

Group Staff Screening Policy

Version No	9.3
Document Type	Policy
Parent Document	Enterprise Risk Management Framework
Parent Framework	Operational and Technology
Document Approver Name	Tanuj Kapilashrami
Document Approver Job Title	Chief Strategy and Talent Officer
Document Owner Name	Nicholas Hugh Jones
Document Owner Job Title	Head, Talent Acquisition QA ,Ops & Exc.
Document Contact Name	Paul Dorey
Document Contact Job Title	Talent Acquisition BGC Manager, Ops & Exc.
Business Scope	All Businesses
Function Role	All Functions
Geography Scope	GLOBAL
Approval Date	10/12/2024
Effective Date	01/01/2025
Next Review Date	31/12/2026

Table of Contents

1. PURPOSE AND SCOPE4

2. MANDATORY POLICY STATEMENTS4

2.1. Application of Background Screening Checks.....4

2.2. Minimum requirements applicable to all Staff4

2.3. Regulatory Regime Roles.....5

2.4. Discrepancies and screening insufficiencies5

3. RESPONSIBLE ROLES FOR IMPLEMENTING THE MANDATORY POLICY STATEMENTS5

4. POLICY RELATED AUTHORITIES.....5

5. CONNECTED PROCESSES AND ACTIVITIES5

6. POLICY EFFECTIVENESS REVIEW6

7. INTERCONNECTED POLICIES & STANDARDS6

8. STANDARDS MAPPED TO THIS POLICY7

9. APPENDIX7

Version Control Table

Name	Changes made	Materiality	Approved by	Version number	Approval Date	Effective Date
Paul Dorey	Migration to Inline format- Non Material Change(No change to document content)	Non-Material	Tanuj Kapilashrami	9.3	10/12/2024	01/01/2025

The full version history is included in [Appendix](#).

1. PURPOSE AND SCOPE

The Group Staff Screening Policy (the Policy) sets out the requirements and responsibilities for background screening of Staff, specifically to:

1. Provide relevant information to support regulatory Fit and Proper assessments.
2. Comply with financial and non-financial regulatory requirements.
3. Identify attempts to conceal relevant information or otherwise misrepresentation by Staff.
4. Prevent internal fraud by Staff.
5. Identify, prevent or manage potential conflicts of interest.

The Policy mandates the requirements for re-screening for Licenced and Regulated Roles* and the escalation approach for screening discrepancies*, as well as cases where screening cannot be completed as prescribed.

The Policy is mapped to the People Risk (Level 2 Risk) within the Operational and Technology Level 1 Risk. This Policy is not designed to comply specifically with any external rules and regulations. The Policy applies throughout the Group.

2. MANDATORY POLICY STATEMENTS

2.1. Application of Background Screening Checks

- a. All hires and appointments within the scope of the Policy are to be screened commensurate with the requirements of the role.
- b. The application of background screening checks is determined by:
 - i. role type (non-regulated role/ licenced and regulated role/ non-employed worker)
 - ii. hiring scenario (new hire / transfer / international assignment / promotion / rehire / conversion)
 - iii. validity of previous screening performed by the Group.

2.2. Minimum requirements applicable to all Staff

- a. The **Minimum Verification Standard** (MVS) as prescribed in the **Group Staff Screening Standard** (GSSS), determines the minimum level of screening required prior to commencement of work/employment.
- b. The Group will not tolerate any deliberate attempt on the part of Staff to mislead and Staff may be terminated from service if adverse or unsatisfactory information is identified through the screening process.
- c. Staff who are transferees resulting from a merger and/or acquisition will be screened commensurate with their role type, i.e., non-regulated or licenced and regulated.

2.3. Regulatory Regime Roles

- a. Licensed and regulated roles* are subject to **three-year** periodic re-screening in all locations. If local regulations prescribe more stringent re-screening requirements, these will take precedence over the Group Policy. Details on re-screening requirements content is detailed in the GSSS.
- b. For **Individual Accountability** (IA)* and other Regulatory Regime Roles*, regulatory reference checks must be completed in line with the relevant Regulators' requirements unless approved by the Individual Accountability Compliance team.
- c. Independent and Notified Non-Executive Directors whose roles are deemed Licenced and Regulated will be subject to "Enhanced Screening"* as well as to periodic re-screening.

2.4. Discrepancies and screening insufficiencies

Where discrepancies or adverse findings are identified, the content of Escalation Approval Matrix* must be followed.

3. RESPONSIBLE ROLES FOR IMPLEMENTING THE MANDATORY POLICY STATEMENTS

- Country Process Owners of Experienced Hires or Global People Services Talent Acquisition & Deployment / Screening Operations Team Leads (or their appointed delegates)
- Country Head of CFCC (or their appointed delegates)
- Global People Services Screening Team
- Global People Services Re-Screening Team (a subset of the Global People Service Screening Team)
- Leads, Quality and Assurance

4. POLICY RELATED AUTHORITIES

Dispensations will be granted where screening cannot be performed due to lack of local infrastructure or where legal, regulatory or data privacy reasons prohibit specific checks. All dispensations must be approved by the Policy Owner.

Authority for approval of hiring (mandatory policy statement 2.4) can be delegated by Country Process Owners of Experienced Hires or Global People Services Talent Acquisition & Deployment / Screening Operations Team Leads to a member of the team. The delegation must be in writing.

5. CONNECTED PROCESSES AND ACTIVITIES

The following key processes as per the Group Process Universe and across all countries are impacted by the requirements in this policy:

- Human Resources — Experienced Hires - Source Candidates
- Human Resources — Experienced Hires - Manage Job Offer
- Human Resources — Experienced Hires - Manage Screening

* Refer to Group Staff Screening Standard

- Human Resources — Experienced Hires - Integrate New Hire
- The Group Individual Accountability Policy and Standard -- Compliance and Financial Crime RTF

6. POLICY EFFECTIVENESS REVIEW

The Policy Owner will monitor the effectiveness of this Policy through the following:

- Evidence gathered through the control assessments for processes connected to this Policy.
- **Annual** effectiveness reviews for ERMF are to be conducted by Country Process Owners of Experienced Hires or by Global People Services Talent Acquisition & Deployment / Screening Operations Teams, in consultation with the Country Head of HR and Head T&R Quality Assurance, to ensure all policy exceptions are identified and have robust remediation plans in place.
- Dispensations to the Policy must be reviewed **annually** by the Country Talent Acquisition & Deployment teams.
 - Where checks cannot be performed due to lack of local infrastructure, legal or regulatory restrictions, these must be documented as “Variations” to the Policy and will be tracked centrally by **Centre of Excellence** (COE) and reviewed **annually** by the Country Talent Acquisition & Deployment and Country CFCC teams.
 - Country Talent Acquisition & Deployment teams will review, in consultation with the relevant Country Risk Framework Owners, dispensations due to lack of local infrastructure, legal or regulatory restrictions to ensure they remain valid and accommodate any revisions that have been made in the policy and standards. If no changes are identified, dispensations will be reraised to reflect that the review has been conducted and includes the new expiration date.
 - All dispensations will be submitted to the Policy Owner for approval. New dispensations will be submitted to Country Risk Owner for approval and to the HR Operational Risk team for review to determine if additional controls are required. The final approval is required from the Policy Owner. Please refer to Framework and Policy Governance Standard for the process on dispensations.
 - Communication will be sent to the COE operations teams to provide the updates and submissions as required; the Talent Acquisition & Deployment team consolidates the dispensation approvals granted and formally record in GovPoint and the GSSS.
- Outcomes from control assessments, Deep Dives and HR Data Governance Forum data will be provided to the Policy Owner who will be responsible for the assessment and effectiveness of the Policy.

7. INTERCONNECTED POLICIES & STANDARDS

Policy Name	Parent RTF	Policy Owner	Area of connection
Group Conflicts of Interest Policy	Compliance	Global Head of Frameworks and Policies	Determination of Conflicts of interest are part of the screening process
Group Data Conduct Policy	Compliance	Global Head, Data Conduct, CFCC	Screening checks will be performed where legally permissible and will be performed in compliance with the Group Data Management Principles.
Group Third Party Risk	Operational &	Executive Director, Third Party Risk	Global Background Screening Vendor Contracts are managed by Vendor

Management Policy	Technology	Management	Management / Supply Chain Management
Group AntiBribery and Corruption (ABC) Policy	Financial Crime	Global Head ABC Policy and Framework	The ABC requirements relate to the review of the eligibility of individuals who have been referred by Client Connections, Public Officials and Politically Exposed Persons as well as to the implications of adverse media.

Standard Name	Parent RTF	Standard Owner	Area of connection
Group Disciplinary Standard	Operational & Technology	Global Head, Employee Relations	The Group Disciplinary principles will be applied where Candidates have not fulfilled all screening requirements post hiring and for adverse results identified as part of any re-screening undertaken.
Group Screening Standards	Operational & Technology	Global Head, AML	Direction on use of third party screening providers and ongoing screening requirements
Group Security Operating Standards	Operational & Technology	Head, Safety & Security, Policy, Projects & Assurance	Non-Bank NEW ownership controls for Property and Landlord provisioned services
Group Licensed and Regulated Roles Standard	Compliance	Head, Regulatory Regimes	Definition of Licensed and Regulated Roles

8. STANDARDS MAPPED TO THIS POLICY

Standard Name	Parent RTF	Standard Owner	Standard Approver
Group Staff Screening Standard	Operational & Technology	Head of T&R Quality Assurance	Chief Strategy and Talent Officer

9. APPENDIX

Name	Changes made	Materiality	Approved by	Version number	Approval Date	Effective Date
Cynthia Cherbonnier	Changes made in line with the Framework and Policy Governance Standards (FPGS).	Non-material	Amit Patel	5.0	24 May 2018	-

Name	Changes made	Materiality	Approved by	Version number	Approval Date	Effective Date
Cynthia Cherbonnier	Annual review of the policy	Non-material	Tanuj Kapilashrami	6.0	21 Oct 2019	-
Cynthia Cherbonnier	Annual review of the policy	Non-material	Tanuj Kapilashrami	7.0	01 Nov 2020	-
Cynthia Cherbonnier	Annual review of the policy • Simplification on governance for dispensations where screening cannot be performed due to lack of local infrastructure. • The terminology of “front office” roles throughout the Policy and Standards have been removed as part of the alignment to the regulated role classification.	Non-material	Tanuj Kapilashrami	8.0	17 Jan 2022	-
Paul Dorey	Annual Review of the Policy	Non-material	Tanuj Kapilashrami	9.0	19 Jan 2023	19 Jan 2023
Paul Dorey	2.4 All adverse findings to follow content in Adverse Escalation matrix Minor language changes	Non-material	Tanuj Kapilashrami	9.1	7 Dec 2023	1 Jan 2024
Paul Dorey	Updating of business area names and terms 2.1 (iv) Removal of term as no longer relevant 3.0 Removal of Head of IA Compliance responsible for implementing mandatory policy statements 4.0 Additional criteria for dispensations 6.0 For dispensations change of owners from “CFCC” to “Risk Framework owners”	Non-material	Tanuj Kapilashrami	9.2	10 Dec 2024	1 st Jan 2025