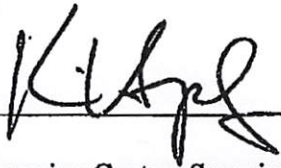


**GUAJOME LEARNING CENTERS
CONFLICT-OF-INTEREST CODE**

The Political Reform Act (Govt. Code § 81000, *et seq.*) requires state and local government agencies to adopt and promulgate conflict-of-interest codes. The Fair Political Practices Commission (FPPC) has adopted a regulation (2 CCR § 18730) that contains the terms of a standard conflict-of-interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the FPPC to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations § 18730 and any amendments to it duly adopted by the FPPC are hereby incorporated by reference. This regulation and the attached Exhibits A and B, designating positions and establishing disclosure categories, shall constitute the conflict-of-interest code of Guajome Learning Centers, which operates Guajome Learning Centers (or "Charter School").

Individuals holding designated positions shall file their Form 700 Statements of Economic Interests with the Charter School, which will make the statements available for public inspection and reproduction. (Govt. Code § 81008.) All statements will be retained by the Charter School.

APPROVED AND ADOPTED by the Board of Directors of Guajome Learning Centers on the 10th day of December 2024.



Guajome Learning Centers Superintendent

I, the undersigned, do hereby certify:

1. That I am the Secretary of the Guajome Learning Centers Board of Directors; and
2. That the foregoing Conflict-of-Interest Code constitutes the Conflict-of-Interest Code of said school as duly adopted by the school's Board of Directors on September 8, 2020.

Secretary Name

Dawn Voss

Secretary Signature

Dawn Voss

Guajome Learning Centers Board of Directors

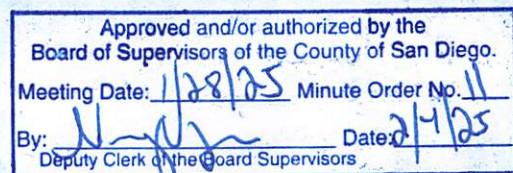


EXHIBIT A
DESIGNATED POSITIONS

<u>Designated Position</u>	<u>Assigned Disclosure Category</u>
Members of the Governing Board	I
Charter School Superintendent	I
General Counsel	I
Consultants	*

*Consultants are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Superintendent may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Superintendent's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict-of-interest code. (Govt. Code § 81008.)

EXHIBIT B
DISCLOSURE CATEGORIES

Category I

Designated positions assigned to this category must report:

- a. Interests in real property which are located in whole or in part within the boundaries (and a two mile radius) of any county in which the Charter School operates.
- b. Investments in, income, including gifts, loans, and travel payments, from, and business positions in any business entity of the type which engages in, the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, educational supplies, textbooks and items used for extra-curricular courses.
- c. Investments in, income, including gifts, loans, and travel payments, from, sources which are engaged in the performance of work or services of the type to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, student services commonly provided in public schools such as speech therapists and counselors.

Category II

Designated positions assigned to this category must report:

Investments in, income, including gifts, loans, and travel payments, from, and business positions in any business entity of the type which engages in the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, educational supplies, textbooks and items used for extra curricular courses.

Category III

Designated positions assigned to this category must report:

Investments in, income, including gifts, loans, and travel payments, from, sources which are engaged in the performance of work or services of the type to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, student services commonly provided in public schools such as speech therapists and counselors.