

**ENTERPRISE COMPLIANCE**

**Current Status of Activities and Accomplishments**

	<b>Activities and Accomplishments</b>	<b>Status</b>
<b>E-1</b>	The recruitment and hiring of the Enterprise Compliance's, Chief Compliance Officer – as of July 16, 2012.	Completed
<b>E-2</b>	<p>2011 Annual Filing Period - Form 700's:</p> <ul style="list-style-type: none"> <li>• As of June 30, 2012, 858 Annual Form 700's have been received.</li> <li>• ECOM has scanned 858 signed Annual Form 700's into the eDisclosure System; completing facial reviews on all scanned Forms.</li> <li>• ECOM has reviewed all 2011 Annual Form 700 Statements for full compliance.</li> <li>• The Enhanced Review has been completed for all CalPERS staff Form 700 filers for the 2011 Annual Period.</li> <li>• 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.</li> </ul>	Completed
<b>E-3</b>	The Board approved the proposed Personal Trading Regulations at the March 2012 Risk and Audit Committee.	Completed
<b>E-4</b>	<p>The Personal Trading Regulations were submitted to the Office of Administrative Law (OAL) in March 2012 and they were published on March 30, 2012.</p> <p>Upon publication, the Regulations were open for a 45 day public comment period. Comments were received and responded to prior to the public hearing at the June Board of Administration Meeting.</p> <p>At the June 2012 Full Board Meeting, the public comment hearing was held regarding the Personal Trading Regulations. CalPERS entered into another 15-day public comment period.</p> <p>On July 5, 2012, the 2<sup>nd</sup> public comment period ended. Comments were received and responded to prior to the August Board of Administration Meeting.</p> <p>The Regulations will be presented to the Board at the August 2012 Board of Administration Meeting for approval and resubmission to OAL.</p>	In Progress
<b>E-5</b>	ECOM and INVO will partner to help ensure staff compliance with the Insider Trading Policy and the Personal Trading Regulations.	Ongoing

<b>E-6</b>	ECOM has taken on the restricted trading list maintenance and distribution from LEGO.	Completed
<b>E-7</b>	On April 17, 2012, OSSD on behalf of ECOM released the Notice of Intent to Award the contract for the Personal Trading Platform.	Completed
<b>E-8</b>	The Investigative Workgroup will develop an Enterprise Investigation Process.	In Process
<b>E-9</b>	ECOM will continue to monitor the CalPERS Ethics Helpline and report to the Risk and Audit Committee.	Ongoing
<b>E-10</b>	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
<b>E-11</b>	ECOM will continue to conduct the Policy Evaluation Project, which contributes to creation of a framework for ECOM compliance programs. <ul style="list-style-type: none"> <li>• To date, ECOM staff has reviewed approximately 234 publically available internal policies.</li> <li>• ECOM will continue work on the development of an enterprise-wide electronic document repository.</li> </ul>	Completed
<b>E-12</b>	ECOM will resolve all outstanding audit findings.	In Process
<b>E-13</b>	Board Governance – Compliance work stream <ul style="list-style-type: none"> <li>• ECOM will assist with the development and administration of fiduciary and undue influence statements.</li> </ul>	Completed
<b>E-14</b>	ECOM will begin the notification process for the annual certification for both fiduciary and undue influence statements.	Completed
<b>E-15</b>	ECOM, in partnership with OSSD, will monitor consultant disclosures as required in the CalPERS Contract-Related Disclosure Requirements Policy.	Ongoing
<b>E-16</b>	ECOM will partner with FCSD for the incorporation of the Annual Compliance Report into the CalPERS Comprehensive Annual Financial Report (CAFR). This change will improve the Annual Compliance Report's transparency and readability, and is a natural extension of ongoing quality improvement efforts related to both the Annual Compliance Report and the CAFR.	In Process
<b>E-17</b>	ECOM working in partnership with ... <ul style="list-style-type: none"> <li>• LEGO on the content of the Form 700 Ethics training requirement.</li> <li>• ECOM, LEGO and HRSD are partnering on the integration of the Form 700 Ethics training requirement that will be available within LMS.</li> <li>• The integration of the mandated Form 700 Ethics training into LMS was completed as of July 1, 2012.</li> </ul>	Completed