



GlobeNet Background Screening Process

All new hires and existing employees of GlobeNet Cabos Submarinos America, Inc. (“GlobeNet”) and its affiliates (each an “Employee”) with access to GlobeNet’s Domestic Communications Infrastructure (“DCI”)¹, must go through the following screening steps at minimum:

- County Criminal Records and Misdemeanor Search (all AKAs & Counties of Residence for past seven years);
- Background Essentials Report, including National Criminal Search, Global Priority Report (US Patriot Act Search), Multi-State Sex & Violent Offenders Search, and Address Source Verification;
- Social Security Number Verification;
- Photo ID Verification;
- Employment Verification from prior Employer;
- Education Certification from highest degree earned; and
- I-9 and E-verify check to confirm US work authorization.

The checks above are reviewed for each Employee by the designated HR contact. Hiring decisions on background checks are made against the following: (a) local regulations; (b) GlobeNet’s hiring guidelines; and (c) time passed since an offense and the relation of an offense to the candidate’s work duties.

¹ “Domestic Communications Infrastructure” means: (a) any portion of the GlobeNet Cable that physically is located in the United States, up to and including the submarine line terminating equipment (SLTE), including (if any) transmission, switching, bridging, and routing equipment, and any associated software (with the exception of commercial-off-the-shelf (“COTS”) software used for common business functions, e.g., Microsoft Office) used by or on behalf of GlobeNet to provide, process, direct, control, supervise, or manage Domestic Communications; and (b) Network Operations Center (“NOC”) facilities.