

*Les
Ambassadeurs
Club*

**Applicant & Employee
Screening Policy**



Les Ambassadeurs Casino®

Corporate Compliance

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Applicant & Employee Screening Policy

CORPORATE COMPLIANCE PROCEDURE

Applicant & Employee Screening Policy

1. Introduction

Our employee screening policy refers to our guidelines for screening employees and applicants' backgrounds, as part of both our hiring process and an ongoing assurance of the integrity of Les A employees.

Screening ensures that we can:

- Get insight into an applicant's background to help ensure that sound decisions are made with respect to hiring and with respect to existing employees.
- Ensure that we hire employees that have a high standard of integrity which is commensurate with working in a cash environment and a highly regulated business.
- Verify an applicant's information for accuracy.
- Screen applicants and employees convicted of or involved in serious criminal conduct fraud or other matters involving dishonesty.
- Ensure that, where applicable, individuals required to hold either a Personal Functional Licence (PFL) or a Personal Management License (PML), are held to the standard required of those licensed positions.
- Ensure that the company meets any regulatory or statutory requirements and in particular is able to show that it is preventing gambling from being a source of crime, associated with crime or being used to support crime.
- Ensure that employees are not a threat to workplace safety.

2. Scope

This employee background check policy applies to all applicants and employees, existing and newly employed who go through or have gone through our company's recruitment process.

3. Policy Elements

Background checks may include:

- Criminal records.
- Credit reports.
- Drug & Alcohol testing.
- Verification reports (e.g. identity, previous employment, education)
- Driving records.
- Reference checks.
- Adverse media.
- Associated criminal involvement.
- Matters in connection with Health and Safety.
- Matters in connection with gambling addiction problems.

Applicants aren't necessarily required to pass every type of background check we offer before our company hires them. Each position has its own requirements. For example, driving records may be relevant to drivers, but not to croupiers.

The basic background screening includes [*Identity documentation, screening through third party service providers, open source media outlets and reference checks.*]

We confirm compliance with legal and equal opportunity guidelines at all times.

Criminal records, criminal association, adverse media and problem gambling association checks are essential if applicants are interviewing for positions where they will:

- Represent our company and deal with our clients or stakeholders.
- Have access to sensitive and confidential information.
- Have access to money and finances.
- Have access to stock or company property.
- Hold either a PFL or PML license as issued by the Gambling Commission subject to the LCCP 2018 and the Gambling Act 2005.
 - **PFL holders:**
 - a dealer/croupier
 - a cashier
 - an inspector
 - a pit boss/gaming supervisor
 - security staff/monitoring surveillance related to gambling activities.
 - **Key position personnel (PML).**
 - overall strategy and delivery of gambling operations
 - day to day running of gambling operations
 - financial planning, control and budgeting
 - marketing and commercial development
 - regulatory compliance
 - gambling related IT provision and security

4. When will we conduct applicant or employee screening?

In most cases, screening will be completed during the application or on boarding process and then again on an annual basis.

These screening checks will be completed by the Compliance and HR departments and reports will be securely held in line with the requirements imposed by both the Data Protection Act 2018 (DPA) and the General Data Protection Regulations (EU 2016/679) (GDPR).

5. Our company's responsibilities

Departmental Heads /Managers, Compliance and HR staff in association with the Data Protection Officer (DPO) (where applicable) must:

- Inform applicants that a background check / personnel screening is required and completed in the position's job advertisement.
- Record / evidence of an applicant's acceptance / employee's objection to the process and let them know how long the process will take.
- Use a reputable and reliable background check provider. Criteria to consider when choosing a provider are: cost, legality, commitment to confidentiality and turnaround time. If our current

provider doesn't meet our requirements for these criteria, Compliance and HR jointly should search for a new provider.

- Inform applicants of the results of their screening and what we plan to do. (reject or move applicants to the next hiring phase)
- Screening results will be made available to those applicants and or employees, upon request in line with their rights, subject to a Data Subject Access request (DSAR) (DPA18 s45; GDPR (EU 2016/679) Article 15).
- Give applicants information that they may need to dispute findings, a report or address any issues relating to information found, resulting from the screening process.
- Departmental Heads /Managers /HR must tell applicants, a clean screening result does not guarantee employment, unless they've already received a verbal job offer.
- Departmental Heads /Managers /HR must ensure that all information handling, is in accordance with the full suite of Data Protection Policy's.

6. What will happen if screening returns adverse results?

Adverse or concerning results do not automatically disqualify applicants from the application process or result in disciplinary action towards employees.

A risk assessment will be completed, on a case by case basis according to the following criteria:

- The nature of the criminal convictions, activity or adverse / findings.
- The volume of the criminal convictions, activity or adverse / findings.
- How either the association with crime and/or adverse finding relates to the position applied for or held.
- Time elapsed from the criminal activity or adverse finding.

HR and Departmental Heads /Managers should keep the company's interests in mind when rating the seriousness of any issues arising from the screening process.

Ultimately, during recruitment, if Departmental Heads /Managers and/or HR decide a particular applicant would bring high or unreasonable risk to our company, the outcome may reasonably be, that the application will be rejected.

With respect to existing employees, the company staff handbook and company disciplinary policies may be considered and or implemented as a result of findings deemed, to potentially cause harm or a high risk.

HR and Departmental Heads /Managers may contact applicants or arrange private meetings with employees to discuss the results of their screening checks and in cases of minor issues and if the applicants or employees answer honestly when questioned, they may still be employed or that no further action is required

7. Procedure

Our aim is to have a transparent screening process that respects every individuals' rights.

We ensure an informed work force through clear information being provided and to all who may be affected by the Employee Privacy Policy.

Departmental Heads /Managers and HR staff will follow this procedure for screening:

- Departmental Heads /Managers in association with the DPO will ensure that adequate information has been provided to both the applicants and employees. This may be achieved by the incorporation and ensured awareness of the Les A Employee Privacy Policy.
- This Policy will be reviewed by The Director of HR and the Director Legal and Compliance on an annual basis.
- Departmental Heads /Managers and HR must note in the job advertisement that a screening check in line with this policy and the Les A Employee Privacy Policy will be performed and that it is a mandatory requirement for all final applicants.
- When the final applicants (one or more) are selected, Departmental Heads /Managers or HR must ensure that consent is received from the applicant before the screening has commenced.
- If Applicants refuse or in the case of existing employees, object to be subject to a screening process, the Departmental Heads /Managers and or HR will inform them that they either, will not be considered for the position or in the case of an existing employee, invited to a formal, meeting to discuss the company requirements.
- Results, both negative and positive must be recorded within the applicant folder or the employee's personnel recorded and kept in line with the Data Protection suite of policy and procedures established by the company.
- Departmental Heads /Managers inform applicants of their decisions and ensure they get copies of their individual screening checks. If there are negative findings, HR/ Departmental Heads /Managers must let those applicants know how to dispute the report.