

2.1 Job Posting and Internal Applicant Policy

1. Purpose

The purpose of the Job Posting Policy is to ensure that employees have the opportunity to apply for open positions for which they are qualified. The Company believes in promoting from within when possible and is committed to employing the best candidates for approved positions and engaging in effective recruitment and selection practices in compliance with all applicable employment laws. We provide equal employment opportunity to all applicants and employees.

2. Scope

This policy applies to all positions for The Heritage Group Family of Companies other than executive, senior management positions, and positions lasting 3 days or less, and is designed to comply with the Vietnam Era Veterans' Readjustment Act (VEVRAA). The Company will provide certain required information to the electronic job boards on which Company positions are posted, including our desire for priority referrals of protected veterans.

3. Job Postings

Once an open position is approved for recruitment, it will be posted on internal and various electronic job boards. Appropriate external recruitment sources will vary depending on the vacancy. Any open position will be posted for at least 3 days.

4. Eligibility

Eligibility: Employees must meet the following criteria to be eligible to be considered as an applicant for an open position.

a. **Company Tenure:** Employees should have at least one year of service in their current role. This requirement helps ensure the employee has had enough time to understand their current role and business before moving to a new one. This requirement may be waived for roles within the same business or based upon extenuating circumstances, subject to HR and leadership approval.

b. **Performance Eligibility:** Employees must not have documented corrective active concerns within the last 6 months or been active on a Performance Improvement Plan within the last 12 months.

5. Application Process: Employees must apply for open positions and complete the screening process with other candidates (internal and external as applicable).

6. Internal Communication: Employees should expect to send and receive internal communication regarding their interests and application.

a. **Intent to Apply:** It is highly preferred for the employee to inform their current manager about their intent to apply for a new role. If the employee is uncomfortable speaking to their current manager, they should inform their HR business partner.

b. Application Details: Details about the role applied for, including the hiring manager and office location for the new position, may be shared with the HR Business Partners supporting the employee's current role and the role applied for.

i. In the initial recruiter screen, the recruiter will:

a. Confirm if the employee notified their current manager of their application. If the employee has not notified their manager, they will communicate with HR Business Partners if the employee is a competitive candidate. The HR Business Partner will support the employee in communication with their manager, as applicable, as they progress in the selection process.

b. Confirm if the employee's compensation expectations are within the salary range for the role, consistent to recruiter practice with external applicants.

c. Recommendations: The current manager may be asked to provide a recommendation or feedback about the employee, including information on the employee's performance, qualifications, and demonstrated skills in their current role. In cases where the employee has intentionally not notified their manager, HR Business Partners may support or propose an alternative recommendation solution.

7. Application Outcomes:

a. If an internal applicant is not invited to move forward at any stage in the process or is not ultimately extended an offer, the recruiter and hiring manager will share constructive feedback with the employee and provide guidance on developmental next steps, if applicable.

b. The offer process for internal applications will follow the same process and approvals as the offer process for external applications. This includes consideration of relocation assistance or other benefits extended to new hires.

c. If an internal applicant is extended and accepts an offer, there will be a waiting period of at least 30 days or as mutually agreed on between the employee and the business(es). Management and HR approval is required for transitions requiring more than 90 days. This requirement ensures a smooth transition and continuity of operations.

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