

SOUTHEASTERN ECONOMIC DEVELOPMENT CORPORATION

CORPORATE POLICY 2.01

ETHICS TRAINING AND STATEMENTS OF ECONOMIC INTEREST

Chapter: 2.0 – Ethics & Conflict of Interest Policies
Section: 2.01 – Ethics Training and Statements of Economic Interests
Effective Date: November 17, 2010

1.0 PURPOSE

1.1 To establish a policy requiring the CORPORATION's BOARD members, officers, and certain employees receive ethics training and file Statements of Economic Interest (FPPC Form 700) with the City of San Diego's City Clerk.

2.0 EFFECTIVE DATE AND AMENDMENTS

2.1 This Policy shall be effective upon the approval by the BOARD. This Policy may only be amended by approval of the BOARD.

3.0 PROCEDURES

3.1 The President or his/her designee is authorized to establish and disseminate administrative procedures to implement this BOARD POLICY, as applicable.

4.0 POLICY

4.1 As one of the City of San Diego's independent corporations, Council Policy 000-04 requires that CORPORATION's BOARD members, officers and other individuals more particularly described in Council Policy 000-04 receive ethics training prescribed by the San Diego Ethics Commission.

4.2 The City of San Diego's Ethics Commission has the responsibility to develop the curriculum for ethics training, to conduct or manage the training, and to maintain records certifying compliance with the City's ethics education requirements.

4.3 Persons described in section 3.1 of this policy shall complete an ethics orientation program prescribed by the City of San Diego's Ethics Commission within sixty days of assuming office and complete a biennial ethics refresher and continuing education program prescribed by the City of San Diego's Ethics Commission. Individuals who are subject to

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this requirement shall complete the refresher program no later than March 31 in the applicable year. Those who file an assuming office Statement of Economic Interests in an even numbered year shall complete the refresher course no later than March 31 of each even numbered year thereafter, and those who file an assuming office Statement of Economic Interests in an odd numbered year shall complete the refresher course no later than March 31 of each odd numbered year thereafter.

- 4.4 The PRESIDENT or his/her designee will coordinate efforts with the San Diego Ethics Commission to schedule the training sessions as outlined above.
- 4.5 The PRESIDENT or his/her designee shall be responsible for ensuring, at least every two years, that BOARD Members and employees are trained in the areas of Ethics, Conflicts of Interest, Gifts, and all other areas as deemed appropriate and shall, pursuant to the BYLAWS, submit certification of such training to the City's Chief Financial Officer.
 - 4.5.1 As one of the CITY's independent corporations, Council Policy 000-04 requires that CORPORATION BOARD members, officers and other individuals more particularly described in Council Policy 000-04 receive ethics training and file a Statement of Economic Interest (FPPC Form 700) with the City of San Diego's City Clerk pursuant to the Political Reform Act (Gov. Code § 81000 et seq.). The City of San Diego's Ethics Commission has the responsibility to develop the curriculum for ethics training, to conduct or manage the training, and to maintain records certifying compliance with the City's ethics education requirements. BOARD members and employees affected shall:
 - 4.5.1.1 Complete an ethics orientation program prescribed by the City of San Diego's Ethics Commission within sixty days of assuming office; and,
 - 4.5.1.2 Complete a biennial ethics refresher and continuing education program prescribed by the City of San Diego's Ethics Commission. Employees subject to this requirement shall complete the refresher program no later than March 31 in the applicable year. Those who file an assuming office

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Statement of Economic Interests in an even numbered year shall complete the refresher course no later than March 31 of each even numbered year thereafter, and those who file an assuming office Statement of Economic Interests in an odd numbered year shall complete the refresher course no later than March 31 of each odd numbered year thereafter.

- 3.6 The PRESIDENT or his/her designee shall coordinate efforts with the San Diego Ethics Commission to schedule the training sessions as outlined above.
- 4.7 The PRESIDENT shall, in coordination with CORPORATION Legal Counsel, be responsible for ensuring, at least every two (2) years, that the BOARD, officers, and key employees receive training in the areas of fiduciary duties and corporate governance, and shall, pursuant to the BYLAWS, submit certification of such training, to the City's Chief Financial Officer.