

I) PURPOSE

COMPANY will conduct background checks on every new hire Team Member as part of the employment application process. New hire eligibility will be based upon the results of the background investigations, company policy, state regulations and state laws.

II) POLICY

1. Background Investigation

A standard background investigation of potential new hires will be completed prior to any applicant commencing employment. Each property's Human Resources Department will be responsible for coordinating the background check process with an approved investigative consumer reporting agency. All offers of employment are contingent upon successful completion of a background check, and all offer letters will so state.

Applicants requiring HR investigation are as follows:

- All positions, with the exception of those requiring completion of a Personal Disclosure Form pursuant to the requirements of the COMPANY, Compliance Program or Compliance Policy.

2. Automatic Disqualification for Employment

In accordance with specific rules and regulations of COMPANY, employment will be denied to any potential new hire based on any of the following items discovered during the investigative process:

- Alias was used in connection with fraud.
- An applicant has had a conviction, including a conviction involving the entry of a deferred judgment and adjudications of delinquency, of a felony.
- Applicant has any conviction of a serious or aggravated misdemeanor, including a conviction involving the entry of a deferred judgment and adjudications of delinquency, or the equivalent.
- Applicant owned, operated or had an interest in any illegal enterprise, or is or has been connected with or associated with any illegal enterprise, within the past seven years.
- Applicant makes any material false statement or omission on any Human Resources application form or work permit application.
- The items listed here are not all-inclusive. Please contact Corporate Legal and/or Corporate Compliance with any questionable scenarios.
- Exceptions to the foregoing automatic disqualification criteria may be made in extraordinary circumstances with the approval of the Corporate General Counsel or the Corporate Vice President of Compliance or their designees.

3. Discretionary Disqualification for Employment

Employment may be denied to any potential new hire based on any of the following items discovered during the investigative process:

- Applicant has multiple convictions of simple misdemeanors or alcohol-related offenses, including those involving the entry of a deferred judgment and adjudications of delinquency. How long ago the convictions occurred, the number and the nature of the convictions will be considered.

- Employment may be denied or delayed until the outcome of any pending charge, which might potentially disqualify the applicant, is known.
- Employment may be denied or delayed until outstanding overdue court-ordered obligations are satisfied. These include, but are not limited to, criminal or civil fines, state or federal taxes or conditions imposed by a court that the applicant has failed to meet in a timely manner.
- The property HRD, in conjunction with the Corporate Legal and/or Corporate Compliance Department, will make the determination with regard to the foregoing discretionary items.