

AMERICAN JEWISH COMMITTEE
CODE OF ETHICS

Effective December 2013

Introduction:

The mission of American Jewish Committee is *to enhance the well-being of the Jewish people and Israel, and to advance human rights and democratic values in the United States and around the world.* In pursuit of this goal, American Jewish Committee, its subsidiaries and affiliates (sometimes collectively “AJC”) are committed to the highest standards of integrity and ethical conduct.

The Executive Council adopted this Code of Ethics (sometimes the “Code”) to provide guidance to *Included Lay Leaders* (defined below) to recognize and deal with ethical issues and effectively fulfill their roles with AJC. The *Included Lay Leaders* under this Code are the members of AJC’s Executive Council and Board of Governors, AJC’s Officers (as defined in AJC’s Bylaws), the members of all committees and subcommittees of the Executive Council and of the Board of Governors, and members of Regional Boards, advisory councils, advisory boards, and boards of Institutes, the national and regional boards of ACCESS and other bodies subjected to this Code by the Executive Council (collectively sometimes the “Guiding Bodies”).

AJC believes that the *Included Lay Leaders* have a responsibility to fully support AJC’s mission while sustaining the viability of AJC and providing financial support. AJC does not assume that an Included Lay Leader’s membership on the board of an organization other than AJC will be detrimental or materially detrimental to AJC or will give rise to a violation of this Code; AJC understands that the Included Lay Leaders have many involvements and interests. This Code addresses where those involvements and interests can/cannot co-exist with an Included Lay Leader’s involvement with AJC.

AJC’s Conflicts of Interest Clearance Committee (“Conflicts Clearance Committee”), which consists of the President, the Chair of the Board of Governors and the Chair of the Audit Committee, will determine whether there is a violation of this Code, based on all relevant facts and circumstances and pursuant to the procedures established by the Conflicts Clearance Committee from time to time. The Conflicts Clearance Committee also shall determine appropriate actions to be taken in the event of violations of this Code.

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Policy Statement:

Included Lay Leaders have legal duties and responsibilities to AJC, including a Duty of Loyalty. This means they will exercise their business judgment in carrying out their responsibilities in a manner that they reasonably believe to be in AJC's best interest and not for personal gain or for the benefit of another organization. It also means that Included Lay Leaders will act to protect AJC's corporate opportunities and the confidentiality of AJC's confidential information; to promote the proper use of AJC's assets; to comply with applicable laws, rules and regulations; and to encourage the reporting of illegal or unethical behavior.

Included Lay Leaders are expected to adhere to this Code. It is the responsibility of each Included Lay Leader to become familiar with and understand this Code, and to seek further explanation and advice concerning the interpretation and requirements of this Code, as well as any situation which appears to be in conflict with it.

Corporate Opportunities: In carrying out their duties and responsibilities, Included Lay Leaders should advance the interests of AJC when the opportunity to do so arises. Included Lay Leaders should avoid: (a) taking for themselves personally opportunities that are discovered in carrying out their duties and responsibilities; (b) using the property or information of AJC, or their AJC position, for personal gain or for the gain or advantage of others, including other corporations or entities; and (c) competing with AJC to the material detriment of AJC.

Confidentiality: Included Lay Leaders should observe the confidentiality of information that they acquire in carrying out their duties and responsibilities as a member of a Guiding Body, except where disclosure is approved by AJC or legally mandated.

Protection and Proper Use of AJC Assets: Included Lay Leaders should promote the responsible use and control of AJC's assets and resources by AJC and its employees. AJC assets, such as information, intellectual property, facilities, software, and other assets owned or leased by AJC, or that are otherwise in AJC's possession, should be used only for AJC's legitimate purposes.

Compliance with Laws, Rules and Regulations: In carrying out their duties and responsibilities, Included Lay Leaders should comply, and seek to cause AJC to comply, with applicable governmental laws, rules and regulations. In addition, Included Lay Leaders should bring to the attention of AJC's Special Counsel or General Counsel any information that he or she believes constitutes evidence of a violation of any law, rule or regulation applicable to AJC and its activities, by AJC, or any of its employees, officers or directors.

Encouraging the Reporting of Illegal or Unethical Behavior: Included Lay Leaders should cause AJC to proactively promote ethical behavior and encourage employees to report evidence of illegal or unethical behavior to appropriate AJC personnel.

Any waiver of the requirements of this Code may be authorized only by the Executive Council or the Conflicts Clearance Committee, or another duly authorized committee of the Executive Council. Any amendment to this Code may be authorized only by the Executive Council.

Please direct questions regarding the application or interpretation of this Code to AJC's Special Counsel (Betty B. Robbins, robbinsb@ajc.org) or General Counsel (Marc Stern, sternm@ajc.org).