



POLICY

Conflict of Interest

Purpose

Directors and officers of Halifax Internet Exchange (HFXIX) are expected to operate, and be seen to operate, to the benefit of HFXIX.

Policy Statement

1. **General.** The directors and officers of HFXIX shall administer the affairs of HFXIX honestly and economically and exercise their best care, skill, and judgment for the benefit of HFXIX. The officers shall exercise the utmost good faith in all transactions relating to their duties for HFXIX. In their dealings with and on behalf of HFXIX, they are held to a strict rule of honest and fair dealings. They shall not use their position or knowledge gained therefrom so that a conflict might arise between the interests of HFXIX and those of the individual or of an organization affiliated with the individual.
2. **Disclosure of Potential Conflict.** Any officer or director of HFXIX shall have a duty to disclose any potential conflict of interest by virtue of business or charitable affiliation.
3. **Conflict of Interest Defined.** A conflict of interest, or potential conflict of interest, or appearance of conflict of interest, occurs when an officer or director of HFXIX is in a position to exert influence, in dealings with or on behalf of HFXIX, which would give preference to any immediate family member, or to other business or charitable organization with whom the officer or director is affiliated, by virtue of employment with, membership in, ownership of, appointment to, or election to said business or charitable organization.
4. **Waiver of Conflict.** Whenever a conflict of interest arises, or the appearance of a conflict of interest, such director or officer with the conflict who is present at the meeting of the directors or of a committee of directors, shall disclose in good faith the material facts as to such interest, or financial interest, or appearance of conflict of interest, and that disclosure shall be minuted. Any action of the organization to approve activity in which a conflict of interest, or appearance of conflict of interest, exists, shall be approved by the disinterested directors.

Applicability of this Policy

This policy applies to directors and officers of HFXIX.

Revision History

January 16, 2014	Initial version 1.0