

NEPOTISM (EMPLOYMENT OF RELATED PERSONS) POLICY

1.1. PURPOSE

TPL's standards for employment decisions such as hiring, promoting, reappointing, evaluating, awarding salary, disciplining, and terminating employees are based solely on criteria relating to credentials and job performance devoid of the possibility of favouritism based on family or personal relationships.

To avoid the existence or appearance of conflicts of interest and favouritism, this policy defines acceptable parameters under which related persons may work or be rewarded at TPL.

1.2. SCOPE

This policy applies to all individuals who are employed at TPL. This is inclusive of all permanent, contractual, and/or temporary staff.

1.3. POLICY STATEMENT

Employees and applicants for employment shall not be denied employment or advancement opportunities because of their status as a family or household member of another employee. However, no person shall be employed, promoted, or transferred to a permanent position in a department where they would be the immediate supervisor of/or receive direct supervision from a related person as described in section [1.4] of this policy.

Persons related to current employees may be hired if the new employee meets all job qualifications in accordance with TPL's established recruitment and selection policies, and work in a division other than the current employee's division.

An employee serving in a supervisory position may not participate in decisions regarding hiring, reappointment, placement, evaluation, rate of pay, salary increases, work assignments, compensation, promotion, monetary awards, or other personal interest for a relative or household member employed by TPL, even when the supervisor is not in the direct line of authority.

If a related applicant seeks employment, appointment, transfer or promotion in the same division as that of a current employee, the hiring official (who cannot be related to the applicant) must certify along with the Head of Human Resources or the CEO that no other applicant has demonstrably superior qualifications. The related applicant may be considered for employment, appointment, transfer or promotion provided the following criteria are met:

- The hiring would not result with an employee in the direct supervisory chain of a related person; and
- The CEO has determined that hiring the applicant would have no adverse impact on the operation of the division or department and there is no conflict of interest.

In exceptional circumstances, a direct supervisory relationship may exist between employees who are family or household members. Such circumstances may be necessitated by factors such as the unique qualifications or responsibilities of the individuals involved or the lack of other available appropriate supervisory personnel. Any exception must be approved by the CEO. Exceptions involving the CEO and the CEO's family or household members must be approved by the Human Resource Department.

1.4. DEFINITION OF "RELATED PERSONS"

The following relationships are sufficiently immediate to invoke the prohibitions against concurrent service of related persons:

- | | |
|---------------------------------------|------------------------------------|
| ▪ Parent and child | ▪ Stepbrother and stepsister |
| ▪ Brother and sister | ▪ Husband and wife |
| ▪ Grandparent and grandchild | ▪ Parent-in-law and child-in-law |
| ▪ Aunt and uncle and niece and nephew | ▪ Brother-in-law and sister-in-law |
| ▪ First cousin | ▪ Guardian and ward |
| ▪ Stepparent and stepchild | |

1.5. RESPONSIBILITIES

Applicants: Individuals must disclose in their application materials whether they are related to a current TPL employee (as defined above). Any misrepresentation or material omission on the application materials may result in the applicant being disqualified from further consideration or dismissed from employment if discovered after a hiring decision has been made.

Hiring Officials: Hiring Officials must document in the search summary any known relationship (as defined in this policy) between the applicant recommended for hire, transfer or promotion and a current TPL employee and certify that neither individual will have responsibility for the direct supervision of the other related person and will not be in a position (i.e. in the supervisory chain) to influence or control the terms and conditions of the other related person's employment, including promotion or transfer opportunities, rates of compensation, work assignments and evaluation of performance.

1.6. WHEN RELATIONSHIPS CHANGE

TPL understands that family relationships can change throughout employment. If a new relationship violates the nepotism policy, report the change or potential change to your HR representative as soon as possible. Human Resource Department will work with you, your family member, and your manager(s) to find a solution that doesn't violate the nepotism policy.

If you have any concerns about relationships within the business, please notify the Human Resource Department as soon as possible.

1.7. ADMINISTRATIVE GUIDELINES

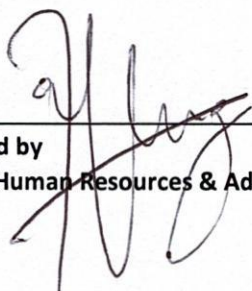
This policy will become effective upon approval by the CEO except for relationships which are already in existence at the time of approval. Those existing relationships will be documented and monitored by Human Resources department, and are to be terminated at the earliest sign of concern expressed by any of the individuals affected by the relationship.

1.8. VIOLATIONS

Violations of this policy may result in disciplinary action, up to and including termination of employment. Violations may include, but are not limited to, failing to disclose and/or actively concealing a relationship that falls within this policy or wilful failure or refusal to cooperate.

Management Rights:

The Management of the company has the right to revert, change, amend, nullify or cancel all or any parts of this policy without prior notice.



Approved by
Head of Human Resources & Administration