

Global Background Checking Policy



Version number	2.0
Last Approved	Mar 2, 2026
Classification	PUBLIC

Overview

This Policy defines the criteria and process for ensuring that backgrounds of the Company's employees are appropriately vetted.

Background checks are performed to validate hiring decisions, ensure candidates are suitable, and to safeguard employees, clients, stakeholders, and the Company from unreasonable risk.

The Company reserves the right to define additional screening criteria 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

This Global Background Check Policy applies to all employees, in particular those who are to be offered employment with the Company.

Global Background Checking Policy

Screening Criteria

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 or function.
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 confidential or restricted 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 the employee will be notified of this requirement.
7. Where a decision not to hire or promote is made based on a candidate's credit report, Human Resources and the relevant employment service will address any additional requirements under the Fair Credit Reporting Act (FCRA).

Background Check Cadence

Background checks must be completed for successful candidates prior to that individual joining and commencing work for the Company. A successful background checks is deemed a precondition of employment. Further checks on employees may occur at any time during their employment.

Background Check Storage and Retention

1. The Company will keep the results of background check information strictly confidential and will securely maintain such information separate and apart from an employees' personnel files.
2. The Company will 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

1. Hiring managers and HR must:
2. Inform candidates that a background check is required in the position's job advertisement.
 - a. Conduct a background check on all successful candidates who accept an offer.
 - b. Ask candidates to provide written permission before conducting a background check, where applicable and provide an indication of how long the process will take.
 - c. Utilize 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.
 - d. 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.
 - e. Give candidates information they need to dispute a report or address any issues a background check turns up.

Background Check Evaluation

1. 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.

- 2. While 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.
- 3. 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

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Author(s)	Stefan Larsen, Heather Wood	
Required Approver(s) and Approval Date	Heather Wood	Mar 2, 2026
Review cycle	ANNUAL	
Next review date	Mar 2, 2027	

Version History

Date	Author(s)	Version	Changes
Mar 2, 2026	Angelina Kilmer Paul Gordon	2.0	Annual Review
May 5, 2025	Art Machado Angelina Kilmer	1.2	Minor organizational and wording changes for clarity
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