

## CONFLICT OF INTEREST POLICY

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National Council of Jewish Women, Inc. (NCJW) believes in an ethic of avoiding situations in which officers, directors, members of key committees and key employees may unduly influence or show favoritism in their decision-making process. NCJW depends upon these individuals who give their time for the benefit of the organization and recognizes that because of varied interests and involvement, this service may at certain times result in situations involving real or apparent conflicts of interest.

A potential conflict of interest situation arises when an officer, director, member of a key committee, or key employee has or appears to have a financial interest in or a fiduciary responsibility to a third party engaged in a transaction with the NCJW. This includes, but is not limited to, the provision of professional or other services or products in the normal course of business to NCJW. For the purposes of this policy,

- (i) a person has a “financial interest” in a third party if the person, the person’s spouse or immediate family member has any financial interest as a shareholder, partner or owner in the third party;
- (ii) a person has a “fiduciary responsibility” to a third party if the third party is a corporation, partnership, proprietorship, firm, association, nonprofit corporation or other entity in which the person, the person’s spouse or immediate family member is a director, trustee, officer or an employee with significant administrative responsibility;
- (iii) the term “key committee” includes but is not limited to the finance, investment, and audit committees;
- (iv) the term “key employee” includes the executive director, the director of finance and administration, the director of development, the director of Washington operations, the director of membership and communications, and the director of the Israel office;
- (v) an “immediate family member” includes a person’s spouse, domestic partner, sibling, parent, child, and other relatives living with such person.

An officer, director, member of a key committee, or key employee shall not use such person’s position or knowledge gained there from, directly or indirectly, for such person’s personal benefit. However, believing that service should not be rendered impossible solely by reason of these conflicts, NCJW, Inc. hereby adopts a policy requiring full disclosure of any such interests and non-involvement in any decision in which potential conflict is involved as follows:

The officer, director, member of a key committee, or key employee having the conflict shall disclose, in writing, the relationship or interest to the president of the NCJW if the transaction is the subject of board approval or to the chair of any committee acting on a transaction, prior to discussion or action, with a copy to the NCJW president and executive director. The officer, director, member of a key committee, or key employee shall not participate in any stage of the deliberation or decision regarding the matter. Before approving the transaction, the board of directors or committee approving the transaction shall have considered other alternatives and comparability data and have determined that the transaction is in the best interest of the NCJW. The minutes of the meeting shall reflect the conflict disclosure was made, the vote taken and, where applicable, the abstention from voting and participation of the conflicted individual.

A Conflict of Interest Policy shall be furnished to each officer, director, and member of a key committee upon commencement of their respective terms and to a key employee upon commencing employment. Each person receiving the conflict of interest policy must acknowledge receipt of same in writing. These acknowledgements are to be retained by the director of finance and administration.

### **Disclosure**

Officers and directors shall file a Conflict of Interest Disclosure Statement (Attachment) annually with the NCJW, Inc. audit committee, disclosing any conflict situations, which shall be updated as needed.

The audit committee shall review the Conflict of Interest Disclosure Statements and address any potential conflicts. The committee will report its findings to the finance committee.

## CONFLICT OF INTEREST DISCLOSURE STATEMENT

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I, \_\_\_\_\_, have read the Conflict of Interest Policy of the National Council of Jewish Women, Inc. and agree to comply therewith. I state that, to the best of my knowledge and belief I, my family members, and related entities, are not involved in any activity and have no outside interests that may conflict with the best interests of NCJW, Inc., except as reported below. I agree to report promptly any situation, which might involve, or appear to involve, any conflict of interest with NCJW, Inc.

Name of Activity or Interest (please be specific)

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If no conflicts exist, initial here \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Return form to:  
CONTACT INFORMATION

A FAITH IN THE FUTURE.

A BELIEF IN ACTION.<sup>®</sup>