

Background Check Guidelines

January 2024

1. Definitions

a. “Contract Document” means, collectively, the relevant contract, agreement, statement of work, task order and/or purchase order governing the provision of the Services by Supplier to Veolia.

b. “Services” means any goods, products, software and deliverables supplied under the Contract Document.

c. “Veolia” means Veolia Water Technologies and Solutions or its affiliate that is contracting with Supplier in the Contract Document.

d. “Supplier” means the entity supplying Services to Veolia in the Contract Document.

e. “Supplier Personnel” means those employed or hired by Supplier to provide Services to Veolia as set forth in the Contract Document.

2. Applicable Law

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:

- Consolidated List of Financial Sanctions Targets (formerly the Bank of England Consolidated List)
- Bureau of Industry and Security Lists
- Consolidated List – Australia
- Consolidated List – Canada
- DTC Debarred List
- EU Consolidated List
- FBI Most Wanted Terrorists
- FBI Seeking Information
- FBI Top Ten Most Wanted
- FBI Most Wanted
- Hong Kong Monetary Authority List
- Interpol Most Wanted
- Ministry of Export, Trade, and Investment (METI) – Japan
- Monetary Authority of Singapore List

Background Check Guidelines

January 2024

- OFAC Sanctions Programs
- OFAC list of Specially Designated Nationals and Blocked Persons
- Primary Money Laundering Concern List (US Department of the Treasury List of Financial Institutions Specially Designated as Being of Primary Money Laundering Concern)
- State Department Proliferation List
- Terrorist Exclusion List
- United Nations Consolidated List

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 Veolia 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.

Supplier may not exclude a candidate solely on the basis of a prior criminal conviction unless the conviction relates to a matter that directly relates to the Supplier Personnel's suitability for assignment to the position for which he or she is intended and only after consideration of additional factors. These additional following factors 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.

Please contact your Veolia Procurement leader if you have any questions.

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Background Check Guidelines

January 2024

3. Veolia, in its sole discretion, may determine certain Services the Supplier Personnel will be performing to be security sensitive in nature, in which case Veolia 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 Veolia premises or having network access to Veolia's networks. Additionally, Veolia 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.
4. Supplier shall maintain, as records, all of the foregoing screenings/verifications for the duration of the Term, and for three (3) years thereafter.
5. If any screened/verified Supplier Personnel providing the Services to Veolia or any Veolia 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 Veolia, or any Veolia Affiliate, a new screening/verification must be ordered.
6. At Supplier's request, and with Veolia's approval, Veolia shall provide the names of its background checking suppliers to Supplier to utilize to conduct the foregoing background checks.
7. Supplier agrees to cooperate with Veolia, in good faith, to establish and implement any background verification process that Veolia may propose to verify that any or all of the foregoing background checks have been satisfied.