

# Conflict of Interest Policy Statement

*Adopted January 21, 2004*



Robert Wood Johnson Foundation

1. Sensitivity to and avoidance of actual conflicts of interest or the appearance thereof are important factors in the operation of any philanthropic activity. It is especially important in instances where such activity is grantmaking of the nature and magnitude of that engaged in by the Robert Wood Johnson Foundation.
2. It is the policy of the Foundation not to make grants or otherwise expend Foundation funds that would result in, or have the appearance of, providing financial or other beneficial advantage to a Foundation Trustee, staff member or immediate family member. The payment of compensation and the payment or reimbursement of expenses to these individuals for personal services that are reasonable and necessary to the carrying out of the Foundation's activities are not prohibited.
3. In the unusual case where organizations with which Trustees, staff members or their immediate families are affiliated are considered for potential grants, such grants will be assessed by the same substantive standards as other grants, but subject to particularly thorough scrutiny and justification.
4. The Foundation will not normally make a grant to support a project for which a Trustee carries immediate responsibility. No Trustee shall act as an advocate with the staff for a grant to an institution with which he is affiliated. Any communications by Trustees with the staff concerning organizations with which they are affiliated should only be initiated through the President.
5. Whenever a Trustee, staff member or immediate family member has an affiliation with an organization that is a Foundation grant applicant or grantee, the Trustee or staff member shall not participate in deliberations or action taken in connection with the grant application and, if a grant is awarded, the Trustee or staff member shall not participate in any action or discussion in connection with the grant.
6. It is the obligation of each Trustee and staff member to disclose all actual or potential conflicts of interest, real or apparent, to the President as soon as there is knowledge of such conflict.
7. It is the responsibility of the President to enforce this policy and to disclose any conflicts of interest to the Chairman of the Board. The Board of Trustees may, on a case-by-case basis, authorize exceptions to this policy for good cause shown. To obtain an exception to the policy, the President shall submit to the Board a specific request therefor, outlining the details of the proposed exception (including, where relevant, any prior exceptions granted) and explaining in detail the justification for the requested exception.

*Distributed Annually*