

EMPLOYMENT OF RELATIVES POLICY

I. PURPOSE

To establish Citizens Energy Group's (Citizens) position on employment of relatives.

II. SCOPE

This policy applies to all Citizens employees.

III. DEFINITIONS

"Relative"— Mother, father, brother, sister, aunt, uncle, husband, wife, daughter, son, nephew, niece, grandparents, grandchild, cousin, in-laws, step relative or any other person with whom the employee has a close personal relationship such as domestic partner, romantic partner, or co-habitant.

IV. POLICY

It is the policy of Citizens to allow relatives of employees to be considered for job opportunities along with other candidates, both internal and external. Employment decisions within Citizens should not be based upon nor influenced by family relationships. It is important to remember that when hiring any candidate, they are hired in a manner that is consistent with our values; especially the values regarding integrity and valuing individuals and that the selection is based on the candidate's skills and qualifications.

In most cases, relatives will not be permitted to work in a position which has a direct reporting or next higher level reporting relationship with a relative.

V. PROCEDURE

While we do not prohibit Relatives from applying for open positions or being employed by Citizens, we are aware that there could be a perceived or actual conflict associated with the employment of Relatives. Due to this, employees will not be permitted to work in a position which has a direct reporting, or next higher level reporting relationship with a Relative.

No reporting relationship with a Relative covered by this policy will be allowed to be maintained, regardless of the positions involved, if it creates a disruption or potential disruption in the work environment, or creates an actual or perceived conflict of interest.

Each Officer, Director, Manager, and Supervisor is responsible for monitoring changes in employee reporting relationships under him/her and for ensuring that all such reporting relationships comply with this policy.

Employees are also responsible for reporting any changes in their status which may result in conflict with this policy.

If an employee, after employment, enters into a reporting relationship with a Relative that is in conflict with this policy, one individual must seek a transfer or a change in reporting relationship as soon as practicable, but no later than 30 calendar days. If no transfer or change can be made within this time-frame, one of the employees must terminate his/her employment within 90 calendar days of notification that a transfer or change was not able to be worked out.

No exceptions to this policy will be made without written consent from either the Vice-President or Director of Human Resources (HR). In those rare instances where a supervisor must oversee a Relative due to emergencies or coverage issues, notification must be made to HR Management either prior to or soon after

the event. Failure of a supervisor to notify HR in these instances may result in the supervisor being disciplined.

Employees who fail to disclose personal relationships covered by this policy will be subject to discipline up to and including termination.

Primary Business Unit Owner: Director of Human Resources

Last Review Date: April 13, 2023

Next Review: 2026

Supersedes: Policy Release #1057, Effective December 1, 2015

Reference: Employment Practices Policy -Policy Release #1000

"Citizens Energy Group at its option reserves the right to change, delete, suspend, or discontinue parts of the policy in its entirety, at any time without prior notice."