

Background Check Procedure

June 2026

Brief & Purpose

Our employee background check policy refers to our guidelines for investigating our job candidates' backgrounds as part of our hiring process. Background checks help us:

- Get insight into candidates' background.
- Ensure we hire reliable employees.
- Verify candidates' information for truthfulness and accuracy.
- Screen candidates convicted of serious criminal behavior.
- Ensure employees meet specific client needs or request for clearance.

Scope

This employee background check policy applies to candidates who go through our company's hiring process. It may also apply to internal candidates who are being considered for a promotion or transfer.

Elements

Background checks may be graded and include:

- Criminal records.
- Credit reports.
- Drug testing.
- Verification reports (e.g. identity, previous employment, education, SSN)
- Driving records.
- Reference checks.
- TWIC Card (Transportation Worker Identification Credential)

All candidates aren't required to pass every type of background check we offer before our company hires them. Each position has its own requirements. For example, driving records may be relevant to field reliable salespeople and taxi drivers, but not to hire office managers. The basic background screening includes [*verification reports and reference checks.*]

Local laws may prohibit or restrict certain types of background checks. We'll comply with legal guidelines at all times.

Criminal record checks are essential if candidates are interviewing for positions where they will:

- Represent our company and deal with our clients or stakeholders. [*Example: Legal Counsel.*]
- Have access to sensitive and confidential information [*Example: Human Resources.*]
- Handle money and finances [*Example: Accountant.*]

When should you conduct an employee background check?

In most cases, background checks cost time and money. We advise hiring managers and HR staff to conduct checks sparingly: preferably, on the final round of shortlisted candidates in the hiring process or a candidate they've chosen to hire. Local laws may require a candidate to have an offer in hand before we ask permission for a background check. We'll comply with all laws.

Background screening shouldn't be used as a way to disqualify someone or reduce the number of applicants for a position. Background checks are meant to reinforce a hiring decision and ensure candidates who have been selected for a job are suitable.

Our company's responsibilities

Hiring managers and HR staff must:

- Inform candidates that a background check is required in the position's job advertisement.
- Ask candidates to provide written permission before conducting a background check and let them know how long the process will take.
- Hire 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.
- Inform candidates of the results of their background checks and what we plan to do (reject or move candidates to the next hiring phase.) Background check providers should give candidates copies of their results.
- Conduct a background check on all candidates who pass through the [*interview phase*] for a specific position without discriminating against certain individuals.
- Give candidates information they need to dispute a report or address any issues a background check turns up.

Hiring managers/HR must tell candidates a clean background check doesn't guarantee employment, unless they've already received a verbal job offer.

What to make of negative findings

Criminal records don't automatically disqualify candidates from the hiring process, unless they are convicted of serious criminal acts (e.g. sexual assault.) We will judge the substance of criminal records according to these criteria:

- Number of criminal convictions for the same offense.
- Time elapsed from the most recent criminal conviction.
- How the criminal conviction relates to the position.

Note that HR/hiring managers will consider convictions, not arrests, when reviewing a candidate's background check.

HR and hiring managers should keep the company's interests in mind when rating the seriousness of any issues background checks uncover. For example, candidates who are considered for a position that involves driving a company vehicle should have at least a two-year clean driving record. HR and hiring managers should reject candidates convicted of driving while intoxicated within the last two years.

Generally, if hiring managers and HR decide a particular candidate would bring high or unreasonable risk to our company, they should reject the candidate.

HR and hiring managers can call candidates to discuss the results of their background checks in cases of minor discrepancies (e.g. a suspended license.) If candidates answer satisfactorily, they may still be hired to work with our company.

Procedure

We aim for a transparent hiring process that respects candidates' rights. We advise hiring managers and HR staff to follow this procedure for background screening:

1. Hiring managers and HR discuss whether a background check is needed for a position and what the check will include.
2. Hiring managers note in the job ad that a background check is required before employment.
3. When the final candidates (one or more finalists) are selected, hiring managers or HR contact the candidates to get written permission for background checks and explain the process. This can be done through an Applicant Tracking System (ATS) on Mobil Desk.
4. If candidates refuse to go through background screening, HR informs them that they won't be considered for the position. If candidates provide written permission, background-check providers can initiate the review.
5. Once HR receives background check results, staff discusses them with hiring managers to decide next steps for the candidates and the position.
6. Hiring managers inform candidates of their decisions and ensure they get copies of their individual background check reports. If there are negative findings, HR/hiring managers must let candidates know how to dispute the report.

Our confidentiality and data protection policies always apply to information background checks uncover.

See: ***HSE.FOR.Confidentiality Agreement.2023***

See: ***HSE.FOR.Data Protection Policy.2023***

Statement of Policy

IPS★ITCS may conduct criminal record checks as part of the application process. This search may include appropriate court records relating to the applicant's county of residence for evidence of felony and/or misdemeanor convictions and potentially searches of the Texas criminal offender record information database, and/or other state-by-state or national criminal databases followed by verifying county searches. Where a criminal record check is part of a general background check for employment, volunteer work, or licensing purposes, the following practices and procedures will generally be followed.

- i. Criminal record checks will be conducted in accordance with applicable law. Applicants or employees will be notified if a criminal record check will be conducted and will be asked to complete a Disclosure and Authorization form in accordance with the Fair Credit Reporting Act (FCRA) and/or CORI request form authorizing IPS★ITCS to conduct a criminal record search. If requested, the applicant or employee will be provided with a copy of this criminal background check policy.
 - ii. IPS★ITCS personnel are responsible for reviewing the criminal offender record reports in the decision-making process and will be familiar with the educational materials made available by the Department of Criminal Justice Information Services (DCJIS).
 - iii. Unless otherwise provided by law, a criminal record will not automatically disqualify an applicant or employee. Rather, determination of suitability based on criminal record checks will be made consistent with this policy and any applicable law regulations.
 - iv. If a criminal record is received, the authorized individual will closely compare the record provided with the information on the Disclosure and Authorization Form and any other identifying information provided by the applicant or employee, to ensure the record relates to the applicant or employee.
 - v. If IPS★ITCS is inclined to make an adverse decision based on the results of the criminal background check, the applicant or employee will be notified immediately. The applicant or employee will be provided with a copy of the criminal record, IPS★ITCS criminal background policy, and the FCRA Summary of Rights, and will be advised of the part(s) of the record that make the individual unsuitable for the position.
- IPS★ITCS will provide the applicant or employee with an opportunity to dispute the accuracy and relevance of the criminal record.
- vi. Applicants or employees challenging the accuracy of criminal record shall be provided a copy of DCJIS's Information Concerning the Process in Correcting a Criminal Record. If the criminal record provided does not exactly match the identification information provided by the applicant or employee, IPS★ITCS will make a determination based on a comparison of the criminal record and documents provided by the applicant or employee. In the event that criminal record information is obtained through the CORI database, IPS★ITCS may contact DCJIS and request a detailed search consistent with DCJIS policy.

vii. If IPS★ITCS reasonably believes the record belongs to the applicant or employee and is accurate, then IPS★ITCS will determine the applicant or employee’s suitability for the position or license at issue. Unless otherwise provided by law, factors considered in determining suitability may include, but not be limited to the following:

- a) Relevance of the crime to the person sought;
- b) The nature of the work to be performed;
- c) Time since the conviction;
- d) Age of the candidate at the time of the offense;
- e) Seriousness and specific circumstances of the offense;
- f) The number of offenses;
- g) Whether the applicant has pending charges;
- h) Any relevant evidence of rehabilitation or lack thereof;
- i) Any other relevant information, including information submitted by the candidates or requested by the hiring authority;

viii. IPS★ITCS will notify the applicant or employee of the decision and the basis of the decision in a timely manner.

Employee Printed Name: _____

Location: _____

Employee Signature: _____

Date: _____

Competency Assessment

| No. | Questionnaire | C/NYC |
|-----|---------------|-------|
| Q1 | | |
| A1 | | |
| Q2 | | |
| A2 | | |
| Q3 | | |
| A3 | | |
| Q4 | | |
| A4 | | |
| Q5 | | |
| A5 | | |

| Enclosed Attachments | |
|---------------------------------|-------------------------------------|
| Risk Assessment | <input checked="" type="checkbox"/> |
| Environmental Aspect and Impact | <input checked="" type="checkbox"/> |
| Training and Competency | <input checked="" type="checkbox"/> |
| Measure and Evaluation Tools | <input checked="" type="checkbox"/> |

Competency Checklist

To be filled out by Trainer and signed by Employee, Assessor and Supervisor before being returned to the HSEQT Manager for recording purposes.

| Procedure | Competency | Date | Competent YES / NO | Employee Signature |
|-----------|------------|------|-----------------------|-----------------------|
| | | | | |
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| | | | | |
| | | | | |
| | | | | |

(Please tick appropriate box)

This employee is competent in performing the job.

| |
|--|
| |
| |

This employee has not attained the competency level.

*

* *If the employee has not attained all competency levels, the General Manager must assess the action to be taken, provide an extension of training or alternative action as listed below.*

Alternate action to be taken: _____

| | | | | |
|-----------|-------------------|-------|-------|-------|
| Signed By | Employee: | _____ | Date: | _____ |
| | Trainer: | _____ | Date: | _____ |
| | Assessor: | _____ | Date: | _____ |
| | Regional Manager: | _____ | Date: | _____ |

Environmental Aspects and Impacts

Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections. The significance of each impact needs to be assessed using the Risk Assessment Model.

| Activity | Aspect | Impact |
|--|---|--|
| Purchasing & Administrative Work | Consumption of goods | Conservation of natural resources |
| | Consumption of energy (eg. Electrical equipment and facilities) | Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss |
| | Generation of waste (eg. Paper) | Consumption of space for waste disposal; Habitat loss |
| Climate Control | Consumption of energy | Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss |
| | Generation of noise | Disturbance to community; Habitat loss |
| Cleaning of – offices / vehicles | Storage, use and release of chemicals | Contamination of air, water or soil; Risk to human health |
| Transport (Fleet vehicles / staff travel) | Consumption of energy | Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Loss of habitat at all stages of generation; Light pollution |
| | Consumption of goods (eg. Oil) | Consumption of natural resources; Generation of waste; Habitat loss; Biodiversity impacts |
| | Generation of waste (eg. Oil) | Consumption of space for waste disposal; Potential contamination of water or soil; Habitat loss |
| | Exhaust emission | Release of greenhouse gases and atmospheric pollution |
| | Use of dangerous goods (eg. Batteries) | Potential contamination of air, water or soil; Risk to human health |
| | Generation of noise | Disturbance to community; Habitat degradation |
| Operations | | |
| | | |
| | | |

Sample only.
To be filled in

Risk Assessment

Risk Assessment // insert name here

| <p>Step No: Logical sequence</p> | <p>Sequence of Basic Job Steps documented in the Procedure, Work Instruction and project plans. Break down Job into steps.</p> <p>Each step should be logical and accomplish a major task.</p> | <p>Potential Safety & Environmental Hazards/Impacts at the site of the Job</p> <p>Identify the actual and potential health and safety hazards and the environmental impacts associated with each step of the job.</p> | <p>Risk Rating</p> <p>Refer to the risk matrix or HSEQT.PRO. Risk Mgt</p> | <p>Recommended Corrective Action or Procedure</p> <p><i>Determine the corrective actions necessary to reduce the risk to as low as reasonably practical (ALARP) refer to HSEQ.PRO.Risk Mgt. The risk must be reduced or controlled to ALARP before work commences.</i></p> <p>Document who is responsible for implementing the controls to manage each hazard identified.</p> | <p>Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt</p> |
|---|---|--|--|--|--|
| 1. | | | | | |
| 2. | | | | | |
| 3. | | | | | |
| 4. | | | | | |
| 5. | | | | | |

Audit



| Process: insert// Procedure: Insert // | | Date: | Audited by: | |
|---|----------|-------------------------|----------------------|--|
| | | Location of Audit: | Area Mgr/Supervisor: | |
| Item | Question | Evidence Sited | Comments | Conformance Score 0,3,5 |
| 1. | | | | |
| 2. | | | | |
| 3. | | | | |
| 4. | | | | |
| 5. | | | | |
| 6. | | | | |
| 7. | | | | |
| AUDITOR'S SIGNATURE: | | CONFORMANCE SCORE: / 25 | | 0 – Non-Conformance 3 – Continuous Improvement Opportunity 5 – Total Conformance |
| SAFETY REP'S SIGNATURE: | | CONFORMANCE %: | | |