

Conflict of Interest Policy



Jewish United Fund
CHICAGO
Jewish Federation



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.



ANNUAL DISCLOSURE STATEMENT FOR 2021-2022

**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.*

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.

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

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

70 Faces Media
Seymour J. Abrams Cheder Lubavitch Hebrew Day School
Ahari
Akiba - Schechter Jewish Day School
American Jewish Joint Distribution Committee (JDC)
Arie Crown Hebrew Day School
ARK, The
Associated Talmud Torahs (ATT)
 REACH Specialized Services in Day Schools
Association for Advancement of Community Centers in
 Israel
Bais Yaakov Girls' High School
Bat Ami
BBYO, including Midwest Region
Be-Atzmi
Be Free Israel
Beit Tefila Yisraeli
BINA
Boatot
Budo for Peace
Chicago Board of Rabbis (CBR)
Chicago Jewish Day School
CJE SeniorLife
Derech Erech
Drachim-HaMidrasha HeChalutz
Edith Falk Community Center
Education for Excellence
ELEM
Enosh
Phillip and Rebecca Esformes Cheder Lubavitch Girls
School
Etgarim
Hanna Sacks Bais Yaakov
Hashgacha Pratit
Hebrew Theological College (HTC)
 Blitstein Institute for Women
 Fasman Yeshiva High School
Hiddush
Hillel in Kyiv
Hillel: The Foundation for Jewish Campus Life
Hillel Torah North Suburban Day School
Hinneni
Honeymoon Israel
Ida Crown Jewish Academy
Illinois Holocaust Museum & Education Center
Inter-Agency Task Force on Israeli Arab Issues
IRep
Israel Movement for Progressive Judaism
Israel Sports Center for the Disabled
Israel Trauma Coalition
ITIMitworks
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 Council for Public Affairs (JCPA)
Jewish Federations of North America (JFNA)

Israel Action Network
Jewish Neighborhood Development Council
Jewish Labor Committee (JLC)
Jewish People Policy Institute (JPPI)
Joan Dachs Bais Yaakov/Yeshivas Tiferes TzviJUF
Birthright Israel
Juice Volunteering for Young Adults
Keshet
Kol Yisrael Haverim
Krembo Wings
Lachish Community Center
Lubavitch Girls High School of Chicago
Maagalim
Maot Chitim
Marianne's Early Childhood Center in Kiryat Gat
Maslan
Masorti Movement
Meitarim
Moishe House, Chicago and Kyiv
Mount Sinai Hospital Medical Center
NATAL
National Conference Supporting Eurasian Jewry (NCSJ)
NCSY
Ne'emanai Torah V'avodah
Network of Jewish Human Service Agencies
Neve Hanna
NFTY
Nirim
Ofanim
Ohr Torah Stone
OneTable
PJ Library Ukraine
Prizmah
Ramon Foundation
Reshut Rabim
Rochelle Zell Jewish High School
SAHI
Scale Up Velocity
Schechter Institutes
Shafir Community Center
Shalom Hartman Institute
SHALVA
Shorashim
Solomon Schechter Day School
Spertus: Institute for Jewish Learning & Leadership
Sulamot-STEM Education
Telshe Yeshiva
Tenufa B'Kehillah
Tzohar
UANI-United Against Nuclear Iran
Unistream
United Hatzalah
USY
World ORT
World Union for Progressive Judaism
Yaacov Herzog Center
Yachdav
Yadid Lachinuch
Yeshiva Ohr Boruch/The Veitzner Cheder