

THE CENTER FOR DISCOVERY

SUBJECT: Employment of Immediate Family Members	MANUAL: Corporate Compliance
	SECTION: Section 7

Purpose: To provide the scope of and procedure for The Center for Discovery (“TCFD”) regarding immediate family members of current employees.

Policy:

At TCFD, employment decisions are based solely on the qualifications and merits of each individual. To prevent potential conflicts of interest, ensure fairness, and maintain professional integrity, TCFD seeks to avoid placing employees in positions where they would have a subordinate relationship with and/or make decisions regarding direct benefits for an immediate family member.

Immediate family is defined under this policy as: spouse, significant other residing in the immediate household, son and daughter (including stepchildren), grandchild, son-in-law and daughter-in-law, parent (including stepparent), grandparent, father-in-law, mother-in-law, brother and sister (including stepbrother and stepsister) and domestic partner.

Regulatory Reference:

N/A

Procedures:

1. Employees must disclose any immediate family relationships with other employees that may fall under the scope of this policy.
 - a. Disclosures should be made to People Operations at the time of hiring or upon the establishment of such a relationship during employment.
 - b. Any such disclosure or report of potential conflict of interest in good faith will not face retaliation. Any form of retaliation will be subject to disciplinary action, up to and including termination of employment.
2. Employees should not initiate nor participate in, directly or indirectly, decisions involving a direct benefit (initial employment, retention, promotion, salary, work assignments, leave of absence, etc.) to members of their immediate family. This policy does not affect current employees hired prior to the initial effective date of the policy nor will changes to the policy apply retroactively.
3. Persons will not be employed in positions where they will have any subordinate relationship, at any level, to members of their immediate family or where a member of their immediate family, in the ordinary course of business, would play a significant role in making decisions concerning their direct benefits. With the approval of the CEO,

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exceptions can be made to this provision for market-scarce jobs or exceptional needs of The Center.

4. A marriage between two employees will not affect either person's employment provided the policies outlined above are not violated. Should any portion of the policy apply to the new relationship, attempts for transfer will be made for the employee having the lesser seniority. Any situation not in compliance with any portion of this policy and which cannot be mutually resolved through transfer or some other approved arrangement will necessitate termination for the related employee with the least seniority.
5. In some instances, The Center's policy of preserving the confidentiality of records may make it inappropriate to have a member of the immediate family of an employee in a particular job at The Center. For example, it is usually inappropriate for someone to hold a job providing access to confidential records concerning the performance or qualifications of a member of the employee's immediate family

Sanction Statement:

Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement:

As part of its ongoing auditing and monitoring process in its Corporate Compliance Program, TCFD will review this policy based on changes in the law or regulations, as TCFD's practices change, and, at minimum, on an annual basis. Additionally, this policy will be tested for effectiveness on an annual basis or more frequently as identified in accordance with TCFD's Corporate Compliance Program. Testing will include but is not limited to ensuring that the policy is appropriately followed; the policy is effective; the policy has been disseminated to all Affected Individuals, as well as notified of any updates or changes.

Tracking of the criteria above and results of this testing will be completed by the CCO, or designee. Additionally, results will be reported to the CCC and Governing Body on a regular basis.

Record Retention Statement:

TCFD will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.

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