The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) which contains the terms of a standard conflict of interest code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Exhibits, designating positions and establishing disclosure categories, shall constitute the conflict of interest code for Diego Plus Education Corp.

Members of the Governing Board and the Chief Executive Officer shall electronically file their Form 700 Statement of Economic Interests with the San Diego County Board of Supervisors. All other individuals holding designated positions shall file their Form 700 Statement of Economic Interests with Diego Plus Education Corp. All statements will be available for public inspection and reproduction (Government Code Section 81008).

* * * * * *

The Diego Plus Education Corp. Board of Directors hereby adopts this Conflict of Interest Code.

Date: December 5, 2019

Carol Stanford, Board Secretary

CONFLICT OF INTEREST CODE
PAGE 1 OF 1
EXHIBIT A

DESIGNATED POSITIONS

<table>
<thead>
<tr>
<th>Designated Position</th>
<th>Disclosure Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governing Board Member</td>
<td>1, 2</td>
</tr>
<tr>
<td>Chief Executive Officer</td>
<td>1, 2</td>
</tr>
<tr>
<td>Chief Financial Officer</td>
<td>1, 2</td>
</tr>
<tr>
<td>Superintendent</td>
<td>1, 2</td>
</tr>
<tr>
<td>Area Superintendent</td>
<td>1, 3</td>
</tr>
<tr>
<td>Director</td>
<td>4</td>
</tr>
<tr>
<td>Principal</td>
<td>3</td>
</tr>
<tr>
<td>Assistant Principal</td>
<td>3</td>
</tr>
<tr>
<td>Consultants/New Positions</td>
<td>*</td>
</tr>
</tbody>
</table>

*Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure requirements in this code, subject to the following limitation:

The Chief Executive Officer or his or her designee may determine in writing that a particular consultant or new position, although a “designated 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 consultant’s or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Chief Executive Officer or his or her designee’s determination is a public record and shall be retained for public inspection in the same manner and location as the Form 700 Statement of Economic Interests. (Government Code Section 81008.)
EXHIBIT B

DISCLOSURE CATEGORIES

Category 1:

Designated positions assigned to this category must report:

Interests in real property located within the jurisdiction, within two miles of the boundaries of the jurisdiction, or within two miles of any land owned or used by Diego Plus Education Corp. Persons are not required to disclose property such as a home or vacation cabin used exclusively as a personal residence; however, a residence in which a person rents out a room, or for which a person claims a business deduction, may be reportable.

Category 2:

Designated positions assigned to this category must report:

Investments and business positions in business entities, and income (including loans, gifts and travel payments) received from sources, that manufacture, provide or sell services and/or supplies of a type utilized by Diego Plus Education Corp.

Category 3:

Designated positions assigned to this category must report:

Investments and business positions in business entities, and income (including loans, gifts and travel payments) received from sources, that manufacture, provide or sell services and/or supplies of a type utilized by the Diego Plus Education Corp. location(s) overseen by the designated position.

Category 4:

Designated positions assigned to this category must report:

Investments and business positions in business entities, and income (including loans, gifts and travel payments) received from sources, that manufacture, provide or sell services and/or supplies of a type utilized by Diego Plus Education Corp. and are associated with the job assignment of the designated position.