

# 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.

## 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  
The Ark  
Associated Talmud Torahs (ATT)  
    REACH Specialized Services in Day Schools  
Association for Advancement of Community Centers in  
    Israel  
Bais Yaakov Girls' High School  
BBYO, including Midwest Region  
Be-Atzmi  
Be Free Israel  
BINA  
Boatot  
Chicago Board of Rabbis (CBR)  
Chicago Jewish Day School  
CJE SeniorLife  
Derech Erech  
Drachim-HaMidrasha HeChalutz  
Edith Falk Community Center  
Educating 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  
ITIM  
itworks  
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 People Policy Institute (JPPI)  
Joan Dachs Bais Yaakov/Yeshivas Tiferes Tzvi  
JUF Birthright Israel  
Juice Volunteering for Young Adults  
Keshet  
Keshet LGBTQ  
Kiryat Gat Community Center  
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  
Moving Traditions  
NATAL  
NCSY  
Ne'emanei Torah V'avodah  
Network of Jewish Human Service Agencies  
Neve Hanna  
NFTY  
Nirim  
Ofanim  
Ohr Torah Stone  
OneTable  
PJ Library Ukraine  
Prizmah  
Ramon Foundation  
Rochelle Zell Jewish High School  
SAHI  
Schechter Institutes  
Shafir Community Center  
Shalom Hartman Institute  
SHALVA  
Solomon Schechter Day School  
Spertus: Institute for Jewish Learning & Leadership  
Sulamot-STEM Education  
Telshe Yeshiva  
Tenufa B'Kehillah  
Trybal Gatherings  
Tzohar  
Unistream  
United Hatzalah  
USY  
World ORT  
World Union for Progressive Judaism  
Yaacov Herzog Center  
Yachdav  
Yadid Lachinuch  
Yael's House  
Yeshiva Ohr Boruch/The Veitzner Cheder  
Youth Futures



**CONFLICT OF INTEREST  
ANNUAL DISCLOSURE STATEMENT FOR 2022-2023**

**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).  
If "none," write "n/a."*

*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.*

***If "none," write "n/a."***

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: \_\_\_\_\_

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