

## **The Rock Family of Companies Vendor Background Check Requirements**

Vendor shall engage third party background check vendor or Client's third-party vendor, Hire Right, to provide background investigation services for all Vendor Employees considered for assignment with Client. Vendor and Client agree that the terms below shall reflect in the third-party agreement between Vendor and third-party background check vendor or Client's third-party vendor, Hire Right. To set up an account with Hire Right, please contact Nichole Atoigue, Global Account Director (314-701-6652) or at nichole.atoigue@hireright.com. Vendor will make and be responsible for all decisions it makes regarding the assignment of Vendor Employees and Vendor must follow the guidelines noted below.

### **1. Obtaining Consumer Report Information**

- A. Global Criminal, Statewide, and Federal District Criminal Record and Social Locator Search-** Search all legally reportable domestic criminal records from official- source data sources based on names and addresses of current and previous residences, employment, and schooling for the past 10 years, both provided by the individual and developed from the Social Security Number Trace.
- B. Widescreen Plus National Criminal Search-** Search of data obtained from the state-based department of corrections, administrative office of the courts, bureau of criminal apprehension, and/or the department of criminal justice records, various county criminal records and data from other applicable government agencies where available. *Possible records identified by this search are required by law to be verified at the official data source.*
- C. Global Sanctions and Enforcement Check-** Search all names consistent with criminal record search.
- D. Social Security Number Trace and Validation-** Returns an applicant's history of addresses and verifies that the social security number has been issued by the Social Security Administration.
- E. National Sex Offender Registry Search-** US Government website that links public state territorial, and tribal sex offender registries from one national search site. Information made available for public record varies from state to state. Search all names consistent with criminal record search.

### **2. Consumer Report Results-** Vendor should review and determine impact of background check results in accordance with the following:

- A. Criminal Record Evaluation Criteria (Criminal record information includes any information self-disclosed and/or revealed by the background check)**
- B.** Vendor shall review all criminal background check & consumer report results, inquire about all disclosures by the candidate, any criminal record results found through the background screening process and any discrepancies in information and to determine if an individual will be disqualified from further consideration for the applicable position. Upon reviewing the background checks, the Vendor should consider the nature and gravity (what happened) of the

offense or conduct, the time elapsed since the offense, conduct or completion of sentence and the nature of the job. Criminal record results found through the background screening process may disqualify candidate from being qualified depending on this analysis.

If candidate discloses or background check reveals a felony or misdemeanor involving violence against a person, sexual crime, crime against property, a crime involving dishonesty or an omitted misdemeanor within the past 5 years is found (excluding minor misdemeanors and minor driving related misdemeanors) or candidate has 3 or more misdemeanor convictions in the past 5 years (excluding minor misdemeanors and minor driving related misdemeanors) and the Vendor recommends proceeding with an individual's assignment to Client, the Vendor shall notify the Client at SOALeaders@RockCentralDetroit.com prior to proceeding with the individual's assignment.

- **C.** Utilize attached criminal disclosure questions (page 3).
- **D. Pending Criminal Cases-** If the background check reveals a pending case for a felony or misdemeanor involving violence against a person, crime against property, sexual crime or a crime involving dishonesty, Vendor shall monitor the case status and upon final adjudication by the Court, Vendor shall review all criminal background check results to determine if an individual will be disqualified from further consideration for the applicable position. Upon reviewing the background checks, the Vendor should consider the nature and gravity of the offense or conduct, the time elapsed since the offense, conduct or completion of sentence and the nature of the job. Vendor will delay the start dates for individuals if the disposition of case is within 2 weeks of the anticipated start in order to obtain the final adjudication of the case, prior to proceeding with its process. If a final adjudication is not received, and the Vendor recommends proceeding with an individual's assignment to Client, the Vendor shall notify the Client at SOALeaders@RockCentralDetroit.com prior to proceeding with the individual's assignment.
- **E. Diversion-Type Cases-** When an individual is engaged in a diversion-type program and pled guilty or no contest to the crime(s), Vendor shall review all criminal background check results to determine if an individual will be disqualified from further consideration for the applicable position. Upon reviewing the background checks, the Vendor should consider the nature and gravity of the offense or conduct, the time elapsed since the offense, conduct or completion of sentence and the nature of the job.

If candidate discloses or background check reveals a felony or misdemeanor involving violence against a person, sexual crime, crime against property, a crime involving dishonesty and the Vendor recommends proceeding with an individual's assignment to Client, the Vendor shall notify the Client at SOALeaders@RockCentralDetroit.com prior to proceeding with the individual's assignment.

- **F. Active Warrants for Arrest-** Individuals must resolve any open warrant(s) within a reasonable time or will be subject to removal from consideration.
- **G. Global Sanctions and Enforcement Check & National Sex Offender Registry Search:** Vendor shall review the following background checks and inquire about all records that report and consider the nature and gravity of the offense or conduct, the time elapsed since the offense, conduct or completion of sentence and the nature of the job. If candidate discloses or background check reveals any confirmed result on these background checks and the Vendor

recommends proceeding with an individual's assignment to Client, the Vendor shall notify the Client at [SOALeaders@RockCentralDetroit.com](mailto:SOALeaders@RockCentralDetroit.com) prior to proceeding with the individual's assignment.

### **Criminal Disclosure Questions:**

1. Have you ever been convicted, found guilty, pled guilty or pled no contest ("nolo contendere") to any felony?

Conviction can include deferred adjudication, delayed sentencing or diversionary programs.

If yes, provide the date of offense (month & Year), location (City & State), charge name and explain what caused the charge to occur.

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2. Have you ever been convicted, found guilty, pled guilty, or pled no contest ("nolo contendere") to any misdemeanor?

This includes driving offenses such as driving under the influence, minor in possession of alcohol, driving while license suspended, etc. that occurred after the age of 16.

If yes, provide the date of offense (month & Year), location (City & State), charge name and explain what caused the charge to occur.

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3. Are there pending charges against you for any felony?

Pending charge means any charge pending final court decision or final court date including deferred adjudication, delayed sentencing or diversionary programs.

If yes, provide the date of offense (month & Year), location (City & State), charge name and explain what caused the charge to occur.

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4. Within the past ten years, have you been the subject of any legal actions, whether civil or criminal, (cease and desist orders, consent orders, injunctions, license suspensions or revocations, etc.), and/or been fined, penalized or disciplined by any federal, state, county or municipal regulatory, licensing, or enforcement authority, agency, or bureau?

If yes, please explain:

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5. Within the past ten years, have you had any license or right to engage in a business, profession or occupation or bond revoked, denied, suspended, refused, enjoined, or restrained? Do not include driver's or motor vehicle license revocations.

If yes, please explain:

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6. Within the past ten years, have you ever been a defendant in any legal action (including suits under any federal or state truth-in-lending laws) in connection with (a) the solicitation, origination, brokering, granting or arranging of mortgage loans, (b) title agent or escrow agent services or (c) any other financial type matter, such as fraud, identify theft or similar matter?

If yes, please explain:

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7. Have you ever, within the past ten years, been engaged in any activity prohibited by the mortgage lending laws, mortgage banking laws, mortgage brokering laws, banking laws, or title/escrow agency?

If yes, please explain: