

# ORANGE COUNTY EMPLOYEES RETIREMENT SYSTEM

## Code of Conduct

### PURPOSE

To provide guidelines for acceptable and lawful business practices, promote professionalism, and establish standards of conduct applicable to all OCERS employees.

### GENERAL POLICY

- Provide our coworkers, Members, Plan Sponsors, and Board Members with the highest level of customer service.
- OCERS is committed to conducting its business affairs in compliance with any and all applicable state, federal, and local laws, statutes, and regulations and expects all employees to act accordingly.
- Employees have the duty to deal honestly, ethically, and respectfully with each other, the Board of Retirement, Plan Sponsors, active and retired members, vendors, visitors, and members of the public.

### CONFIDENTIAL DATA

In the course of employment with OCERS, employees are provided access to business records, reports, processes, plans, bids, proposals, member information, databases and other types of documents and information. Conduct that exemplifies protecting confidential and/or proprietary information includes:

- Refrain from disclosing confidential information that adversely affects OCERS' ability to provide service
- Take reasonable steps to ensure confidential information is secured and that it is not discussed or disclosed, either intentionally or unintentionally, in public or through communication channels such as email, voicemail, text messages, the internet, or other forms of written and spoken communication
- Disclose information only to authorized personnel who have a legitimate need to know or to be in compliance with legal mandate
- Check with Management before discussing or disclosing information to safeguard against improper disclosure
- Create communications and documents with the understanding that all employee communications and files created in the course of

employment are the property of OCERS. Employees should not have any expectation of personal privacy in any messages or documents created or transmitted using OCERS systems, including email and voicemail.

- Any discarded material which identifies a social security number, address, contribution balance, pension amount, or other confidential information must be shredded.

## **PROTECT THE PRIVACY OF PERSONAL INFORMATION**

OCERS abides by all applicable legal requirements that protect the privacy of employee, Board Member, active and retired member personal information (i.e. social security numbers, home addresses and telephone numbers, medical information).

- Employees are responsible for ensuring that appropriate procedures and systems are in place to safeguard access to this type of information
- Employee, plan sponsor, Board Member, active and retired member information is confidential and may not be disclosed except as permitted by law and applicable regulations
- When access to personal information is permitted, the information obtained must only be used for legitimate business purposes

## **CALIFORNIA PUBLIC RECORDS ACT REQUESTS**

While OCERS is a public agency and subject to public records requests, there are parameters that accompany the distribution of this information.

- Only specifically authorized persons may talk with the press. Refer without comment, any press interview, information requests, and all other inquiries from the media to Robert Kinsler (Public Relations), or Julie Wyne (Assistant CEO, External & Legal Operations)
- Employees with questions regarding the release of confidential information should be directed to their immediate supervisor
- Official public records requests are date sensitive, and it is critical that these requests are routed promptly.

## **CHAIN OF COMMAND**

You are encouraged to discuss problems relating to work situations with your immediate supervisor so issues can be resolved promptly. If an issue cannot be resolved following a discussion with your immediate supervisor, you can request a

meeting with your manager. If a settlement is not reached at the managerial level, then a more formal discussion process can be followed which may involve OCERS Admin/Human Resources department, the respective Chief of the division (i.e. Chief Operations Officer, Chief Investment Officer, Chief Financial Officer) and/or the Chief Executive Officer.

Staff is expected to adhere to the chain of command, as outlined below:

- **Immediate Supervisor**
- **Department Manager**
- **Assistant CEO**
- **CEO**

### **COMPLIANCE WITH OCERS CODE OF CONDUCT**

If an employee suspects a violation of the standards described in OCERS Code of Conduct they are responsible for reporting such matters.

\*This form is not a substitution for the applicable MOU; contact Human Resources with any questions.

By signing below, I acknowledge that I have received a copy and understand the guidelines established within the "OCERS Code of Conduct" and agree to abide by them.

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Employee Signature

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Date