

**POLICY NUMBER:** 2.00.103**EFFECTIVE DATE:** 6/12/25**TITLE:** Confidentiality and Use of Position**SUPERSEDES:** 6/16/22**BOARD ADOPTION:** 6/12/25**REVIEWED:**

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**PURPOSE**

Washington State Investment Board (WSIB) Board members and employees hold influential positions of power with access to information not available to the general public. The Board seeks to prevent an inadvertent abuse of power as well as a release of confidential or non-public information that could result in financial detriment or loss of trust by the people.

**Guidelines**

## 1. Confidentiality

- A. Confidential information shall be used solely for the Board's purposes and under no circumstances revealed except as required by law, contract, agreement, or consent.
- B. No Board member or employee shall divulge confidential information in the Board's or the WSIB's possession, whether labeled confidential or not, to any unauthorized person or entity.
- C. No Board member or employee shall share or divulge information to any unauthorized person or entity in advance of the time prescribed for its authorized issuance.
- D. Board members and employees may not otherwise use or permit others to use information not available to the general public.
- E. If confidential or proprietary information will be shared with non-WSIB employees, the Board member or WSIB employee must ensure that such person signs a non-disclosure agreement.

## 2. Use of Position

- A. No Board member or employee shall use their position or employment with the WSIB or use the WSIB's facilities, equipment, or supplies to obtain or attempt to obtain personal gain or advantage either for themselves or for other persons.
- B. Except in the course of official duties, no Board member or employee shall use their position or employment with the WSIB or use WSIB facilities, equipment or supplies to assist another in a transaction involving the WSIB, including the use of influence over the Board or WSIB to obtain or attempt to obtain gain or advantage for the person or entity seeking to transact business.
- C. No Board member or employee shall accept employment or engage in a business or professional activity that might reasonably be expected to require or induce the disclosure of confidential information acquired by reason of their official position.

## 3. Post-WSIB Employment

- A. No Board member or employee shall accept employment or compensation after leaving the Board or state service in violation of state law:

- i. One-Year Restriction: Board members and employees may not accept employment or compensation from an employer ("new employer") within one year of termination of state service or employment if all of the following conditions apply:
    - a. During the previous two years, the Board member or employee supervised, negotiated, investigated, advised, or administered a contract involving the new employer and while in state service was in a position to make discretionary decisions affecting the outcome of such negotiations or administration.
    - b. The state contract(s) had a total value in excess of \$10,000.
    - c. The duties with the new employer include implementing, supervising, or controlling a WSIB contract, or portion thereof.
  - ii. Two-Year Restriction: A Board member or employee may not within two years following termination of state service or employment have a direct or indirect beneficial interest in a WSIB contract expressly authorized or funded by executive action when the Board member or employee participates in such action.
- B. A former Board member or employee may not accept employment or compensation if the member or employee knows, has reason to believe, or circumstances would lead a reasonable person to believe that it was offered as influence, compensation, or reward for the performance or non-performance of official duties. A former Board member or employee also may not assist another person or entity, whether or not for compensation, in any transaction involving the WSIB in which the former member or employee participated.

#### **POLICY REVIEW**

The Board shall review this policy at least once every (3) three years to ensure that it remains relevant and appropriate.

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Policy Adopted 6/20/19  
Revised 6/16/22  
Revised 6/12/25