



Conflict of Interest Policy

Our Conflict of Interest policy exists to protect JCC Association and assist the board members, staff and volunteers in making ethical decisions that benefit JCC Association as a whole, not just particular individuals or parties associated with the organization.

A conflict of interest arises when someone associated with JCC Association does not place the organization's interest above their own interests or those of a third party.

As a public charity, our conduct must be above reproach. Not only must we avoid an actual conflict of interest but we must also be aware of the appearance of, perception of, or potential for a conflict of interest. As a person associated with JCC Association, it is your duty to disclose, on an annual basis or as a situation arises, other obligations that might prevent you from acting in the best interest of JCC Association and then remove yourself from discussions, actions, votes or other activities in relation to the conflict.

Our Conflict of Interest policy applies to everyone involved in JCC Association, including:

- All board members
- All committee members
- All staff members (including contractors) in the organization
- All volunteers and interns

Examples of potential conflicts requiring disclosure:

- A business that you have a financial interest in, bids on a contract from JCC Association or otherwise gains financially from JCC Association.
- You have an opportunity to further the interests of or give preference to another organization over JCC Association.
- There is an action in which you stand to personally gain, directly or indirectly, from the results.
- You have a familial or personal relationship with a staff member or member of the board of JCC Association.

- There is a situation that does not appear to be handled in a manner that benefits JCC Association.

Personal gain may result not only in cases when you or a relative have a significant ownership in a firm with which JCC Association does business, but also when you or your relative receive any kickback, bribe, substantial gift (value of more than \$100), or special consideration as a result of any transaction or business dealing involving JCC Association.

No presumption of guilt is created by the mere existence of a relationship with outside firms. However, if you have any influence on transactions involving purchases, contracts, or leases, it is imperative that you immediately disclose such relationships to the chief financial officer to ensure that the decision is made solely to promote the best interest of JCC Association.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to acceptable conduct. If a situation arises where you find it difficult to determine the proper course of action, discuss the matter openly with your immediate supervisor and, if necessary, with the chief financial officer or the human resources manager.

Should you witness a possible conflict of interest or a potential conflict of interest, you have a duty to disclose this to JCC Association. If you wish to submit the potential conflict confidentially and anonymously, you may contact our third-party provider, Lighthouse, Inc, on-line at www.lighthouse-services.com/jcca or call toll-free hotline at [1-833-480-0010](tel:1-833-480-0010).

The potential conflict of interest will be investigated by the appropriate parties. If it relates to a member of the board, or the senior staff, then it will be turned over to a special committee of the board that is not involved in the conflict. If it involves a member of the staff or volunteer, appropriate senior staff will make the determination.

Once the determination is made, you may be asked to:

- Abstain from the action;
- Remove yourself from any discussions related to the conflict;
- Refrain from discussing the issue with other co-workers, volunteers or board members so as not to influence their actions;
- Consider other actions, depending on the situation.

Disregarding or failing to comply with this Conflict of Interest policy could lead to disciplinary action up to and including termination of employment, or removal from the board.