

Relationship-Related Conflicts of Interest & Favoritism Policy - FAQs

Q: Why is this policy coming out now?

A: We've always had a nepotism policy to address these types of relationships. But the word nepotism can be confusing and we felt it was time to create more clarity. Hilltop wants to hire the best qualified candidates and sometimes those candidates are family members or friends of current employees. When they are, we want to make sure we maintain a positive and fair workplace.

Q: What does "relationship-related conflict of interest" mean?

A: It means if two or more employees have a family connection or a close personal relationship, it could affect their ability to make fair decisions at work. This could lead to favoritism or the appearance of favoritism.

Q: What if my family member or a person I have a close relationship with gets hired at Hilltop?

A: That's great! Hopefully, that person shared this on their application. Also, if this relationship presents a conflict of interest or if others could view it that way, it will be important for you to let your supervisor, Ops Director or People Ops Business Partner know about it. Each person in the relationship will need to sign a **"Relationship-Related Conflict of Interest Conduct Agreement"**. The main point of this is to make sure everyone involved is clear about the expectations and agrees to do their part to maintain a positive and fair workplace.

Q: What if I'm not sure if there's a potential, perceived or actual conflict of interest with my particular family member(s) or close friends who also work at Hilltop?

A: Please reach out to your supervisor, Ops Director or People Ops Business partner to talk it through. Sometimes, it may not be obvious that a conflict exists and a conversation can clarify that for everyone involved.

Q: I'm not comfortable sharing the details of my relationship with my supervisor, Ops Director or People Ops Business Partner. How can I follow this policy?

A: While it's important that you share there is a relationship, you are not required to share exactly what that relationship is. For example, if you live with another employee, you would NOT need to share your living arrangements or explain whether this person is a roommate or a romantic partner. You would only need to use the words, "I am in a close personal relationship with (other employee's name)."

Q: What's the process for hiring or promoting people who are related or in a close personal relationship?

A: We just need to make sure that family members or those in close personal relationships don't have formal authority over one another. If that's the case, someone from Senior Leadership will need to give written approval first.

Q: Can I be involved in work decisions about my family member or close friend?

A: To keep things fair, you need to avoid participating in any decisions about hiring, promoting, salary, performance, or any other work-related matters involving your family or close personal relationships.

Q: What if I start a relationship or become family with another Hilltop employee?

A: First, it's important to think about your boundaries. Work relationships can present challenges, especially if you are in a position of authority over the other person.

If you start a relationship that creates a real or perceived conflict of interest, you must let your supervisor, Ops Director or People Ops Business Partner know. If you're not sure if there's a conflict, ask your supervisor, Ops Director or People Ops Business Partner.

If you are in a position of authority over another Hilltop employee and, although discouraged, you begin a relationship with that person, it's important you let your supervisor, Ops director, or People Ops Business Partner know right away. If you have formal authority over that person, we will need to create a plan to adjust the situation immediately. If you could be perceived as having authority over them, even if you don't have formal authority, we will need to create a plan to manage the situation appropriately. Either way, the main thing to remember is it's important to disclose the relationship so we can take appropriate steps to maintain a positive, fair workplace.

Q: Who will know about my relationship if I disclose it?

A: We'll only share that information with the people who need to know in order to help manage any potential conflicts.

Q: What happens if someone reports a conflict of interest or favoritism?

A: Our People Operations team and other relevant individuals will work with everyone involved to find a solution that reduces or eliminates the conflict. If favoritism is found, we'll take action to make things right.

Q: How am I expected to behave if I'm in a relationship with a coworker?

A: It's simple, really. Just be professional and follow Hilltop's Code of Conduct at all times, no matter if you're family or close friends with another employee. Also, think about what information is appropriate (or not) to discuss outside of work. Be sure to keep information confidential according to your role and be sensitive to the damage that can happen in the workplace when venting to one another.

Q: What if I become aware of someone who is in a relationship with another coworker?

A: It's important to apply our values, especially Relationship and Inclusivity. Avoid gossip, judgmental behaviors that can be hurtful, and making assumptions that can alienate people. If you believe this relationship presents a conflict of interest that has not been disclosed, you may report it to your supervisor, Ops Director, or People Ops Business Partner.

Q: If I already have a family member or close personal relation that works at Hilltop, does this policy apply to me?

A: Yes, it sure does. All employees who are currently family members or in close personal relationships that could be seen as having a perceived or real conflict of interest will need to disclose these relationships to their supervisors, Ops Directors, or People Ops Business Partners. You will go through the same process and be asked to sign the **“Relationship-Related Conflict of Interest Conduct Agreement.”**