Pfizer Criminal Background Check Policy

Policy Scope
All contracting agencies and other organizations (“Agency”) providing services to Pfizer are required to ensure that their employees, independent contractors, consultants, (and all other individuals they assign to work on Pfizer premises and/or projects) successfully pass a criminal background check according to the criteria listed. It is the organization or Agency’s responsibility to have these checks performed, and have documentation of clean record in place, prior to any work starting at the site, at their expense. The contracting firm must also insure their compliance with this policy is current if work at Pfizer is not continuous.

Disqualifying Offenses

Felony
- All felony convictions within the last seven (7) years except as restricted by applicable federal, state and local laws.
- All felony drug convictions (no time limit) where the Individuals former position, or the Pfizer project to which the individual is being considered for placement, involve handling of pharmaceutical in any capacity.

Misdemeanors
The following misdemeanor convictions within a period of five (5) years except as restricted by applicable federal, state and local law:
- Arson
- Assault
- Battery
- Child abuse and neglect
- Criminal contempt
- Criminal conversion (Theft)
- Criminal mischief
- Escape
- Evading arrest
- Failure to stop
- Harassment (includes telephone)
- Hit and run collision
- Indecent exposure
- Injury to personal property
- Larceny
- Petty theft\Possession of controlled drugs
- Possession of drug paraphernalia
- Possession of marijuana
- Possession of stolen goods
Prostitution
Purchasing alcoholic beverages for a child
Resisting arrest
Sexual offenses
Theft by check
Trespassing
Unlawful sales to minors (alcohol and tobacco)
Vandalism
Violation of probation
Violation of protection order
Welfare violation code

Time restrictions calculation
All hiring time restrictions for felony or misdemeanor convictions are calculated from the
date of release from prison system following incarceration.

Pending Charges
An individual charged with a disqualifying offense may not be placed with Pfizer while
any such charge[s] is pending. The individual may be considered for placement if
exonerated of the charge[s].

Outstanding warrants
An individual with an outstanding warrant for a disqualifying offense may not be placed
with Pfizer until the warrant has been dismissed.

Failure to disclose
Any individual who fails to disclose any felony and/or misdemeanor conviction[s] prior
to the Agency’s submission of the individual’s background information for the criminal
record check may not be placed with Pfizer.

Non-Disqualifying Offenses
A conviction of one of the following offenses within a five (5) year period (as long as the
offenses did not occur within the previous twelve (12) months), and there are no other
convictions of any other disqualifying offense:
Breach of Peace
Disorderly Conduct
Failure to appear

Motor Vehicle Record (MVR)
The following MVR check is required prior to the placement of any individual in a
position that requires the operation of a motor vehicle on behalf of Pfizer:

Disqualifying Criteria
Invalid, suspended, or revoked drivers license
1 conviction of driving under the influence (DUI) within the preceding year, 2 or more DUI
convictions, no time limit.
3 or more moving violations within the last 3 years
Any accumulation of suspensions of over 1 year in length within the last 3 years
More than 2 accidents with indication of fault within the last 3 years
More than 3 accidents, no time limit

**Debarment Lists**

All individuals will be checked against the following debarment / exclusion lists maintained by the following agencies:

1. Federal Department of Health and Human Services  
   [http://oig.hhs.gov/fraud/exclusions.html](http://oig.hhs.gov/fraud/exclusions.html)
2. General Services Administration  
   [http://epls.gov](http://epls.gov)
3. Federal Food and Drug Administration  
   [http://WWW.FDA.GOV/ORA/compliance_ref/debar/default.htm](http://WWW.FDA.GOV/ORA/compliance_ref/debar/default.htm)

No individual whose name appears on any of these lists may be placed in any