

Exhibit A

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**CONFLICT OF INTEREST CODE OF THE
PUBLIC AGENCIES SELF-INSURANCE SYSTEM**

1. Standard Code of FPPC

The Political Reform Act of 1974 (Government Code § 81000 et seq.) requires each state and local government agency to adopt and promulgate conflict of interest codes. As a public agency, the Public Agencies Self-Insurance System ("PASIS") is therefore required to adopt such a code. The Fair Political Practices Commission ("FPPC") has adopted a regulation (2 Cal. Code of Regs. § 18730) which contains the terms of a standard conflict of interest code, which can be incorporated by reference as an agency's code. After public notice and hearing, the regulation 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 (2 California Code of Regulations section 18730) and any future amendments to it duly adopted by the FPPC are hereby adopted and incorporated herein by reference. This regulation and the Appendix attached hereto designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of PASIS. This code shall take effect when approved by the Board of Supervisors for the County of San Diego, and received by PASIS, and shall thereafter supersede any and all prior codes adopted by PASIS.

3. Filing of Statements of Economic Interests


Pursuant to Section 4 of the model code set forth in (2 California Code of Regulations section 18730(b)), designated employees set forth in the Appendix shall file statements of economic interests (Form 700) electronically with the County of San Diego. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

APPROVED AND ADOPTED by the Board of Directors of PASIS on the 28th day of April 2022.

ATTEST

Janelle Laughlin Digitally signed by Janelle Laughlin
Date: 2022.05.17 14:12:32 -0700
Chairman, Board of Directors
Public Agencies Self-Insurance System


Secretary, Board of Directors
Public Agencies Self-Insurance System

Approved and/or authorized by the
Board of Supervisors of the County of San Diego.
Meeting Date: 6/28/2022 Minute Order No. 13
By:  Date: 7/6/22
Deputy Clerk of the Board Supervisors

**APPENDIX TO
CONFLICT OF INTEREST CODE OF
PUBLIC AGENCIES SELF-INSURANCE SYSTEM**

Preamble

Any person designated in Section I of this Appendix who is unsure of any right or obligation arising under this Code may request a formal opinion or letter of advice from the FPPC or an opinion from PASIS's General Counsel. (Gov. Code § 83114; 2 CCR § 18730(b)(11).) A person who acts in good faith in reliance on an opinion issued to him or her by the FPPC shall not be subject to criminal or civil penalties for so acting, provided that all material facts are stated in the opinion request. (Gov. Code § 83114(a).)

Opinions rendered by General Counsel do not provide any statutory defense to an alleged violation of conflict of interest statutes or regulations. The prosecuting agency may, but is not required to, consider a requesting party's reliance on General Counsel's opinion as evidence of good faith. In addition, PASIS may consider whether such reliance should constitute a mitigating factor to any disciplinary action that PASIS may bring against the requesting party under Government Code section 91003.5.

I.

Designated Employees

<u>Designated Employees</u>	<u>Categories Disclosed</u>
Members & Alternates of the Board of Directors	All
General Manager	All
Treasurer	All
General Counsel	All
Consultants ¹	All

¹ With respect to consultants, the General Manager may determine in writing that a particular consultant, although a "designated employee," is hired to perform a range of duties that is limited in scope and thus is not required to comply with the written disclosure requirements described in these categories. 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 General Manager's determination is a public record and shall be retained for public inspection by PASIS in the same manner as this Conflict of Interest Code. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

II.

Disclosure Categories

Category 1.

A designated employee in this category shall report all interests in real property, and investments in, and income from, business entities of the type to operate or provide any of the following:

- Accounting or auditing services
- Banks and savings and loans
- Computer hardware or software, or computer services or consultants
- Communications equipment or services
- Entities or persons who have filed claims against PASIS or have claims pending against PASIS
- Insurance brokers and agencies
- Insurance adjusting, claims auditing or administration, or underwriting services
- Office equipment or supplies
- Personnel and employment companies and services
- Printing or reproduction services, publications, and distribution
- Securities, investment or financial services companies
- Operation of self-insurance programs and risk management

Category 2.

A designated employee in this category shall disclose all business positions in, investments in, and income from any business of the type to provide personnel, services, supplies, material, machinery, or equipment to PASIS and is associated with the job assignment or position of the designated employee.