

## **Conflict of Interest Policy (August 10, 2013)**

SEALS requires each of its personnel to avoid conflicts between personal interests and the interests of SEALS and to exercise his or her best objective judgment in acting on SEALS's behalf at all times.

Harm to SEALS may occur when SEALS personnel benefit from the receipt of a personal benefit from a third party with which SEALS has an actual or potential business relationship. These harms may include, but are not limited to:

- An actual conflict with SEALS's interests;
- The denigration of or embarrassment to SEALS;
- A violation of state or federal law or ethical principle; or
- An actual or perceived breach of that person's duty of undivided loyalty to SEALS.

This Conflict of Interest Policy is designed to provide guidance to SEALS personnel about how to handle possible personal benefits offered to them and to assist SEALS in preventing any resultant harms to the organization and its members.

1. **General Approach.** In general, SEALS's approach is to require disclosure of any personal benefits (as described below) so that the Board of Trustees is aware of potential conflicts or other harms to the organization and can take appropriate action.

2. **Persons Covered.** The term "SEALS personnel" includes members of the Board of Trustees, non-Board officers, and staff of SEALS and volunteers acting on behalf of SEALS.

3. **Personal Benefits.** Personal benefits include financial or other emoluments of any kind received in connection with work performed on behalf of SEALS (exclusive of any compensation from SEALS). This term includes benefits received by SEALS personnel and their friends, family members, or businesses with which they are closely associated.

4. **Board Member and Officer Disclosure.** Prior to approval of any contract for the purchase of goods or services by SEALS, members of the Board of Trustees and non-Board officers of SEALS shall disclose all personal benefits received from or relationships to the vendor of those goods or services. These benefits include, but are not limited to, any gifts or other emoluments (e.g., free airfare, ground transport, food, lodging, or entertainment) received in connection with site evaluation visits. If a SEALS Board member or non-Board officer fails to disclose a personal benefit or relationship to the Board of Trustees, each other SEALS Board member or non-Board officer who is aware of the personal benefit or personal relationship is obligated to report it to the Board.

5. **Executive Director's Accommodations.** Under SEALS's Bylaws, the Executive Director is expected to be present for the entirety of the Annual Meeting, is authorized to negotiate for his/her accommodations, and can accept free accommodation from the resort (which will sometimes include food and beverage). While the Executive Director may accept such benefits,

the Executive Director is expected to disclose to the Board these and any other benefits that have been offered before a contracting decision is made.

6. Procedures and Possible Actions. When a Board member or non-Board officer (a) discloses to the Board of Trustees the receipt of a personal benefit or reports to the Board of Trustees the receipt of a personal benefit by another Board member or non-Board officer or (b) fails to disclose or report to the Board the receipt of a personal benefit, the Board shall take appropriate action. Possible actions include, but are not limited to, determining that no conflict of interest results from the receipt of the personal benefit, declining to enter into a contract with the vendor from whom the benefit was received, asking the recipient to return the personal benefit to the donor, prohibiting the future receipt of all or some personal benefits by the person who received the benefit or who failed to report receipt of the benefit, or removing from the Board or any other position with SEALS the person receiving the benefit or failing to report the benefit.

7. Annual Report. SEALS personnel shall promptly disclose receipt of any personal benefit simultaneously to all Board members. The SEALS Compliance Officer shall maintain all such disclosures. The Board of Trustees shall discuss these items at least once per year at a meeting of the Board. These disclosures shall be made available to faculty members at any SEALS member school upon request.

**Southeastern Association of Law Schools, Inc. (“SEALS”)**

**Acknowledgment of Conflict of Interest Policy**

I have been provided with, have read, and understand my obligations under the Conflict of Interest Policy for the Southeastern Association of Law Schools, Inc.

I agree that I will, as applicable,

- as a member of the Board of Trustees, non-Board officer, staff member, or volunteer acting on behalf of SEALS, promptly disclose to the SEALS Compliance Officer any personal benefit received by me or relationship of me to any SEALS vendor (or by my friends, family members, or businesses with which I am closely associated) in connection with work performed on behalf of SEALS (exclusive of any compensation from SEALS);
- as a member of the Board of Trustees or non-Board officer, disclose to the Board all personal benefits received from or relationships to the vendor of those goods or services prior to Board approval of any contract for the purchase of goods or services by SEALS; and
- as a member of the Board of Trustees or non-Board officer, report to the Board any personal benefit received by another member of the Board or a non-Board officer from a vendor of goods or services to SEALS (or relationship of such individual to a vendor of goods or services to SEALS) if that member fails to disclose the personal benefit or relationship to the Board of Trustees.

I understand that any failure by me to comply with the Conflict of Interest Policy may result in the Board of Trustees taking appropriate action.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

Name (printed): \_\_\_\_\_