

## Arise® Platform Policy **Background Check Policy**

August 8, 2022 Version 1.0 A background check is required for individuals servicing client opportunities on the Arise® Platform. Background checks initiated through the Arise® Platform will be performed by our third party vendor, First Advantage. Arise considers the following to be the minimum components of a background check:

- Social Security Number Verification (SSNV)
- Federal criminal 7 Year residence history based on given addresses and those developed from SSNV
- Felony including misdemeanor (single index search) 7 Year residence history based on given addresses and those developed from SSNV
- Sex Offender national
- A current background check that is free from disqualifying dispositions is required for all Service Partners and their agents enrolling in a new opportunity. Disqualifying dispositions may vary based on the opportunity and may include, but are not limited to:
  - security related crimes and cybercrimes (such as hacking, email and internet fraud, malware)
  - theft and burglary (including forgery, fraud, identity theft, bad check and the receiving or possession of stolen goods)
  - crimes involving violence and threats (such as assault and battery, hate crimes, manslaughter, murder, robbery, stalking or harassment and weapons crimes).
- 2. There will be a \$30 fee for each individual taking the background check.
- 3. Background checks that are free from disqualifying dispositions will remain current for 36 months from the date the background check is started.
- 4. Certain client programs require additional compents for the background checks. If a Service Partner or its agent has a current background check but the client program requires additional checks, he or she will need to complete the additional background check(s) through First Advantage. However, there will not be a charge for the additional checks unless the individual's background check is no longer current.

- 5. If a Service Partner or its agent is not continuously servicing for six months, certain client opportunities may require an additional background check.

  There will be no charge for this check.
- Certain client opportunities may require a drug test or fingerprinting. There will
  be no charge for these checks unless stated otherwise in the Opportunity
  Announcement.
- 7. Background checks must be completed prior to being certified for a client program. In certain cases, a background check may be required prior to the start of certification.
- 8. The applicable Opportunity Announcement will contain additional details on background checks for client programs that require additional checks.
- Background checks will be conducted in accordance with applicable law.
   Individuals will be asked to complete a Disclosure and Authorization form in accordance with the Fair Credit Reporting Act (FCRA).
- 10. If an adverse decision is inclined to be made based on the results of the background check, the impacted individual will be notified promptly. The individual will be provided with a copy of the criminal record and the FCRA Summary of Rights. The individual will have an opportunity to dispute the accuracy and relevance of the criminal record prior to a final decision.

## How Are Background Checks Evaluated?

In evaluating the results of a background check, the following guidelines will govern:

- Background checks that contain information regarding criminal offenses will
  not necessarily disqualify an individual. Each such check will be considered
  on a case-by-case basis.
- 2. Determinations based on background checks will be made consistent with this policy and any applicable law or regulations.
- 3. If an individual has a criminal record, a determination will be made whether the disclosed criminal conviction:
  - (i) demonstrates behavior that could adversely affect (a) the Arise® Platform, (b) the safety of Service Partners, Arise, clients or other third parties, and their respective employees, agents and customers, or (c) the security of Service Partner assets, Arise

- assets, client assets or third-party assets, or
- (ii) will impair the individual's ability to successfully perform services on the applicable client program.

A conviction may only be considered as disqualifying if the criminal conviction is related to (i) or (ii) above.

- 3. Each case will be viewed individually and each factor and decision point will be considered carefully.
- 4. When determining whether a person should be disqualified due to a criminal record, the below mitigating factors will be considered. Although this is not an exhaustive list of factors, these factors will be evaluated along with any other associated extenuating circumstances:

Mitigating Factors to be Considered	Decision Points
Nature of the crime	For all criminal convictions, the nature of the services must be considered. This factor considers the nature and gravity of the offense as it relates to the nature of the services sought. Is the nature of the conviction such that there would be a concern for the safety of Service Partners, Arise or client employees, client customers, protection of Service Partner, Arise and client assets, the confidentiality/sanctity of Service Partners, Arise or client records and the records of clients' customers, including but not limited to credit card data and other confidential consumer information?
	customers, other employees, or the public, careful consideration should be given to whether a person who was convicted of a crime involving violence presents a significant risk to the company, its employees, its clients or its client's customers.
	For services involving access confidential personally identifiable information ("PII") (such as customer names, addresses and phone numbers) or financial responsibility (such as billing, credit card payments), criminal convictions involving integrity, fraud or theft will weigh against the individual.
Age at time of crime	Was the individual a teenager or close to one when the crime was committed? If the individual was a minor at the time of the criminal offense, this could weigh in the individual's favor.
Efforts at rehabilitation and successful completion of sentencing	If sentencing required probation, community service or other, has the individual completed the service?

Time elapsed since conviction or final adjudication	If significant time has elapsed since the crime was committed, this could weigh in the individual's favor.
Explanation of reason crime was committed	If the crime was committed under extenuating circumstances, an individual may submit court records to validate the individual's explanation.
Number of criminal convictions	Has the individual had additional convictions? If the individual is a repeat offender, this could weigh against the individual.

## What is the Refund Policy?

No refunds will be issued for background check payments or fees under any circumstances.

Arise reserves the right to change this policy at any time without prior notice.