

CONFLICT OF INTEREST POLICY STATEMENT FOR ACLU OF OHIO AFFILIATE BOARD MEMBERS AND BOARD COMMITTEE MEMBERS

Board members and Board Committee members shall perform their duties in good faith, in a manner they reasonably believe to be in the best interest of the ACLU of Ohio Affiliate, with such care as an ordinarily prudent person in a like position would use under similar circumstances. In keeping with these duties, each Board member shall follow these guidelines:

1. No Board member shall vote upon any issue in which the Board member, the member's employer, or a client of the Board member, has a financial interest.

2. No Board member shall be present for debate on any issue in which the Board member, the Board member's employer, or a client of the Board member, has a financial interest, unless full disclosure of the interest is first made to the Board, and the Board determines, on the basis of full disclosure of the facts, that the interest does not give rise to a conflict of interest that justifies barring the Board member from being present for all or part of the debate.

3. In situations not provided for in the preceding guideline #2, where the Board member has a significant relationship or affiliation with another person or organization that has a significant interest, financial or otherwise, in a matter before the Board, the Board member shall disclose the nature of the relationship and interest before debate on the issue, and the Board member shall not vote upon the issue. The Board may bar the member from being present for all or part of the debate.

4. No Board member or Board Committee member, or any member of that person's family, should accept any gift, entertainment, service, loan, or promise of future benefits from any person who either personally or whose employees might benefit or appear to benefit from such Board or Board Committee member's connection with the ACLU of Ohio Affiliate, unless the facts of such benefit, gift, entertainment, service, or loan are disclosed in good faith and are authorized by the Board. This guideline is not intended to apply to gifts and/or similar entertainment of nominal value that clearly are in keeping with good business ethics and do not obligate the recipient.

5. No Board member or Board Committee member should perform, for any personal gain, services for the ACLU of Ohio Affiliate as a supplier of goods or services, as an employee or consultant, or in any other capacity which promises compensation of any kind, unless the facts are disclosed fully and in good faith and the Board or Board Committee authorizes the transaction. The Board member or Board Committee member shall disclose the relationship of any family member or other close relative seeking to perform such services for personal gain for the ACLU of Ohio Affiliate.

6. No Board member, Board Committee member, or any other member of that person's family, should have any beneficial interest in, or substantial obligation to, any ACLU of Ohio Affiliate supplier of goods or services or any other organization that is engaged in doing business with or serving the ACLU of Ohio Affiliate unless it has been determined by the Board, on the basis of full disclosure of facts, that such interest does not give rise to a conflict of interest.

Any matter of question or interpretation that arises relating to this policy should be referred to the President and General Counsel for decision or for referral to the Board of Directors for decision, where appropriate.
