

	<h1>CORPORATE POLICY</h1>	Number: EC&F 2.4 Owner: Corporate HR – Employee Relations Type: Ethics, Compliance & Fraud Effective Date: 07-2022
Title STATEMENT OF ECONOMIC INTERESTS (Form 700) & FINANCIAL DISCLOSURES		

SECTION 1: PURPOSE

Informs the State Fund Board, Officers, and designated Workforce Members of their duty to disclose financial interests in order to comply with the Political Reform Act.

SECTION 2: POLICY STATEMENTS

2.1 Commitment to Disclose

State Fund commits to public accountability. Disclosing information as the Political Reform Act requires lets the public and State Fund check for conflicts of interest, self-dealing, and divided loyalties. Disclosing information reflects State Fund’s value of Doing What’s Right.

2.2 Disclosures and Training

The State Fund Board, Officers, and those Workforce Members designated in the State Fund Conflict of Interest Code or Government Code §87200 have a duty to:

- File annual financial disclosures on the Statement of Economic Interests Form 700 and applicable schedules.
- Complete an Ethics training course every two years per Government Code §11146, and certify they read and understood this policy as part of State Fund’s Code of Conduct acknowledgement process.

2.3 Identification of and Notice to Designated Filers

- State Fund’s Conflict of Interest Code identifies the classifications, department assignments, and disclosure levels of Workforce Members who must file the Form 700.
- Government Code §87200 requires State Fund’s Board of Directors, President and Chief Executive Officer, Chief Financial Officer, and Chief Investment Officer/Treasurer to file annually and when they assume or leave these positions.
- State Fund provides notice to designated filers of their duty to file annually and when they assume or leave a designated position.

2.4 Public Record Notices

Form 700’s are public records under the Political Reform Act and the California Public Records Act. State Fund discloses these records to the public upon request.

2.5 Penalties for Failure to File Timely and Accurately

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- Designated filers who fail to accurately and timely file may be referred to the Fair Political Practices Commission's Enforcement Division, the Attorney General, or local district attorney for investigation and possible prosecution.
- Penalties may include public notice of improper or untimely filing or other violation of the Act, criminal prosecution, civil fines of up to \$5000 per violation, and payment of attorney fees and costs.

2.6 Duty to Disqualify

- A filer has a disqualifying conflict of interest in a decision-making process if it is foreseeable that the decision will influence a filer's personal finances or other financial interests.
- In such cases, a risk exists that could favor the filer's private financial interests rather than that of State Fund and the public's general interest.
- To avoid actual bias or the appearance of bias, the filer shall not participate in the decision.

SECTION 3: APPLICABILITY, SCOPE, & BASIS

This policy applies to the State Fund Board, Officers, and those Workforce Members who are designated filers.

3.1 Related Laws and Regulations

Cal. Government Code

§11146, State Agency Ethics Training

§§81000-91014, the Political Reform Act

§81008, Public Records; Inspection; Reproduction; Time; Charges

§87100 *et seq.* Public Officials, State and Local

§87200 *et seq.* Applicability

§87300 *et seq.* Agency Requirement

§87302, Required Provisions

§§18110-18997 Regulations of the Fair Political Practices Commission

§18700 -18756 Basic Rule; Guide to Conflict of Interest Regulations

§18722 -18756 Filing Assuming and Leaving Office Statements of Economic Interests; Alternates and Designees

[Cal. Code of Regulations, 2 CCR Division 6, Sections 18109-18997](#)

SECTION 4: AUTHORITY

The Executive Vice President & Chief Administrative Officer has the duty of policy assurance

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and oversight. The Vice President of Corporate HR as policy owner has the duties of compliance with, updates to, and enterprise monitoring of this Policy.

SECTION 5: RELATED CORPORATE POLICIES

EC&F 2.1 Complaint Reporting & Anti-Retaliation

EC&F 2.2 Incompatible Activities

EC&F 2.3 Business Ethics

SECTION 6: DEFINITIONS

Conflict of Interest Code: FPPC approved Code required by the Political Reform Act. It lists State Fund positions who must file a Form 700.

Designated Filers – State Fund Officers or Workforce Members with positions designated to file the Statement of Economic Interests and Schedules (Form 700) per our Conflict of Interest Code or Government Code §82700.

Financial Interest: An interest exists if it is reasonably foreseeable that the decision will have a material financial effect on a filer, his/her immediate family or a spouse/registered domestic partner. This means any financial interests in addition to those identified in Government Code §87103 and the FPPC’s regulations 2 CCR 18700-18756.

Below is a summary of important financial interests that may apply to filers, but check the law before filing a Form 700 or identifying a conflict of interest.

- Real property with a direct or indirect interest worth two thousand dollars (\$2,000) or more
- Business entities in which the filer or immediate family member is a director, officer, partner, trustee, employee, or holds a management position and/or has a direct or indirect investment worth two thousand dollars (\$2,000) or more
- Income sources with an aggregate value of five hundred dollars (\$500) or more provided to, promised to, or received by the filer within 12 months prior to the time of making a decision. This excludes loans/gifts by a commercial lending institution made in the regular course of business on terms available to the general public.
- Personal Finances of the filer, spouse or registered domestic partner, and immediate family including expenses, income, assets, or liabilities.
- Gifts with aggregate value exceeding what the FPPC publishes for the current calendar year.

State Fund Workforce – Collective group of people who work for State Fund, including officers, employees, and non-employees. Use of the term does not intend or create an employer-employee or agency relationship. The term’s use has no impact on State Fund’s relationships with consultants or independent contractors.

SECTION 7: HELP & ADVICE

- For questions regarding this Corporate Policy, email SEI Filing Officer at

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Form700@scif.com

- For help on completing the SEI Form 700 or other SEI related questions submit a request through AskAdmin.
- For information on the Fair Political Practices Act contact the FPPC Advice Email: advice@fppc.ca.gov or Toll-Free Helpline: 866-275-3772. Or view information on the following website fppc.ca.gov

SECTION 8: REVIEW HISTORY

Review Date	Action Date	Action	Section(s) Revised	Effective Date
5/9/2011	5/9/2011	Functional reorganization & clarity	Section 1, 3, 4, 6, & 7	05/2011
3/26/2012	3/26/2012	Annual Review	No content change	
2/28/2013	2/28/2013	Annual Review; designated filers and compliance notice	1; 2.1; 2.2; 2.5; 3 & 6	03/2013
9/22/2016	9/22/2016	Policy Owner Approval	2.1; 2.2 & 6	01/2017
10/10/2016	10/10/2016	Executive Approval	2.1; 2.2 & 6	01/2017
8/03/2017	8/03/2017	Link Refresh	Sections 3.1 & 5	01/2017
6/03/2019	7/01/2019	Biennial Review	No content change	07/2019
2/21/2020	2/21/2020	Link refresh	Section 3.1, 5, 7	07/2019
10/12/2020	10/12/2020	Link refresh	Section 3.1, 7	07/2019
6/14/2022	6/15/2022	Annual Review	Section 1 - 7	07/2019
06/15/2022	06/15/2022	Minor clerical revisions	Section 2.1, 4, 7	07/2022
06/15/2022	06/15/2022	Policy Owner Approval	Section 2.1, 4, 7	07/2022