

Policy:	Employment of Relatives	Policy Reference and Revision Number:	HR 006 Rev 001
Department:	Human Resources	Effective Date:	03/16/2022
Authorized By:	SVP Human Resources	Page:	Page 1 of 2

PURPOSE

To ensure that employee hiring, promotion, and transfer practices do not create conflicts of interest or favoritism due to employment of employee’s relatives.

POLICY

BWC Terminals (the “**Company**”) may employ and promote a husband, wife, father, mother, father-in-law, mother-in law, grandfather, grandmother, son, son-in-law, daughter, daughter-in law, uncle, aunt, nephew, niece, brother, sister, brother-in-law, sister-in-law, step relatives, domestic partner (defined by federal, state and local law) or cousin of current employees (each a “**Relative**”) based on their merit and qualifications for a position without preferential treatment only under the following two (2) conditions (a “**Permitted Relative Relationship**”):

1. The existing employee and the employee’s Relative do not work in a subordinate-supervisory department or group whereby (a) one-party reports to the other or (b) both parties report to the same supervisor; and
2. There is no opportunity for impropriety, favoritism or bypassing of standard controls as a result of necessary interaction between the current employee and the employee’s Relative as a result of their assigned job duties or the position of the employee.

Notwithstanding the above, it is expressly recognized and understood that employment of Relatives of the Board of Managers and Officers of the Company is prohibited. For the sake of clarity, Officers of the Company includes Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Senior Vice President, and Vice President.

REQUIRED NOTICE

Every employee is required to inform their immediate supervisor and the Senior Vice President, Human Resources if any of the following occurs:

- a. a Relative is employed or offered a position with the Company;
- b. the position offered to a Relative would not qualify as a Permitted Relative Relationship; or
- c. the Permitted Relative Relationship may be violated due to pending marriage or commencement of a close personal relationship.

RESOLUTION OF JOB RELATIONSHIP

- a. The impacted employees will have sixty (60) days from the creation of a potential situation that would not qualify as a Permitted Relative Relationship to resolve the situation on their own.
- b. If the impacted employees have not yet resolved the situation in a manner acceptable to the Company within said sixty (60) day period, the Company will determine the most appropriate action for the specific situation, including, without limitation, transfer or termination of one of the employees.

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INVOLUNTARY JOB RELATIONSHIP OR OTHER CONFLICT

If the Company either (i) creates a situation, such as reduction in force, that eliminates an existing Permitted Relative Relationship or (ii) determines that there is a conflict or the potential for conflict because of the relationship between employees, even if no direct reporting relationship or authority is involved, the Company will reassign one of the employees to permit a Permitted Relative Relationship within sixty (60) days. During said sixty (60) day period, the supervisory employee will be recused from any involvement or direct input in the employment decisions of the other employee.

POLICY EXCEPTIONS

Any requests for an exception to this Policy requires a written justification for the exception by the Senior Vice President for the department requesting an exception prior to any employment decision. Any exceptions to this policy must be approved in writing by the Senior Vice President, Human Resources; provided, however that if the exception is requested by the Human Resources Department, then such approval shall be resolved by the Senior Vice President and General Counsel.