
Natron Background Check and Drug Testing – Policy and Procedure

All offers of employment at Natron Energy, Inc. (“Natron Energy” or the “Company”) are contingent upon clear results of a thorough and complete background check that consists of an educational, employment, and criminal check. Background checks will be conducted on all final candidates.

The Company recognizes the importance of maintaining a safe, secure workplace with employees who are qualified, reliable, nonviolent, and who do not present a risk of serious harm to their coworkers, the organization, themselves, or others. To promote these concerns and interests, the Company reserves the right to investigate an individual’s prior employment history, personal references, educational background, and criminal history in accordance with all applicable laws and regulations. The Company reserves the right, in accordance with the law, to investigate an individual’s credit, driving records, and professional license or certification should the individual’s role involve dealing with Company financial information, driving on behalf of the Company, or require a professional license to perform job duties. The Company also reserves the right to perform a drug screening for all candidates who will be operating machinery or working in a production or lab environment.

Consistent with legal or contractual requirements, and only to the extent permissible under applicable law, the Company also reserves the right to obtain and review an applicant’s criminal conviction record and related information, and to use such information when making employment decisions.

All background checks will be conducted in strict conformity with the federal Fair Credit Reporting Act (FCRA), applicable state fair credit reporting laws, and local, state, and federal anti-discrimination and privacy laws. The Company is an equal opportunity employer and will comply with applicable federal, state, and local laws relating to the use of background checks for employment purposes. Natron Energy reserves the right to modify this policy at any time without notice.

Procedure:

Final candidates will receive a background check request after they have received an offer of employment. They must complete a background check authorization form through the background check vendor when they have received the request. It is our practice to provide an employment offer prior to conducting a background check; we will require the completion of a background check authorization form after an offer of employment is extended.

1. Candidates will be provided with appropriate written notice of the Company’s intention to obtain information by way of a background check. The Company and/or the consumer reporting agency will furnish candidates with the appropriate disclosures required under FCRA and applicable state law.

2. Candidates will also be provided with a separate authorization form(s) required under FCRA and applicable state law providing for written permission from the candidate before obtaining any consumer report.

An HR or Recruiting team member will initiate the background check, and the background check vendor will send appropriate release form per the state the candidate lives in. Upon receipt of the signed authorization form, a consumer reporting agency will conduct the background checks. A designated HR representative will review all results.

If the candidate will be operating machines or working in the lab, they will also be subject to the drug screening test. The background check vendor will reach out to the candidate with options on medical locations in the area that they live. The candidate will go to the vendor to complete a standard urine test. A medical doctor will review all results and inform Natron Energy of the results.

An HR representative will notify the candidate and hiring manager regarding the results of the check, and drug screen, if applicable. In instances where negative or incomplete information is obtained, the appropriate manager and HR team member will assess the potential risks and liabilities related to the job's requirements and determine whether the individual should be hired. If a decision not to hire a candidate is made based on the results of a background check, there may be certain additional Fair Credit Reporting Act (FCRA) requirements, such as pre-adverse action and adverse action notices, that will be handled by Human Resources in conjunction with the employment screening service, when applicable.

Background check information will be maintained in a file separate from employees' personnel files for a minimum of seven years as per Natron's Global Document Retention Schedule.

Background Checks will include:

- **Social Security Verification:** validates the applicant's Social Security number, date of birth, and former addresses (US Only).
- **Prior Employment Verification:** confirms applicant's employment with the listed companies, including dates of employment and position held. This verification will be run on the past three employers or the previous 10 years, whichever comes first.
- **Personal and Professional References:** calls will be placed to individuals listed as references by the applicant.
- **Educational Verification:** confirms the applicant's claimed educational institution, including the years attended and the degree/diploma received.
- **Criminal History:** includes review of criminal convictions and probation in accordance with applicable law. The following factors will be considered for applicants with a criminal history:

- The nature of the crime and its relationship to the position.
- The time since conviction.
- The number of convictions (if more than one).
- If hiring the applicant would pose an unreasonable risk to the business, its employees, or its customers and vendors.

The following additional background searches will be required if applicable to the position:

- **Motor Vehicle Records:** provides a report on an individual's driving history in the state requested. This search will be run only when driving is an essential requirement of the position.
- **Credit History:** checks candidate's credit history. This search will be run for Finance/Buyer positions that involve management of Natron Energy's funds and/or handling of cash or credit cards.
- **Drug Screening:** is a urine test through a medical office affiliated with the background check vendor. A test will be required for all positions operating machinery or working in a production or lab environment. All results are reviewed by a doctor and private medical information is kept confidential.

Consumer Credit Reports:

The Company obtains consumer credit reports only under very limited circumstances, for example, when applicants are being considered for a position in which they will have access to Company finances, banking, or credit card account information. When the Company needs to obtain a consumer credit report, it will comply with applicable federal and state laws.

Drug Screening:

We want to ensure that employees (especially those in safety-sensitive roles) are sober and alert when performing their duties. Drug testing is a mandatory part of the background screening process for all final candidates in safety-sensitive roles who handle machinery or work in a production or lab setting (unless otherwise prohibited by law.)

Drug tests will be conducted by trusted laboratories and medical professionals. Results from any drug test will remain confidential. Candidates will receive copies of their test results.

Here we outline our requirements ensuring that we comply with all applicable laws.

Testing candidates

If candidates will be operating machinery or working in a lab, we require them to pass a drug test for illegal substances. Recruiters are obliged to mention this in job descriptions and give candidates copies of this policy before they are tested.

This drug test will be the final stage before hiring. We may test candidates we have already extended a job offer to, but that offer will be contingent upon them clearing the drug test. Candidates have the right to refuse drug testing and thus decline our job offer.

We test candidates based on their job role. We do not single out candidates based on any protected characteristic (e.g., race, gender, disability, etc.). Candidates who test positive for any illegal substances (e.g., cocaine, PCP) fail our drug test, and we may refuse to hire them.

Illegal drugs we test for in the multi-panel drug screen are Cocaine, Methamphetamine, Heroin, Phencyclidine (PCP), Fentanyl, Opiates including Oxycodone, and Ketamine.

We do not discriminate against people with disabilities who may need to take prescription drugs for medical conditions as prescribed by their medical provider, but we also want to make sure that our employees don't breach our Drug-Free Workplace policy and put their own or their colleagues' safety at risk.

Testing Procedures:

All drug testing under this policy will be conducted by an independent testing facility licensed by the state, which will obtain the individual's written consent prior to testing. The Company will pay for the full cost of the test.

Prescription Drugs:

When you are called to the medical lab to provide samples, please:

- Inform the lab professionals about any prescription drugs (including medical marijuana) you take or have taken in the past year.
- Bring valid prescriptions with you when possible. The lab will not disclose any information you provide about your medical conditions to our company.

If your prescribed medications (e.g., types of opiates) bring about positive results, we may ask a medical professional to examine you and determine whether you are fit to complete your safety-sensitive job duties. If you are not, we may rescind our job offer.

Contesting false positives:

Candidates should contact HR and Recruiting if they should consider any foods or supplements they may have consumed that could be responsible for the false positive (i.e., poppy seeds). If possible, they should bring them to the lab that conducted the drug test. The lab may try to cross-check any false positive, often using a sample other than urine. We may order a re-test when appropriate.

Escalation and Investigation:

The HR and Recruiting team and all involved parties will follow the same process for reviewing background checks and escalating any call outs for fair and equal practice.

Rehires will be subject to background checks unless their original background check was completed within the last 12 months by Natron Energy.

Background checks will be stored in designated background files outside the regular employee file, and with restricted access to those HR and Recruiting team members who are involved in the process. See Employee Files Storage and Retention policy for further details.

All information obtained from background or reference checks will be used only for purposes of making hiring decisions and will be maintained confidentially, in accordance with applicable legal requirements; and may only be reviewed or accessed by authorized individuals with the approval of Human Resources.

For more information regarding this policy, employees should contact your HR Generalist or the Recruiting Director.