



Pre-placement Screening Policy

Policy effective date: 08/03/2002

If you have questions, please contact [HR Connections](#) at 1-877-81-ASK HR (877-812-7547) or 918-661-5381.

POLICY

All written offers of employment with ConocoPhillips (the “Company”) in the U. S. will be contingent upon the satisfactory completion of a pre-placement screening of the candidate's application, resume and other biographical data provided by the applicant. Routinely, this check will include: a Social Security Number trace; a criminal record check for felony convictions, misdemeanor convictions negotiated from a felony charge or any misdemeanor conviction for theft, violence, fraud or moral turpitude; verification of education; verification of prior employment for the past seven years; and a check against various restricted parties lists administered by both the U.S. and non - U.S. countries. A motor vehicle record and credit history will be checked only if pertinent to the position for which the applicant is being considered.

PROCESS

Human Resources will accept and process applications for employment. Once the decision is made to proceed with the applicant's employment, an offer (contingent upon the successful completion of the background investigation) will be made. In compliance with the Fair Credit Reporting Act (FCRA), candidates for employment will be advised that a consumer report and/or an investigative consumer report may be obtained to assist in the evaluation of his/her employment application and/or for "employment purposes" at any time during applicant's continued employment. The candidate will also be required to sign a waiver to such use.

The IR/ER CoE and LSC will oversee and coordinate pre-placement screenings of the following: Social Security Number trace; criminal records; previous employment; education; credit reports and motor vehicle reports, as required. The LSC will provide the Human Resources contact with the reports of the pre-employment screenings; however, all records will be maintained by the LSC and will not be placed in the employee's personnel file.

Employment Verification This provides verification of past and present employment for at least the last seven years that includes job title and dates of service. The applicant's date of birth and Social Security Number will be compared to the employers' records, and any discrepancies will be noted on the report.

Criminal History – Past 7 Years All felony convictions, all misdemeanor convictions that resulted from a felony arrest and any misdemeanor conviction for theft, violence, fraud or moral turpitude will also be reported to Human Resources. To conduct a complete pre-placement screening, the court located in the county seat of every county of residence or employment for the past seven years must be checked since the records are maintained on a county-by-county basis. Some states permit a statewide search of criminal records.

credit History A detailed credit history will include accounts, payment history, liabilities and public record information such as judgments, liens and collections. The report will also include current and former addresses, employers and names reported by financial institutions to the credit bureau. Credit history may be obtained on any candidate being considered for a position with money-handling responsibilities and other positions regarded as sensitive.

Social Security Number Trace This checks the applicant's Social Security Number and verifies residences.

Educational Verification This will include verification of graduation, dates of attendance and diploma /equivalent or degree awarded of the highest level of education required. Grade point average is included when required. The applicant's date of birth and Social Security Number are compared to the institutions' records and discrepancies are noted on the report. NOTE: Education checks are not required for interns and college recruits, as transcripts are required.

Motor Vehicle Records This provides the applicant's driving history for the requested state(s). The report will also include the current status of the license, dates and description of violations as well as suspensions or revocations.

Company Compliance All employment-related investigations must be conducted in compliance with Title 15 USC sections 601 through 625, the Fair Credit Reporting Act (FCRA) and applicable state law. To the extent applicable state law provides for stricter requirements, pre-placement investigations will be conducted in accordance with the stricter state law. Non compliance could subject the company to civil penalties. Sections 604, 606 and 615 outline the Company's responsibilities when using consumer reports for employment purposes. The FCRA was amended by Public Law 104-208 on September 30, 1996 and became effective September 30, 1997. The FCRA was designed to protect the privacy of information maintained by consumer reporting agencies (CRA) and to insure that the information maintained is accurate. The amendments increased the responsibilities of employers because inaccurate or incomplete information could be used to adversely affect applicants and employees.

Consumer Reporting Obligations The law requires that applicants and employees are notified consumer reports may be used for employment purposes and that they agree to the use of this information. The act also requires that the applicant or employee be notified, in writing, before any adverse action is taken in a "pre-adverse action disclosure" notice. The applicant must also be given a copy of the consumer report and a copy of "A Summary of Your Rights Under the Fair Credit Reporting Act".

The state of California, under the California Investigative Consumer Reporting Agencies Act, requires that consumer investigative reporting information be made available to any applicant or employee having a permanent California residence. The Human Resources contact should send out to the applicant or employee a "Disclosure and Notice – California Investigative Consumer Reporting Agencies Act" and a copy of the "California Civil Code 1786.22" which outlines the rights of individuals to access the information.

Once an adverse action is taken, the individual must receive an "Adverse Action Notice". It must include the name, address and phone number of the CRA and a statement that the CRA provided the report did not make the decision and cannot give specific reasons for it. The notice must also advise the individual the right to dispute the accuracy or completeness of any information the agency furnished, and of his right to an additional free consumer report from the agency within 60 days.

Pre-Screening Requests All requests for pre-placement screenings will originate from a site-authorized

requestor or Human Resources contact. The request must include: the applicant's full name (John Robert Smith, Jr.) and any other name the applicant has used; date of birth; Social Security Number; all employers for the last seven years to include name, address, position, supervisor, phone number and dates employed. The request must also include all residences for the past seven years, including dates. All periods of time must be accounted for and gaps in employment or residences explained. Information submitted on the candidate for employment should also include any known convictions (as defined on the application) within the past seven years. The initial request for a pre-placement screening from Human Resources must have a statement that the applicant has been advised that a consumer report and/or an investigative consumer report may be obtained to assist in the evaluation of his/her employment application and/or for "employment purposes" at any time during applicant's continued employment and has signed a waiver to such use.

The Company establishes plans, policies and programs appropriate to the business needs and requirements of its various operations and organization. The Plans, policies or programs shown here are provided as guidelines to employees. Different plans, policies or programs than those shown here may apply to subsidiary company employees, retail store employees or other employees based on business needs, local customs, contractual agreement, or legal requirements. Company plans, policies and programs are continually under review, and are subject to revision at any time without future notice, at the sole discretion of the Company. Generally, notification of changes will be made to employees prior to the effective date of the change. EMPLOYEES SHOULD CONFIRM THAT THE PLANS, POLICIES AND PROGRAMS ACCESSED HERE APPLY TO THEM AND/OR THEIR ORGANIZATION BEFORE TAKING ANY ACTIONS. Contact the Leveraged Service Center or your local HR Business Partner if you have questions.

Absent a specific written contract to the contrary, employment with ConocoPhillips, its subsidiaries and affiliates may be terminated with or without cause at any time by the employee or the Company. Nothing contained in these plans, policies or programs shall constitute a part of any employment contract or create a required procedure, practice or policy that must or should be followed in the investigation, evaluation, or disposition of any personnel matter.