



**CONFLICT OF INTEREST POLICY**  
*OF*  
***JEWISH FEDERATION OF METROPOLITAN CHICAGO***  
***JEWISH UNITED FUND OF METROPOLITAN CHICAGO***  
***JFMC FACILITIES CORPORATION***

This Conflict of Interest Policy has been adopted by Jewish Federation of Metropolitan Chicago, Jewish United Fund of Metropolitan Chicago, and JFMC Facilities Corporation. Each of said organizations is referred to below as the “Organization.”

**1. RATIONALE**

Officers, directors, committee members and senior staff members of the Organization (collectively, “Key Individuals”) have a fiduciary duty to conduct all business of the Organization in a manner consistent with the best interests of the Organization. This duty requires that all decisions and actions of Key Individuals on behalf of the Organization must be made or taken solely with a view to, and with a desire to promote, the best interests of the Organization.

Key Individuals are likely to be, and indeed should be, persons with substantial involvement in business and community organizations. It would be very difficult, or perhaps impossible, for the Organization to recruit competent leadership from people entirely free of potential conflicts of interest with the Organization. The best way to protect the Organization from the taint of actual or apparent conflict of interest is for the Organization to require Key Individuals to disclose potential conflicts of interest in advance. With this information the Organization can take action to prevent the conflict of interest from tainting the decision-making process of the Organization. Such action will consist of excluding the conflicted Key Individual from any vote regarding the specific matter, although depending on circumstances the conflicted party may or may not be permitted to participate in the discussion regarding that matter.

**2. DEFINITIONS**

A “Conflict of Interest” exists when a Key Individual or Family Member of a Key Individual:

- (i) directly or indirectly does or seeks to do business with, or receives or seeks to receive anything of value from, the Organization or any Affiliated Agency or Beneficiary Agency,
- (ii) has a direct or indirect ownership interest or investment in an organization doing or seeking to do business with, or receiving or seeking to receive anything of value from, the Organization or any Affiliated Agency or Beneficiary Agency,

(iii) receives anything of value from any person or organization who does or seeks to do business with the Organization or any Affiliated Agency or Beneficiary Agency, or

(iv) is an officer, director, influential employee or consultant of any Affiliated Agency or Beneficiary Agency.

The “Affiliated Agencies” and “Beneficiary Agencies” are listed on Attachment A hereto.

A “Family Member” of an individual means the spouse, children and parents of such individual.

Notwithstanding the foregoing,

- (a) with respect to the vote taken by the Federation Board of Directors on annual allocations traditionally taken in June of each year, a director of the Federation shall not be deemed to have a Conflict of Interest solely because the director or a Key Family Member of the director is a volunteer officer or volunteer director of an Affiliated Agency or Beneficiary Agency; and Agency, or
- (b) with respect to a vote by a committee of the Organization, a committee member shall not be deemed to have a Conflict of Interest solely because a Family Member of the committee member is a volunteer officer or volunteer director of an Affiliated Agency or Beneficiary Agency.

### **3. DISCLOSURE**

All Key Individuals shall submit to the Organization an initial written disclosure statement and thereafter, annual disclosure statements, attesting that:

S/he understands and agrees to comply with the Conflict of Interest Policy; and

Except as specifically described in the disclosure statement, neither s/he nor, to the best of his/her knowledge, any of his/her Family Members has, during the past 12 months been engaged in, or anticipates at any time in the future being engaged in, any Conflict of Interest.

In addition to submitting initial and annual disclosure statements, whenever a Key Individual is present at a meeting where s/he can reasonably anticipate that final deliberation or voting is about to occur on a matter in which s/he has a Conflict of Interest, s/he shall immediately and fully disclose the Conflict of Interest to the person chairing the meeting.

### **4. NON-PARTICIPATION**

A Key Individual who has disclosed or been found to have a Conflict of Interest with respect to a particular matter shall refrain from any vote regarding that specific matter, although depending on circumstances such individual may or may not be permitted to participate in the discussion regarding that matter.

## **5. REPORTING**

The Executive Vice President-Administration of the Organization shall be responsible for collecting and reviewing the initial and annual disclosure statements, and at least annually shall submit to (i) the Chairman of the Board, (ii) the Chairman of the Overall Planning and Allocations Committee, (iii) the Chairman of the Administration Committee and (iv) and the President a written report listing the Conflicts of Interest disclosed in such statements and the actions, if any, taken by the Organization in response thereto.

## **6. PENALTY FOR NONCOMPLIANCE**

Failure of any Key Individual to comply with this Policy, including but not limited to failure to timely submit disclosure statements, will be grounds for removal from office.

## **7. EXCESS BENEFIT TRANSACTIONS**

In deciding whether to approve any contract or transaction between the Organization and a Key Individual, the Board of Directors or committee with authority to grant final approval (the "decision-making body") must comply with the substantive and procedural requirements of the "excess benefit" rules of the Internal Revenue Code. These rules require that (i) the economic benefits to the Key Individual must not exceed a reasonable amount, (ii) the decision-making body must obtain and use comparability data in making the decision, and (iii) the decision-making body must fully and timely document the basis for its decision. Further guidance on the "excess benefit" rules can be obtained from the Organization's legal counsel.



**CONFLICT OF INTEREST  
ANNUAL DISCLOSURE STATEMENT FOR 2018-2019**

**JEWISH FEDERATION OF METROPOLITAN CHICAGO  
JEWISH UNITED FUND OF METROPOLITAN CHICAGO  
JFMC FACILITIES CORPORATION**

*Capitalized terms used in this Disclosure Statement have the meaning(s) set forth in the attached Conflict of Interest Policy.*

I, \_\_\_\_\_, certify that:

1. I understand and agree to comply with the attached Conflict of Interest Policy.
2. Neither I nor, to the best of my knowledge, any of my Family Members has, during the past 12 months, been involved in, or anticipate at any time in the future becoming involved in, any activity or circumstances that constitutes a Conflict of Interest, except as specifically described below:

*Fully describe any Conflict of Interest involving you or your Family Member(s).  
Attach additional pages, if necessary. If "none," so state.*

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*Fully describe any facts or circumstances that you wish reviewed in order to  
determine whether or not such facts or circumstances constitute a Conflict of  
Interest. Attach additional pages, if necessary. If "none," so state.*

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3. The name and address of my principal business or occupation is:

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Type of business  
or occupation: \_\_\_\_\_

4. In the last five years I have not been convicted of a felony under the Sarbanes-Oxley Act of 2002, or a Class 3 or Class 2 felony under the Illinois Securities Act of 1953.

SIGNATURE: \_\_\_\_\_

NAME: \_\_\_\_\_  
(PLEASE PRINT)

DATE: \_\_\_\_\_

## **Attachment A: Affiliate, Beneficiary, Local, National, Overseas, & Grantee Agencies**

Seymour J. Abrams Cheder Lubavitch Day School  
Akiba - Schechter Jewish Day School  
America-Israel Cultural Foundation (AICF)  
American Jewish Joint Distribution Committee (JDC)  
American Jewish World Service (AJWS)  
Arie Crown Hebrew Day School  
ARK, The  
Associated Talmud Torahs (ATT)  
    REACH  
Aviators Club  
Bais Yaakov Girls' High School of Chicago  
Be-Atzmi  
Bernard Zell Anshe Emet Day School  
BINA  
BBYO, including Midwest Region  
Centropa  
Center for Initiatives in Jewish Education  
Chicago Board of Rabbis (CBR)  
Chicago Jewish Day School  
CJE SeniorLife  
ELEM  
Enosh – The Israeli Mental Health Association  
Phillip and Rebecca Esformes Cheder Lubavitch Girls  
School  
Etgarim  
Foundation for the Benefit of Holocaust Victims in Israel  
Hanna Sacks Bais Yaakov High School  
Hazon  
Hebrew Immigrant Aid Society (HIAS)  
Hebrew Theological College (HTC)  
    Blitstein Institute for Women  
    Fasman Yeshiva High School  
Hebrew Union College (HUC)  
Hillel in Kyiv  
Hillel Torah North Suburban Day School  
Hillel: The Foundation for Jewish Campus Life  
Honeymoon Israel Foundation  
Hoops for Kids  
Ida Crown Jewish Academy  
Illinois Holocaust Museum & Education Center  
Inter-Agency Task Force on Israeli Arab Issues  
Israel Action Network  
Israel Children's Zone  
Israel Movement for Progressive Judaism  
Israel Sports Center for the Disabled  
Israel Trauma Coalition  
Jerusalem Center for Public Affairs  
Jewish Agency for Israel (JAFI)  
Jewish Child & Family Services (JCFS)  
    HIAS - Chicago  
    Jewish Vocational Service (JVS)  
    Response  
Jewish Community Center of Chicago (JCC)  
Jewish Community Centers Association (JCCA)  
Jewish Community Council West Rogers Park  
Jewish Council for Public Affairs (JCPA)  
Jewish Council on Urban Affairs (JCUA)  
Jewish Federations of North America (JFNA)  
Jewish Funders Network (JFN)  
Jewish Labor Committee (JLC)  
Jewish People Policy Institute (JPPI)  
Jewish Telegraphic Agency (JTA)/Seventy Faces Media  
Jewish Theological Seminary  
Joan Dachs Bais Yaakov/Yeshivas Tiferes Tzvi  
JUF Birthright Israel  
KAHAL: Your Jewish Home Abroad  
Keshet  
Krembo Wings  
Libenu Foundation  
Lubavitch Girls High School  
Maot Chitim  
Maslan  
Masorti Movement  
Moishe House  
Mount Sinai Hospital Medical Center  
NATAL  
National Conference Supporting Eurasian Jewry (NCSJ)  
National Jewish Center for Learning & Leadership (CLAL)  
NCSY  
Network of Jewish Human Service Agencies  
Neve Hanna  
NFTY  
Nirim in the Neighborhood  
Ohr Torah Stone  
OneTable  
Orot: Center for New Jewish Learning  
Reconstructing Judaism  
Revadim  
Rochelle Zell Jewish High School  
SAHI  
Schechter Institutes  
Shalom Hartman Institute  
SHALVA-Domestic Violence Services  
Shorashim  
Solomon Schechter Day School  
Spertus: Institute for Jewish Learning & Leadership  
SVARA  
Telshe Yeshiva  
Tsohar  
UANI-United Against Nuclear Iran  
Unistream  
United Israel Appeal (UIA)  
USY  
World ORT  
Yaacov Herzog Center  
Yachad in Unum  
Yedid  
Yeshiva Ohr Boruch/The Veitzner Cheder  
Yeshiva University  
Youth Futures