

**GLOBAL EDUCATION COLLABORATIVE
CONFLICT OF INTEREST CODE BRIDGE POLICY**

I. ADOPTION

To ensure compliance with the Political Reform Act of 1974, California Government Code Section 87100, *et seq.*, the Global Education Collaborative Board of Directors hereby adopts this Conflict of Interest Code Bridge Policy (“COI Bridge Policy”) in order to align with the provisions of the Conflict of Interest Code of the Los Angeles Unified School District (“LAUSD Code”) (attached hereto and incorporated herein by reference) as applied to the designated employees of Global Education Collaborative (“GEC” or “Charter School”).

This COI Bridge Policy shall apply to all governing board members, corporate officers, and designated employees of the Charter School.

II. STATEMENT OF ECONOMIC INTERESTS

This COI Bridge Policy aligns the titles of persons at the Charter School, including governing board members, who hold positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest (“Designated Position”) to those listed Designated Positions listed in Exhibit B to the LAUSD Code.

This COI Bridge Policy also includes the relevant financial disclosure categories for each Designated Position as reflected in Exhibits A and B to the LAUSD Code.

III. FILING

Each person in a Designated Position shall file a Form 700 Statement of Economic Interest (“Statement”) at the time and manner prescribed by the LAUSD Code, disclosing reportable investments, interests in real property, business positions, and income required to be reported under the category or categories to which the Designated Position is assigned in Exhibit A to the LAUSD Code.

IV. DISQUALIFICATION

The Charter School recognizes that, under the Political Reform Act, no person shall make, participate in making, or try to use his/her official position to influence any Charter School decision which he/she knows or has reason to know will have a reasonably foreseeable material financial effect, distinguishable from its effect on the public generally, on the person or a member of his or her immediate family.

VI. MANNER OF DISQUALIFICATION

A. Non-Governing Board Member Designated Employees

When a non-Governing Board member designated employee determines that he/she should not make a decision because of a disqualifying interest, he/she should submit a written disclosure of the disqualifying interest to his/her immediate supervisor. The supervisor shall immediately reassign the matter to another employee and shall forward the disclosure notice to the Charter School Principal, who shall record the employee's disqualification. In the case of a designated employee who is head of an agency, this determination and disclosure shall be made in writing to his/her appointing authority.

B. Governing Board Member Designated Employees

Interest in a contract: Where a Governing Board member has a direct or indirect personal, material, or financial interest in a contract, the interest will be reviewed under Government Code Section 1090, to determine whether there is a violation and if the remote or non-interest exceptions apply. Should the Board determine that there is a Government Code Section 1090 violation, the Board must not vote to enter into the contract, as Government Code Section 1090 prevents the entire board from voting on the contract.

All other financial interests: Governing Board members shall disclose a disqualifying interest at the meeting during which consideration of the decision takes place. This disclosure shall be made part of the Board's official record. The Board member shall refrain from participating in the decision in any way (i.e., the Board member with the disqualifying interest shall refrain from voting on the matter and shall leave the room during Board discussion and when the final vote is taken) and comply with any applicable provisions of the Charter School bylaws.

EXHIBIT A

Applicable Financial Disclosure Categories from the LAUSD Code

CATEGORY 1

Persons in this category shall disclose all interests in real property within LAUSD's jurisdiction. Real property shall be deemed to be within the jurisdiction if the property or any part of it is located within or not more than two miles outside the boundaries of LAUSD's jurisdiction or within two miles of any land owned or used by LAUSD.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

CATEGORY 2

Persons in this category shall disclose all investments and business positions.

CATEGORY 3

Persons in this category shall disclose all income and business positions.

CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including gifts, loans and travel payments) received from entities that manufacture, sell or otherwise provide supplies and/or services of a type utilized for governmental purpose in the past 2 years and associated with the job assignment of designated positions assigned to this disclosure category.

...

CATEGORY 6

Individuals who, under contract, participate in decisions by providing information, advice, recommendation or counsel to the agency which could affect financial interests shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the agency head (or designee).

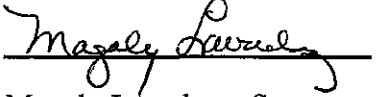
EXHIBIT B

**Alignment of Charter School
Designated Positions to LAUSD Code**

CHARTER SCHOOL DESIGNATED POSITION	SIMILAR LAUSD DESIGNATED POSITION	FINANCIAL DISCLOSURE CATEGORIES
Charter School Board Member	Board of Education Member	1, 2, 3
Principal	Superintendent of Schools	1, 2, 3
Director of Operations	Chief Operating Officer	1, 2, 3
Building Manager	Chief Facilities Executive	1, 2, 3
Contractor	Non-Employee Filer: Consultant	6

CERTIFICATE OF SECRETARY

I certify that I am the duly elected and acting secretary of the Global Education Collaborative, a California nonprofit public benefit corporation; that the conflict of interest policy, consisting of 5 pages including the certificate of the secretary, is the conflict of interest policy of this corporation as adopted by the board of directors on November 29, 2011; and that this conflict of interest policy has not been amended or modified since that date.


Magaly Lavadenz, Secretary