

JPMC'S MINIMUM CONTROL REQUIREMENTS FOR CONTINGENT LABOR SUPPLIERS

These Minimum Control Requirements (“**Minimum Control Requirements**”) are stated at a relatively high level, and JPMC recognizes that there may be multiple approaches to accomplish a particular Minimum Control Requirement. Supplier must document in reasonable detail how a particular control, including those pertaining to dependent third party providers (subcontractors) who collect, transmit, share, store, control, process, manage or access JPMC Data, meets the stated Minimum Control Requirement. The term “**should**” in these Minimum Control Requirements means that Supplier will use commercially reasonable efforts to accomplish the stated Minimum Control Requirement, and will document those efforts in reasonable detail, including the rationale, if any, for deviation. This documentation may be reviewed by Auditors to assess the control and the merit of the rationale for deviation. Not all of the stated Minimum Control Requirements will apply to all Services or other Deliverables, but Supplier must be able to reasonably show how the Minimum Control Requirement does not apply. These Minimum Control Requirements do not limit Supplier’s obligations under the Agreement or applicable Law, and do not limit the scope of an audit by JPMC.

In addition to these Minimum Control Requirements and provisions stated in the Master Services Agreement, some Suppliers have agreed to and signed “Rules of Engagement” regarding interactions between Supplier Personnel and JPMC in the provision of staffing services. These “Rules of Engagement” continue to be in force and are not replaced by, but are requirements in addition to, these Minimum Control Requirements.

As used in these Minimum Control Requirements, (i) “**including**” and its derivatives mean “including but not limited to”, and; (ii) any capitalized terms not defined herein shall have the same meaning as set forth in the applicable Master Services Agreement.

CANDIDATE SOURCING

High-level control objective:

Supplier's compensation of recruiters is appropriate and does not incent the placement of unqualified or otherwise inappropriate candidates. Supplier has a robust program to monitor and assess performance of any Supplier Personnel and/or subcontractors used for candidate sourcing or for verification services (background, education and employment) and skill assessments.

Recruiting:

Supplier's recruiting process must be documented and must demonstrate that compensation practices are based on successful placement of candidates. Process must include actions taken and subsequent performance monitoring of recruiters when those recruiters demonstrate a pattern of placing candidates with early terminations including issues of unacceptable performance, job abandonment, early resignations or negligible or fraudulent conduct.

Supplier must maintain data on candidate placement, early terminations and early and on-time releases and extensions for a period of three years following assignment completion or termination and that provide that data upon request.

Recruiters should be subject matter experts in their areas of concentration and/or highly experienced in recruiting. If requested, recruiters' experience and resumes should be made available to JPMC assignment sponsors.

Referrals:

The Supplier's referral program, and any corresponding incentives, must be documented and available for review.

Supplier referral process must ensure that referred candidates are appropriately experienced and skilled before they are put forth for any role. Referrals include candidates referred by Supplier Personnel and candidates referred by external sources. The referral process should be designed so that referrals are accepted only from Supplier Personnel with a successful tenure of six months or more and that referral incentives are not a substitute for active and diligent recruiting efforts. Referral incentives, if any, should be paid out only after a defined waiting period to ensure the referred candidate's success in the role.

Supplier must track referrals be able to provide information on the frequency of referrals in general, and on the source of the referral, on any referred candidates. All referrals must be categorized as either (i) referred by JPMC employee or client, (ii) referred by Supplier Personnel, (iii) referred by External Party – Government Official or (iv) referred by External Party – Other. Additionally, JPMC must be informed at the time of resume provision, which candidates have been referred and which have been obtained through the standard candidate sourcing process.

Subcontractors:

Supplier must not use subcontracted recruiters or staffing firms in sourcing candidates for JPMC without prior written approval, which JPMC may withhold in its sole discretion.

Subcontractors may be used to verify background, education and/or references and to administer capability assessments. The Supplier must review documentation related to any candidate verification and

must maintain copies of all documents for a period of seven years following the completion or termination of the assignment. Suppliers must be able to evidence their review of candidate verification, inclusive of document copies, before any candidate is put forth to JPMC.

CANDIDATE SKILLS ASSESSMENT

High-level control objective:

Supplier's end to end process ensures that identified candidates have the skills, experience, training and qualifications to perform the requested functions. Following the initial phone screening, all candidate interviews should be conducted either in person or via video.

Supplier must have a process to identify and assess skills and competencies of candidate(s) that are relevant for the role, including situational questions and technical tests as appropriate. The process must include dispositioning of failing test results. Assessment results must match the skills and capabilities described on the candidate's resume. Supplier should develop a testing curriculum for key skills designed to be comprehensive with a passing result providing assurance to JPMC that the candidate is qualified. No unqualified candidates are to be presented to JPMC. Testing results must be made available to JPMC upon request and assessments for required role skills should be assessed within 12 months prior to placement at JPMC, except if a candidate was formerly at JPMC within the past 12 months and will be placed in a role requiring the same skills as the prior role. Any other requested exceptions to testing requirements must be approved in writing by JPMC.

The Supplier process must also include a method to verify at the time of testing that the candidate taking the test is the candidate. Testing results (including dates and scores) and identity verification data must be made available upon request and retained for a period of three years following the completion or termination of the assignment.

CANDIDATE BACKGROUND SCREENING

High-level control objective:

The Supplier hiring process must include a documented process for the performance of any and all checks necessary to ensure that placement of a candidate at JPMC will not expose JPMC to fraud, theft, negligence or violence.

In addition to employment and education verification as described below, background screenings must be completed within 45 days before placement at JPMC and must include the following, where allowed by law:

Criminal check

I-9 Verification/ or equivalent eligibility documentation if outside of the US.

Social Security/Identity Check

Drug Screening

Results of all background screening must be maintained for as long as the candidate assignment is ongoing and for an additional three years following the completion or termination of the assignment. If the candidate is placed at JPMC for a second or subsequent time and 45 days or more has elapsed since the completion or termination of the last assignment, the entire background screening process must be performed again before placement.

CANDIDATE EDUCATION AND REFERENCE VERIFICATION

High-level control objective:

Supplier's end to end process ensures that identified candidates have accurately and completely described prior job experience and attained education.

Supplier must have a robust process to verify the highest level of education listed on the application and/or resume of candidate. Additionally, Supplier must verify all relevant work experience for the past 10 years.

Verification should include the following components:

Education:

Candidate attended and graduated from all schools indicated as highest level of education

Candidate earned the degree/certification indicated

Candidate has completed all certification continuing education requirements indicated (if applicable)

Work Experience:

Candidate held the role/title indicated

Candidate worked at the stated company for the time indicated

CANDIDATE IDENTITY VERIFICATION

High-level control objective:

Assurance that throughout the Supplier screening process, the identity of the candidate is verified and recorded at multiple checkpoints, particularly at interview, during any capabilities assessment and at the start of each work assignment.

Suppliers must have a documented process to verify candidate's identity by examining and recording multiple sources of identification. Suppliers must maintain all onboarding and identity verification paperwork, including copies of documents examined to confirm candidate identity for a period of 3 years following the completion or termination of the assignment.

SUPPLIER PERSONNEL PERFORMANCE MONITORING

High-level control objective:

The Supplier must have a process to collect feedback periodically from JPMC to ensure that the performance of Supplier Personnel is meeting expectations.

SUPPLIER PERSONNEL CONDUCT TRAINING AND ATTESTATIONS

High-level control objective:

The Supplier Personnel hiring program must include Code of Conduct and Anti-Corruption training to ensure resources are fully aware of conduct requirements at JPMC.

Suppliers must provide adequate training on the JPMorgan Chase & Co. Supplier Code of Conduct, and JPMorgan Chase & Co. Supplier Anti-Corruption Policy, along with supplier developed training on Cyber Security and Phishing, compliance with applicable laws, and the proper provision of Services and privacy training prior to commencing work at JPMC.

Candidates must attest to the completion of required training on an annual basis. Supplier is responsible for maintaining current candidate attestation records.

REGULATORY AND LEGAL COMPLIANCE

High-level control objective:

Supplier must have a structure and processes in place for researching, evaluating, and complying with all National and other Laws and regulations that are relevant to Recruitment, Hiring Practices, and Employment Law in addition to all other legal and regulatory requirements impacting the services provided.

Supplier must be compliant with any applicable laws and regulations for JPMC Data to include candidate information that is stored, managed, shared, or accessed by the Supplier and its subcontractors.

Supplier must have reporting requirements for supplier personnel if they are arrested. All arrests must be reported, with the exception of minor traffic violations/citations. All supplier personnel must notify their employer regarding any current arrest/pending charges and provide supporting documentation related to the matter. Supplier must promptly notify JPMC if any current resources report an arrest or pending charges.