating Officer	Category 1
Chief Financial Officer	Category 1
General Counsel	Category 1
Executive Vice-President, Sales & Revenue	Category 1
General Manager	Category 1
Controller	Category 1
Executive Director, Human Resources	Category 2
Director of Venue Operations	Category 2
Director of Planning and Procurement	Category 2
Procurement Manager	Category 3
Procurement Analyst	Category 3
Defined Contribution Committee Members	Category 2
Consultants/New Positions	Category 4

Agenda Item 3.A

APPENDIX B

Disclosure Categories

Category 1: You must disclose:

- Investments and business positions in business entities (1) doing business with the San Diego Convention Center Corporation; (2) providing any type of goods and services to the Convention Center; or (3) that use the Convention Center.
- Income and gifts from any source doing business with the San Diego Convention Center Corporation or who is a party to a contract with the San Diego Convention Center Corporation.
- Interest in real property located within a two-mile radius of the San Diego Convention Center and any other real property owned, used or operated by the San Diego Convention Center Corporation.

Category 2: You must disclose:

- Investments and business positions in any entity (1) doing business with the San Diego Convention Center Corporation; (2) providing any type of goods and services to the Convention Center; or (3) any other business that uses the Convention Center. For purposes of Defined Contribution Committee Members, disclosure is limited to entities providing goods or services supplied by any actuarial, accounting, banking, financial, investment, or consulting firm.
- Income and gifts from any source doing business with the San Diego Convention Center Corporation or who is a party to a contract with the San Diego Convention Center Corporation.

Category 3: You must disclose

- Investments and business positions in any firm that supplies goods or services to the San Diego Convention Center Corporation.
- Income and gifts from any person or business entity that supplies goods or services to the San Diego Convention Center Corporation.

Category 4: Consultants/new positions shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation: The President may determine in writing that a particular consultant or new position, although a "designated filer, 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 described 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'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.