



Hiring and Employment of Immediate Family Policy

Policy Statement

BBK Consulting, Inc. (the Company) is committed to hiring qualified candidates for all positions within the Company, Therefore, BBK Consulting, Inc. (the Company) does not apply a general prohibition against the employment of immediate family.

However, in accordance with all applicable employment legislation, some restrictions will be placed on the hiring of immediate family and/or placement of immediate family that will result in or has the potential to result in a conflict of interest or influence.

Purpose

The purpose of this policy is to identify and define the restrictions placed on the hiring of immediate family that could result or has the potential to result in a conflict of interest. To prevent such situations from arising, the following guidelines have been put in place:

Definition

For purposes of this policy, "immediate family" includes the employee's brother, sister, mother, father, stepmother, stepfather, husband, wife, common-law partner, children, aunt, uncle, stepchildren, father-in-law, mother-in-law, sister-in-law, brother-in-law, daughter-in-law, son-in-law, and anyone with whom the employee is in a romantic relationship.

Procedure

The Company restricts the hiring of immediate family which results in immediate family reporting directly or indirectly to the same Manager.

Additional considerations include, but are not limited to:

- Potential areas for perceived collusion
- Grievances or disciplinary action processes hampered or unduly influenced
- Adverse impact on the morale of other staff
- An unfair advantage gained by immediate family member or perceived favoritism
- Possible negative cross-over with the employees' personal relationship
- Negative perceptions arising from the appointment

Managers, in consultation with Senior Management and Human Resources, must examine and weigh the potential risks of hiring an immediate family member, and determine if the risks outweigh the benefits.

Employees who marry or become immediate family members during the course of employment may continue employment as long as there is not a) a direct or indirect supervisor/subordinate relationship between the employees or b) an actual or potential conflict of interest or the appearance of a conflict of interest. In the event that this situation does occur, Managers, in consultation with Senior Management and Human Resources, must examine the situation to determine the appropriate remedial course of action required to remove the reporting relationship or conflict/potential conflict, as the case may be. The Company shall have complete discretion to determine the appropriate remedial action in each case.

It is the responsibility and obligation of each employee to report promptly to their Manager and Human Resources for any existing or potential immediate or close personal relationship that may violate this policy.

This policy applies to all future hires on or after October 3, 2017.