

## Background Check Policy and Procedure

Offers of employment at COC Consulting may be contingent upon clear results of a thorough background check. Background checks may be conducted on candidates, as deemed necessary.

Background checks will include:

**Criminal History:** includes review of criminal convictions and probation. The following factors will be considered for applicants with a criminal history:

- The nature of the crime and its relationship to the position.
- The time since the conviction.
- The number (if more than one) of convictions.
- Whether hiring, transferring or promoting the applicant would pose an unreasonable risk to the business, its employees or its customers and vendors.

### Procedure

After verbal acceptance of an offer, candidates must complete a background self-declaration and authorization form and return it to Human Resources.

If a background check is deemed necessary, Human Resources will order the background check upon receipt of the signed release form, and either internal HR staff or an employment screening service will conduct the checks. A designated HR representative will review all results.

The HR representative will notify the hiring manager regarding the results of the check. In instances where negative or incomplete information is obtained, the appropriate management and the director of Human Resources will assess the potential risks and liabilities related to the job's requirements and determine whether the individual should be hired. If a decision not to hire or promote a candidate is made based on the results of a background check, there may be certain additional Fair Credit Reporting Act (FCRA) requirements that will be handled by Human Resources in conjunction with the employment screening service (if applicable).

Background check information will be maintained in a file separate from employees' personnel files for a minimum of five years.

COC Consulting reserves the right to modify this policy at any time without notice.