

CalPERS Personal Trading Regulations: Overview, Resources & Navigation

CalPERS Enterprise Compliance, Risk & Governance

Agenda

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- Overview of CalPERS Personal Trading Regulations
- Personal Trading Resources Available to Covered Persons
- Navigating MyComplianceOffice (MCO)
 - Accessing MCO & Attestations
 - Requesting for Pre-clearance
 - Brokerage Account Maintenance
- Appendix
 - Non-Designated Brokerage Accounts & Quarterly Transaction Affirmations
 - Managed Accounts & Certification Letter

Objective

To provide an overview of the CalPERS Personal Trading Regulations and applicable rules, highlight resources available to Covered Persons for more information, and how to navigate the MCO system.

- Raise awareness of the importance of the Regulations
- Provide information to Covered Persons regarding requirements of the Regulations

As a CalPERS employee, you should maintain the highest ethical standards and avoid any conflicts of interest, or appearances of such, while performing the duties of your position and when making and disclosing personal financial interests.

Overview of CalPERS Personal Trading Regulations

Insider Trading & Personal Trading

Federal and state laws require firms like CalPERS to have processes in place to detect and prevent the misuse of material, non-public information (MNPI).

[CalPERS Insider Trading Policy](#) is intended to ensure that CalPERS, its Board members and employees comply with the anti-fraud provisions of the federal securities laws and with their fiduciary responsibilities.

CalPERS Insider Trading Policy:

- Applies to all employees at CalPERS
- Certain employees are subject to additional rules and requirements (**CalPERS Personal Trading Regulations**)



CalPERS Personal Trading Regulations (1 of 5)

When a pre-clearance request is submitted, approval/denial is usually granted instantly from the system.

Approved: requested transaction will not violate the Regulations – you may conduct the transaction in your personal brokerage account.

Denied: DO NOT proceed with the requested transaction as it will violate the Regulations – resubmit your pre-clearance request at a later date.

Pending Approval: the requested transaction is under manual review – the Personal Trading Team will review and approve/deny as appropriate.

Receiving pre-clearance approval protects you and the fund from noncompliance with federal and state securities laws and reduces potential conflicts of interest and the appearance of such conflicts.

CalPERS Personal Trading Regulations (2 of 5)

Standards & Codes

[CalPERS Personal Trading Regulations](#) are found at Title 2, Section 558.1 and are enforced and administered by CalPERS Enterprise Compliance, Risk & Governance (ECRG)

Purpose & Intent

- Protects CalPERS staff by reducing the potential appearance or existence of front-running, insider trading, and/or misuse of CalPERS knowledge
- Monitors daily personal trading activity against firm trade activity to ensure compliance with the Regulations

Applicability

- Any employee/Board Member and their Spouse/Registered Domestic Partner who potentially has access to CalPERS investment information

CalPERS Personal Trading Regulations (3 of 5)

Covered Persons are required to obtain pre-clearance approval before the purchase, sale or transfer of **Covered Securities** of any size when executed in a **Covered Account**.

Pre-clearing transactions is an important step to ensuring Covered Persons do not violate the **Blackout Period**, **Holding Period**, and/or the **Restricted List**.

Explicit pre-clearance approval in the Personal Trading Platform ([MyComplianceOffice](#)) is required prior to transacting in your personal brokerage account.

CalPERS Personal Trading Regulations (4 of 5)

Covered Persons

- INVO, EXEO, BSU, OFAS, ECRG, FINO, LEGO, ITSB, ISOF
- Board Members and their appointed Designee(s)
- Spouses or registered domestic partners

Covered Securities

- Stocks, Bonds, ETFs, ETNs (including options)
- Futures, forward contracts (commodities/currencies)
- Private placement offerings (private and real estate)

Covered Account

- Any account that can transact in Covered Securities, even if they currently do not hold Covered Securities

CalPERS Personal Trading Regulations (5 of 5)

Blackout Period

- The day before, day of, and day after CalPERS firm trades

Holding Period

- 30 calendar day period in which one must hold a security and/or stay out of a security

Restricted List

- List of companies CalPERS has MNPI about

Pre-clearance Considerations

The most common reasons for noncompliance are failure to pre-clear or incorrectly entering the details of the request.

Important Reminders

- Ensure the trade details (security ticker, brokerage account, buy/sell, etc.) are entered exactly as intended prior to executing the trades.
- Pre-clearance approval is valid only for the current market session or next market session if submitted after market hours.
 - Market hours are 6:30am-1pm PT.
- Covered Persons are responsible for ensuring approval has been granted (email confirmation); MCO is our book of record.

When in doubt, pre-clear the transaction.

Personal Trading Resources Available to Covered Persons

Personal Trading Materials and Resources (1 of 4)

CalPERS External Site

- Transparency & Accountability: Personal Trading Regulations
 - Personal Trading Regulations
 - Personal Trading Overview Deck
 - Personal Trading FAQs
 - Link to MCO
 - Personal Trading Quick Reference Guide
 - Insider Trading Policy

Personal Trading Materials and Resources (2 of 4)

Personal Trading Regulations

The CalPERS Personal Trading Regulation, Section 558.1 of the Public Employees' Retirement Law, is available on the Intranet and external website.

Personal Trading Overview Deck

Detailed presentation that is intended to be a self-guiding document that covers all aspects of the Personal Trading rules and requirements and navigating the Personal Trading Platform, MCO.

Personal Trading Materials and Resources (3 of 4)

Personal Trading FAQs

A short document that covers FAQs regarding Covered Persons, Covered Accounts, Covered Securities, and navigation through the Personal Trading Platform.

Link to MCO

Link for Covered Persons to access the Personal Trading Platform.

Personal Trading Materials and Resources (4 of 4)

Personal Trading Quick Reference Guide

A short document that details how to navigate the Personal Trading Platform; logging in, general navigation, disclosing brokerage accounts, pre-clearing transactions, etc.

Insider Trading Policy

CalPERS policy regarding the anti-fraud provisions of the federal securities laws and Rules of the Securities and Exchange Commission (SEC).

Navigating MyComplianceOffice (MCO)

How to Access MCO

How to Access MyComplianceOffice (MCO)

- Use the shortcut icon on your desktop (on-site or VPN), or;
- Use the links from the Intranet or external site, or;

<https://www.mycomplianceoffice.com/customer/portal>

- Username: CalPERS email address
- Welcome email from MCO will contain temporary password
- Use the “Forgot your password?” link to reset your password thereafter



MCO Homepage

Intuitive homepage with quick access to pre-clear trades:

The screenshot displays the CalPERS MCO homepage. At the top left is the CalPERS logo. The top right corner features a search bar labeled 'Site Search' and a user profile for 'M D Thao'. A left-hand navigation menu is titled 'My MCO' and includes sections for 'Overview' (with 'My View' selected), 'Activities' (with 'Assignments'), 'Submissions' (with 'Requests' and 'Confirmed'), 'Policies and Procedures' (with 'Documents'), and 'Personal Trading' (with 'Accounts', 'Trades', 'Holdings', and 'Trading Documents'). The main content area is titled 'My View' and shows 'My Assignments' with a 'See All Open Assignments' link. A congratulatory message reads 'Congratulations, M D!' and 'Your to-do list is empty! The next time you have an assignment to complete it will appear here.' Below this is a 'Submission Options' section with a search bar and five buttons: 'Personal Trade Pre-Clearance', 'Add an Account', 'Reconsideration Request: Blackout Period Denial', 'Reconsideration Request: Holding Period Denial', and 'Reconsideration Request: Restricted List Denial'.

Initial & Annual Personal Trading Attestation

CalPERS Personal Trading Regulations require Covered Persons attest to the below within 30 days of appointment and annually thereafter:

1. Personal Trading Regulation Attestation
2. Covered Account Validation
3. Account Statement and Confirmation Authorization

Additionally, Covered Person team members are required to complete **Mandatory Personal Trading Training** (GoLearn) within 14 days of appointment and annually thereafter (due 12/31).

This is a requirement for all Covered Persons, regardless of if you have Covered Accounts and/or trade in the markets.

Initial & Annual Attestation (1 of 3)

Personal Trading Regulations Attestation

Download the Section 558.1 Personal Trading Regulations (you must click and download the Regulations before you can respond).

Assignment Questions

Questionnaire: PT Questionnaire

1) 558.1 Personal Trading Regulations

Please click the link below to download and read the Cal. Code of Regs. Section 558.1 Personal Trading Regulations.

Note: You must open the PDF in order to complete the attestation.

[Personal Trading Regulations.pdf](#)

Initial & Annual Attestation (2 of 3)

Covered Account Validation

Select “No” if you do not have any Covered Accounts to Disclose.

Select “Yes” to disclose your Covered Accounts (see slide 34).

If you already have existing accounts, it will ask you to review and attest that the disclosed is still true and correct (annual attestation).

2) Covered Account Validation

Do you or your Spouse/Registered Domestic Partner have a brokerage account held in your name(s) or have authorization to execute or direct transactions in a brokerage account to purchase, sell or transfer a Covered Security (e.g., stocks, bonds, futures, options)?

Yes, I have a brokerage account(s) and have disclose... ▾

*If you have a Managed Account, please download the Managed Account Certification Letter and attached the completed form to your brokerage account(s). Managed Account Holders must certify annually that the disclosed account information is current and provide an updated Managed Account Certification Letter from the third-party money manager.

Please email personaltrading@calpers.ca.gov.

[Managed Account Certification Form.docx](#)

Accounts Attestation (All Active Data)

[Add New Account](#)

Account ID	Account Name	Introducing Brokerage	Status at Introducing Brokerage	Status	Pending Review	Attested	
	Fidelity Cash	Fidelity Investments	Open	Active	No	Yes	 
	Roth IRA	Fidelity Investments	Open	Active	No	Yes	 

If you have account(s) listed, please review each account(s) and update the account details if needed.

Total results: 2

Initial & Annual Attestation (3 of 3)

Account Statement and Confirmation Authorization

A “Yes” response affirms that you authorize your broker to send duplicate account statements and trade confirmations to CalPERS for your Covered Accounts.

Note: If you do not have any Covered Accounts, a “Yes” response affirms you will allow authorization of any future disclosed Covered Accounts.

3) Account Statement and Confirmation Authorization

COVERED PERSON WITH COVERED ACCOUNT(S):

I authorize my broker(s) to provide duplicate account statements and trade confirmations to CalPERS/MyComplianceOffice (MCO) for me and my Spouse or Registered Domestic Partner.

COVERED PERSON WITH NO COVERED ACCOUNT(S):

If I become the owner of a Covered Account, I agree to authorize my broker(s) to provide duplicate account statements and trade confirmations to CalPERS/MyComplianceOffice (MCO) for me and my Spouse or Registered Domestic Partner.

Yes, I agree to provide duplicate account statements and trade confirmations to CalPERS/MyComplianceOffice (MCO).

Requesting for Pre-clearance

How to Request for Pre-Clearance (1 of 2)

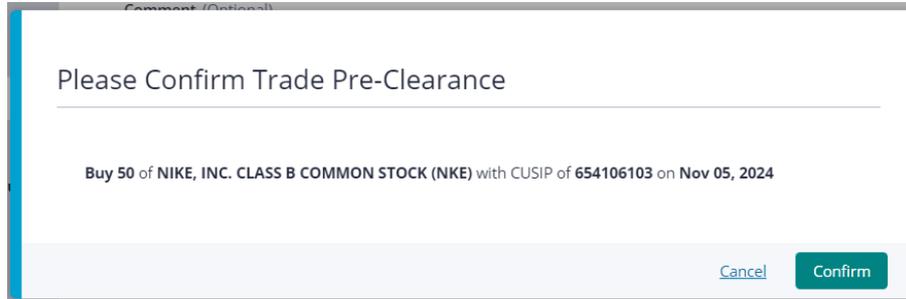
Request for pre-clearance by clicking “Personal Trade Pre-clearance” from the home page. Enter standard trade details and hit Submit.

- Ticker Symbol
- Brokerage Account
- Action
- Order Type
- Quantity
- Attestation

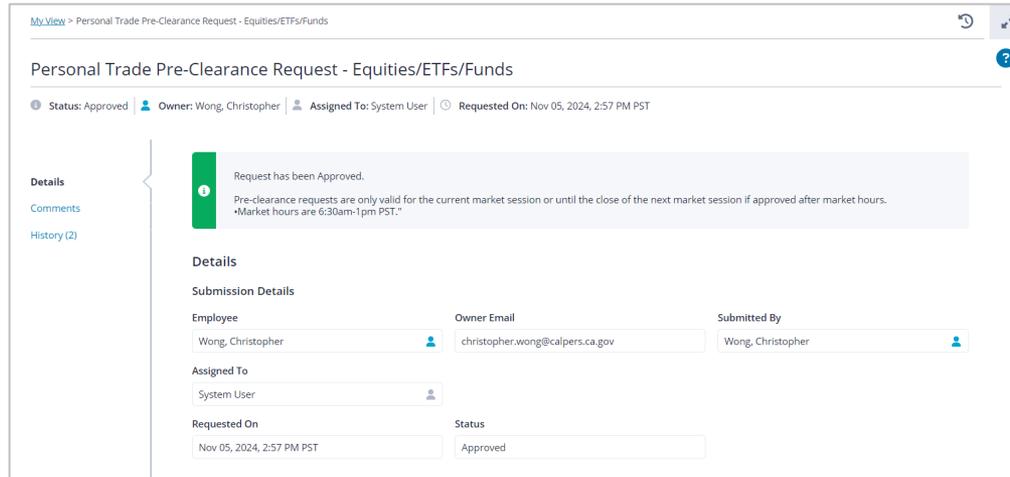
The forms change based on security type (equities, fixed income, etc.)

How to Request for Pre-Clearance (2 of 2)

After clicking Submit, a confirmation will populate, click “Confirm” to submit the pre-clearance:



Next page will display status & confirmation details:



Pre-Clearance Confirmations (1 of 2)

Once the pre-clearance request has been submitted, you will see an alert indicating Approved, Denied or Pending status. **Statuses are color coded:**

Status: **APPROVED**

 Request has been Approved. Please note the below.

 Approved pre-clearance requests are only valid for:

- Market Order: the current market session or until the close of the next market session if approved after market hours (market hours are 6:30am-1pm PT).
- Limit Order: 100 business days – please note, if the details of your limit order change, you must submit a new pre-clearance request.

Status: **PENDING APPROVAL**

 Your request is pending approval. You will be notified once the request has been approved or denied.

Status: **DENIED**

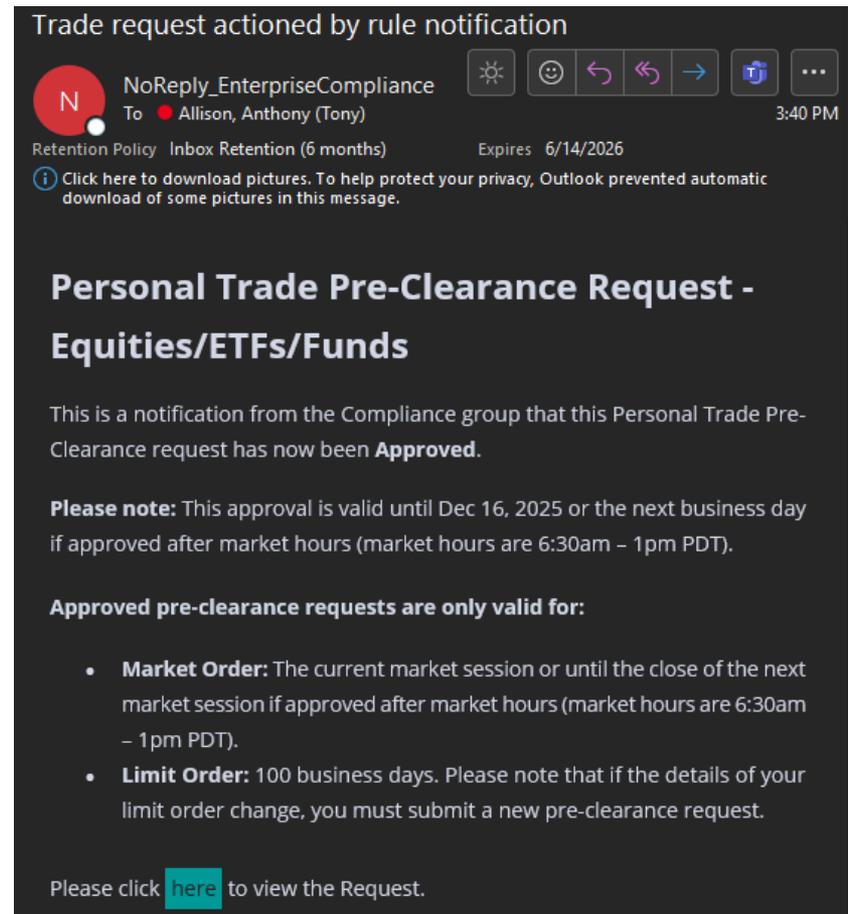
 Request has been Denied.

Pre-Clearance Confirmations (2 of 2)

Users will also receive an email confirmation with a link to the request and the request's expiration date.

Pre-clearance requests are only valid for the current market session or until the close of the next market session if approved after market hours.

- Market hours are 6:30am-1pm PT.



Fixed Income Pre-clearance Requests

Select “Personal Trade Pre-clearance” from the home page, toggle to “Fixed Income,” enter standard trade details and hit Submit.

- Identifier/CUSIP
- Brokerage Account
- Action
- Total Par Value
- Attestation

The screenshot shows a web form titled "Add Trade Pre-Clearance". At the top, there is a breadcrumb "My View > Add Trade Pre-Clearance" and a refresh icon. Below the title is a help icon. A note states "All fields are required unless marked (Optional)". Under "Trade Type", there is a "Select Type" section with four buttons: "Equities/ETFs/Funds", "Fixed Income" (which is highlighted in blue), "Options", and "Private Investment". To the right of these is a dropdown menu labeled "Other Submissions". Below this is a light blue information box with a question mark icon and the text: "To request Trade Pre Clearance Approval, please complete the required fields below. You will be notified once the request has been processed." Under "Security Details", there is a label "Company Name/Identifier/Ticker" and a search input field with the placeholder text "Search by Security / Identifier / Ticker" and a dropdown arrow.

Options Pre-clearance Requests

Select “Personal Trade Pre-clearance” from the home page, toggle to “Options,” enter standard trade details and hit Submit.

- Ticker Symbol
- Option Details
- Brokerage Account
- Action
- Order Type
- Number of Contracts
- Attestation

Option Details

Search for your Option

After selecting an Underlying Security, please enter the mandatory search criteria below to identify and select the relevant Option.

Expiry Month: Select option expiry month

Expiry Year: Select option expiry year

Option Type: Put, Call

Strike Price: e.g. 1000.00

Search for Options

Manually Add an Option Symbol

No Options found
No options were found matching your search criteria.
Cancel this window to amend your search or use the form below to manually create an option symbol.

Ticker Symbol: AMZN

Expiry Date: Jul 04, 2025

Option Type: Put, Call

Strike Price: 250

Option Symbol: AMZN 250704P00250000

Cancel Use this option

Private Investments Pre-clearance Requests

Select “Personal Trade Pre-clearance” from the home page, toggle to “Private Investments,” enter required fields and hit Submit.

- Investment Details
- Business Entity*
- Account Details
- Trade Details
- Conflict Questions
- Attestation
- Upload Supplemental Information (offer letter, PPM, etc.)

The screenshot shows a web form titled "Add Trade Pre-Clearance". At the top, there is a breadcrumb "My View > Add Trade Pre-Clearance". Below the title, a note states "All fields are required unless marked (Optional)". The "Trade Type" section features a "Select Type" dropdown menu with four options: "Equities/ETFs/Funds", "Fixed Income", "Options", and "Private Investment" (which is selected and highlighted in blue), and "Other Submissions". A blue information icon is followed by a message: "To request Trade Pre Clearance Approval, please complete the required fields below. You will be notified once the request has been processed." The "Investment Details" section asks "Do you already have a holding in this Private Investment?" with "Yes" and "No" radio buttons. Below this is a "Choose Private Security" dropdown menu with the placeholder text "Start typing".

**MCO has a private business security master list to select from*

Brokerage Account Maintenance

View Existing and Add New Accounts

Covered Persons can view their existing brokerage accounts and add New Accounts by clicking the “Accounts” link under the Personal Trading tab.

Accounts

Accounts

Add New Account

Account ID	Account Name	Financial Instit...	Status at Financ...	Status	Pending Review	Account Data S...	Online Access D...	Attested
	Fidelity Roth IRA	Fidelity Investments	Open	Active	No	Direct Feed From F...	No Authentication ...	Yes
	Fidelity Cash	Fidelity Investments	Open	Active	No	Direct Feed From F...	No Authentication ...	Yes

Total results: 2

To add a new account, click the “Add New Account” button in the upper left-hand corner.

The next screen will take you to the account disclosure form where you can enter the required information and hit Submit.

Adding New Accounts (1 of 2)

The account disclosure form requires you to enter the following information:

- **Financial Institution/Broker**
 - Current CalPERS Designated Brokerage List (recent additions include Robinhood, LPL Financial, and Raymond James)
- **Account ID** (Account Number)
- **Account Full Name**
- **Account Short Name** (will auto populate)
- **Do you have Trading Discretion over this Account?** (Selecting “No” indicates the account is a Managed Account. A managed account letter will be required if “No” is selected.)
- **Can this Account hold Covered Securities?** (Selecting “No” indicates the account can only transact in non-Covered Securities, such as open-ended mutual funds.)
- Click **Submit**

Adding New Accounts (2 of 2)

Accounts > Add Account

Add Account

All fields are required unless marked (Optional).

3 All CalPERS covered persons are required to disclose covered/monitored accounts as defined in 558.1, Personal Trading Regulations. Please fill in all the required fields with your account information. If your Financial Institution does not appear in the dropdown list, please select "Other" and type in the name of the Financial Institution in the Account Description field.

Account belongs to
Self

Account Details

Introducing Brokerage
-- Please Select --

Account ID

Account Full Name

Account Short Name

Accounts > Add Account

Account Full Name

Account Short Name

Account Description (Optional)

Additional Details

Account Status (Optional)
Open Closed

Date Account Opened (Optional)
Select Date

Do you have Trading Discretion over this Account?
Yes No

Can this Account hold covered Securities?
Yes No

Any other Information relevant to this Account (Optional)

Cancel Submit

Once submitted, the account disclosure goes to the ECRG team to review; we then work to establish the electronic feed with the broker-dealer.

Contact and Resources

For additional questions, please contact the ECRG team:

personaltrading@CalPERS.ca.gov

Additional resources can be found here:

[Personal Trading Regulations Resources](#) (External)

Appendix

Managed Accounts

Managed Account Definition

CalPERS Personal Trading Regulations define a managed account as an account with the capability of trading Covered Securities that meets all the following criteria:

- It is managed by a third party who is not a Covered Person
- No Covered Person has the power to affect or ability to control or influence investment decisions in the account
- No Covered Person communicates (directly or indirectly) with the person(s) with investment discretion regarding specific trade activity in the account

A managed account letter from the money manager stating the agreed arrangement complies with the above criteria is also a requirement.

Adding New Accounts

The account disclosure form requires you to enter the following information:

- **Financial Institution/Broker**
- **Account ID** (Account Number)
- **Account Full Name**
- **Account Short Name** (will auto populate)
- **Do you have Trading Discretion over this Account?** (Selecting “No” indicates the account is a Managed Account. A managed account letter will be required if “No” is selected.)
- **Can this Account hold Covered Securities?** (Selecting “No” indicates the account can only transact in non-Covered Securities, such as open-ended mutual funds.)
- Click **Submit**

If a managed account letter is not provided, we will contact you via email to obtain.

Managed Account Certification

Covered Persons with Managed Accounts must certify annually by first business day of April.

- Review accounts, attach an updated managed account letter and certify.

Assignment Questions

Do you or your Spouse/Registered Domestic Partner have a brokerage account(s) that is managed by a third-party money manager who has full discretion to act as an investment advisor and manage any investment trading activities in your account(s)?

A Managed Account must meet ALL of the following criteria:

- It is managed by a third-party who is not a Covered Person.
- No Covered Person has the power to affect or ability to control or influence investment decisions in the account, and
- No Covered Person communicates(directly or indirectly) with the person(s) with the investment discretion regarding specific trade activity in the account.

Choose one of the above

Accounts Attestation (All Active Data)

[Add New Account](#) 

Account ID	Account Name	Financial Institution	Status at Financial Institution	Status	Pending Review	Attested	
1234567a	TestAccount	Robinhood	Open	Active	Yes	Yes	 

I attest that the Accounts data above is correct. Total results: 1

Please click the link below to download the Managed Account Certification Form. If you answer yes to the Assignment Questions, you must attach an updated copy of your Managed Account Certification Form, once it is signed by your third-party money manager. You will not be allowed to submit the Affirmation until you complete this requirement.

[Managed Account Certification Form.docx](#)

[Return to Overview](#) [More Actions](#) [Save as Draft](#) [Complete](#)

Non-Designated Brokerage Accounts

Non-Designated Brokerage Account Definition

CalPERS Personal Trading Regulations require all Covered Persons to maintain their accounts with a Designated Brokerage (i.e., established on the electronic feed in the personal trading platform).

If a Covered Account cannot be established on an electronic feed, it is considered a “Non-Designated Brokerage Account”.

Covered Persons must disclose why they cannot move the account and receive approval of such account from the ECRG.

Adding Non-Designated Brokerage Accounts

The account disclosure form requires you to enter the following information:

- **Financial Institution/Broker**
 - Select “Other” form the drop-down list
- **Account ID** (Account Number),
- **Account Full Name & Account Short Name** (will auto populate)
- **Account Description** (enter the name of the non-designated broker, if “Other” was selected as the Financial Institution/Broker)
- **Do you have Trading Discretion over this Account?** (Selecting “No” indicates the account is a Managed Account. A managed account letter will be required if “No” is selected.)
- **Can this Account hold Covered Securities?** (Selecting “No” indicates the account can only transact in non-Covered Securities, such as open-ended mutual funds.)
- **Any other Information relevant to this Account** (Provide the reason as to why you cannot move the account to a designated broker.)
- Click **Submit**

Non-Designated Brokerage Account Requirements

Covered Persons who hold Non-Designated Brokerage Account(s) are required to:

- **Pre-clearance Approval:** Prior to the buying, selling or transferring of Covered Securities.
- **Holding Period:** The 30-calendar day between the acquisition and sale, and the 30-calendar day period between sale and re-acquisition, of a Covered Security, on a last-in first-out basis.
- **Blackout Period:** Covered Persons are prohibited from buying, selling or transferring Covered Securities during the Blackout Period for transactions you direct (i.e., purchase additional shares or sale of shares). The Blackout Period means the three-day period of time that commences one market day before and ends one market day after a transaction in Covered Securities by CalPERS.
- **Completion of Quarterly Transaction Affirmations:** see next slide.

Maintaining a Non-Designated Brokerage Account

- **Completion of Quarterly Transaction Affirmations:**
 - Manually enter all buys, sells, and transfers that occurred in your Non-Designated Brokerage Account for the past quarter in the MCO system.
 - Upload the “paper” statements for the related accounts that detail the holdings and transactions of the account in the MCO system. ECRG will review the statements to ensure all transactions complied with the Regulations.

Assignment Questions

For Covered Accounts from brokers or broker-dealers that do not provide account activity information electronically to the On-Line Platform, Covered Person Employees and Board Members must report all purchases, sales and transfers of Covered Securities on a quarterly basis, within 30 calendar days after the first day of each new calendar quarter.

Trades Attestation (From Apr 01,2023 To Jun 30,2023)

[Add New Trade](#)

Trade Date	Sec. Type	Action	Security Name	Symbol	Qty	Price	Introducing Brokerage	Account No.	Trade Source
No data available									

I certify these investment transactions are accurate and complete to the best of my knowledge, and I hereby certify that I have uploaded all brokerage statements and have individually entered each purchase, sale and transfer of Covered Securities for me and my Spouse or Registered Domestic Partner for the previous quarter. Total results: 0

Attachments

Attach Documents to this Assignment

Drag & drop files here

[Browse files to upload](#)

Name	Size	Comments	Attached By	Attached On
No Data				