

# **WOOLWORTHS** FINANCIAL SERVICES

## **External Supplier Control Obligations People Screening**



Version 7.3 Dated April 2021

Control #	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/position shall be subjected to mandatory credit checks if:</p> <p>The role has a financial mandate/budget approval/ payments processing (includes persons who process claims), including payroll administrators</p> <p>The role has access to SAP/ Workday approval process</p> <p>FAIS roles including key individuals</p> <p>Insurance claims Administrators</p> <p>Credit roles</p> <p>Branch cash handling roles including custodians</p> <p>Sourcing – where the role involves supplier contracting and sign off/approval</p>	Local and (international if applicable) regardless of grade for roles that fall in the categories listed. This is to evidence that the person is not susceptible to unethical behavior, fraud, or corruption to offset substantial debt by manipulating the system or processes, as well as ensure high level integrity for individuals in critical senior roles.

			Critical roles (Exco, Exco -1 and -2 and Country CMCs) IT roles which 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: - 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 recognized must be verified by independent means (e.g., as Companies House check).	To confirm: - 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 Supplier cannot perform checks because of local legal reasons they are automatically exempt from doing so and need only notify WFS of this. Suppliers must also perform any additional/enhanced checks that may be required by local legislation beyond WFS' minimum requirements

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5. Sanctions Checks	Before employment/ assignment starts	All Roles	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 WFS.

6. Criminal Record Checks	Before of 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 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: - an independent check for any directorships held, to identify any potential conflicts of interest and / or disqualified status a media coverage checks to identify if the individual has been the subject of adverse media attention	Checks that for any individuals who hold in-scope roles, that 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 unauthorized 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 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 WFS 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"> <li>- for individuals to notify them of relevant changes in circumstances (e.g., subsequent convictions, bankruptcy).</li> <li>- 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</li> </ul> <p>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>	<p>Verifies that:</p> <ul style="list-style-type: none"> <li>- changes in circumstances that come to light which may change an initial screening decision are reviewed.</li> <li>- persons failing to disclose material information are removed from assignment, and.</li> </ul> <p>appropriate rescreening is undertaken for former employees who re-join the Supplier.</p>
12. United States Additional Provisions	Before employment/	Solely for roles providing services	Supplier must:	To confirm the suitability and integrity of an individual and

	assignment starts	in the United States, unless otherwise agreed with WFS	<ul style="list-style-type: none"> <li>- perform drug-testing on individuals.</li> <li>- if requested by WFS, provide finger-printing specimens for personnel working on-site at a WFS location, or having access to WFS' systems; and</li> </ul> <p>undertake additional checks where required. 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 ABSA US Compliance team for further instructions.</p>	ensure that US-specific requirements and those under FINRA regulation are complied with.
13. 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 WFS 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 WFS of fraud/theft or other criminal activity.
14. 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 WFS Compliance Policies	To determine if there is any conflict of interest as outlined in the WFS Compliance Policies