



## Policy #515a

### Conflict of Interest

A conflict of interest affecting a member of the Board of Directors or staff of the National ACLU or of an affiliate may arise when the pecuniary interests of that person, or of a person in the person's immediate family, of a person with whom the person has an intimate relationship, of a non-ACLU client of the person, or of an employer or business associate of the person, may be directly and materially affected by an action (other than adoption of a substantive policy) proposed to be taken by the relevant ACLU entity.

Neither Board members nor staff members shall participate in the decision of any matter in which they may have such a conflict of interest as defined above; nor shall they participate in the discussion of such a matter unless the nature of the conflict has first been disclosed to the other participants in the discussion. In the case of Board members, the usual procedure should be that the member affected by the conflict of interest announces the existence of the conflict and the minutes reflect the fact that the member did not participate in the decision of the matter (nor in the discussion, if that be the case.) In the case of a staff member, the usual procedure should be that the staff member informs his or her superior (or in the case of the head of an affiliate, the chair of his or her board) of the conflict requiring exclusion.

[Board Minutes, January 25-26, 1992]