American Jewish Joint Distribution Committee

711 Third Avenue New York, NY 10017-4014 T: 212.687.6200 F: 212.370.5467 www.jdc.org
JDC Hill P.O.B. 3489 Jerusalem 91034 T: 02.655.7111 F: 02.566.1244

JDC CONFLICT OF INTEREST POLICY STATEMENT

Purpose

The American Jewish Joint Distribution Committee, Inc requires staff members to conduct themselves ethically and with integrity and to avoid any conflict between their own interests and the interests of JDC. This Policy Statement is based on the laws, rules and regulations of the United States, and the relevant laws, rules and regulations of the countries of operation pertaining to JDC's activities; it sets forth general principles with respect to conflicts of interest and applies to all staff worldwide.

JDC staff members have a duty of loyalty and commitment to JDC and should put JDC's interests ahead of any other personal, business or commercial intent. JDC expects staff to avoid situations that present an actual or potential conflict between their interest and those of JDC. Staff members are expected to make prompt disclosure of any fact or circumstance that may involve, or have the appearance of creating, a conflict of interest.

Conflicts of Interest

A conflict of interest may arise where an employee or a member of his or her immediate family, has a legal or beneficial interest, whether direct or indirect, as a member, owner, director, officer, volunteer or paid professional, lessor, broker or investor in an enterprise or has a special, personal, business or family relationship with an enterprise:

(a) from which JDC purchases or leases services, equipment, supplies or real estate (or an interest therein);

(b) which renders investment, managerial, consulting or other services to JDC;

(c) which has a pecuniary or business relationship with JDC;

(d) which receives funding or grants from JDC (other than a JDC-affiliated organization); or

(e) which is in direct competition with JDC.–

A conflict of interest may also arise in the following situations:

(a) using propriety or confidential JDC information for personal gain or to JDC's detriment;

(b) giving, releasing or discussing with anyone not associated with JDC any information concerning JDC and its activities not already available to the general public;

(c) using JDC assets or labor for personal use;

(d) accepting personal gifts from suppliers or potential suppliers, or individuals or communities served by JDC, except as provided below; or

(f) Exploiting an opportunity for personal profit or gain based on inside knowledge or confidential information obtained in the course of employment with JDC.

Receiving Gifts and other Benefits

Receipts of gifts or other benefits~~:~~ (e.g., travel or entertainment) may present potential conflicts of interest. In some circumstances, employees are presented with gifts and/or tokens of appreciation for their work on behalf of individuals and/or communities served by JDC. Employees may accept token gifts or gifts with nominal or insignificant monetary value in gratitude for their work. However, acceptance of a significant gift, benefit or payment from partners or beneficiaries, or organizations with which JDC does business, would likely be perceived as having the potential to influence professional decisions and thus represents a clear conflict of interest. In any event, staff members should never accept gifts that may reasonably be deemed to affect their judgment or actions in the performance of their duties.

Disclosure Procedures

If a member of staff believes that he/she may have a conflict of interest, it is his/her responsibility to report this to his/her direct supervisor and the appropriate Human Resources Director. Similarly, if at any point a member of staff is uncertain as to whether a specific set of circumstances represents or has the potential to represent a conflict of interest, he/she is strongly encouraged to raise it with his/her direct supervisor and the appropriate Human Resources Director. This may include issues related to volunteering with another organization or utilizing a network of professional contacts on behalf of another entity.

The above mentioned Human Resources Director will submit a report to the Executive Director of Global Human Resources Development and the Chief Operating Officer for Finance and Headquarters who will then determine if a conflict of interest exists.

If a conflict of interest is found to exist, the employee will be provided with an opportunity to resolve the conflict of interest, where circumstances so permit. The determination of whether a conflict of interest exists and the resolution of that conflict, however, remain in the sole discretion of JDC.

Certain staff members will be required to sign a conflict of interest statement. Those already employed by JDC, will be asked to sign a conflict of interest policy statement by **Wednesday, April 30, 2008**. New staff will be asked to do so when they are hired by the organization.

AMERICAN JEWISH JOINT DISTRIBUTION COMMITTEE,

CONFLICT OF INTEREST STATEMENT

In keeping with the Conflict of Interest policy of the American Jewish Joint Distribution Committee, Inc. as set out above, I _____do hereby attest to the following:

(1) I have read and understand the Conflict of Interest policy, and

(2) Neither I nor to my knowledge any member of my family has in the past, is presently, or plans to engage in any activity that contravenes said policy, except as specifically noted below:

Note: Please describe fully any activity that you believe may contravene the JDC Conflict of Interest Policy and which you wish to have reviewed. Attach additional pages if necessary.

The above constitutes a full and complete disclosure of all activities that either do or may contravene the JDC Conflict of Interest Policy.

_____ _____

(Signature) (Date)