

THE TOR PROJECT, INC.

CONFLICTS OF INTEREST, INCLUDING RELATIONSHIPS

Notice: This document was written by and for the Tor Project, Inc. (“TPI”), and is intended to inform and advise TPI employees and contractors about Company policies that should inform their decisions and behavior. However, the Tor Community extends far beyond employees and contractors, and the Community has its own set of policies intended to both complement TPI’s policies in areas where it does not have its own, and to provide guidance for individuals who wish to participate in and/or contribute to the Tor Community beyond/outside of employment. For more information about the Tor Community’s policies, please contact the Community Team Lead at <https://trac.torproject.org/projects/tor/wiki/org/teams/CommunityTeam>.

The Tor Project, Inc., (the “Company”) expects all employees and contractors to avoid situations that create an actual, potential or perceived conflict between your personal interests and the interests of the Company. A conflict of interest exists when your loyalties or actions are divided between the Company’s interests and your personal interests, or those of another, such as with a current or potential funder or your personal business or a vendor. The Company expects you to use good judgment, to adhere to high ethical standards, and to avoid situations that create an actual, potential, or perceived conflict of interest.

If you or someone with whom you have a close relationship (e.g., a relative [defined below] or close companion or significant other [defined below]) has a financial or employment relationship with a current or potential donor or funder, or with a person who is employed by or advises on the disbursement of funds by an organization, foundation, or government agency that currently or potentially funds the Company, you must disclose this fact to Human Resources. You should be aware that if you enter into a personal relationship with a funder or a funder’s employee, a resulting conflict of interest may require steps to protect the Company.

A familial or intimate relationship among employees, contractors, or Tor community members can also create an actual, potential, or perceived conflict of interest, especially where one member of the relationship supervises another member in the relationship or otherwise has professional influence over the other member in the relationship. For the purposes of this policy, a “relative” is any person who is related by blood, marriage or domestic partnership, and “significant other” is any person whose relationship with the employee is either intimate (i.e., romantic or sexual) in nature or similar to that of persons who are related by blood, marriage or domestic partnership. Individuals in such relationships should disclose the situation to the Company.

To avoid situations of actual, potential or perceived conflicts of interest, the Company may refuse to hire a relative or significant other in a position where the potential for or appearance of favoritism or conflict exists.

If you are unsure as to whether a certain transaction, activity or relationship presents an actual, potential or perceived conflict of interest, you should obtain clarification from your Project Lead and/or Human Resources. Failure to adhere to this policy, including failure to disclose any conflicts, could result in disciplinary action, up to and including immediate discharge.