



**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 2015-16**

**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 AND NATIONAL AND GRANTEE AGENCIES JEWISH FEDERATION OF METROPOLITAN CHICAGO JEWISH UNITED FUND OF METROPOLITAN CHICAGO**

Seymour J. Abrams Cheder Lubavitch Hebrew Day  
School

Akiba - Schechter Jewish Day School

America-Israel Cultural Foundation (AICF)

American Jewish Joint Distribution Committee (JDC)

American Jewish World Service (AJWS)

Anti-Defamation League

Arie Crown Hebrew Day School

ARK, The

Associated Talmud Torahs (ATT)

Association of Jewish Family and Children's  
Agencies

Bais Yaakov Girls' High School of Chicago

Bernard Zell Anshe Emet Day School

BBYO, including Midwest Region

Board of Jewish Education

Center for Jewish Genetics

Chicago Board of Rabbis (CBR)

Chicago Jewish Day School

Chicagoland Jewish High School

Community Foundation for Jewish Education (CFJE)

Congregation Or Chadash

Continuum Theater

CJE SeniorLife

Ein Prat

ELEM

Eretz Hemda

Phillip and Rebecca Esformes Cheder Lubavitch  
Girls School

Etgarim

Foundation for the Benefit of Holocaust Victims in Israel

Hanna Sacks Bais Yaakov Girls High School

Hebrew Immigrant Aid Society (HIAS)

HIAS - Chicago

Hebrew Theological College (HTC)  
Fasman Yeshiva High School

Hebrew Union College (HUC)

Hillel Torah North Suburban Day School

Hillel: The Foundation for Jewish Campus Life  
iCenter

Ida Crown Jewish Academy

Illinois Holocaust Museum & Education Center

Inter-Agency Task Force on Israeli Arab Issues

InterfaithFamily.com

IsraAID

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)  
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 Federations of North America (JFNA)

Jewish Labor Committee (JLC)

Jewish People Policy Institute (JPPI)

Jewish Telegraphic Agency (JTA)

Jewish Theological Seminary

Jewish Vocational Service (JVS)

Joan Dachs Bais Yaakov/Yeshivas Tiferes Tzvi

JUF Birthright Israel

Keshet Day School

Krembo Wings

Lubavitch Girls High School

Maot Chitim

Masorti Movement

Meitarim

Mishkan Chicago  
Moishe House  
Mount Sinai Hospital Medical Center  
NATAL  
National Conference Supporting  
Eurasian Jewry (NCSJ)  
National Jewish Center for Learning and  
Leadership (CLAL)  
Reconstructionist Rabbinical College  
Sahi  
Schechter Institutes  
Shalom Hartman Institute  
SHALVA-Domestic Violence Services  
Shorashim Solomon Schechter Day  
School  
Spertus: Institute for Jewish Learning &  
Leadership  
Telshe Yeshiva  
Tsohar  
UANI-United Against Nuclear Iran  
United Israel Appeal (UIA)  
United Synagogue of Conservative  
Judaism  
UpStart  
URJ NFTY  
World ORT  
Yaacov Herzog Center  
Yeshiva Ohr Boruch/The Veitzner Cheder  
Yeshiva University