

Aspect	Nepotism Policy	Conflict of Interest Policy
<b>Scope</b>	<ul style="list-style-type: none"> <li>- Covers familial relationships such as spouses, parents, children, siblings, aunts, uncles, nieces, nephews, cousins, and in-laws.</li> </ul>	<ul style="list-style-type: none"> <li>- Covers a wide range of personal, financial, and external affiliations, including relationships with family members, friends, business partners, clients, or vendors.</li> </ul>
<b>Disclosure Requirement</b>	<ul style="list-style-type: none"> <li>- Requires disclosure of familial relationships among employees.</li> <li>- Disclosures must be made upon hiring and updated for any changes.</li> </ul>	<ul style="list-style-type: none"> <li>- Requires disclosure of any potential conflicts of interest, including financial investments and external affiliations.</li> <li>- Disclosures should be made promptly and updated regularly.</li> </ul>
<b>Employment Decisions</b>	<ul style="list-style-type: none"> <li>- Employment decisions must be based solely on merit, qualifications, and job performance.</li> <li>- Personal relationships should not influence these decisions.</li> <li>- Managers must ensure decisions are documented and justified.</li> </ul>	<ul style="list-style-type: none"> <li>- Employees must make business decisions objectively and in the best interests of the company, without favoritism or bias.</li> </ul>
<b>Supervisory Relationships</b>	<ul style="list-style-type: none"> <li>- Direct supervisory relationships between relatives are discouraged.</li> <li>- If unavoidable, appropriate measures such as reassignment of duties or additional oversight will be implemented.</li> </ul>	<ul style="list-style-type: none"> <li>- Employees with a conflict of interest must recuse themselves from decision-making processes where their personal interests may influence the outcome.</li> <li>- Employees should report conflicts involving colleagues to their supervisor or HC Department.</li> </ul>
<b>Conflict Resolution</b>	<ul style="list-style-type: none"> <li>- Conflicts arising from familial relationships will be addressed promptly and impartially.</li> <li>- Measures may include reassignment, recusal from decision-making, or other appropriate actions.</li> <li>- Employees are encouraged to report concerns about nepotism or favoritism without fear of retaliation.</li> </ul>	<ul style="list-style-type: none"> <li>- Any concerns or questions regarding potential conflicts of interest should be addressed to HC Department for review and resolution.</li> </ul>

<b>Training and Awareness</b>	<ul style="list-style-type: none"> <li>- Training on the Nepotism Policy will be provided during onboarding and periodically thereafter to ensure understanding and compliance.</li> </ul>	<ul style="list-style-type: none"> <li>- All employees will receive training in identifying and managing conflicts of interest during onboarding and periodically thereafter.</li> <li>- Managers and supervisors will receive additional training.</li> </ul>
<b>Enforcement and Compliance</b>	<ul style="list-style-type: none"> <li>- Violation of this policy may result in disciplinary action, up to and including termination.</li> <li>- The HC Department is responsible for monitoring compliance and conducting regular audits.</li> </ul>	<ul style="list-style-type: none"> <li>- Violation of this policy may result in disciplinary action, up to and including termination.</li> <li>- The HC Department is responsible for monitoring compliance and conducting regular audits.</li> </ul>
<b>Exceptions</b>	<ul style="list-style-type: none"> <li>- Exceptions may be considered on a case-by-case basis, particularly where no conflict of interest exists, or the relationship does not impact job performance.</li> <li>- Requests for exceptions must be submitted in writing to the HC Department and reviewed by higher management.</li> </ul>	<ul style="list-style-type: none"> <li>- N/A</li> </ul>