EXHIBIT A

CONFLICT OF INTEREST CODE
MIDPENINSULA REGIONAL OPEN SPACE DISTRICT

The Political Reform Act (Government Code Sections 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) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's 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 Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Midpeninsula Regional Open Space District (District)**.

Individuals holding designated positions shall file their statements with the **District**, which will make the statements available for public inspection and reproduction. (Gov. Code Sec. 81008.) All statements will be retained by the **District**.

EXHIBIT A

CONFLICT OF INTEREST CODE FOR THE MIDPENINSULA REGIONAL OPEN SPACE DISTRICT

APPENDIX A- DESIGNATED POSITIONS

Designated Positions	Assigned Disclosure Categories
Accountant I/II	2
Area Manager	1, 2
Area Superintendent	1, 2
Assistant General Counsel (All Levels)	1, 2
Assistant General Manager	1, 2
Board Members	1, 2
Bond Oversight Committee Members	1, 2
Budget & Finance Manager	3
Budget & Analysis Supervisor	3
Capital Projects Field Manager	1, 2
Capital Project Manager (All Levels)	1, 2
Chief Financial Officer/Director of Administrative Services	1, 2
District Clerk/Assistant to the General Manager	2
Engineering and Construction Manager	1, 2
Executive Assistant/Deputy District Clerk	2
Facilities Maintenance Supervisor	3
Field Resource Specialist	2
Finance Supervisor	2
General Counsel	1, 2
General Manager	1, 2
GIS Program Administrator	1, 2
Governmental Affairs Specialist	2, 3
Grants Program Manager	3
Human Resources Manager	2
Human Resources Supervisor	2
Information Systems and Technology Applications Program Manager	3
Information Systems and Technology Manager	3
Information Technology Program Administrator	3
Interpretation & Education Program Manager	3
Land and Facilities Services Manager	2
Maintenance, Construction and Resource Supervisor	2
Management Analyst—Risk Manager	2
Natural Resources Manager	3
Planner (All Levels)	1, 2
Planning Manager	1, 2
Procurement Specialist	3
Property Management Specialist (All Levels)	1, 2
Public Affairs Manager	1, 2

Public Affairs Specialist (All Levels)	2
Real Property Manager	2
Real Property Specialist (All Levels)	1, 2
Resource Management Specialist (All Levels)	1, 2
Senior Accountant	2
Senior Administrative Assistant	2
Senior Management Analyst	1, 2
Senior Technologist	2
Supervising Ranger	1, 2
Training and Safety Specialist	2
Visitor Services Manager	3
Volunteer Program Manager	3
Consultants/New Positions	*

*Consultants/new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation:

The General Manager 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 comply fully with the disclosure requirements described 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 General Manager's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code (Gov. Code Section 81008).

The following positions are NOT covered by the conflict of interest code because they must file under Government Code Section 87200 and, therefore, are listed for informational purposes only:

- Controller

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

CONFLICT OF INTEREST CODE FOR THE MIDPENINSULA REGIONAL OPEN SPACE DISTRICT

APPENDIX B-DISCLOSURE CATEGORIES

Category 1

Real property located within the jurisdiction or sphere of influence, as well as real property within two miles of the real property owned or used by the District or the potential site.

Category 2

A. Investments and business positions in business entities and sources of income (including receipt of gifts, loans and travel payments) if the business entity or source is of the type that:

1. Is engaged in business within the District and which is of the type that has contracted with the District to provide employee testing or training, professional services, consulting services, financial services, other services, supplies, materials, machinery, books, uniforms, publications, equipment, vehicles or insurance.

2. Is engaged in the design, planning, engineering, construction, materials supply or project management of private or public construction projects with the District.

3. Is engaged in the business of brokerage, acquisition, leasing, marketing or disposal of real property within the District.

4. Is engaged in the preparation of reports, surveys, evaluations or investigations of the type used by the District, including environmental documents such as Environmental Impact Reports, real property appraisals, land surveys, environmental assessments, hazardous waste investigations, percolation evaluations, engineering reports, biological assessments, geologic or hydrologic evaluations, or evaluation of the physical condition of real property.

Category 3

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source is of the type for which the employee's division has purchasing authority.

This is the last page of the conflict of interest code for the Midpeninsula Regional Open Space District .

CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for the Midpeninsula Regional Open Space District was approved on 9/3/25 .

This code will become effective on 10/3/25 .

Sukhdip K Brar

Digitally signed by Sukhdip K Brar
Date: 2025.09.03 10:12:35 -07'00'

Sukhi K. Brar
Assistant Chief Counsel
Fair Political Practices Commission