

Policy – Pre-employment Background Investigation

ICM Ventures, Inc. ("ICM") conducts a background screening on all candidates to whom it offers employment. The background screening is used to confirm information relevant to an applicant's employment, including statements (and possible omissions) from the employment application and other employment forms. The screening may include a search of court records for criminal convictions; verification of an applicant's social security number, previous employment, education and licensure (if applicable); a review of driving and credit history records; and potentially other types of information. ICM reserves the right to rescind a job offer to an applicant who, either orally or in writing, makes any false or misleading statements or material omissions in the course of the application process. ICM may use an outside agency to undertake these screenings and to verify employment-related information. The Federal Fair Credit Reporting Act (FCRA) gives job applicants certain rights when outside agencies are used. When ICM uses an outside agency for this purpose, it will comply with the FCRA.

Procedure:

1. All applicants, at the time they complete their application, will be given a copy of ICM Ventures, Inc.'s policy concerning pre-employment background investigations.
2. Pre-employment background screening will only be conducted for employees to whom ICM extends a conditional offer of employment.
3. All applicants will be processed by the Human Resources Department in Colwich, KS.
4. All conditional offers of employment made by ICM Ventures, Inc. are contingent upon ICM's determination that the applicant's background investigation is satisfactory.

Nothing in this policy is intended to create a contract of employment. The employment status of all ICM employees is at will.