

Vetting Specification for External Staff JAPAN

Valid as of 20 January 2021

Current State				
Check	Sources / Tools	Requirement / Validation	Successful Vetting Check Criteria	Timing

These specifications are to be understood as recommendation by UBS and do not constitute any obligation by the Supplier. The Supplier neither has to confirm completion of vetting to UBS, nor would the Supplier be audited in respect to vetting.

Identity Check		This check is the responsibility of the supplier.		Pre-UBS start date
Right to work verification		This check is the responsibility of the supplier.		Pre-UBS start date
Global Background Check (COSIMA, GTS, Rehire)	Cosima, GTS, Internal HR systems	Background check to identify records of terrorist/criminal activities or networking; personal misconduct / reputation problem / hostility against UBS or conflict of interest with UBS, negative references concerning trustworthiness, work ethics, reputation. Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons).	No hits	Pre-UBS start date, Pre-offer, latest pre-UBS start date
Family Relationship	Self-declaration	Candidate needs to be asked whether he/she has family or personal relationships with UBS employees. - Family relationship: spouse, domestic partner or civil partner (or similar as recognised by law), parent (or parent-in-law), sister or brother (or in-law), child, step child. - Personal relationship: management reporting line. Answers are adequately documented.	No family relationship with UBS	Pre-UBS start date, Pre-offer, latest pre-UBS start date
External Directorship and Positions (self declaration)	Self-declaration	Candidate needs to be asked whether he/she has any external directorship that could raise a conflict of interest with UBS to disclose. Answers are adequately documented.	No external directorship and positions	Pre-UBS start date, Pre-offer, latest pre-UBS start date
Registered Status / Statutory Disqualification	Japan Securities Dealers Association Check (JSDA) check for staff with employment history in financial firms. To check in JSDA database to see if the staff had breached the law, or had engaged in misconduct in the past.	JSDA database Only applicable for agency/temp workers	No breach/misconduct	Pre-UBS start date

<p>Criminal Record Check</p>	<p>Civil Litigation Check by Tokyo District Court AND Anti-Social Forces (ASF) Check - Traces records back to the 1960s is an alternative for JPN - Search through private database which based on media articles - It reveals the potential relation to the so-called Yakuza - Database is maintained by a Private organization: security protection Network Co., Ltd.</p> <p>No Criminal Record Check is available in Japan for employment screening purpose. Criminal and credit checks are not legally allowed in general. However, Authorities do not issue relevant records for vetting purposes (as a substitute, civil litigation and bankruptcy to be done). If applicable, international credit and criminal checks to be done for candidates.</p>	<p>Document(s) need to be original and current; e.g. dated not older than 2 months from receiving.</p> <p>Onboarding: Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months over the last 5 years (required address history).</p> <p>Periodic Vetting: Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months over the period equal to the frequency of periodic vetting (e.g. if the frequency of periodic vetting is 3 years, the check / address history must cover the last 3 years).</p> <p>For both Onboarding and Periodic Vetting an appropriate address verification shall be performed for the current address. Further proof of residence shall only be requested if circumstances (applicable legal and regulatory requirements) demand such. Identification of any records associated with the candidate.</p>	<p>No entries found in respective document.</p>	<p>Pre-UBS start date, latest 4 weeks after UBS start date</p>
<p>Credit Check</p>	<p>Bankruptcy Check / Report by Japan Government Gazette (National Printing Bureau).</p> <p>No Credit Check is available in Japan for employment screening purpose. Criminal and credit checks are not legally allowed in general. However, Authorities do not issue relevant records for vetting purposes (as a substitute, civil litigation and bankruptcy to be done). If applicable, international credit and criminal checks to be done for candidates.</p>	<p>Document(s) need to be original and current; e.g. dated not older than 2 months from receiving.</p> <p>Onboarding: Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months over the last 5 years (required address history).</p> <p>Periodic Vetting: Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months over the period equal to the frequency of periodic vetting (e.g. if the frequency of periodic vetting is 3 years, the check / address history must cover the last 3 years).</p> <p>For both Onboarding and Periodic Vetting an appropriate address verification shall be performed for the current address. Further proof of residence shall only be requested if circumstances (applicable legal and regulatory requirements) demand such. Check the summary of the candidate credit and bankruptcy history and compare with the address history.</p>	<p>No debt defaults (overdue amounts, collections, litigations) Candidate has not been legally declared a bankrupt.</p>	<p>Pre-UBS start date, latest 4 weeks after UBS start date</p>
<p>External Directorship (Database Search)</p>	<p>Public database</p>	<p>Database check to identify any external directorships and assess candidate integrity based on external directorship self-declaration.</p>	<p>No hits, no discrepancies between self-declaration and database search</p>	<p>Pre-UBS start date, latest 4 weeks after UBS start date</p>