

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 valid, original photographic evidence and retain 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 retain a copy as evidence.	To verify that the individual is legally entitled to work in the relevant jurisdiction(s).
3. Career and Company Verification	Within 6 weeks of the start of employment/ assignment	All roles (excluding roles related to facilities and building domestic maintenance/ ATM maintenance)	<p>Verify:</p> <ul style="list-style-type: none"> • employment history for the last five years (or the time period a regulator dictates if it is a regulated role). • with any career gaps greater than 90 days evidenced; and • via independent means that the contact details for previous employers are bona fide. Previous employers who are not recognised must be verified by independent means (e.g. a Companies House check). <p>Individuals who have been dismissed by a previous employer or resigned while under investigation / disciplinary process by a previous employer, must not be assigned to Barclays (unless escalated to Barclays and it is mutually agreed that they can be assigned due to mitigating circumstances e.g. health reasons).</p>	<p>To confirm:</p> <ul style="list-style-type: none"> • the suitability and integrity of the person; • that career gaps greater than 90 days are investigated and assessed to ensure that all information on previous employment is accurate; and • that previous employers are genuine.

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

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4. Sanctions Checks	Before employment/ assignment starts	For roles where the supplier is providing workers to Barclays (providing goods or services which do not involve the provision of workers to Barclays is out of scope)	Prove compliance with applicable sanctions laws by checking 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 regulatory or reputational risk for Barclays.
5. Politically Exposed Person (PEP) Checks	Before employment/ assignment starts	For roles where the supplier is providing workers to Barclays (providing goods or services which do not involve the provision of workers to Barclays is out of scope)	Perform a check to identify whether the individual: <ul style="list-style-type: none"> - Has Politically Exposed Person (PEP) status - Is an immediate family member of a PEP - Is a close associate of a PEP (e.g. in a close business relationship with a PEP). In the event the individual meets any of the above criteria, inform Barclays and agree a solution as appropriate.	From an anti-bribery and corruption perspective, this screening guards against the risk of PEP status being used to exert improper influence for or on behalf of Barclays.
6. Credit / Bankruptcy Checks	Before employment/ assignment starts	All roles	Carry out via a consumer credit database (or the local country equivalent), a credit and bankruptcy check of the individual, and retain a copy of the credit report on file.	These checks may reveal any individual who may pose a conflict of interest risk if the candidate is under financial pressure outside of the work environment.

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7. Criminal Record Checks	Before employment/ assignment starts	All roles	<p>Carry out, via a criminal records bureau (or the local country equivalent), a check for criminal convictions and retain evidence of such checks.</p> <p>Individuals must not be assigned to Barclays if they have had a conviction related to:</p> <ul style="list-style-type: none"> Sex offences; Violence against person(s); Fraud, theft, or blackmail; Possession of weapons; Distribution of illegal drugs; Terrorism-related offences. 	Checks that the individual is of good character, and helps guard against inappropriate disclosure of information by individuals with criminal or malicious intent.
8. Directorship and Media Checks	Within 6 weeks of the start of employment/ assignment	For any roles with access to secret Information ** and those requiring regulatory approval/certification in accordance with the requirements of the relevant financial services authority.	<p>Perform:</p> <ul style="list-style-type: none"> • an independent check for any directorships held, to identify any potential conflicts of interest and / or disqualified status; and • an adverse media 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/certification in accordance with the requirements of the relevant regulator only	Perform a check that individuals in any roles requiring regulatory approval/certification 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.

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**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	Supplier must have a process for dealing with incomplete checks or adverse screening results. 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 Barclays 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	Supplier must have a process in place: <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). 	Verifies that: <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 assignment; and; - appropriate re-screening is undertaken for former employees who re-join the Supplier.
12. FINRA (The Financial Industry Regulatory Authority) Regulatory Requirements	<p>Scope 1</p> <p>Fingerprinting</p> <p>Prior to start date.</p> <p>Scope 2</p> <p>FINRA Questionnaire.</p> <p>10-year employment history verification.</p> <p>Prior to start date.</p>	<p>1) Roles deemed as FINRA 17F-2.</p> <p>2) Roles deemed as Non-Registered Associated Persons.</p>	<p>A supplier must have a process in place to collect:</p> <p>Scope 1.</p> <p>Finger printing to be supplied to FINRA to check against FBI data base for identifying any Statutory Disqualification.</p> <p>Scope 1 and 2.</p> <p>FINRA Questionnaire for identifying any Statutory Disqualifications</p> <p>Questionnaire</p> <p>10 Year pre-employment history checks</p>	<p>Fingerprinting Confirms:</p> <p>Compliant with FINRA regulations</p> <ul style="list-style-type: none"> • No adverse information held by the FBI that would result in a Statutory Disqualification. <p>Questionnaire Confirms and or Identifies</p> <ul style="list-style-type: none"> • Compliant with FINRA regulations • Statutory Disqualifications <p>10 Year employment history Confirms:</p> <ul style="list-style-type: none"> • Compliant with FINRA regulations. Matched against provided employment history and independently verified.

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