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Effective July 27, 2015 a Transportation Security Administration Directive went into effect which requires all Security Identification Display Area ("SIDA") badge holders to be fingerprinted every two years in order to renew their SIDA badge. Compliance with our security and legal obligations is of the utmost importance at Envoy and we take those obligations very seriously. The following is the Envoy Arrests and Criminal Convictions Disclosure Policy.

Arrests or Criminal Convictions Disclosure Policy

Except to any extent prohibited by applicable law, individuals applying for employment or completing a fingerprint application with Envoy must inform the Company of any arrest or criminal convictions other than minor traffic offenses. In addition to this initial disclosure, employees have an ongoing obligation to advise their supervisor and the Compliance Department of any arrest or criminal convictions, other than traffic offenses, that occur while employed with Envoy within 24 hours of release from incarceration. Applicants and employees bear complete responsibility to disclose all arrests or criminal convictions. **Failure to accurately disclose may result in corrective action up to and including termination.**

Federal regulations identify 28 crimes that will disqualify an employee from receiving a SIDA badge and from working in a secure or sterile area of the airport, if convicted or found not guilty by reason of insanity. At the Company's discretion, an employee charged with any of these disqualifying crimes may be placed on an unpaid Administrative Leave of Absence ^[2], not to exceed 45 days. Unless the employee, by the end of the 45-day period, provides the Company with official documents proving to the Company's satisfaction that the conviction(s) do not fall under the 28 disqualifying crimes, the employee will be released from employment with Envoy. In addition, Envoy reserves the right to take corrective action up to and including termination of an employee at any time based on a Company determination of misconduct. Company will follow Federal Regulations regardless if you hold a SIDA badge or an employee that does not require a SIDA badge due to scope of job.

These federally disqualifying crimes are as follows:

1. Forgery of certificates, false marking of aircraft, and other aircraft registration violation
2. Interference with air navigation
3. Improper transportation of a hazardous material
4. Aircraft piracy
5. Interference with flight crew members or Flight Attendants
6. Commission of certain crimes aboard aircraft in flight
7. Carrying a weapon or explosive aboard aircraft
8. Conveying false information and threats

9. Aircraft piracy outside the special aircraft jurisdiction of the U.S.
10. Lighting violations involving transporting controlled substances
11. Unlawful entry into an aircraft or airport area that serves air carriers or foreign air carriers contrary to established security requirements
12. Destruction of an aircraft or aircraft facility
13. Murder
14. Assault with intent to murder
15. Espionage
16. Sedition
17. Kidnapping or hostage taking
18. Treason
19. Rape or aggravated sexual abuse
20. Unlawful possession, use, sale, distribution, or manufacture of an explosive or weapon
21. Extortion
22. Armed or felony unarmed robbery
23. Distribution of, or intent to distribute, a controlled substance
24. Felony arson
25. Felony involving a threat
26. Felony involving one or more of the following:
 - Willful destruction of property
 - Importation or manufacture of a controlled substance
 - Burglary
 - Theft
 - Dishonesty, fraud, or misrepresentation
 - Possession or distribution of stolen property
 - Aggravated assault
 - Bribery
 - Illegal possession of a controlled substance punishable by a maximum term of imprisonment of more than one year
27. Violence at international airports
28. Conspiracy or attempt to commit any of the criminal acts listed above

For arrests or convictions other than one of the 28 federal disqualifying crimes, the Company, at its discretion, will determine whether, due to the general nature of the work performed by the employee and the circumstances or egregiousness of the conviction, the individual will be offered employment or allowed to continue to work at Envoy. The Company may withhold an employee from service without pay pending its consideration and/or investigation of the situation.

The Company will review all arrests and convictions (whether or not among the 28 federal disqualifying offenses) and make a determination about an employee's continued employment. Again, **any failure to**

accurately disclose all relevant arrests or criminal convictions in accordance with this Policy may result in corrective action up to and including termination.

The Company retains sole discretion in interpreting the terms of its policies.

Frequently Asked Questions: Arrests or Criminal Conviction Self-Disclosure Policy

To comply with federal regulations, Envoy is required to obtain fingerprints from all new-hire employees, and again every two years for certain employees working in safety-sensitive areas. As part of the fingerprinting process, each individual must self-disclose any arrests or criminal convictions other than minor traffic offenses. This disclosure includes any agreement in which you avoided prosecution by participating in a program such as: probation, pretrial diversion, deferred adjudication or adjudication withheld for any criminal offense.

These disclosures are also required under Envoy's Arrests or Criminal Convictions Disclosure Policy, which requires individuals applying for employment to inform the Company of any arrests or criminal convictions, other than minor traffic offenses, and to disclose any such arrests or convictions that occur while employed by Envoy.

Below are answers to some Frequently Asked Questions (FAQ) about self-disclosure. They are intended to provide a general background and commonly used terminology to assist you in understanding the criminal disclosure requirements as part of the fingerprinting process and the ongoing disclosure obligations.

This FAQ does not and cannot cover all possible terminology or individual circumstances. Each individual applicant and/or employee bears responsibility to make the required arrests or criminal conviction disclosures. Failure to accurately disclose arrests or criminal convictions may result in corrective action up to and including termination.

Importantly, none of the information contained in this document constitutes legal advice and should not be taken as such. All individuals should contact an attorney with questions pertaining to any specific criminal convictions or related issues.

General Background on Arrests or Criminal Convictions

What constitutes a "criminal offense?"

It is possible that individuals charged with a crime were "arraigned" on the charge. An arraignment is a formal proceeding in court where the charges are read aloud (or presented in hand), the individual must enter a plea of guilty or not guilty, and bail (if applicable) is set. The accused may be appointed an attorney or asked to hire one. For individuals that recall going through this process before a judge or magistrate, it is likely that a criminal charge was issued. It is also possible, however, to be charged with a crime without having to appear in court. In some jurisdictions, a person can have an attorney appear on

his or her behalf to respond to a criminal charge. Individuals with specific questions on criminal offenses and/or charges should contact an attorney.

What is a Conviction?

A conviction is a finding (or judgment) by a judge or jury that a person is guilty of a particular crime or charge. This judgment can come by way of a plea of guilty or a finding of guilt after a trial.

What if I never went to trial?

The issue of criminal convictions can arise where a person has been charged with a criminal offense and resolved the case in some way short of going to trial, found guilty, or entering a plea to otherwise end the matter. Although an accused may plead guilty to a criminal offense (which can constitute a "conviction"), it is possible to resolve a criminal matter by some other method that involves a combination of punishment and a partial admission of responsibility. The nature and circumstances of those resolutions varies considerably among different states and even local jurisdictions. Pleas can include:

- "Continuance Without a Finding" ("CWOFF" or "admission to sufficient facts");
- "No Contest Plea"; and,
- "Adjournment in Contemplation of Dismissal" (aka "ACOD," "pre-trial diversion," "pre-trial probation," or "Probation before Judgment").

Each of the terms above involves a different set of circumstances and is defined by the laws of the state where the incident took place. Individuals with specific questions on arrests or criminal convictions, pleas and/or other resolutions of criminal offenses should contact an attorney. Again, failure to accurately disclose arrests or criminal convictions with Envoy may result in corrective action up to and including termination.

As a rule of thumb unless charges were dropped entirely, or you were found not guilty on all charges, you should disclose the matter on either the employment application, fingerprint application or the Arrests or Criminal Conviction Self-Disclosure form.

Driving Under the Influence

Do I have to disclose DWI/DUI/OWI convictions?

Yes – including if you participated in a diversion program.

Sealing or Expunging a Record

What does it mean to have your records sealed or expunged?

Many jurisdictions have a process for "sealing" a criminal record, an act that closes the criminal record from public view unless it is sought by a court order. In other places, a record can be expunged from the public rolls. This is considered more permanent than "sealing" a record, and has the effect of eliminating the record, with a few exceptions.

Sealing or expunging a record is usually done by either the passage of time or a motion or request by someone made before a court or magistrate. The laws of each jurisdiction determine if, and how, records

are sealed or expunged in that jurisdiction. For some jurisdictions, juvenile cases are expunged after a set period of time, such as when the defendant reaches the age of 18. In other cases, a person can move to seal his or her record after a set number of years passes from the date the case concluded.

My record was expunged – do I still need to self-disclose the charges?

There is great confusion surrounding the notion of sealing or expunging a record and many people may believe – incorrectly – that a case was automatically sealed or expunged if it concluded in something short of a conviction.

Without a document from a court indicating that a case was sealed or expunged, it is best to assume that neither applies to the case. Expungement and sealing of a record is not automatic for a case that has been concluded (even if the charges were dismissed). Even if a case was sealed or expunged, moreover, it still may be necessary to disclose the incident. Sealing or expunging a criminal case can prevent it from appearing on a standard criminal record check, but it may still appear on a background check conducted for a government security clearance or related employment. It is very likely that a person's complete criminal history will be discovered, so it may be best to admit having an expunged conviction when applying for such a job.

Even with a clear criminal record, the following situations might still occur:

- A cleared conviction can still constitute a prior offense if an individual is charged or convicted with another crime at a later date.
- A cleared conviction can still count if a court considers revoking or suspending a driver's license.
- If any government agency asks directly about prior convictions, cleared convictions may still need to be disclosed.

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[1] Complete the Arrest and Criminal Convictions Disclosure Form: https://my.envoyair.com/wp-content/uploads/2015/12/DOC_POL_Arrests_and_Criminal_Conviction_Self_Disclosure_Form-1-Oct-2019.pdf

[2] unpaid Administrative Leave of Absence: <https://my.envoyair.com/loa>