



Duty Statement

Classification: **Associate Investment Manager**

Position Number: **275-345-4633-002**

HCM#: **7472**

Branch/Section: **Enterprise Compliance, Risk & Governance / Investment Compliance Advisory Services**

Location: **Sacramento, CA**

Working Title: **Compliance & Risk Manager**

Effective Date: **September 1, 2024**

Collective Bargaining Identifier (CBID): **M01**

Supervision Exercised: **Yes** **No**

Telework: **Office-Centered** **Remote-Centered** **Not Eligible**

The Enterprise Compliance, Risk and Governance Office (ECRG) promotes and supports an organizational culture which builds compliance awareness into the daily business processes for all CalPERS business lines and program areas. ECRG monitors CalPERS business activities and establishes an infrastructure that provides assurance to management and the Board of Administration that program areas abide by all applicable laws, regulations, and policies.

Under the direction of the Compliance & Risk Director (Investment Manager), the Compliance & Risk Manager (Associate Investment Manager) oversees and directs compliance activities within the Compliance Investment Advisory unit. These activities support the Chief Compliance Officer who promotes the sound and secure operation of CalPERS enterprise compliance program.

The Compliance & Risk Manager responsibilities include providing Compliance advisory services to Investments and Benefits Divisions, managing compliance on-boarding of Investments and Benefits teams as required, enhance conflicts of interest monitoring, oversee third-party risk, lead risk assessment oversight and consultation, and manage personal trading monitoring.

In all the following roles and responsibilities, the Compliance & Risk Manager the AIM will maintain a positive team management approach while demonstrating CalPERS' Core Values of Quality, Respect, Integrity, Openness, Accountability, and Balance in accordance with personal work ethic in alignment with CalPERS Investment Beliefs.

Essential Functions

Regular and consistent attendance in the office at least three days a week for teamwork, in-person collaboration, personal interactions with members, stakeholders, and other team members, cross-functional communications within CalPERS, and supervision of work. In-person collaboration is essential to promote and foster innovation, creativity, and complete engagement by the team. Coordinating work in person allows the teams to stay functional and aligned with the work of others. Being present in the office is essential to allow for immediate accessibility for discussions, questions, mentoring, or strategy sessions between team members.

- 20% Onsite¹ and virtually, manages the Investment Compliance Advisory team to include developing people, processes and systems through training, coaching, and process improvement within the team. Provides the direction and oversight of assignments, engagement with business partners, executive management, and Board of Directors, ensure compliance policies and framework are in line with Enterprise objectives and deliver on aiding in managing compliance and risk within assigned divisions or practices.
- 20% Advisory Services
- Onsite and virtually, essential leadership in providing business partners in Investments and Benefits necessary advice and guidance on compliance and risk management areas such as regulatory requirements, regulatory change, and industry best practices in managing and mitigating risk; Manages feedback and appropriate challenge on risk inventories, controls, risk assessments. Identify and deliver insights to business partners and management on observations and recommendations. Facilitates appropriate escalation paths to bring urgent risk matters to management's attention.
- 20% Compliance Monitoring and Oversight
- Onsite and virtually, expert compliance knowledge and industry best practices subject matter expertise, as well as project management skills to plan and manage compliance testing and monitoring initiatives impacting Investments and Benefits divisions that establish an effective environment of operational compliance and internal controls for oversight and monitoring. Oversees developing and maintaining a repository of applicable federal and state securities laws and regulations and identify critical linkages that guide the development of CalPERS investment policies and protocols. As an independent party, facilitates compliance reviews on an ongoing review cycle to provide a compliance assessment of program policies, processes and functions to reduce risk, strengthen compliance, and improve operational effectiveness within the Investment and Benefits divisions. Develops and implements Compliance systems and tools to conduct necessary surveillance and monitoring of specific transactions and activities. Delivers summary of compliance reviews and highlight new and innovative opportunities and recommendations to management. Develop and utilize investment compliance tools and frameworks to mature compliance policies, strategies, guidelines, benchmarks, and procedures that are consistent with investment industry best practices.
- 10% Personal Trade Regulation Compliance, Surveillance, Guidance, Education and Reporting, (including MNPI & Insider Trading Education)
- Onsite and virtually, manages the engagement process with all levels of staff individually, including Board Members, and their spouses or registered domestic partners to capture and

monitor the personal trading of such “Covered Persons” in accordance with the Personal Trading. Directs comprehensive forensic analysis of personal securities transactions, including various levels of investigation, research, and collaboration with the Legal Office to ensure compliance with the Regulations. Proactively respond to inquiries and educate Covered Persons of the Regulation requirements, including but not limited to providing training in small and large class settings and periodically reviewing the efficacy of all types of training offered (one on one, mandatory, onboarding, etc.); Develops recommendations and guidance on how to comply with Regulation. Develops, implements, and enhance surveillance techniques to evaluate the potential for Material Non-Public Information (MNPI) in program areas outside of CalPERS Investment Office in accordance with the Insider Trading Policy and the need to place additional securities of companies on the Restricted List (e.g., Health Care, Pension, Procurement, Board Members, etc.). Oversees the development and implementation of reports and other key stakeholders with respect to potential noncompliance with the Personal Trading Regulations and other data trends and analysis.

10% Conflicts of Interest Review (Political Reform Act / Investment Transaction Reviews)

Onsite and virtually, oversee the process of working with the asset classes within the Investment Office and existing and potential CalPERS external managers to review, document, and report conflicts of interest as they relate to CalPERS policies, federal, state, legislative and regulatory requirements and industry guidelines, and any other applicable potential conflicts. Develop and manage a robust conflict of interest review process (e.g., Compliance Control Room) that aims to establish a conflict-free environment within the Investment Office asset classes, including but not limited to staff, consultants, and potential investments. Establish Continuously review and update cycles for policies and procedures to ensure continued efficacy and relevance in monitoring Investment Office conflicts.

10% Investment Compliance Education and Outreach (Political Reform Act, Personal Trade Regulations, CalPERS Incompatible Activities Statement, Insider Trading Policy, Onboarding, Offboarding, Ongoing Guidance).

Onsite and virtually, lead the Conflict-of-Interest education program. manage the research and collaborate with various internal and external parties to create and develop periodic education sessions that cover a multitude of investment compliance topics, including but not limited to the complexities of the Political Reform Act, GC1090, Personal Trading Regulations, CalPERS Incompatible Activities Statement, Insider Trading Policy requirements, the intricacies of determining financial interests and investments for disclosures on the Form 700, etc.; Identify and deliver definitive recommendations and guidance on how to comply with various compliance rules and requirements. Periodically review and update education and outreach materials to ensure continued relevance of such guidance and training. Work directly with Compliance Senior Management to provide onboarding and offboarding guidance regarding all applicable compliance requirements and inquiries.

5% Placement Agent Disclosure Regulation Compliance, Administration, Guidance, and Reporting

Onsite and virtually, lead the efforts with the asset classes within the Investment Office and existing and potential CalPERS external managers to administer, provide guidance, and report the Disclosure of Placement Agent Fees, Gifts and Campaign Contributions in

accordance with regulatory requirements. Manage research and proactively respond to inquiries, educate external managers of the regulation requirements, including but not limited to working directly with external manager's general counsel and/or chief compliance officer. Partner with the Investment Office and the Legal Office to ensure that all potential external managers and Program Areas are compliant with the requirements of the Regulation; Identify and deliver definitive recommendations and guidance on how to comply with Regulation. On at least a quarterly basis, develop and deliver the report to the Investment Committee all Placement Agent Disclosures in accordance with the requirements of the Regulation. Lead the continuous evaluation and development of enhancements and improved processes to streamline and operationalize the intent of the Placement Agent Disclosure Regulation.

5% Onsite and virtually, performs other related duties and projects as assigned.

Working Conditions

- ¹ This position is designated as office-centered and works primarily onsite at the Sacramento, CA - Headquarters at least three weekdays.
- Multi-story building in downtown Sacramento.
- Low wall cubicle setting.

Conduct, Attendance and Performance Expectations

- Ability to maintain consistent attendance.
- Ability to demonstrate punctuality, initiative, and dependability.
- Ability to model and support CalPERS Core Values (Integrity, Accountability, Respect, Openness, Quality and Balance).
- Ability to model CalPERS Competencies and demonstrate proficiency in; Collaboration, Leading People, Leading Change, Driving Results, Business Acumen, Communication, and Leading Self.

I have read and understood the duties and essential functions of the position and can perform these duties with or without reasonable accommodation.

Employee Name (Print):

Employee Signature: _____ **Date:**

I certify that the above accurately represent the duties of the position.

Supervisor Signature: _____ **Date:**