

## EMPLOYMENT OF RELATIVES

## Purpose:

The enterprise encourages associates to recommend our company to family and friends as a great place to work. The purpose of this policy is to ensure our employment processes are free of conflicts of interest, or the appearance of a conflict of interest. This policy defines the Company's expectations related to hiring, transferring, or promoting family members for all company facilities including distribution centers, retail stores, and corporate support offices and functions.

This policy does not apply to temporary workers, seasonal workers, or student interns.

## **Policy:**

Members of an associate's family will be considered for positions based on their qualifications. Immediate family members will not be considered if the position would:

- 1. Be in the same chain of supervision as another family member; or
- 2. Have the potential for creating a conflict of interest, or the appearance of a conflict of interest; or
- 3. Have influence or decision-making authority related to the wages, benefits, or job assignments of another family member.

A family relationship must be disclosed by a candidate at the time the candidate applies for a position. For purposes of this policy, family members are defined as: spouse, child, step-child, parents, domestic partners, or siblings.

Where changes in status occur, such as the marriage of two associates, or where a restructuring of the company creates a reporting relationship in violation of this policy, the associates will be expected to achieve compliance as soon as practical but within six months of the first date of violation. Compliance may be achieved through transfers to open positions or resignation of one of the associates.

For Company leaders in the position of CEO, COO, EVP, Corporate SVP, or banner / region President, their children and step-children will not be employed by the Company. In the event that a promotion results in a violation of this policy, the child or step-child will be allowed a six month transition out of the company and offered the support of our out-placement services.

Associates in violation of this policy as of Jan. 1<sup>st</sup>, 2008, will be considered grandfathered and not required to meet the compliance requirements described above. As future promotions and transfers occur, the intent would be to look for opportunities where it would be possible to resolve the violation.