

## Background Check Policy

All offers of employment as well as contract agreements with contract consultants at Socrates AI are contingent upon clear results of a thorough background check. Background checks will be conducted on all final candidates, employees changing positions or as deemed necessary and may vary based on the type of role, scope, and customer account being supported.

As a minimum, background checks will include:

- **Social Security Verification:** validates the applicant's Social Security number, date of birth and former addresses.
- **Prior Employment Verification:** confirms applicant's employment with the listed companies, including dates of employment, position held and additional information available pertaining to performance rating, reason for departure and eligibility for rehire. This verification will be run on the past two employers or the previous five years, whichever comes first.
- **Personal and Professional References:** calls will be placed to individuals listed as references by the applicant.
- **Educational Verification:** confirms the applicant's claimed educational institution, including the years attended and the degree/diploma received.
- **Criminal History:** includes review of misdemeanor or felony criminal convictions and probation. The following factors will be considered for applicants with a criminal history:
  - The nature of the crime and its relationship to the position.
  - The time since the conviction.
  - The number (if more than one) of convictions.
  - Whether hiring, transferring or promoting the applicant would pose an unreasonable risk to the business, its employees or its customers and vendors.

The following additional background searches will be required if applicable to the position:

- **Credit History:** confirms candidate's credit history. This search will be run for positions that involve management of Socrates AI's funds and/or handling of cash or credit cards.
- **10-Panel Drug and Substance test:** where applicable, the candidate will complete a confidential drug screen at a certified testing facility arranged by Human Resources.

## Procedure

Human Resources will order the background check upon the selection of the finalist candidate and their acceptance of Socrates' conditional job (or promotional) offer.

The HR representative will provide the third-party screening company with the name and email address for the applicant. The employment screening company shall obtain the signed release form and will conduct the checks. A designated HR representative will review all results.

The HR representative will notify the hiring manager regarding the results of the check. In instances where negative or incomplete information is obtained, the appropriate management and Chief Human Resources Officer or Senior HR Advisor will assess the potential risks and liabilities related to the job's requirements and determine whether the individual should be hired. If a decision not to hire or promote a candidate is made based on the results of a background check, there may be certain additional Fair Credit Reporting Act (FCRA) requirements that will be handled by Human Resources in conjunction with the employment screening service (if applicable).

Background check information will be maintained in a file separate from employees' personnel files for a minimum of five years.

Socrates AI reserves the right to modify this policy at any time without notice.