

Arabelle Solutions Background Checking Guidelines

1. To the extent permissible by applicable law, Supplier shall, through the utilization of an authorized background checking agency:

a. Verify such Supplier Personnel's identity (e.g., using social security numbers and credit reporting databases to verify identity gaps);

b. Perform a watchlist screen to ensure that no such Supplier Personnel is included on the following government or organization lists, and not place any Supplier Personnel that is identified on such lists:

- United Nations Consolidated List
- European Union Consolidated List
- U.S. Department of Treasury Office of Foreign Assets Control ("OFAC") list of Specially Designated Nationals ("SDN") and Blocked Persons
- U.S. Department of Treasury OFAC Non-SDN Iranian Sanctions List
- U.S. Department of Treasury OFAC Foreign Sanctions Evaders ("FSE") List
- U.S. Department of Treasury OFAC Sanctions Programs (list of sanctioned countries)
- U.S. Department of State Non-Proliferation Sanctions Lists
- U.S. Department of Commerce BIS Denied Persons List
- U.S. Federal Bureau of Investigation ("FBI") Most Wanted Terrorists
- U.S. FBI Seeking Information
- U.S. FBI Top Ten Most Wanted
- U.S. FBI Most Wanted

c. Conduct a background screen as follows:

i. perform a criminal record check through an authorized background-reporting agency (including in-person searches of county courthouse records, where such records are available (e.g. United States, Mexico, etc.) covering at least the last seven (7) years, including all locations of residence and locations of employment, as stated on his or her resume, which the Supplier Personnel resided and worked during that period;

ii. verify the past seven (7) years of employment (e.g., position or job title held, dates of employment and duties); and

iii. not place any Supplier Personnel with ARABELLE SOLUTIONS if such Supplier Personnel lied or failed to disclose any relevant information, including but not limited to any prior criminal conviction on his or her pre-placement or employment application.

In instances where the entire prior employment record for the past seven (7) years is not able to be verified based on due diligence (e.g. former employer is no longer in business or not responding), the prior employment portion of the background check will be considered complete when the most relevant experience and at least half of his/her prior employment history for the past seven (7) years is verified. The Supplier is encouraged to ask Supplier Personnel for proof of prior employment where the Supplier Personnel's previous employer is not responding to requests for confirmation of employment. Proof of prior employment could include pay stubs or tax records confirming employment at the company noted.

Supplier may not exclude a candidate solely on the basis of a prior criminal conviction unless the conviction relates to dishonesty or breach of trust; or a matter that directly relates to the Supplier Personnel's suitability for assignment to the position for which he or she is intended. In reaching a placement decision based on criminal background checks, consideration should be given to the following factors that may mitigate the doubts and/or risks that may be indicated by the Supplier Personnel's criminal record:

- Whether the criminal record is correct;
- The amount of time that has elapsed since the conviction(s);
- The facts and circumstances surrounding the act(s) or event(s);
- The number of and type/severity of the offenses for which the individual was convicted;
- Age at time of the conviction or release from prison;
- Evidence that the individual has successfully performed similar work post-conviction; Length and consistency of employment history before and after the conviction(s);
- Rehabilitation efforts, education and training. Employment or character references and other information regarding fitness for the particular position; and
- Whether the individual is bonded under a federal, state or local bonding program.

2. ARABELLE SOLUTIONS, in its sole discretion, may determine certain Services the Supplier Personnel will be performing to be security sensitive in nature, in which case ARABELLE SOLUTIONS may mandate, to the extent permitted by applicable law, the foregoing screenings/verifications be conducted regardless of whether or not the Supplier Personnel are performing the Services on ARABELLE SOLUTIONS premises or having network access to ARABELLE SOLUTIONS's networks. Additionally, ARABELLE SOLUTIONS may require further verifications and/or searches as may be deemed necessary, to the extent permitted by applicable law, such as, for example, verifying the Supplier Personnel's highest level of education and conducting a department of motor vehicle search.

3. Supplier shall maintain, as records, all of the foregoing screenings/verifications for the duration of the Term, and for three (3) years thereafter.

4. If any screened/verified Supplier Personnel providing the Services to ARABELLE SOLUTIONS or any ARABELLE SOLUTIONS Affiliate leaves the employ of Supplier for a period of twelve (12) months or more, and such Supplier Personnel are then rehired by Supplier and reassigned to servicing ARABELLE SOLUTIONS, or any ARABELLE SOLUTIONS Affiliate, a new screening/verification must be ordered.

5. At Supplier's request, and with ARABELLE SOLUTIONS's approval, ARABELLE SOLUTIONS shall provide the names of its background checking suppliers to Supplier to utilize to conduct the foregoing background checks.

6. Supplier agrees to cooperate with ARABELLE SOLUTIONS, in good faith, to establish and implement any background verification process that ARABELLE SOLUTIONS may propose to verify that any or all of the foregoing background checks have been satisfied.