

2026 CONFLICT OF INTEREST CODE FOR THE ORANGE COUNTY SANITATION 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 Cal. Code of Regs. Section 18730) which contains the terms of a standard Conflict of Interest Code, which may be incorporated by reference in an agency's code. After public notice and hearing, it 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, any amendments to it duly adopted by the Fair Political Practices Commission, and all additional guidance by the Fair Political Practices Commission, are hereby incorporated by reference. This regulation and the attached Appendix designating officials and employees and establishing disclosure categories, shall constitute the Conflict of Interest Code of the Orange County Sanitation District (OC San).

The following designated employees and officials shall file statements of economic interests electronically with the Fair Political Practices Commission: Orange County Sanitation District Board of Directors, Orange County Sanitation District Financing Corporation Board of Directors, Treasurer of the Orange County Sanitation District Financing Corporation, and the Director of Finance.

The following designated employees shall file statements of economic interests electronically with the Clerk of the Orange County Board of Supervisors: General Manager, General Counsel, Assistant General Counsel, Assistant General Manager, Director of Communications, Director of Engineering, Director of Operations & Maintenance, Director of Environmental Services, Director of Human Resources, Secretary of the Orange County Sanitation District Financing Corporation, and the Clerk of the Board.

The Orange County Sanitation District's Filing Officer (Clerk of OC San's Board of Directors) will thereafter verify the completion of the filing statements. If OC San's

Filing Officer receives any statements of economic interests by other means, the Filing Officer shall make and retain a copy and forward the original of these statements to the Fair Political Practices Commission or the Clerk of the Orange County Board of Supervisors. Statements for all other designated employees will be retained by OC San's Filing Officer.

EXHIBIT A

ORANGE COUNTY SANITATION DISTRICT

**LIST OF DESIGNATED POSITIONS
CONFLICT OF INTEREST CODE**

Designated Positions	Disclosure Categories
Accounting Supervisor	OC-05
Assistant Clerk of the Board	OC-05
Assistant General Counsel (ADDED)	OC-01
Assistant General Manager	OC-01
Buyer	OC-05
Chief Plant Operator	OC-05
CIP Project Manager	OC-41
Clerk of the Board	OC-05
Construction Inspection Supervisor	OC-05
Construction Inspector	OC-10
Consultant	OC-30
Contracts Administrator	OC-05
Contracts Supervisor	OC-05
Cost Estimator	OC-41
Director of Communications	OC-41
Director of Engineering	OC-41
Director of Environmental Services	OC-41
Director of Finance	OC-41; OC-12
Director of Human Resources	OC-41, OC-11
Director of Operations & Maintenance	OC-41
Engineer	OC-29, OC-41
Engineering Manager	OC-41
Engineering Supervisor	OC-41
Environmental Protection Manager	OC-29
Environmental Supervisor	OC-29
Finance Manager	OC-05
General Counsel	OC-01
General Manager	OC-01
Human Resources Manager	OC-11; OC-12
Human Resources Supervisor	OC-11
Information Technology Manager	OC-08
Information Technology Supervisor	OC-08
Lead Source Control Inspector	OC-05; OC-29
Maintenance Manager	OC-05
Maintenance Superintendent	OC-05
Maintenance Supervisor	OC-05

Materials Management Supervisor	OC-05
Operations Manager	OC-05
Operations Supervisor	OC-05
Orange County Sanitation District Board of Directors and Financing Corporation Board of Directors	OC-01
Principal Accountant	OC-41
Principal Buyer	OC-05
Principal Contracts Administrator	OC-05
Principal Environmental Specialist	OC-29
Principal Human Resources Analyst	OC-11
Principal Information Technology Analyst	OC-08
Principal Public Affairs Specialist	OC-05
Principal Safety and Health Specialist	OC-05
Principal Staff Analyst	OC-05; OC-12
Public Affairs Supervisor	OC-05
Purchasing and Contracts Manager	OC-05
Purchasing Supervisor	OC-05
Safety & Health Manager	OC-05
Safety & Health Supervisor	OC-05
Secretary of the Orange County Sanitation District Financing Corporation	OC-05
Senior Buyer	OC-05
Senior Construction Inspector	OC-10
Senior Contracts Administrator	OC-05
Senior Cost Estimator	OC-41
Senior Engineer	OC-05
Senior Scientist	OC-21
Source Control Inspector I and II	OC-29
Treasurer of the Orange County Sanitation District Financing Corporation	OC-41

The following amendments are made:

ADDITIONS:

Assistant General Counsel

DELETIONS:

None

EXHIBIT B

ORANGE COUNTY SANITATION DISTRICT

DISCLOSURE CATEGORIES CONFLICT OF INTEREST CODE

Disclosure Category	Disclosure Description
OC-01	All interests in real property in Orange County or located entirely or partly within OC San's boundaries, as well as investments, business positions, and sources of income (including gifts, loans, and travel payments).
OC-05	All investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that provide services, supplies, materials, machinery, and equipment (including training and consulting services) used by OC San.
OC-08	All investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that develop or provide computer hardware/software, voice data communications, or data processing goods, supplies, equipment, or services (including training and consulting services) used by OC San.
OC-10	All investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that are engaged in any real estate activity including, but not limited to, real estate appraisal, development, construction, planning/architectural design, engineering, sales, brokerage, leasing, lending, insurance, rights of way, and/or studies; and/or property or facilities management/maintenance/custodial and utility services used by OC San or provides capital for the purchase of property used or sold by OC San.
OC-11	All interests in real property in Orange County or located entirely or partly within the OC San's boundaries, as well as investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that are engaged in the supply of equipment related to (i) recruitment, employment search & marketing, classification, training, or negotiation with personnel; (ii) employee benefits; and (iii) health and welfare benefits.
OC-12	All interests in real property in Orange County or located entirely or partly within OC San's boundaries, as well as investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that invest funds or engage in the business of insurance including, but not limited to, insurance companies, carriers, holding companies, underwriters, brokers, solicitors, agents, adjusters, claims managers, and actuaries; from financial institutions including, but not limited to, banks, savings & loan associations, and credit unions; or sources that have filed a claim, or have a claim pending, against OC San.

EXHIBIT B

ORANGE COUNTY SANITATION DISTRICT

DISCLOSURE CATEGORIES CONFLICT OF INTEREST CODE

Disclosure Category	Disclosure Description
OC-21	All investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that provide laboratory or chemical – related goods, supplies, equipment, or services (including training and consulting services).
OC-29	All investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that are subject to inspection or regulation by OC San.
OC-30	Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest category in the code subject to the following limitation: The Department Head/Director/General Manager may determine that a particular consultant, although a “designated position”, is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant’s duties and, based upon that description, a statement of the extent of disclosure required. The determination of disclosure is a public record and shall be filed with the Form 700 and retained by the Filing Officer for public inspection.
OC-41	All interests in real property in Orange County, as well as investments in, business positions with, and income (including gifts, loans, and travel payments) from sources that provide services, supplies, materials, machinery, vehicles, or equipment (including training and consulting services) used by OC San.