

Altium Nepotism Policy

1. Background

Altium is an equal opportunity employer and will strive to ensure that fair hiring practices are utilized at all times. To ensure that our organization and hiring processes are free of any conflict of interest, we have adopted this policy to ensure that nepotism does not occur at Altium.

2. Intent

The purpose of this policy is to:

- Legitimately prevent a conflict of interest or the appearance of a conflict of interest that arises through the hiring or employment of friends and relatives; and/or
- Legitimately prevent the misuse of authority and influence or the appearance of such misuse.

3. Definitions

1. **Nepotism** - Favoritism granted to relatives or close friends, usually in the form of hiring practices, and employment activities.
2. **Conflict of Interest** - A conflict of interest exists when an employee is able to gain a special advantage due to being a relative or close friend of another Altium employee, or conversely, where Altium is at risk as a result of the fact that two or more employees are relatives or close friends. In the hiring and employment of relatives, conflict of interest situations include:
 - Any influence exercised directly or indirectly by an Altium employee in the selection and hiring process in which their friend or relative is a candidate;
 - Direct or indirect supervisory relationship;
 - The ability of one family member to influence or exert financial or administrative control over another;
 - The ability of one family member to influence human resource matters including, but not limited to, performance reviews, preferred work assignments, promotions, reclassifications, disciplinary matters, special leaves, and/or access to additional hours and/or overtime; and/or
 - Relatives that are employed in positions that establish a real or potential security, confidentiality, or financial risk to Altium.

For the purposes of this policy, family members or relatives shall be defined as: Wife, Husband, Domestic Partner, anyone in a romantic relationship, Mother, Father, Brother, Sister, Son, Daughter, Aunt, Uncle, Nephew, Niece or any In-Laws

3. **Direct Reporting Relationship** - A direct reporting relationship occurs when an employee reports directly to a supervisor or manager.
4. **Indirect Reporting Relationship** - An indirect reporting relationship occurs when an employee reports to a supervisor and the supervisor reports to a manager; thus, the employee indirectly reports to the manager.

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4. Policy

In accordance with the Altium Code of Conduct, Altium will not discriminate in its hiring practices on the basis that a person is a relative to a current employee. To this end, relatives of Altium employees are eligible for employment with Altium provided that:

1. The hiring process is open and equitable, and candidates are selected in accordance with Altium's hiring related policies;
2. Altium shall accept applications from, and consider a member of an employee's immediate family for employment if the candidate has all the requisite qualifications;
3. An immediate family member shall not be considered for employment if by doing so, it might create a direct or indirect managerial/subordinate relationship with the friend or family member, or if his/her employment could create a conflict of interest either real or imagined;
4. Altium employees do not directly or indirectly influence the selection and hiring process in which their relative is a candidate;
5. Managers and supervisors exclude themselves from any hiring process where their relative is a candidate;
6. A direct or indirect supervisor/subordinate reporting relationship is not created between such employees; and/or
7. Relatives are not employed in positions where a real or perceived conflict of interest exists. If a real or perceived conflict of interest arises due to marriage/cohabitation, or if two or more related employees work in a situation where there is a real or perceived conflict of interest:
 - The employees will notify their manager/supervisor or Human Resources. Note: if the situation existed before the enactment of this policy, such existing relationships or situations must be disclosed immediately, evaluated, and managed as provided in this policy.
 - The manager/supervisor and Human Resources will work together to assess the situation and determine whether there is a real or perceived conflict of interest. If there is a real or perceived conflict of interest, the VP, Human Resources will be informed.
 - The VP, Human Resources in consultation with the local Human Resources staff and the manager/supervisor, will make reasonable efforts to investigate suitable options within Altium for one of the related employees.

If two related employees or two employees in a relationship are working in a real or perceived conflict of interest and fail to notify their manager/supervisor or Human Resources, they may be subject to disciplinary action. If a manager/supervisor has knowledge of a relationship between two employees where a real or perceived conflict of interest exists, the manager/supervisor will notify the VP, Human Resources or the Regional Human Resources Director. If the manager/supervisor fails to notify the VP, Human Resources or Human Resources, the manager/supervisor may face disciplinary action.