



External Supplier Control Obligations People Screening

Control Title*	Timing	Scope	Control Description	Why is it Important
1. Identity Verification	Before employment/ assignment starts	All roles	Verify the identity of an individual by checking and retaining valid, original photographic evidence, and retaining a copy as evidence.	To prove that the individual is who they say they are
2. Legal Right to Work in Assignment Country	Before employment/ assignment starts	All roles	Check that the individual is legally entitled to work in the relevant jurisdiction by obtaining the original appropriate government-issued documentation and retaining a copy as evidence.	To verify that the individual is legally entitled to work in the relevant jurisdiction(s).
3. Credit Checks	Before employment/ assignment starts	All roles	<p>The following roles/positions shall be subjected to mandatory credit checks if:</p> <ul style="list-style-type: none"> • The role has a financial mandate/budget approval/payments processing (includes persons who process claims), including payroll administrators. • The role has access to SAP/ Workday approval process. • FAIS roles, including key individuals. • Insurance Claims Administrators • Credit roles • Branch cash handling roles, including custodians • Sourcing – where the role involves supplier contracting and sign off/approval 	Local and (international if applicable), regardless of grade, for roles that fall in the categories listed. This is evidence that the person is not susceptible to unethical behavior, fraud, or corruption, and is unlikely to offset substantial debt by manipulating the system or processes, thereby ensuring a high level of integrity for individuals in critical senior roles.

			Critical roles (Exco, Exco -1 and -2, and Country CMCs) IT roles that have access to financial systems	
4. Employment Verification	Within 8 weeks of the start of employment/ assignment	All roles (Excluding roles related to facilities and building domestic Maintenance / ATM maintenance)	Verify: <ul style="list-style-type: none"> • Employment history for the last three years (Five years if it is a regulated role). • Reference checks to confirm that the employment history was without incident and that career gaps can be evidenced; and • via independent means that the contact details for references from previous employers are bona fide • Previous employers who are not recognised must be verified by independent means (e.g., Companies House check). 	To confirm: <ul style="list-style-type: none"> • the suitability and integrity of the person • that career gaps greater than three months are investigated and assessed to ensure that all information on previous employment is accurate; and • that references are genuine

*If the Supplier cannot perform checks because of local legal reasons, they are automatically exempt from doing so and need only notify ABSA of this. Suppliers must also perform any additional/enhanced checks that may be required by local legislation beyond ABSA's minimum requirements.

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5. Sanctions Checks	Before employment/ assignment starts	All Roles	Prove compliance with applicable sanctions laws by checking that an individual is not listed on any official sanctions lists or restricted activity matrices.	If an individual is on a government and other sanctions list, this may pose a regulatory or reputational risk for ABSA.

6. Criminal Record Checks	Before the start of employment/ assignment	All Roles	Carry out, via legal agencies, a check for criminal convictions, and retain evidence of such checks. International checks are required if the candidate has lived overseas for 6 or more months in the last 10 years.	Checks that the individual is of good character and helps guard against inappropriate disclosure of information by individuals with criminal or malicious intent.
7. Academic and Professional Qualification Checks	Before the start of employment/ assignment	All Roles	To ensure that the person has the requisite qualifications for the role and meets any legislative minimum qualification requirements. To ensure the person's qualifications are authenticated.	To ensure that the person has the requisite qualifications for the role and meets any legislative minimum qualification requirements. To ensure the person's qualifications are authenticated.
8. Directorship and Media Checks	Within 8 weeks of the start of employment/ assignment	For any roles with access to Secret Information ** and those requiring regulatory approval	Perform: <ul style="list-style-type: none"> an independent check for any directorships held, to identify any potential conflicts of interest and/or disqualified status a media coverage check to identify if the individual has been the subject of adverse media attention 	Checks that for any individuals who hold in-scope roles, there are no conflicts of interest and/or individuals who may pose reputational risk.
9. Regulator Checks	Before employment/ assignment starts	Roles requiring regulatory approval only	Perform a check that individuals in any roles requiring regulatory approval can be evidenced in the relevant database/register.	Checks that an individual has the required approval from the regulator and that they are deemed 'fit and proper' to prevent regulatory risk.

**Secret Information - Information for which unauthorised disclosure (internally or externally) may cause serious financial or reputational damage, significant loss of competitive advantage, or regulatory sanction or legal action.

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10. Incomplete Checks or Adverse Results	As required	All Roles	Suppliers must have a process for dealing with incomplete or adverse screening checks. This may involve further discussion with the individual, completion of a declaration of fact, or a risk assessment to determine if a hire can still take place.	Verifies that Supplier personnel are not automatically assigned to ABSA if the required evidence for a check cannot be gathered for an individual, or if they fail a check.

11. Changes to Personal Circumstances and Failure to Disclose Information	As required	All roles	<p>Supplier must have a process in place:</p> <ul style="list-style-type: none"> • for individuals to notify them of relevant changes in circumstances (e.g., subsequent convictions, bankruptcy) • to ensure that subsequent discovery of adverse information is investigated and action taken if appropriate (e.g., a criminal charge that was not disclosed during screening); and • for re-screening an individual who has left the Supplier's employ and is subsequently re-employed after more than 3 months (evidence of Legal Right to Work should be obtained in all cases). 	<p>Verifies that:</p> <ul style="list-style-type: none"> • changes in circumstances that come to light, which may change an initial screening decision, are reviewed • persons failing to disclose material information are removed from the assignment; and • appropriate rescreening is undertaken for former employees who re-join the Supplier.
12. Foreign Nationals working on a work permit or visa in South Africa	As required	All roles as required	<p>Suppliers must ensure that:</p> <ul style="list-style-type: none"> • the candidate holds the correct and valid work permit or work visa as applicable 	Ensuring supplier control for foreign nationals working on a work permit or visa in South Africa is crucial for legal compliance and operational integrity.
13. United States Additional Provisions	Before employment or assignment starts	Solely for roles providing services	Supplier must:	To confirm the suitability and integrity of an individual and

Commented [lv1]: We need to reword this, this would not be applicable to Suppliers. I've made proposed update

		in the United States, unless otherwise agreed with ABSA	<ul style="list-style-type: none"> perform drug-testing on individuals if requested by ABSA, provide fingerprinting specimens for personnel working on-site at an ABSA location, or having access to ABSA's systems; and undertake additional checks where services are performed for ABSA Capital Inc. (the registered broker-dealer of ABSA). There are extended and additional requirements for career verification and criminal history screening as prescribed under FINRA regulation. If this applies, speak to your Sourcing contact, who will engage the ABSA US Compliance team for further instructions. 	ensure that US-specific requirements and those under FINRA regulation are complied with.
14. Fraud Checks	Before employment/assignment starts	All Roles	To check whether fraudulent activities have been recorded against the person. To check, so far as is possible and legally permitted, databases where fraudulent activity may have been recorded against the person, so as to reduce the risk to Absa of fraud/theft or other criminal activity.	To check whether fraudulent activities have been recorded against the person. To check, so far as is possible and legally permitted, databases where fraudulent activity may have been recorded against the person, so as to reduce the risk to Absa of fraud/theft or other criminal activity.

15. Former employees returning to a Group employer company will be re-screened in accordance with the Minimum mandatory screening requirements	Before employment/ assignment starts	Former Employees returning to Group employer (Excluding: Retrenched staff)	The review of ER Navigator or ER Navigator Report is to be actioned by the PX/PRA or CRC team (where applicable). and communicated to the relevant Hiring Manager, Human Capital Partner, TAP, and ER Manager to determine next steps	Checks were performed during the former employment period/engagement, and these remain valid and can be evidenced. Regulatory authorizations (where applicable) remain valid. Re-hires into Absa require review of the ER Navigator system and/or ER Navigator report to ascertain eligibility for re-hire as per the Talent Acquisition Standard.
16. Retrenched staff	Before employment/ assignment starts	Retrenched employees, who return to the Group	If a retrenched employee has left the organization but returns, the provisions regarding re-screening will be applied as part of the re-hire process, where previous screening cannot be evidenced, or the person is employed into a regulated role they have not previously held. The re-hire will be aligned with the Reassignment and Retrenchment Policy	Streamlines the hiring process by ensuring all compliance measures are in place before reintegration.
17. Dismissed employees due to misconduct or employees who have resigned during a disciplinary process	Before the shortlisting process starts	Previously dismissed employees due to misconduct, or employees who have resigned during a disciplinary process	<ul style="list-style-type: none"> Employees dismissed for misconduct must not be rehired. At the core of this dismissal is trust, which would have been irreparably broken. Employees who resign during a disciplinary hearing or while an investigation is pending should be flagged in Workday to prevent future rehire. 	Reduction of potential legal and compliance risks.

			<ul style="list-style-type: none"> • Dispensations will only be considered in the case of No-Fault terminations. (please see Section 5, Glossary 5.2 Definitions in the Talent Acquisition Standard) 	
18. Retirees	Before the fixed contract starts	Retirees who return to the Group on a fixed-term or contingent contract after retirement	For retirees: a fixed-term contract or contingent contract conversion shall be by exception only, and for a maximum period of 6 months, which must be accompanied by a compulsory skills transfer and succession plan as supporting documentation.	Streamlines the hiring process by ensuring all compliance measures are in place before reintegration.
19. Outside business interest and private work	Before employment/assignment starts	All Roles	To determine if there is any conflict of interest as outlined in the Absa Group Compliance Policies	To determine if there is any conflict of interest as outlined in the Absa Group Compliance Policies