

ENTERPRISE COMPLIANCE

Current Status of Activities and Accomplishments

	Activities and Accomplishments	Status
E-1	<p>2011 Annual Filing Period - Form 700's:</p> <ul style="list-style-type: none"> • As of April 23, 2012, 772 Annual Form 700's have been received. • ECOM has scanned 772 signed Annual Form 700's into the eDisclosure System; completing facial reviews on all scanned Forms. • ECOM has reviewed 385 Form 700 Statements for full compliance. • The Enhanced Review has been completed for 363 Form 700 Statements. • ECOM, in coordination with FCSD and PAOF, will publish Form 700 disclosure statements and the Travel Information Summaries on the CalPERS webpage for Board members and representatives, Executive Staff, and key investment staff. 	In Process
E-2	The Personal Trading Regulations were approved by the Board at the March 2012 Risk and Audit Committee.	Completed
E-3	The Personal Trading Regulations were submitted to the Office of Administrative Law in March 2012 and they were published on March 30, 2012.	In Progress
E-4	In April 17, 2012, OSSD on behalf of ECOM released the Notice of Intent to Award the contract for the Personal Trading Platform.	Completed
E-5	The Investigative Workgroup will develop an Enterprise Investigation Process.	In Process
E-6	The Investigative Workgroup will update CalPERS Anti-Fraud Policy to reflect the organization's changing structure and needs. CalPERS Anti-Fraud Policy was approved April 3, 2012.	Completed
E-7	<p>ECOM will continue to conduct the Policy Evaluation Project, which contributes to creation of a framework for ECOM compliance programs.</p> <ul style="list-style-type: none"> • To date, ECOM staff has reviewed approximately 375 publically available internal policies. • ECOM will continue work on the development of an enterprise-wide electronic document repository. 	In Process
E-8	ECOM will resolve all outstanding audit findings.	In Process

E-9	<p>Board Governance – Compliance work stream</p> <ul style="list-style-type: none"> • ECOM will assist with the development and administration of fiduciary and undue influence statements. • In coordination with LEGO, ECOM will conduct fiduciary training. 	In Process
E-11	ECOM, in partnership with OSSD, will monitor consultant disclosures as required in the CalPERS Contract-Related Disclosure Requirements Policy.	In Process
E-12	ECOM will continue to monitor the CalPERS Ethics Helpline and report to the Risk and Audit Committee.	In Process
E-13	ECOM and INVO will partner to help ensure staff compliance with the Insider Trading Policy.	In Process
E-14	ECOM has taken on the restricted trading list maintenance and distribution from LEGO.	Completed
E-15	<p>ECOM working in partnership with ...</p> <ul style="list-style-type: none"> • LEGO on the content of the From 700 Ethics training requirement. • LEGO & HRSD on content for a Compliance Based Training for all staff. • ECOM, LEGO and HRSD are partnering on the integration of the From 700 Ethics training requirement and a Compliance Based Training for all staff that will be available within LMS. 	In Process