

**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 §§27.3503, 27.3510 as statutory filers to Government Code §87200.	Form 700 (Government Code § 87200)
2. <u>Chief Executive Officer</u>	Under policy direction of the Retirement Board, 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, provides assistance and recommendations to the Board and its committees.	1 – Form 700 (Local Code Filer Under San Diego Municipal Code §27.3503; Government Code §87300)
3. <u>General Counsel / Chief Compliance Officer</u>	General Counsel: Under the direction of the CEO, provides legal representation, advice, and recommendations the Board and staff; directs and reviews the work of SDCERS' Legal Division and outside legal firms. Chief Compliance Officer: Under the direction of the Board, develops and maintains procedures to prevent illegal, unethical or improper conduct; develops and updates ethics standards for Board and staff; ensures compliance with federal tax laws; and monitors compliance with local, state and federal laws and conducts investigations as required.	1
4. <u>Chief Investment Officer</u>	Under the direction of the CEO, prepares recommendations regarding investment policy, practices, allocations, and instruments; coordinates and participates in the review, selection, evaluation, and termination of investment managers; negotiates contracts for investment managers and other investment-related activities.	1

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| 5. <u>Associate General Counsel / Assistant General Counsel</u> | Under the direction of the General Counsel, acts on behalf of the General Counsel when necessary, and provides legal representation, advice, and recommendations to the Board and staff. | 1 |
| 6. <u>Member Services Director</u> | Under the direction of the Chief Benefits Officer, oversees customer service functions, including Call Center, direct correspondence, and meetings with Members. Resolves complex Member benefit issues, and directs all member counseling, education and outreach activities. Oversees the Communications Manager and communications with members. | 1 |
| 7. <u>Chief Benefits Officer</u> | Under the direction of the CEO, oversees benefits administration, member services, and the processing of disability retirements; 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. Coordinates with the actuary | 1 |
| 8. <u>Chief Information Officer</u> | Under the direction of the CEO, directs and manages information technology staff, contractors, consultants, vendors and technical services contracts; manages technical infrastructure and facilities, desktop services, application support, Help Desk, IT procurement and system implementation and integration projects; manages Board of Administration audio/video production; develops and manages division budget to support business operations; develops and implements IT Strategic Plan and initiatives to support SDCERS' business objectives; develops, implements and enforces organizational IT policies and procedures. | 1 |

9. <u>Senior Investment Officer</u>	Under the direction of the Chief Investment Officer, advises and makes recommendations to the Chief Investment Officer, CEO, and the Board by conducting research and investigations, preparing or presenting reports and/or analysis and acts as back-up to the Chief Investment Officer when the Chief Investment Officer is unavailable.	1
10. <u>Investment Officer</u>	Under the direction of the Chief Investment Officer, advises and makes recommendations to the Chief Investment Officer, CEO, and the Boardby conducting research and investigations, preparing or presenting reports and/or analysis.	1
11. <u>Assistant Investment Officer</u>	Under the direction of the Chief Investment Officer, responsible for the management of SDCERS' operational, audit, and cash management functions and serves as a resource for the Investment Division	1
12. <u>Internal Auditor</u>	Under the direction of the Board Audit Committee and Board, 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 (CAFR); and performs investigations or other duties as requested by SDCERS' CEO or the Audit Committee.	1
13. <u>Disability Review Officer</u>	Under the direction of the Chief Benefits Officer, reviews disability applications for compliance with medical and administrative requirements; makes recommendations to the Board of Administration and the Disability Committee regarding eligibility for disability retirements by preparing or presenting reports and analysis.	1
14. <u>Controller</u>	Under the direction of the CEO, directs and manages finance and accounting staff and budget operations; develops and administers department budget; prepares financial reports for the Board;	1

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; coordinates preparation of the annual financial report (CAFR) and interactions with the independent auditor.

15. Communications Manager

Under the direction of the Member Services Director, 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 of and 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.

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16. Consultant

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 Chief Executive Officer 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 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.

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| 17. <u>Investment Manager</u> | Exercises discretionary authority over those funds or accounts designated to be under his or her supervision. Directs investments in those accounts without prior consultation with the Board or Staff. Initiates, negotiates, and completes purchases and sales of securities and properties within the portfolio(s) under his or her supervision. Makes decisions and recommendations within the Board's Investment Guidelines and City Charter. | 1 |
| 18. <u>Independent Non-Board Members of the Audit or Investment Committees</u> | <p>Audit Committee Non-Board Member: Overseas financial reporting processes, systems of internal controls, audit process and process for monitoring compliance with laws and regulations and internal financial policies and procedures.</p> <p>Investment Committee Non-Board Member: Develop investment guidelines, monitor investment transactions and performance, market conditions, and recommend changes as needed; recommend investment managers and consultants, develop proxy voting guidelines.</p> | 1 |

SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM
CONFLICT OF INTEREST CODE
APPENDIX B

Disclosure Categories

Category 1

Investments and business positions in any business entity that supplies goods or services to SDCERS, and in any security which was or is held by any fund administered by Board of Administration wherein the reporting party's interest in said security amounts to 1% or more of the issue of that security.

Income and gifts from any person or business entity that supplies goods or services to SDCERS.

Interests in real property.

For the purposes of this Appendix, "goods or services" mean goods or services supplied by any actuarial, accounting, banking, financial, investment, or consulting firm.

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 in SDCERS' Office.

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