

**APPENDIX**

**CONFLICT OF INTEREST CODE OF THE COUNTY OF SANTA CLARA**

**EXHIBIT “A”**  
**LIST OF DESIGNATED POSITIONS FOR**  
**PROCUREMENT DEPARTMENT**

<b>Designated Position</b>	<b>Disclosure Category</b>
Director of Procurement	1
Administrative Services Manager	3
Administrative Support Officer	3
Application Administrator	3
Business Systems Analyst	3
Buyer	3
Financial and Administrative Services Manager	3
Integration Analyst	3
IT Business Analyst	3
IT Manager	3
IT Project Manager	3
Management Analyst	3
Materials Supply Specialist	4
Procurement Contracts Specialist	3
Procurement Manager	3
Program Manager	3
Senior Application Administrator	3
Senior Business Systems Analyst	3
Senior Management Analyst	3
Senior Strategic Sourcing Officer	3
Strategic Sourcing Manager	3
Strategic Sourcing Officer	3

<b>Designated Position</b>	<b>Disclosure Category</b>
Systems Administrator	3
Consultant	2

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**EXHIBIT “B”**  
**DISCLOSURE CATEGORIES FOR**  
**PROCUREMENT DEPARTMENT**

Pursuant to the County of Santa Clara’s Conflict of Interest Code, Disclosure Categories 1 and 2 shall read as follows for all Code Agencies.

**Disclosure Category 1:** Persons in this category shall disclose:

(1) all investments in, business positions in, and income (including gifts, loans and travel payments) from:

(a) all sources that provide, plan to provide, or have provided in the last two years, facilities, goods, software, hardware, or related technology, equipment, vehicles, machinery or services, including training or consulting services, to the County;

(b) all sources that are subject to the regulatory, monitoring, investigatory, enforcement, valuation, certification, permit or licensing authority of, or have an application for a license, permit or certificate pending before, the County;

(c) all sources that receive, are planning to apply to receive, or have received in the last two years, grants or other monies from or through the County; and sources that receive referrals to provide assessments and/or treatments that are required or recommended by the County; and

(2) all interests in real property in the County of Santa Clara located entirely or partly within the County, or within two miles of County boundaries, or of any land owned or used by the County.

**Disclosure Category 2:** Each Consultant shall disclose: (1) all investments in, business positions in, and income (including gifts, loans and travel payments) from: (a) all sources that provide, plan to provide, or have provided in the last two years, facilities, goods, software, hardware, or related technology, equipment, vehicles, machinery or services, including training or consulting services, to the County; (b) all sources that are subject to the regulatory, monitoring, investigatory, enforcement, valuation, certification, permit or licensing authority of, or have an application for a license, permit or certificate pending before, the County; (c) all sources that receive, are planning to apply to receive, or have received in the last two years, grants or other monies from or through the County; and

sources that receive referrals to provide assessments and/or treatments that are required or recommended by the County; and (2) all interests in real property in the County of Santa Clara located entirely or partly within the County, or within two miles of County boundaries, or of any land owned or used by the County, subject to the following limitation: the Code Agency for which a consultant works may determine in writing, following approval by County Counsel as to form and legality, that the particular consultant is hired to perform a range of duties that is limited in scope and, thus, is not required to comply with the full disclosure requirements described above, but instead must comply with more tailored disclosure requirements specific to that consultant. Such a determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements.

In addition to the above two categories, the Procurement Department shall have the following categories:

**Disclosure Category 3:** Persons in this category shall disclose all investments in, business positions in, and income (including gifts, loans and travel payments) from:

(1) all sources that provide, plan to provide, or have provided in the last two years, facilities, goods, software, hardware, or related technology, equipment, vehicles, machinery or services, including training or consulting services, to the County; and

(2) all sources that receive, are planning to apply to receive, or have received in the last two years, grants or other monies (a) from or through the Procurement Department, or (b) from or through the County related to the work of the Procurement Department.

**Disclosure Category 4:** Persons in this category shall disclose all investments in, business positions in, and income (including gifts, loans and travel payments) from all sources that receive, are planning to apply to receive, or have received in the last two years, goods, hardware, related technology, equipment, vehicles, or machinery, from or through the Procurement Department related to the County's property disposal efforts.