



**Background Check Requirements
for Service Provider Personnel
with Access to FireEye Facilities and/or Network**

Minimum Screening Guidelines

Type of Access	Screening Requirements
Badged access to FireEye facilities	(1) Identity Verification (2) Criminal History Check (3) Global Sanctions Check
Access to FireEye network	Items (1), (2) and (3) above, plus (4) Employment Verification (5) Education Verification

For both types of access, screening for items (2) and (3) above must be completed no earlier than one (1) year prior to the worker’s commencement of services to FireEye.

Definitions of Screening Requirements Terminology

Type of Check	Verification Requirements
Identity Verification*	– Verify worker’s eligibility to work in the United States, including strict compliance with the Immigration Reform and Control Act of 1986 and Form I-9 requirements
Criminal History Check**	– Verify that criminal history checks are performed for the last seven (7) years to include states and counties of worker’s residence based on the Social Security Number (SSN) Trace, in addition to a federal criminal history check and National Sex Offender Registry check – Identify any felony and misdemeanor convictions
Global Sanctions Check	– Verify that worker is not on international sanctions lists, including, but not limited to, lists maintained by the following sources: OFAC, FBI, INTERPOL, European Union, United Nations Security Council – Verify that worker is not on any other credible terrorist list
Employment Verification	– Verify worker’s employment history for the last seven (7) years, including name of employer, dates of employment and title – Identify any discrepancies
Education Verification	– Verify worker’s highest level of education, including institution, dates of attendance and degree earned – Identify any discrepancies

*For workers providing services outside of the United States, the Identity Verification should authenticate the worker’s identity by checking the government-issued identification number provided by the worker against the name associated with that number to determine if it matches the worker’s name.

**For workers providing services outside of the United States, the Criminal History Check should be followed to the highest degree of criminal background check and screening standards allowable by local law.

Adjudication Criteria

If a background screen yields information that Service Provider believes could adversely impact the worker's ability to perform the anticipated responsibilities, Service Provider should undertake an individualized assessment that considers the following non-exhaustive list of factors, in accordance with the Adjudication Criteria in the table below:

- Nature of the finding(s)
- Relationship of the finding(s) to the nature of the worker's assignment and responsibilities
- Recency of the finding(s)
- Number of findings
- Findings when considered collectively

Generally, FireEye will rely on Service Provider to decide whether to disqualify a worker for assignment with FireEye based on the Adjudication Criteria. However, if there is a question as to a worker's qualifications, Service Provider may seek additional input from FireEye.

Nature of Finding		Potential Action
Felony Conviction	Any conviction within the last seven (7) years	Ineligible for assignment
Misdemeanor Conviction	Any conviction involving violence and/or theft within the last seven (7) years	Generally ineligible for assignment
	Two (2) or more convictions involving illegal drugs or alcohol within the last seven (7) years	Eligibility for assignment considered on a case-by-case basis
	Any conviction for failure to fulfill a court order for any misdemeanor charge or conviction	Eligibility for assignment considered on a case-by-case basis
	Other and/or multiple convictions that demonstrate a pattern of continued disregard for the law and adversely reflect on the worker's reliability and trustworthiness	Ineligible for assignment
Education and Employment Experience	Any dates that are incorrect by more than three (3) months	Eligibility for assignment considered on a case-by-case basis
	Any major discrepancy in title provided by worker and title verified	Eligibility for assignment considered on a case-by-case basis
	Any falsification of information on the background check application	Generally ineligible for assignment
Other	Active sex offender or sexual predator status	Generally ineligible for assignment
	Active status on any Global Sanctions list specified in this document	Ineligible for assignment, absent written approval from FireEye's Human Resources department