

CONFLICT OF INTEREST CODE FOR THE
ROCKETSHIP EDUCATION, INC.

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission had adopted a regulation (2 Cal. Code of Regs. Sec. 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, 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 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 **Rocketship Education, Incorporated.**

Individuals holding designated positions shall file their statements of economic interest with the **Rocketship Education, Incorporated**, which will make the statements available for public inspection and reproduction. (Gov. Code Section 81008.) All statements will be retained by the **Rocketship Education, Incorporated.**

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**APPENDIX A
DESIGNATED POSITIONS**

<u>Designated Position</u>	<u>Assigned Disclosure Category</u>
Board Members	1, 2
Chief Executive Officer	1, 2
Chief Business Officer	1, 2
Chief Program Officer	1, 2
Chief Growth & Community Engagement Officer	1, 2
Vice President of Schools	1, 2
Vice President, Facilities and Treasury	1, 2
Vice President, Strategy and Scalability	1, 2
Vice President, Human Resources	3
Vice President, of Personalized Learning and Achievement	3
Controller	2
Senior Director, Operations	3
Senior Director, Integrated Special Education	3
Legal Counsel	1, 2
School Principal	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 Chief Executive Officer 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 fully comply with the disclosure requirements described in this section. Such 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 Chief Executive Officer'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 Sec. 81008.)

APPENDIX B

DISCLOSURE CATEGORIES

Category 1. Designated positions assigned to this category must report:

- a. Interests in real property within the boundaries of the Rocketship Education, Incorporated that are used by the Rocketship Education, Incorporated or are of the type that could be acquired by the Rocketship Education, Incorporated as well as real property within two miles of the property used or the potential site.
- b. Investments and business positions in business entities or income (including receipt of gifts, loans, and travel payments) from sources of the type that engage in the acquisition or disposal of real property or are engaged in building construction or design for school districts.

Category 2. Designated positions assigned to this category must report:

Investments and business positions in business entities and income (including receipt of gifts, loans, and travel payments) from sources of the type that are contractors engaged in the performance of work, training, consulting or services, or are sources that manufacture or sell supplies, instructional materials, machinery, equipment, or vehicles of the type utilized by Rocketship Education, Incorporated.

Category 3. Designated positions assigned to this category must report:

Investments and business positions in business entities and income (including receipt of gifts, loans, and travel payments) from sources of the type that are contractors engaged in the performance of work, training, consulting or services, or are sources that manufacture or sell supplies, instructional materials, machinery, equipment, or vehicles of the type utilized by the designated position's department. For the purposes of this category, a principal's department is his or her entire school.

This is the last page of the conflict of interest code of the **Rocketship Education, Inc.**



CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for the **Rocketship Education, Inc** was approved on 1/27/ 2016. This code will become effective on _____ 2016.

A handwritten signature in black ink, appearing to read "Brian G. Lau", written over a horizontal line.

Brian G. Lau

Senior Commission Counsel

Fair Political Practices Commission