

APPENDIX H



American GI Forum of the United States

Member Confidentiality Policy

Overview and Purpose:

Due to the nature of our business, it is essential that all our members fully understand how to treat confidential information. Accordingly, this member Confidentiality Policy has been crafted and implemented to ensure that everyone who is a member of the AGIF-US and AGIF Organization(s) knows and complies with our expectations regarding sensitive information.

We want to make sure that any relevant information pertaining to our organization, clients, and partners is properly secured because it may be:

- Legally binding (such as contractual material).
- Essential to our successful business operations (such as proprietary information pertaining to our mission).

Duty of Loyalty-Confidentiality:

The duty of loyalty prohibits a member from using the AGIF-US or AGIF Organization(s) position to obtain a personal profit or to gain a personal advantage. A member is privy to information that may not be known to others outside the AGIF-US or AGIF Organization(s) sphere. As part of the duty of loyalty, a member cannot take advantage of AGIF-US or AGIF Organization(s) information for his or her own personal interests.

Confidentiality Is a Fiduciary Responsibility:

Fiduciary responsibilities mean that members must act honestly and put the best interests of the AGIF-US and AGIF-Organization(s) ahead of their own interests.

It also means that they must avoid or acknowledge Conflicts of Interest and abstain from voting when such a conflict exists. Members also have limits on how they can share information and with whom they may share it.

Maintaining confidentiality also means that members must maintain the confidentiality of any personal or sensitive information they acquire during their service to the organization.

Scope:

This is a blanket policy. As such, this Member Confidentiality policy applies to anyone who works for/with us in any capacity that actually has or could potentially have access to confidential and/or sensitive information.

Confidential and Sensitive Information — Defined

For the purposes of this policy, confidential and/or sensitive information is defined as:

- Uncirculated financial information.
- Records pertaining to donors/partners/clients/members.
- Patents, formulas, or new methods/methodologies.
- Donor and/or client lists (existing and prospective).
- Written/electronic documents or similar material entrusted to our organization by outside parties.
- Recruiting/conference marketing and other unrevealed strategies.
- Any material explicitly marked as confidential.
- Uncirculated material pertaining to goals, predictions and proposals marked as confidential.
- Any information that has to do with an Article V complaint.

Depending on their position title/responsibilities, seniority and other factors, our members may have differing levels of authorized access to this type of material.

Member's Obligations Under this Policy:

In accordance with this policy all employees must:

- Take reasonable steps to ensure that confidential material is never left in plain view or otherwise unsecured.
- Shred confidential material when it is no longer needed.

- Ensure that any confidential information in a digital format is only viewed on secure devices.
- Refrain from making authorized disclosures to members unless absolutely necessary.
- Refrain from taking/emailing confidential documents off AGIF-US or AGIF Organization(s) property unless absolutely necessary.
- Surrender all confidential documents and material to the organization upon resignation, termination or at any time upon the request of their commander or chairwoman.
- Take reasonable steps to ensure that they do not mistakenly disclose any confidential information to any unauthorized persons in or outside the organization.
- Report any inadvertent disclosures of confidential information to their direct commander or chairwoman as soon as possible.

Prohibited Conduct and Activities:

Members are prohibited from doing the following:

- Using confidential information for financial or personal gain.
- Removing or making copies of confidential material; or facilitating the reproduction of confidential material relating to the AGIF-US or AGIF Organization(s) in any manner.

How We Safeguard Confidential Information:

We take the following steps to safeguard confidential information:

- Store hardcopies in secured filing cabinets.
- Encrypt electronic information and ensure databases are protected . Ask anyone who works for us to sign non-compete and/or non-disclosure agreements (NDAs).
- Require commanders and chairwomen to authorize access to confidential information.

Exceptions to this Policy:

From time to time, some circumstances may warrant disclosure of confidential or sensitive information. We reserve the right to disclose said information when:

- A regulatory/law enforcement/or other government agency requests it as part of an investigation or audit.
- If we consider a venture or partnership requiring the disclosure some information (within legal parameters).

When this happens, commanders and chairwomen who receive such requests or are privy to such considerations should carefully document their disclosure procedure and gather required authorizations. We're legally obligated not to disclose more information than necessary to accommodate such requests or make relevant business decisions.

Consequences for Failure to Comply:

Any member or other such person obligated to comply with this policy who deliberately or unintentionally fails to do so will be disciplined. The type of discipline will depend on the severity and frequency of the violation(s). Anyone found to be using confidential/sensitive information for personal gain in violation of this policy will be terminated. This policy is binding even after a member resigns or is expelled.

This Member Confidentiality Policy should be read and adhered to by all members of the AGIF-US and AGIF Organization(s).

Adopted by the National Board on this day ____ of April 2022.

Greg Nichols, National Secretary