

CONFIDENTIALITY AND CONDUCT POLICY

Category	Governance	Policy Owner	Governance Committee
Policy No.	1.3	Review Frequency	Every two years
Version No.	2.1	Status	Approved
Effective Date	January 31, 2025	Date Approved	January 31, 2025
Approver of Related Procedures	Governance Committee	Approver(s)	Board of Directors

1.0 PURPOSE AND SCOPE

- 1.1 This policy applies to every HDC officer, director, staff, or committee member (“HDC Personnel”). This policy exists to set out their confidentiality obligations and explain what they can and cannot say publicly about HDC. It also exists to address potential conflicts of interest, promote good conduct and uphold the reputation of HDC.
- 1.2 This policy does not apply to contractors. Their confidentiality obligations are outlined in their contracts with HDC.

2.0 CONFIDENTIAL INFORMATION AND PUBLIC STATEMENTS

- 2.1 “**Confidential Information**” is a special set of information that HDC Personnel are not allowed to share with any person outside of HDC. It includes discussions of the Board of Directors’ or committee meetings, materials shared at or prepared for those meetings, correspondence, reports, HDC’s financial data, HDC’s security policies and processes, any information marked “confidential” or with a similar marking, and any non-public information of HDC. If HDC Personnel wants to provide Confidential Information outside of HDC, he/she must first obtain written approval from the Executive Director.
- 2.2 HDC encourages HDC Personnel to be advocates for HDC and speak positively of HDC in public.

3.0 CONDUCT

- 3.1 HDC requires HDC Personnel to avoid conflicts of interest and conduct themselves respectfully and professionally.

4.0 CODES OF CONDUCT

- 4.1 In order to ensure HDC Personnel comply with this policy, HDC has the following codes of conduct:
- a) Director Code of Conduct (Form 1.3.0-1)
 - b) Employee Code of Conduct (Form 1.3.0-2)
 - c) Committee Member Code of Conduct (Form 1.3.0-3).
- 4.2 Each HDC Personnel is required to read and sign the code of conduct that applies to them. Persons who serve on the board of directors but also serve on committees only need to sign the Director Code of Conduct.

5.0 ASSOCIATED PROCEDURES

- 5.1 None.