J.F.K. Health and Welfare Fund, Incorporated Board of Directors Conflict of Interest and Code of Ethics Policy (effective on January 1st, 2016)

Purpose: To establish a Conflict of Interest and Code of Ethics Policy for the J.F.K. Health and Welfare Fund, Inc. Board of Directors that sets criteria for encouraging the J.F.K. Health and Welfare Fund, Inc. Corporation Officers and Directors to promote a culture of ethical integrity and high standards of professionalism. This policy applies to the J.F.K. Health and Welfare Fund, Inc. Corporation Officers and Directors on the dates that they assume their offices, and shall remain applicable until they vacate their offices. The J.F.K. Health and Welfare Fund, Inc. President shall review this policy annually on the beginning date of the corporate fiscal year in order to monitor and enforce Board of Directors compliance with this policy.

Policy:

The highest standards of ethical conduct must be maintained at all times in order to ensure the continuing integrity of the J.F.K. Health and Welfare Fund, Inc. The broad scope of this policy is therefore intended to mitigate and negate situations that may result in embarrassment and the loss of public support for the J.F.K. Health and Welfare Fund, Inc. Ethics comes from the Greek word *Ethos* which means character. Character is not just defined by how a person behaves when conditions are optimal. It is easy to take the high road when the path is paved and obstacles are few or non-existent. Character is also defined by decisions made under pressure, when no one is looking, hidden risks exist, and the direction forward is unclear. The J.F.K. Health and Welfare Fund, Inc. Corporation Officers and Directors share a responsibility to project an ethical character of professionalism, integrity, compassion, loyalty, and honesty in all that they do. They are obligated to accept this challenge and to maintain a culture that is consistent with the expectations outlined in this policy. By doing so, they will create a legacy that validates and sustains the honor of the J.F.K. Health and Welfare Fund, Inc. and at the same time will ensure that they leave the J.F.K. Health and Welfare Fund, Inc. in better condition than when they entered it. Accordingly they have the responsibility to conduct themselves in a manner that reflects ethical behavior and integrity. In so doing, they will help to foster a continuing positive public perception of the J.F.K. Health and Welfare Fund, Inc. Therefore, the J.F.K. Health and Welfare Fund, Inc. Corporation Officers and Directors shall:

- Conduct themselves in a manner that reflects positively on the J.F.K. Health and Welfare Fund, Inc.
- Accept responsibility for their actions/inactions and for the consequences of their actions/inactions.
- Support the concepts of fairness and respect for the value of diverse thoughts and opinions.
- Avoid situations that could adversely affect the credibility or public perception of the J.F.K. Health and Welfare Fund, Inc.

- Be truthful and honest, and report instances of lying, cheating, stealing or other dishonest acts that compromise the integrity of the J.F.K. Health and Welfare Fund, Inc.
- Conduct their personal affairs in a manner that does not improperly influence the performance of their duties or bring discredit to the J.F.K. Health and Welfare Fund, Inc.
- Recognize that they serve in positions of public trust that requires stewardship in the honest and efficient use of the J.F.K. Health and Welfare Fund, Inc. assets, including funds, and that those assets are protected from misappropriation, misuse and theft.
- Exercise professionalism, competence, respect and loyalty in the performance of their duties, and use information, confidential or otherwise, gained by virtue of their positions only to benefit the J.F.K. Health and Welfare Fund, Inc.
- Avoid financial investments, outside employment, outside business interests, or activities
 that conflict with or are enhanced by their official positions, or that may create a conflict
 of interest or the appearance of impropriety.
- Disclose any financial interests that could create a conflict of interest or the appearance of impropriety.
- Not propose or accept personal rewards, special privileges, benefits, advancement, honors or gifts that may create a conflict of interest or the appearance of impropriety.
- Not discriminate against any organization member on the basis of race, religion, color, ethnicity, creed, age, marital status, national origin, ancestry, gender, sexual preference, veteran status, medical condition, or handicap.
- Not harass, intimidate, or threaten any organization member, and report to the J.F.K. Health and Welfare Fund, Inc. Board of Directors those who engage in such behaviors.
- Responsibly use social networking, electronic communications, or other media technology capabilities in a manner that does not discredit, dishonor or embarrass the J.F.K. Health and Welfare Fund, Inc.

This Conflict of Interest and Code of Ethics Policy was approved and adopted by a majority vote of the J.F.K. Health and Welfare Fund, Incorporated Board of Directors on December 10th, 2015 as follows: 7 "Yes" votes, 0 "No" votes, and 1 "Abstain" vote.

Alan Wolfe

Executive Vice-President

Alon Wolfe

J.F.K. Health and Welfare Fund, Incorporated