

Recruitment Policy

HR Policy | Global

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This document is a template intended to be reviewed, tailored and approved by your organisation before use.

Replace all references to “the Company” with your organisation’s name.

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1. Purpose

This Policy sets out the mandatory requirements for identifying, approving, sourcing, selecting, screening and appointing people to roles at the Company. Its purpose is to ensure that every appointment is merit-based, lawful, free from discrimination, and completed only after pre-employment screening proportionate to the risk of the role.

As a deposit-taking financial institution, the Company's licence to operate depends materially on the honesty, competence and accountability of its people. Recruitment is therefore both a people process and a prudential control: it is the first line of defence against fraud, misconduct and capability gaps, and the entry point to the Company's obligations under the senior manager accountability regime applicable in its jurisdiction(s), the suitability expectations of the BCBS Corporate Governance Principles for Banks, and the employee screening requirements of the FATF Recommendations.

This Policy is owned by the Chief People Officer and approved by the Chief Executive Officer. It supports, and must be read with, the Fit and Proper Policy, the Code of Conduct, the Remuneration Policy and Framework, the Privacy Policy and the AML/CFT Program.

2. Scope

This Policy applies to the Company and all of its controlled entities, and to every appointment to work for or on behalf of the Company, including:

- permanent, fixed-term, part-time and casual employees;
- internal transfers, promotions and secondments (inbound and outbound);
- contractors, consultants and agency workers engaged in Company roles;
- graduates, interns and work-experience placements; and
- candidates for Accountable Roles and other Regulated Roles, in conjunction with the Fit and Proper Policy.

Appointments to the Board of Directors are outside the scope of this Policy and are governed by the Board Charter, the Board Renewal Policy and the Fit and Proper Policy. The assessment methodology for suitability is set out in the Fit and Proper Policy; this Policy governs when that assessment must be triggered within recruitment.

2.1 Jurisdictional application

This Policy states international best practice for recruitment in a banking institution. The Company must map each requirement of this Policy to the employment, anti-discrimination, privacy, immigration and financial-services law of each jurisdiction in which it operates, and must document that mapping. Where the law of an operating jurisdiction imposes a stricter or additional requirement, local law prevails; where local law prohibits a check or practice described in this Policy, the Company must apply the closest lawful alternative and record the variation.

3. Definitions

Term	Definition
Accountable Role	A role designated under the senior manager accountability regime applicable in the Company's jurisdiction(s), or a role that otherwise carries actual or effective senior executive responsibility for management or control of the Company or of a significant part of its operations.
Approval to Recruit	The documented authorisation, granted under the delegations in this Policy, to commence recruitment for a specific budgeted or new position.
Candidate	Any person, internal or external, who applies for or is considered for a role with the Company, including contractors converting to employment.
Contractor	An individual engaged to provide services to the Company under a contract for services, whether directly or through an agency, personal services entity or service provider, and who is not an employee of the Company.
Hiring Manager	The line manager with an approved vacancy who is accountable for the selection decision for that vacancy.
Merit-Based Selection	Selection in which the preferred candidate is the person assessed as best able to perform the role, judged against pre-defined, job-related criteria using consistent methods.
Pre-Employment Screening	The verification and background checks completed before a candidate commences work, comprising the checks prescribed for the applicable Screening Tier in this Policy.
Protected Attribute	A personal characteristic in respect of which discrimination is prohibited under applicable local law or the Company's policies, including race, colour, national or ethnic origin, sex, sexual orientation, gender identity, age, disability, pregnancy, marital status, family or carer responsibilities, religion, political opinion, social origin and trade union membership or activity, consistent with ILO Convention No. 111.
Regulated Role	A role for which applicable local law or a regulator in a jurisdiction in which the

	Company operates requires fitness and propriety assessment, approval, registration, certification or notification before appointment, together with any other role the Company designates as requiring a suitability assessment, including directors and senior managers.
Right-to-Work Verification	Confirmation, through documents or government verification services accepted in the relevant jurisdiction, that a candidate is lawfully entitled to perform the work offered in the location where it will be performed.
Screening Tier	One of the risk-based categories (Tier 1 to Tier 3) defined in this Policy that determines the pre-employment checks required for a role.
Secondment	A temporary assignment of an employee to a different role, team or entity for a defined period, after which the employee is expected to return to their substantive role.
Structured Interview	An interview in which all candidates for a role are asked a consistent set of pre-agreed, job-related questions and are scored against the same criteria by a panel.
Suitability Assessment	The documented assessment of a person's honesty, integrity, reputation, competence, capability and, where relevant, financial soundness required before appointment to a Regulated Role, conducted under the Company's Fit and Proper Policy and the senior manager accountability regime applicable in the Company's jurisdiction(s).
Vulnerable Role	A role with access to customer funds, payment systems, privileged IT access, market-sensitive information or unsupervised contact with vulnerable customers, attracting heightened screening.

4. Regulatory Framework

The key legislation, regulations and standards relevant to this document include (as amended from time to time):

Instrument / Standard	Relevance
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ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	Establishes the international prohibition of discrimination in access to employment that underpins this Policy's non-discrimination requirements at every recruitment stage.
ILO Equal Remuneration Convention, 1951 (No. 100)	Requires equal remuneration for work of equal value, constraining how salary ranges are set, disclosed and offered during recruitment.
ILO fundamental Conventions on forced labour and child labour (Nos. 29, 105, 138 and 182)	Prohibit forced and child labour; the basis for minimum-age verification and for prohibiting recruitment fees or practices that create debt bondage.
ILO Private Employment Agencies Convention, 1997 (No. 181) and the ILO General Principles and Operational Guidelines for Fair Recruitment	Set the fair-recruitment standards applied to the Company's use of recruitment agencies, including the principle that candidates are never charged recruitment fees.
UN Guiding Principles on Business and Human Rights	Require the Company to respect human rights in its own hiring and through its recruitment agencies and screening providers, and to remediate adverse impacts.
BCBS Corporate Governance Principles for Banks	Establish the expectation that board members and senior management are, and remain, suitable and that appointment processes assess integrity, competence and experience.
Senior manager accountability regime applicable in the Company's jurisdiction(s)	Governs designation, suitability assessment, regulatory approval or registration, and statements of responsibility for Accountable Roles; this Policy triggers those obligations within recruitment.
FATF 40 Recommendations, in particular Recommendation 18	Require screening procedures to ensure high standards when hiring employees, implemented through this Policy's employee due diligence checks for AML/CFT-sensitive roles.
BCBS Principles for the Sound Management of Operational Risk	Treat people capability, conduct and third-party arrangements as operational risk; recruitment controls and screening providers form part of the operational risk framework.
FSB Principles for Sound Compensation Practices	Constrain offer terms for material risk takers, including sign-on awards, guaranteed payments and deferral, which recruitment offers must respect.
OECD Privacy Guidelines and the EU General Data Protection Regulation (as a	Set the collection-limitation, purpose, security and retention standards this

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.

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