

Global Background Checking Policy



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Classification	PUBLIC

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Overview

1. This global background check policy applies to all employees, in particular those who are to be offered employment with one of our Group Companies. The Company (LTG and all of its subsidiaries) reserves the right to make further checks on employees at any time during their employment, for example when being considered for promotion or transfer.

Applicability

The applicability of this statement falls under purview of the [Global Policy Applicability Statement](#).

Scope

1. This policy is intended to be iterative to best address the needs of the Company and it subject to change in our sole discretion Whilst it is believed this policy is in its completed format, it is undergoing a period of review and is therefore open to adjustment. Any changes will be version controlled and the initial review period will be deemed to have completed and the policy expected to take effect from 1 October 2022.

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Policy elements

1. Subject to applicable laws in the relevant jurisdiction, background checks may include:
 - a. Criminal records
 - b. Credit reports
 - c. Drug testing
 - d. Verification reports (e.g. identity, previous employment, education, SSN)
 - e. Reference checks

2. An employee background check may include some or all of the above checks depending on the requirements of the employee's position. For example, credit reports may only be relevant to those that work within a certain business unit.
3. The basic background screening applicable to all new employees includes, verification reports, reference checks and criminal checking.
4. Local laws may prohibit or restrict certain types of background checks. We will comply with local legal guidelines at all times.
5. Higher level criminal record checks may be essential if candidates are interviewing for positions where they will:
 - a. Represent our company and deal with our clients or stakeholders.
 - b. Have access to sensitive and confidential information
 - c. Handle money and finances
 - d. Have any contact with children or the elderly
6. If a higher level check is required this will be in line with local guidelines and you will be notified of this requirement.
7. Where a decision not to hire or promote is made based on a candidate's credit report, there may be additional requirements under the Fair Credit Reporting Act (FCRA) that will be by Human Resources and the relevant employment screening service.

When will an employee background check be conducted?

8. In most cases, background checks will be completed for successful candidates and prior to that individual joining the Company. Successful background checks is deemed a condition of employment. Further checks on employees may occur at any time during their employment.
9. Background checks are there to reinforce a hiring decision, ensure candidates who have been selected for a job are suitable, and to safeguard employees, clients, stakeholders, and the Company from unreasonable risk.

Where will background check results be stored and how long will they be maintained?

10. It is the Company's desire to keep the results of any background check information strictly confidential and will securely maintain such information separate and apart from an employees' personnel files.
11. The Company will generally maintain background check results for a period of five (5) years provided that a shorter or longer timeframe may be applied based on local laws.

Company responsibilities

12. Hiring managers and HR must:
 - a. Inform candidates that a background check is required in the position's job advertisement.
 - b. Conduct a background check on all successful candidates who accept an offer.
 - c. Ask candidates to provide written permission before conducting a background check, where applicable and provide an indication of how long the process will take.
 - d. Utilise a reputable and reliable background check provider. Criteria to consider when choosing a provider are: cost, legality, commitment to confidentiality and turnaround time. If our current provider doesn't meet our requirements for these criteria, HR should search for a new provider.

- e. Background check providers, or the HR team will inform candidates of the results of their background checks and any necessary next steps. Copies of results should also be provided to the individual as part of this process.
 - f. Give candidates information they need to dispute a report or address any issues a background check turns up.
13. On the rare occasion that negative findings are identified on background checks, a full review will be carried out by the HR team. Recommendations will be considered and approved by a selected panel, to include Business Leader, HR and legal representatives.
14. Whilst positive background checks are a condition of employment, a negative finding does not automatically disqualify the individual. Every case will be reviewed on its own merit and a consistent and fair approach will be taken in accordance with the local laws, Company policies and Client contract commitments. HR and hiring managers will keep the company's interests in mind when rating the seriousness of any issues background checks uncover.
15. Should an individual not meet the expected background check requirements to continue with employment, the Company may take action to rescind its offer or terminate employment, as appropriate.

Document control

i This policy is only controlled in its live, digital format. Any other format or export of this policy is an uncontrolled version of this document

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Version History

Date	Author(s)	Version	Changes
Nov 1, 2024	@angelina.kilmer	1.1	Change Policy classification from Confidential to Public
Jan 31, 2024	@Paul Gordon	1.0	Original converted to Global Policy Register