

# Personnel Policy Manual



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|----------------|-------------------------|----------------|---------------|
| <b>Subject</b> | Employment of Relatives | <b>Section</b> | 1.3           |
|                |                         | <b>Date</b>    | April 1, 2007 |

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## 1.0 POLICY

It is the policy of COM DEV USA to consider employment of qualified applicants who are relatives of employees. However, relatives will not be placed in positions where their relationship adversely affects, or appears to affect, the objectivity, judgment, effectiveness, safety, security, or morale of employees in performing company business.

Under unusual or special circumstances, exceptions to this Policy may be made with the prior approval of the Human Resources Director and the General Manager or designee.

## 2.0 DEFINITION OF RELATIVES

For purposes of this Policy, a relative includes, but is not limited to, an employee's:

- a. Spouse
- b. Mother or Father
- c. Sister or Brother
- d. Child
- e. Mother/Father-In-Law
- f. Grandparent
- g. Grandchild
- h. Significant Other/Domestic Partner

This Policy is not limited to relatives and applies to other situations involving potential and actual conflict of interests, as determined by the Human Resources Director. Close personal relationships who do not share the same household, for example, may fall within the scope of this Policy.

## 3.0 PROVISIONS

### 3.1 Placement

- a. Relatives are not placed in positions under the direct or immediate supervision of another, where one is responsible for approving the requests for financial reimbursements or company material for the other, or where the relationship can adversely impact the safety, security, or morale of the company or its employees.
- b. The Human Resources Director considers on an individual basis the placement of relatives of employees in positions where one has an indirect supervisory relationship to the other, has access to sensitive information regarding the other, or works closely with the other in order to ensure the following:
  1. Relatives are not placed in positions where career progression or work assignments of one can be influenced or determined by the other.
  2. Relatives are not placed in positions which compromise or are perceived to compromise their objectivity, judgment, or effectiveness; that of their supervisor, or that of other employees.

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### 3.2 Resolution of Conflicts

- a. Working relationships in conflict with this Policy, which result from changes such as company reorganization or the marriage of employees, are handled on a case by case basis by the Human Resources Director.
- b. The Human Resources Director will exercise all reasonable and practical means to resolve the relationship conflict within four months while maintaining employment of all involved parties.
- c. If the Human Resources Director is unable to resolve the relationship conflict as stipulated above, he/she will notify the General Manager prior to the separation of one or both affected employees.

## 4.0 PROCEDURES

### 4.1 Employee's Responsibilities

- a. Employees have the responsibility to disclose to supervision any contemplated or existing relationship that could impair her/his objectivity, judgment or effectiveness as an employee of COM DEV USA.
- b. An employee is to take the initiative in disclosing relationships whenever they have an actual or potential conflict of interest and not rely on prompting by management.

### 4.2 Management Responsibilities

- a. Management has the responsibility to notify Human Resources regarding the proposed placement of the employee with a relative and to implement corrective action if a conflict of interest is determined to exist.

### 4.3 Human Resources Responsibilities

- a. The Human Resources Director must review all proposed employment offers, especially offers to relatives of current employees. Only those offers of employment that are consistent with the intent of this policy will be approved.
- b. The Human Resources Director also must review all proposed transfers, demotions, and promotions to ensure that the potential working relationships are consistent with the intent of this policy.

## 5.0 POLICY CHANGE INFORMATION

None