Employment of relatives POLICY

We are committed to hiring and retaining highly qualified persons. At the same time, we recognize that, despite their qualifications, hiring and retaining close relatives of present personnel might raise serious questions regarding the objectivity – or appearance of objectivity – of work assignments, performance appraisals, and employee treatment. Our employment policies, administered on a case‑by‑case basis, are based on balancing these concerns.

We do not normally employ spouses, parents, children, brothers, sisters, or corresponding in-laws if:

1. They are seeking full-time, part-time, or temporary employment; and

2. Employment results or may result in having supervisory influence (actual or perceived) over the relative’s evaluations and progress.

If an employee and a close relative work in the same office and one of them becomes a manager with supervisory influence over the other, as described above, a transfer will most likely be arranged. Also, if an employment arrangement may be perceived to violate our guidelines prohibiting close relatives from having supervisory influence over one another, a transfer also may be arranged. If a transfer is not feasible, the employees will have 30 days to decide which relative will stay with the Company. If the employees do not make the decision within the allotted period, the Company will make the decision based upon the employment history and job performance of both employees, as well as the Company’s needs.

THIS POLICY IS OPTIONAL