



Employee Background Check Policy

AIMCOR Group, LLC | Human Resources

AIMCOR Group, LLC

HUMAN RESOURCES



Human Resource governance for AIMCOR Group, LLC, AIMCOR Enterprise Insurance Group (AIMCOR EIG), and all other subsidiary divisions and/or affiliates of AIMCOR Group, LLC all referred to herein as AIMCOR Group, LLC or "the company".

Policy brief & purpose

The Employee Background Check Policy refers to AIMCOR Group, LLC's guidelines for investigating job candidates' backgrounds as part of the company's 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.

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.

Policy elements

Background screenings may include:

- Criminal records.
- Credit reports.
- FINRA Broker Check
- Drug screening (as deemed appropriate)
- Verification reports (e.g. identity, previous employment, education, SSN)
- Reference checks

Dependent upon the position a candidate is applying, the individual may not be required to pass all background screenings above. Each position has its own requirements. For example, FINRA Broker Checks are only required for positions where FINRA licensing is required as outlined in the AIMCOR FINRA Registration Policy.

Basic background screening includes: Reference checks and the verification reports outlined above.

Local laws may prohibit or restrict certain types of background checks. AIMCOR Group, LLC ensures compliance with legal guidelines at all times.

Background checks are conducted during the final phase of the hiring process once the hiring manager has identified the candidate they intend to hire. Due to limitations in local law the candidate may be required to have an offer in hand before we ask permission to conduct any background screenings.

AIMCOR Group, LLC does not use background screenings as a method to disqualify a candidate or reduce the number of applicants for a position.

It is the Company's policy to use background screenings as a means of reinforcing a hiring decision and ensure suitability of the position for the selected candidate.

Use of Information Obtained in a Background Investigation

Information obtained from a background investigation will be considered for employment purposes as permitted by federal and state law and in accordance with [Company Name]'s Equal Employment Opportunity Policy. Information will be reviewed to determine:

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- Whether false statements or material omissions were made by an individual on an application for employment or during an interview;
- Whether an applicant or employee, based on the job duties of the position in question, poses a threat to security and/or employee safety in the workplace; and
- The likelihood of an applicant or employee being successful and productive on the job.

Company's Responsibilities

Hiring managers and HR staff must:

- Inform candidate that a background screening is required in the position posting.
- Request candidates to sign any required Authorization forms necessary for the individual to acknowledge written consent to undergo background screening prior to conducting any background check.
- Provide reasonable expectation to a candidate for the expected length of time to complete the screening process(es).
- Inform candidate of all results of their background checks, explain any adverse findings (to the extent permitted by law), and clearly communicate the go-forward plan based on the findings, i.e. reject or proceed with hiring.
- Provide information to the candidate for how they can obtain copies of their results from the background check provider(s) and any information the candidate may need in order to dispute a report's findings or address issues that turn up from a background check
- Conduct a background check on all candidates who pass through the interview process and are applying for a position that requires screening without discriminating.

Hiring managers/HR are required to inform candidates that a clean background check does not guarantee their employment with the Company, unless they've already received a verbal, or written offer.

Actions Taken for Negative Findings

Criminal records do not automatically disqualify a candidate from the hiring process, unless they are convicted of serious criminal acts (e.g. sexual assault.) The substance of records will be assessed in accordance with the following 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.

HR and hiring managers are only permitted to 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.

As general practice, should the hiring managers and HR determine that a particular candidate would bring high or unreasonable risk to the 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 proceed with hiring.

Procedure

AIMCOR Group, LLC provides a transparent hiring process that respects the rights of all candidates. Hiring managers and HR staff are advised 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 position posting that a background check is required prior to being hired for employment.
3. When the final candidate(s) are selected, the hiring manager, or HR contact the candidate to explain all screenings required and obtain all required Authorization forms necessary for the individual to acknowledge written consent to undergo background screening prior to conducting any background check.
4. If a candidate refuses to undergo required background screening, HR will inform the candidate that they are no longer eligible for hiring consideration. If candidates provide written permission, background-check providers can initiate the review.
5. Once HR receives background check results, findings should be discussed with hiring managers (to the extent permitted by law) and decision as to next steps for the candidates and the position should be rendered.
6. Hiring managers or HR should inform candidate of these decisions and ensure the candidate is provided the necessary information to obtain 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.

Disclaimer: This policy is meant to provide general guidelines and should be used as a reference. It may not take into account all relevant local, state or federal laws and is not a legal document. AIMCOR Group, LLC will not assume any legal liability that may arise from the mis-use of this policy by an unauthorized individual.

Required Provisions for Company to Obtain Consumer Report

In compliance with the Fair Credit Reporting Act (FCRA) as amended by the Consumer Credit Reporting Act of 1996, we hereby certify to [Name of Consumer Reporting Agency] that we will comply with the following provisions.

AIMCOR Group, LLC will prior to obtaining or causing a “consumer report” and/or an “investigative consumer report” to be obtained for employment purposes:

- Provide to the individual who is the subject of any report a clear and conspicuous written disclosure, in a document consisting solely of the disclosure, The disclosure will explain that a consumer report and/or investigative consumer report may be obtained for employment purposes, and will be presented to him/her before the report is procured or caused to be procured. The disclosure will satisfy all requirements identified in the Act.
- Obtain written authorization for the report from the individual who is the subject of the report

Should the individual make a written request within a reasonable amount of time, we will provide:

- Information about whether an investigative consumer report has been requested.

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- If an investigative consumer report has been requested, written disclosure of the nature and scope of the investigation requested.
- The name and address of the outside agency to whom requests for any of these reports have been made.

Note: The above information will be provided no later than five days after the date on which the request for such disclosure was received from the individual or such report was first requested, whichever is later.

Should the individual be denied employment, or other adverse action taken, in whole or in part on the basis of the report, AIMCOR Group, LLC will provide to him/her:

- A copy of the report.
- A description, in writing, of the rights of the consumer entitled: "A Summary of Your Rights Under the FCRA."

The information from the report will not be used in violation of any applicable federal or state equal employment opportunity law or regulation.

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SPECIMEN FORMS / AGREEMENTS

For Reference Purposes Only

Sample Employment Verification

[Date]

[Name and Title of Former Employer's Representative]

[Company]

[Address]

Re: Employment Verification for [Name of Candidate]

(Please provide the following information to the best of your knowledge.)

Name and location of your company: _____

Candidate's final job title at your company: _____

Dates candidate was employed by your company: _____

Reason for leaving: _____

Starting salary: _____ . _____ Ending salary: _____ . _____

Eligible for rehire? ☐ Yes ☐ No If no, why not: _____

Please place a check mark under the appropriate rating for each item below.

	Exceeded Job Requirements	Met Job Requirements	Did Not Meet Job Requirements
Quality of work	☐	☐	☐
Attendance	☐	☐	☐
Cooperation/attitude	☐	☐	☐

Additional comments:

Manager's Signature

Date

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Credit Report Request Pursuant to FCRA

All candidates for employment: Please read carefully before signing below.

As part of its employment application process, AIMCOR Group, LLC may obtain or have prepared a consumer/investigative consumer report concerning my prior employment, military record, education, credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, criminal background, or mode of living.

I understand that upon written request to AIMCOR Group, LLC, I will be informed whether an investigative consumer report was requested, and given full information as to the nature and scope of such investigation. I understand that an investigative consumer report is a report in which information regarding my character, general reputation, personal characteristics, or mode of living, is obtained through personal interviews with neighbors, friends, or associates with whom I am acquainted.

By signing below, I authorize AIMCOR Group, LLC to obtain a consumer/investigative consumer report on me as part of its pre-employment background investigation process. If I am offered employment by AIMCOR Group, LLC, I further authorize AIMCOR Group, LLC to obtain additional consumer/investigative consumer reports on me for employment purposes at any time during my employment.

By signing below, I also acknowledge that AIMCOR Group, LLC has provided me with a summary of my rights under the federal Fair Credit Reporting Act.

Name of Candidate (please print)

Signature of Candidate

Date

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For Reference Purposes Only

Sample Request for Verification of a Candidate's Prior Employment

[Date]

[Name and Title of Former Employer's Representative]

[Company]

[Address]

Re: Employment Verification for [Name of Candidate]

Dear [Name of Former Employer's Representative]:

[Company]

[Name of Candidate] has applied for employment with AIMCOR Group, LLC. Would you kindly provide us with a statement regarding your experience with this applicant during the applicant's term of employment with your company? Please complete the information requested below, and [fax it back to _____] [return it in the enclosed self-addressed stamped envelope] at your earliest convenience. Feel free to call me as well at [_____].

Of course, your reply will be held in the strictest confidence. Thank you in advance for your assistance.

Sincerely,

[Name] , [Title]

AIMCOR Group, LLC

Reference Release

I hereby authorize [Former Employer] to provide AIMCOR Group, LLC with the information requested in the attached Employment Verification Form. I hereby expressly release [Former Employer] from any and all claims which may be related to or arise from the disclosure of the reference information provided by [Former Employer] pursuant to this authorization, including, but not limited to, claims for defamation, interference with contract, and negligence.

Candidate's Signature

Date

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For Reference Purposes Only

Sample Requesting Verification of a Candidate's Prior Employment

[Date]

[Name of Candidate]

[Applicant Address]

Dear [Name of Candidate],

Recently, you authorized AIMCOR Group, LLC to obtain a consumer/investigative report about you from a consumer-reporting agency. In compliance with the Fair Credit Reporting Act, we want to advise you that we have now received the completed report and it does contain negative information, which our company must evaluate before making any decisions regarding your employment.

Enclosed you will find:

1. A copy of the report we obtained, and
2. A summary of your rights under the Fair Credit Reporting Act.

We will advise you in the event of any adverse decisions regarding your application based upon this negative report.

Sincerely

[Name]

[Title]

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For Reference Purposes Only

Sample Letter of Adverse Action

[Date]

[Name of Candidate]

[Applicant Address]

Dear [Name of Candidate],

Thank you for taking the time to interview with [Company]. We regret to inform you that after carefully considering your qualifications and background, we are unable to extend an offer of employment.

Our decision was influenced, in part, by information contained in a consumer/investigative consumer report prepared at our request by [Name, Address, and Phone Number of the Consumer Reporting Agency that Furnished Report], a copy of which we have provided to you previously.

Please note that [Name of Consumer Reporting Agency] did not participate in our decision not to hire you and thus, cannot provide you with any specific reasons why this adverse action was taken.

Under the law, you have the right to obtain a free copy of the report from the above-named consumer reporting agency. You have 60 days to contact the agency to request a copy. You also have the right to dispute the accuracy and completeness of any information contained within the report with the consumer reporting agency.

Thank you again for your interest in [Company]. We wish you the best of luck in your job search.

Sincerely

[Name]

[Title]



Employee Privacy Policy

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Sample Employee Privacy Policy

In this age of the Internet where privacy has become an increasing concern, we take your privacy very seriously. The privacy and security of your personal data (the "Personal Information") which we collect from you is important to us. It is equally important that you understand how we handle this data.

By accepting employment with AIMCOR Group, LLC, you expressly acknowledge that you have read, understand and agree to all of the terms of this Privacy Policy as outlined below and as it may be modified by us from time to time with or without prior notice.

Collection of Information

In the course of conducting our business and complying with federal, state, and local government regulations governing such matters as employment, tax, insurance, etc., we must collect Personal Information from you. The nature of the Information collected varies somewhat for each employee, depending on your employment responsibilities, your citizenship, the location of the facility where you work, and other factors. We collect Personal Information from you solely for business purposes, including those related directly to your employment with the Company, and those required by governmental agencies.

Data collected may include, without limitation, such things as:

Your name	Date of birth
User ID(s)	Gender, race, and ethnicity
Phone numbers	Health and disability data
Email address (es)	Banking and other financial data
Mailing addresses	Trade union data
Government identification numbers, e.g., Social Security number, driver's license number	Personal and health -related data for you and your family
Family-related data, e.g., marital status	

Anyone who sends unsolicited to the Company by any means, e.g., mail, email, fax, expressly consents to the storage, destruction, processing, or disclosure of the data, as well as any other reasonable business-related use by the Company or any government agency of the unsolicited data.

We do monitor employee use of the Internet in order to detect access to inappropriate websites or other misuse of the Company's computer network. We also use email filters to block spam and computer viruses. These filters may from time to time block legitimate email messages.

The Company will not knowingly collect or use Personal Data in any manner not consistent with this Policy, as it may be amended from time to time, and applicable laws.

Because the Personal Information collected by the Company is necessary for business purposes, you are required to provide it. Your refusal or failure to provide the requested Personal Information may, therefore, disqualify you from employment with AIMCOR Group, LLC or from receipt or enjoyment of certain Company benefits.

Use of the Information We Collect

The primary purposes for collection, storage and/or use of your Personal Information include, but are not limited to:

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- **Human Resources Management.** We collect, store, analyze, and share (internally) Personal Information in order to attract, retain and motivate a highly qualified workforce. This includes recruiting, compensation planning, succession planning, reorganization needs, performance assessment, training, employee benefit administration, compliance with applicable legal requirements, and communication with employees and/or their representatives.
- **Business Processes and Management.** Personal Information is used to run our business operations including, for example, scheduling work assignments, managing company assets, reporting and/releasing public data (e.g., Annual Reports, etc.); and populating employee directories. Information may also be used to comply with government regulation.
- **Safety and Security Management.** We use such Information as appropriate to ensure the safety and protection of employees, assets, resources, and communities.
- **Communication and Identification.** We use your Personal Information to identify you and to communicate with you.

Disclosure of Data

The Company acts to protect your Personal Information and ensure that unauthorized individuals do not have access to your Information by using security measures to protect Personal Information. We will not knowingly disclose, sell or otherwise distribute your Personal Information to any third party without your knowledge and, where appropriate, your express written permission, except under the following circumstances.

- **Legal requests and investigations.** We may disclose your Personal Information when such disclosure is reasonably necessary (i) to prevent fraud; (ii) to comply with any applicable statute, law, rule or regulation; or (iii) to comply with a court order.
- **Third-party vendors and service providers.** We may, from time to time, outsource services, functions, or operations of our business to third -party service providers. When engaging in such outsourcing, it may be necessary for us to disclose your Personal Information to those service providers, e.g., a payroll service, a benefits provider. In some cases, the service providers may collect Personal Information directly from you on our behalf. We will work with any such providers to restrict how the providers may access, use and disclose your Information.
- **Business Transfers:** During the term of your employment, we may buy other companies, create new subsidiaries or business units or sell part or all of the Company or its assets. It is likely that some or all of your Personal Information will be transferred to another company as part of any such the transaction. However, your Personal Information will remain subject to protection outlined in the then current Privacy Policy.
- **Protection of Company and Other.** We may release Personal Information when we believe release is necessary to comply with the law; enforce or apply our policies and other agreements; or protect the rights, property, or safety of Company, our employees, or others. This disclosure will never, however, include selling, renting, sharing or otherwise disclosing your Personal Information for commercial purposes in violation of the commitments set forth in this Privacy Policy.

Security of Your Personal Information

We employ reasonable security measures and technologies, such as password protection, encryption, physical locks, etc., to protect the confidentiality of your Personal Information. Only authorized employees have access to Personal Information. If you are an employee with such authorization, it is

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imperative that you take the appropriate safeguards to protect such Information. Paper and other hard copy containing Personal Information (or any other confidential information) should be secured in a locked location when not in use. Computers and other access points should be secured when not in use by logging out or locking. Passwords and user ID's, should be guarded and not shared. When no longer necessary for business purposes, paper and hard copies should be immediately destroyed using paper shredders or similar devices. Do not leave copies in unsecured locations waiting to be shredded or otherwise destroyed. Do not make or distribute unauthorized copies of documents or other tangible medium containing personal data. Electronic files containing Personal Information should only be stored on secure computers and not copied or otherwise shared with unauthorized individuals within or outside of Company.

The Company will make reasonable efforts to secure Personal Information stored or transmitted electronically secure from hackers or other persons who are not authorized to access such Information.

Compliance with this Privacy Policy is important to the Company. Any violation or potential violation of this Policy should be reported to the Director of Human Resources. The failure by any employee to follow these privacy policies may result in discipline up to and including discharge of the employee. Any questions or suggestions regarding this policy may also be directed to the Director of Human Resources.

Updating and Accessing Your Personal Data

You must promptly inform us when changes occur in the Personal Information you have provided so that we can maintain accurate Information about you. Although you may update or change your Information, we may maintain such Personal Information previously submitted in historical archives.