



Global Background Screening
Components & Thresholds Trade
Vendor/Contractor/Consultant
United States

Revision Record

Revision No.	Date	Description of Change	Authored by	Approved By
0	4/21/2011	Initial Issue		Steve Greenbacker
1	5/25/2016			Steve Greenbacker
2	7/18/2017	Updated template/format	Marissa Wargo	Steve Greenbacker
3	2/6/2018	Updated last drug screen from 6 months to "within state law". Added annual motor vehicle checks to those driving a company vehicle.	Marissa Wargo	Craig Mansfield

Critical Trade Vendor, Contractor and Consultant Policy Statement:

Alexion Pharmaceuticals, Inc., reserves the right to require background investigations to determine suitability and trustworthiness of trade vendors, contractors and consultants requesting or requiring unsupervised and/or unattended access to Alexion assets, facilities, intellectual property, protected data, trade secrets and personnel.

Escorted visitors not accessing Alexion intellectual property, trade secrets, protected data or any other high value assets (virtual or physical) are excluded from the background investigation requirements.

Suitability and trustworthiness will be assessed through industry standard scoring of a combination of criteria, including (depending upon access level); name and social security number verification, Federal Debarment history, criminal conviction history, employment and education verification, Patriot Act compliance, reference checks, drug screening and professional license verification in accordance with applicable local, state, federal and country regulations and laws, and any other regional norms.

Alexion will work with one or more independent third party background investigation firms (preferred background investigation firms) that will be provided with Alexion background investigation criteria and thresholds for granting access. The names and contact information for these firms will be made available to prospective applicants for access.

Alexion Pharmaceuticals, Inc., will not collect, possess, or maintain any personal data pertaining to any prospective or actual trade vendor, contractor or consultant, and will only be provided with an CLEAR or NOT CLEAR status from our preferred background investigation firms based upon established criteria and thresholds. The Alexion contracting manager may require the contracting firm to bear the cost of completing required background investigations as a cost of doing business, or may reimburse the contracting firm for costs.

Critical Trade Vendors, Contractors and Consultants defined:

Any trade vendor, contractor, or consultant requesting or requiring unsupervised and/or unattended access to Alexion assets, facilities, confidential, sensitive or protected data, trade secrets and/or associates is subject to these Guidelines.

REQUEST FOR PROPOSAL (RFP) BACKGROUND INVESTIGATION LANGUAGE

Company Requests for Proposals who seek trade vendor, contractor or consultant services must include the following language with regard to background checks:

Given the nature of Alexion's business, and the level of access that vendor's personnel would have to Alexion's facilities while performing Services, vendor must complete a background check with regard to each person who may be assigned to perform Services at any Alexion facility. The background check must comply with the federal Fair Credit Reporting Act and all other applicable legal requirements, and must include name and social security number verification, employment verification, criminal conviction history and Patriot Act compliance.

Vendor agrees that it will not permit or recommend any individual to perform Services at any Alexion facility who does not successfully complete the background check.

ACCESS LEVELS

Level I Any trade vendor, contractor, or consultant requesting or requiring **escorted** access to Alexion facilities and associates with **no** access to confidential intellectual property, protected data, and trade secrets does not require a background investigation. This population should be processed for facility entry as a visitor.

Level II Any trade vendor, contractor, or consultant requesting or requiring **unescorted** access to Alexion facilities and associates with or without access to confidential, sensitive, or protected data, and trade secrets must successfully complete a background investigation.

Background investigations must include the following, subject to applicable law: name and social security number verification, local and federal criminal conviction history, Patriot Act compliance verification and employment verification. Where an individual's responsibilities will include operating a motor vehicle for Alexion business purposes, the background investigation must also include the individual's motor vehicle record and 10 panel drug screen. For anyone operating a company vehicle, motor vehicle record checks must be conducted annually.

Background investigations can be performed by 1) an Alexion preferred background investigation firm, or 2) the background investigation firm retained by the contracting company, which must confirm that it has

completed the background check according to Alexion criteria and applicable law through an affirmation on the contracting company's letterhead stating that the individual is "clear" or "not clear." Alexion must not see any personal data.

Acceptance of a prior background investigation performed by the contracting company must have been completed within the last 6 months or as applicable by state law for drug screening and 12 months for all other verifications.

The following methods may be used to verify employment history when the conditions describe below exist:

- For employers no longer in business - If a candidate's previous employer is no longer in business, the candidate should provide a name and daytime phone number of a professional reference who can verify their period of employment. If the candidate does not have a professional reference for this period of employment, he or she must provide one of the following documents prior to assignment with Alexion: 1) W-2 form if employed for at least a full calendar year; 2) One pay stub for each twelve-month period of employment; if employment was for a period less than twelve months, a pay stub reflecting the paycheck issue date and year-to-date earnings is acceptable; 3) Letter of reference and/or verification, including the dates of employment on company letterhead.
- For candidates who were self-employed – within the last seven years, one of the following documents must be provided prior to assignment with Alexion to demonstrate self-employment: 1) A copy of a business license and/or registration; or 2) 1040 & 1099 tax forms.
- For candidates who served in the military: a copy of their DD214 Long Form which indicates the candidate's character of service and type of discharge prior to assignment with Alexion.

Depending upon the nature and criticality of access requested or required, Alexion reserves the right to require additional background screening checks, subject to applicable law.

THRESHOLDS FOR CONTRACTOR OR CONSULTANT ACCESS

The following describes the general reasons that an individual would be disqualified from receiving on-site or remote access to Alexion assets, facilities, intellectual property, protected data, trade secrets, and people, based upon a background check. Background checks must be conducted by either an Alexion preferred background investigation firm

provider, or the background investigation firm of the contracting company, and must be performed consistent with applicable federal, state and local law. No information will be used to disqualify a candidate where such disqualification would violate any applicable law.

General Disqualifications

Any falsification, omission or misleading information provided to Alexion or to a contracting company either on the “Alexion Work & Education History Information Sheet” or resume/CV.

- Any criminal convictions for assault, battery, robbery, murder, manslaughter, rape, sexual assault, stalking, unlawful use of weapons, kidnapping, false imprisonment, motor vehicle hit and run, burglary, arson, malicious destruction of property or animal cruelty.
- Any other criminal convictions for violent acts against a person(s) regardless of the level of offense (i.e. felony or misdemeanor).
- Any felony conviction involving the sale or distribution of illegal or controlled substances.
- Any felony conviction for theft, larceny, fraud, forgery or computer crimes.
- Any convictions for providing false information to a police/peace officer or violations of probation/parole/orders of protection.
- Any outstanding warrants for arrest.
- (If the position requires driving) Convictions for driving under the influence, driving while intoxicated, and reckless driving of any vehicle.

ALEXION PREFERRED INDEPENDENT THIRD PARTY BACKGROUND INVESTIGATION FIRMS



Baker St. AssociatesSM

Investigative & Security Consultants

Telephone: 203-775-1200 Facsimile: 203-775-0420

Email: bsaclient@bakerstassoc.com

Baker St. Associates

PO Box 5091
Brookfield, CT 06804
Telephone: 203-775-1200 Fax: 203-775-0420

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Printed: 03/22/11

Background Investigation Report

Completed: 03/22/11

Prepared For: CenterPoint Security Associates

Requested By: Michael Hugyo

Attention: Michael Hugyo

Prepared By: TINA

Subject: SMITH, KENNETH

SS #: XXX-XX-5555

Address: NEW LONDON, CT 06378

RESULTS

The subject of this report is **CLEAR** in the following categories based on the background check requirements established by Alexion.

Criminal Record Search

Drug Test

Employment Verification

Education Verification

Federal Debarment

Patriot Act

SS# Trace

End Of Report