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CONFLICT OF INTEREST CODE

SAN BERNARDINO COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

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 Cal. Code of Regs. Section 18730, which contains the terms of a standard conflict of interest code. It can be incorporated by reference and may be amended by the Fair Political Practices Commission after public notice and hearings to conform to amendments in the Political Reform Act. Therefore, the terms of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with the attached APPENDIX in which members and employees are designated and disclosure categories are set forth, constitute the conflict of interest code of the San Bernardino County Employees' Retirement Association.

The terms of the conflict of interest code amended or adopted and promulgated pursuant to Section 18730 are as follows:

Section (2) Designated Employees.

The persons holding positions listed in the Appendix are designated employees. It has been determined that these persons make or participate in the making of decisions which may foreseeably have a material effect on economic interests. Designated employees shall file statements of economic interests with Secretary of the Board who will make the statement available for public inspections and reproduction. (Government Code section 81008.) Statements for all designated employees will be retained by the Secretary of the Board.

Section (3) Disclosure Categories

All designated employees shall file pursuant to the disclosure categories set forth in the Appendix, which specify the kinds of economic interests that are reportable. Such a designated employee shall disclose in his or her statement of economic interest those economic interests he or she has which are of the kind described in the disclosure categories to which he or she is assigned in the Appendix. It has been determined that the economic interests set forth in a designated employee's disclosure categories are the kinds of economic interests which he or she foreseeably can affect materially through the conduct of his or her office.

Effective January 1, 2026, Trustees, the Chief Executive Officer, the Chief Investment Officer, and all other employees classified as investment officers, are designated as public officials who manage public investments, and shall file their Statements of Economic Interests with the Fair Political Practices Commission.

This code does not establish any disclosure obligation for those designated employees who are also specified in Government Code section 87200.

Approved by BOR _____
Approved by BOS _____

APPENDIX A – DESIGNATED EMPLOYEES

	DISCLOSURE CATEGORY
I. BOARD OF TRUSTEES	5
II. EXECUTIVE / ADMINISTRATIVE GROUP	
A. Chief Executive Officer	1
B. Chief Counsel	1
C. Chief Investment Officer	1
D. Chief of Member Services	1
E. Chief Financial Officer	1
F. Chief Information Officer	1
G. Clerk of the Board & Executive Assistant	2
H. Chief Human Resources Officer	1
I. Chief Communications Officer	1
III. LEGAL SERVICES	
A. Senior Staff Counsel	2
B. Staff Counsel	2
C. Disability Retirement Manager	2
D. Survivor Benefits Manager	2
IV. FISCAL SERVICES	
A. Accounting Manager	2
V. INFORMATION SERVICES	
A. Information Security Manager	2
B. Senior Business Systems Engineer	2
C. Information Systems Engineer	2
D. Information Systems Operations Manager	2
E. Facilities and Projects Assistant Manager	2
F. Pension Administration Systems Assistant Manager	2
VI. INVESTMENT SERVICES	
A. Deputy Chief Investment Officer	1
B. Senior Investment Officer	1
C. Investment Officer	1
D. Associate Investment Officer	1
E. Senior Investment Analyst	2
F. Investment Operations and Portfolio Analytics Manager	2
G. Deputy Clerk of the Board & Senior Executive Secretary	2
VII. MEMBER SERVICES	
A. Retirement Benefits Manager	2
VIII. COMMUNICATIONS	
A. Government Affairs Manager	2

APPENDIX B – DISCLOSURE CATEGORIES

CATEGORY 1.

Designated employees in this category shall disclose all sources of income, interests in real property, investments and business positions in business entities. Designated employees in this category shall complete all schedules of Form 700, if applicable.

CATEGORY 2.

Designated employees in this category shall disclose sources of income, investments, and business positions in business entities which provide services, supplies, materials, machinery or equipment of the type purchased or utilized by the department in which the designated employee is employed. Designated employees in this category shall complete all schedules of Form 700 except schedule C, if applicable.

CATEGORY 3.

Designated employees in this category shall disclose all sources of income, investments, and business positions in business entities which engage in land development, construction, or the acquisition or sale of real property, and shall disclose all interests in real property. Designated employees in this category shall complete all schedules of Form 700, if applicable.

CATEGORY 4.

Persons in this category shall disclose all investments, income, and business positions in business entities which are subject to the regulatory, permit, or licensing authority of the department in which the designated employee is employed. Designated employees in this category shall complete all schedules of Form 700 except schedule C, if applicable.

CATEGORY 5.

Persons in this category are required to make disclosure pursuant to Government Code Sections 87200 and 87202. No additional disclosure obligations are imposed under this code. Designated employees in this category shall complete all schedules of Form 700, if applicable.