

## NRHS Fund, Inc.

## Policy on Confidentiality, October 12, 2018

This confidentiality policy is designed to help Directors, Officers, employees, contractors and staff members of the NRHS Fund, Inc. (Fund) identify and deal with situations that present a need for confidentiality. All capitalized terms are defined in Sections 1 of this policy.

1. Definitions.

A. A "Responsible Person" is any person serving as an officer, employee, contractor, committee member, member of the Board of Trustees.

B. A "Family Member" is a spouse, domestic partner recognized by any state or local municipality, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister, of a Responsible Person.

C. "Confidential NRHS Fund Information" includes all internal communications from Fund officers or Trustees, NRHS Board members or officers, Advisory Council members of NRHS, staff members, employees, and contractors, including but not limited to written information, electronic communication, and internal memoranda.

This information includes but is not limited to all distributed minutes prior to their approval by the Board of Trustees and includes other notes of the meetings of the Board of Trustees. It also includes written or electronic communications of any committee, either standing or ad hoc. Additionally, this information consists of commercial business agreements and proposals, applications for grants or scholarships, personal information contained in the Fund records and files except when used for a legitimate Fund business purpose, including drafts and internal memoranda.

This does not affect the statutory right of members of the Board of Trustees to inspect formalized and completed minutes of meetings of the Board of Trustees.

2. Confidentiality.

Each Responsible Person shall exercise care not to disclose confidential information including "Confidential NRHS Fund Information". Furthermore, a Responsible Person shall not disclose or use information relating to the business of the Fund for the personal profit or advantage of the Responsible Person or a Family Member. Each responsible person shall exercise all deliberate care not to knowingly misrepresent the Fund business information, including information disseminated at meetings of the Board of Trustees.

### 3. Review of Policy.

A. Each Responsible Person shall review a copy of this policy and abide by its terms. Each Responsible Person shall execute the letter attached hereto on a tri-annual basis. Each letter shall therefore be valid for three calendar years after its execution by a Responsible Person.

B. At its organizational meeting, the Fund shall review the confidentiality policy. In addition, the Board, each committee of the Board, any ad hoc committee shall at their first meeting of the calendar year review the confidentiality policy, for the benefit of new members of the Board or committee.

C. Each Responsible Person shall review this policy every three years, at or before the appropriate organizational meeting of the Board of Trustees. Any changes to the policy shall be communicated immediately to all Responsible Persons. Every third year, subsequent to the organizational meeting, the Fund shall present in-person, mail or email a copy of the confidentiality policy to each Responsible Person.