

Lorenz Financial Services, LLC

Background Check Policy

September 19, 2016

The company may conduct credit report and criminal background checks as part of the application or employee promotion process. This search may include appropriate court records relating to the applicant's or employee's county of residence for evidence of felony and/or misdemeanor convictions. State and federal searches may also be conducted. Credit reports with FICO scores will be requested. Other requested searches may include history of foreclosures, bankruptcies, sex offences and requests from the Office of Foreign Assets Control, US Department of Treasury.

The following practices and procedures will generally be followed.

I. Background checks will be conducted on job applicants. Checks can also be conducted on current employees at any time as part of a promotion or other review.

II. All record checks will be conducted in accordance with applicable law. Applicants or employees will be notified if some or all record checks will be conducted and will be asked to complete the appropriate disclosure forms and submit digital fingerprints.

III. All record checks will be made at the company's expense. Based on the type of work involved, the company reserves the right to use discretion as to which background checks will be requested.

IV. Based upon the results of the reports and background checks, a company officer will determine the applicant or employee's suitability for the applied-for position or promotion. Unless otherwise provided by law, factors beyond the above reports that will be considered in determining suitability may include, but not be limited to the following:

- a) Relevance of the crime to the position sought;
- b) The nature of the work to be performed;
- c) Time since the conviction;
- d) Age of the candidate at the time of the offense;

- e) Seriousness and specific circumstances of the offense;
- f) The number of offenses;
- g) Whether the applicant has pending charges or is on bail, parole, work release or house arrest;
- h) Any relevant evidence of rehabilitation or lack thereof;
- i) Any other relevant information, including information submitted by the candidate or requested by the hiring authority

V. The Company will provide the applicant or employee with an opportunity to dispute the accuracy and relevance of any of the requested reports.

VI. Once a company officer has made a decision, the applicant or employee will be notified immediately. If the applicant is not to be hired or an employee dismissed or demoted, the applicant or employee will be provided with a copy of the credit report, criminal record or other reports and the company's Background Check Policy.