

Effective date: 05/01/2012

Revision date: 01/01/2021 – Clarified language on relatives, how to report a relative, and approvals.

Purpose

The purpose of this policy is to establish uniform practices regarding the employment (including regular, contractual and temporary) of relatives in ConocoPhillips. The intent of this policy is to ensure equitable treatment of all employees; avoid conflicts of interest; and prevent the appearance of partiality in the hiring, promotion, demotion, reassignment, and transfer of employees, thereby limiting the negative effect on morale and the appearance of impropriety.

General Provisions

Relatives, for purposes of this policy, are defined as spouse, son, daughter, mother, father, brother, sister, grandparent or grandchild, stepparent or stepchild, stepsister, stepbrother, in-laws, aunt, uncle, nephew, niece, cousin, significant other, domestic partner, or any other relationship that could present a conflict of interest as determined by the Company.

On an annual basis, each relative is required to disclose their relationship(s) on their personal compliance form of the annual Ethics Code Certification. Relatives may be employed by ConocoPhillips in accordance with normal staffing requirements. To reduce the potential for conflicts of interest, however, no manager or supervisor shall employ or have a relative in a direct reporting relationship or in a position that poses a possible conflict of interest. Relatives shall not work for the same supervisor without the prior approval of Employee Relations.

In the event a relationship between two employees is created during employment that puts the employee in a position where he/she works in a relative's direct line of supervision, or in a position that poses a possible conflict of interest, each employee involved has a responsibility to immediately inform management and report the new incident to Ethics via the EthicsPoint Helpline and then complete the Disclose a Conflict of Interest form. An appropriate solution will be sought as soon as practical. Failure to report the situation in advance of the potential conflict or knowingly not disclosing a conflict, may result in disciplinary action up to and including termination.

Questions

If you have questions, contact [HR Connections](#). For immediate assistance, call 877-812-7547.

The Company establishes programs, policies and procedures appropriate to the business needs and requirements of its various operations and organizations (the "Policies"). Different Policies than those shown here may apply to subsidiary company employees based on business needs, local customs, contractual agreement, or legal requirements. The Company reserves the right to change, amend, or terminate any of the Policies at any time, without notice, subject to applicable law and/or the terms of any applicable collective bargaining agreement or contract. The information provided is not intended to supersede applicable local, state or federal law or the terms or provisions of any current collective bargaining agreement. In the event of conflict, the law or collective bargaining agreement shall prevail. If there are any discrepancies or conflicts between this information and the terms of the official Policies or any underlying insurance contracts, the official Policies and insurance contracts will control your actual benefits. Employees should confirm that the Policies accessed here apply to them and/or their organization before taking any actions.