

Vetting Specification for External Staff LUXEMBOURG

Valid as of 01 June 2022

Current State				
Check	Sources / Tools	Requirement / Validation	Successful Vetting Check Criteria	Timing
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	<p>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).</p> <p>Cosima / GTS check only permissible in cases where criminal check is performed. For criteria, see section "Criminal Record Check". GTS Check: This check only permissible when the candidate is a known rehire. In addition, negative media information held within GTS cannot be considered for vetting purposes</p> <p>Periodic Vetting No periodic Vetting is permitted</p>	No hits	Pre-UBS start date
Family Relationship	Self-declaration	<p>Candidate needs to be asked whether he/she has family or personal relationships with UBS employees.</p> <ul style="list-style-type: none"> - 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. <p>Answers are adequately documented.</p>	No family relationship with UBS	Pre-UBS start date
External Directorship and Positions (self declaration)	Self-declaration	<p>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.</p>	No external directorship and positions	Pre-UBS start date
Registered Status / Statutory Disqualification		Not applicable		Pre-UBS start date
Criminal Record Check	<p>Criminal Record check is not allowed to be performed by UBS (or its vendors) for external staff working/providing services to UBS entities in Luxembourg.</p> <p>The supplier must have a confirmation that</p> <ul style="list-style-type: none"> - it has conducted the criminal record check by reviewing and assessing the original extract(s) of the criminal record and found the candidate eligible (eligible = no convictions) 	<p>Onboarding Cases Checks are only permitted for onboarding cases if any of the following criteria is met:</p> <ul style="list-style-type: none"> - Management roles (external staff with senior responsibilities) or personal assistants and board administrators with access to confidential financial information - Functions which involve the handling of confidential financial information, including financial systems (e.g. highly privileged users, regulated, certified and client facing roles) - Staff of control functions per Policy 1-C-007976 or staff responsible for control activities in non control functions <p>Where this check is permissible, document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. 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). s</p> <p>Periodic Vetting No periodic Vetting is permitted</p> <p>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>	Confirmation of eligibility	Pre-UBS start date
Credit Check		Not allowed for employment screening purposes. / No periodic Vetting is permitted		N/A

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External Directorship (Database Search)	Public database	Database check to identify any external directorships and assess candidate integrity based on external directorship self-declaration. The check 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)	No hits, no discrepancies between self-declaration and database search	Pre-UBS start date