



Background Checks and Drug Screening Policy for Third-Party Contractors

1. Purpose: This policy outlines the procedures and requirements for the Contractors (as defined below) of Cox Enterprises and its affiliates (“Cox”) to conduct background checks and drug screenings prior to providing services to Cox. The purpose is to ensure the continued safety, security, and integrity of Cox’s workplace, employees, clients, and assets.

2. Scope: This policy applies to all third-party Contractors who are engaged in providing services to Cox in the United States. Henceforth, “Contractor” shall mean the contractor, supplier, consultant, temporary worker, service provider, or any other vendor under contract or otherwise providing services to Cox. Contractor’s employees, contractors, subcontractors, agents and/or representatives are “Contractor’s Personnel”.

3. Screening Options and Attestation:

- As set forth in the agreement between Cox and the Contractor, Contractor Personnel who provide services for Cox may be required to submit to a background and drug screen prior to providing services.
- Effective 12/31/2024, dependent upon the nature and scope of the roles performed (Exhibit A 1.1 & 1.2) Contractors may attest that they have conducted their own background checks and drug screenings in compliance with Cox’s stated screening criteria in place of Cox’s pre-employment screening provider.
- For roles where Contractor is required to use Cox’s screening provider and/or where Contractor wishes to leverage Cox’s preferred vendor for both background and drug screening prior to performing services for Cox, the current screening process and results reporting process will remain unchanged.
- By signing an agreement with Cox or performing any services for Cox, the Contractor represents and warrants that all Contractor Personnel providing services to Cox have undergone required background checks and drug screenings and meet all requirements of Cox’s, including this policy.

4. Background Checks:

- Prior to engaging with any Contractor or Contractor’s Personnel for services, Cox reserves the right to require background checks of Contractor Personnel which may include, but not be limited to identity, employment history, criminal history, national social security, education verifications, and MVR searches.



- Depending on the nature of the role and services being performed for Cox, background checks may be conducted by either the Contractor’s preferred screening provider or Cox’s authorized screening provider.
 - Exhibit A contains the required method of screening based on the nature of roles and services being performed.
 - For screens performed outside of Cox’s authorized screening provider, the Contractor shall be required to attest that the criteria used for screening consideration meets or exceeds the requirements set forth in Exhibit A
 - The decisioning criteria for Contractor Personnel placement based on the results of those screens result should indicate the subject is either “Cleared for Placement” or “Further Review Required”
 - For those whose screenings require further review, the Contractor may be required to provide documentation to substantiate the adjudication process.
- Contractors shall provide all necessary consents for the background check process.

5. Drug Screening:

- Cox may require drug screening as a condition of engagement for certain roles, based on the nature of the role and services being provided.
 1. Contractors will be notified in advance if drug screening is required and shall provide all necessary consents to the process.
- Drug screening will include testing for illegal drugs and controlled substances as permitted by law.
 1. Contractors subject to drug screening will be subject to either a 4 or 5 panel screening based on the nature of the role and services being provided.
 1. 4-Panel screening shall include a collection of a urine specimen to determine if Opiates, PCP, Cocaine, and/or Amphetamines exist in the system.
 2. 5-Panel screening shall include a collection of a urine specimen to determine if Opiates, PCP, Cocaine, Amphetamines and/or Marijuana/Cannabis (THC) exist in the system.
- Drug Screening Outcomes
 1. Cleared for placement
 - Negative for all tested substances or
 - Applicant not required to test



2. Further Review Required*

- Returned as a dilute specimen or
- Any invalid drug test

** If adjudicated and cleared, Contractor must be able to provide documentation to substantiate the adjudication process.*

3. Subject not cleared for placement

6. Compliance:

- Contractor shall comply with the background check and drug screening requirements as outlined in this policy. Cox may modify this policy at any time and Contractor shall be responsible for continuing to comply with all such modifications. Contractor's compliance with this policy is a material term of its agreement with Cox and Cox may terminate the agreement and/or any SOWs for violations.
- Contractor shall ensure that such background checks and drug tests, including the administration of placement decisions as a result thereof, (1) comply with Cox's then current guidelines and policies (which will be provided to Contractor in writing or electronically and may change from time to time); and (2) comply with all applicable federal, state and local laws, rules and regulations including without limitation, the Fair Credit Reporting Act and all laws, regulations, and guidance enforced by the Equal Employment Opportunity Commission.
- Contractors must maintain and provide accurate and complete information during the screening process and any other information as necessary for Cox to ensure ongoing compliance with the program. Cox may, upon written notice to Contractor, audit (or retain a third party to audit) the books and records of Contractor related to its compliance with this policy, provided that Contractor shall not disclose any personally identifiable information in connection with such audit.
 - Penalties & enforcement for violations will be determined by Cox (in its sole discretion) and may include, but are not limited to:
 - Requiring Contractor to use Cox's Screening Provider.
 - Requiring Contractor to pay any penalties or fees incurred by Cox due to Contractor's noncompliance with this policy, including any background check and drug screening requirements.
 - Immediate termination of the contract and potential legal action against Contractor
 - Prohibiting Contractor from future engagement with Cox



- Contractors are solely responsible for any costs associated with background checks and drug screenings unless otherwise specified in their contract with Cox.

7. Confidentiality:

- Information obtained through background checks and drug screenings will be treated as confidential and will only be shared with authorized personnel on a need-to-know basis.
- Contractors’ privacy rights will be respected throughout the screening process, and information will be handled in accordance with applicable privacy laws and regulations.

9. Review and Revision:

- This policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations.
- Cox reserves the right to revise, amend, or update this policy as necessary, and any changes will be communicated to affected contractors in a timely manner.

10. Additional Terms, Conditions, and Definitions

Exhibit A

Screening Criteria and Packages (1.1)

		Package		
Screen	Description	Standard	Driver	Advanced
National Social Security Search (NSSS)	A database that matches a candidate's SSN to former places of residence and potential AKAs/maiden names. This service is the first step of any Cox background check and generates criminal jurisdictions and names to be used for subsequent searches.	Required	Required	Required
Criminal History Search	A felony / misdemeanor search in all jurisdictions of residence (disclosed and revealed by the NSSS) for the past 7 years. Regardless of search scope, Contractor’s system must strike any information that is not reportable by state/federal law. Contractor will search statewide record repositories where available and reliable, in place of county jurisdictions.	Required	Required	Required
Federal Criminal	A federal district court search in all jurisdictions of residence (disclosed and revealed by the NSSS) for the past 7 years. As with the criminal history search,	Required	Required	Required



History Search	state and federal reporting laws supersede Cox's search scope requirements.			
Multi-State Criminal History Search (MSCHS)	This database search includes records from county/state courts, departments of corrections, probation/parole offices, and other criminal record databases. Contractor conducts an initial search of the MSCHS and verifies all potential record information at the court of origin prior to reporting; this confirms that the case belongs to the subject in question, and verifies case details such as charge classification, disposition and sentence. Standard legal reporting restrictions are applied to this service as well. In addition to criminal databases, the MSCHS also scans the sex offender registries of 49 states*+ Puerto Rico/D.C./Guam (*Nevada does not allow their sex offender data to be used for employment purposes).	Required	Required	Required
Verified Watch List	This is an aggregate of global watch lists with data sources including, but not limited to: FBI's Most Wanted, Interpol, Department of State, OFAC, OIG, GSA, DEA, HHS, etc. While results are present on the report, this is not a service that is reviewed under Cox criteria. It is a value-add that they want included, but since the information originates with an un-verified database, results do not figure into a candidate's placement eligibility.	N/A	N/A	Required
Motor Vehicle Record	Motor Vehicle Report: 3-year personal history or 5-year commercial history, depending on state laws	N/A	Required	Required



Background & Drug Package Role Requirements (1.2)

Criteria for Determination				Resulting Determination		
What sites will be Physically Accessed? ¹	Will System / Logical Access be required?	Will this role involve Driving?	Will this role be responsible for Safety / Security of others?	Background Check	Drug Screen	Responsible for Verification / Vendor
Critical Facilities ²	N/A	N/A	N/A	Advanced	5 panel	Cox / Infomart ⁴
Cox Facility (non-critical)	N/A	Yes, federally regulated	N/A	Standard + MVR	5 panel	Cox / Infomart ⁴
		Yes, Motor Vehicles ³	N/A	Standard + MVR	5 panel	Contractor / No preference
		No	Yes	Standard	5 panel	Contractor / No preference
		No	No	Standard	4 panel	Contractor / No preference
Customer Property	N/A	N/A		Advanced	5 panel	Cox / Infomart
Remote ONLY	Y	N/A		Standard	4 panel	Contractor / No Preference
	N	N/A		Standard	Not required	Contractor / No Preference

¹Physical Access is defined as any contractor who will be on Cox premises more than 15 days in a rolling 12-month period or who will require unescorted access to Cox facilities.

²Critical facility is defined as high risk or secure facilities that are essential to the company's core operations, this includes data centers, network operations centers, and control rooms.

³ Motor Vehicles are defined as any equipment or vehicle with an operational weight exceeding 1,500 lbs. This includes but is not limited to cars, trucks, bulldozers, cranes, etc.

⁴Infomart is Cox's preferred 3rd party screening service for background check and drug screening