

Vetting Specification for External Staff POLAND

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 and Internal HR systems for the termination reason as per the work certificate only	<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 and the termination reason as per the work certificate only.</p> <p>Cosima / GTS check only permissible in cases where criminal check is performed. For criteria, see section "Criminal Record Check".</p> <p>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 All Risk sensitive roles in scope for Periodic Staff Vetting are permitted. Those roles are Managing Directors and above, HPU's, External Non-Executive Directors, Regulatory (Registered Roles) Group M&A & Equity Investments: staff with involvement into strictly confidential Group M&A projects OR involvement in managing Equity Holdings projects, Group CFO: Investor Relations staff with regular involvement into strategic projects of strictly confidential nature, Group Treasury: Enhanced Benchmark Submitters responsible for the daily labor submission process administered by ICE, Group Compliance Regulatory and Governance: In addition to Group Compliance, Regulatory and Governance-based EC members the following sub-MD GCRG staff is considered to require the highest level of personal integrity or own a risk sensitive, which grants them enhanced authority due to privileged access to systems, networks, data and knowhow owned by UBS: (i) regulatory Affairs team lead, assistant to Head G&RA and CoS team (ii) Group Investigations (i.e. Criminal Investigations & IT Forensics team, eDiscovery/eDTS team and Data Analytics & Tools team), (iii) GSS staff, (iv) Cyber testers in C&ORC GF, (v) staff with access to the PEP cockpit reporting</p>	No hits	Pre-UBS start date
Family Relationship	Self-declaration Check only allowed on candidate's voluntary consent.	<p>Candidate needs to be asked whether he/she has family or personal relationships with UBS employees.</p> <p>- 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> <p>Answers are adequately documented.</p>	No family relationship with UBS. If a relationship disclosed, further analysis to be performed by Line Manger with Compliance. Candidate cannot be refused if the relationship is revealed.	Pre-UBS start date
External Directorship and Positions (self declaration)		Not allowed for employment screening purposes		N/A
Registered Status / Statutory Disqualification		Not applicable for external staff		N/A
Criminal Record Check	Excerpt from the National Criminal Record (Krajowy Rejestr Karny)	<p>Level 1 suppliers: 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. Performing a check on foreign address history is not permitted, document(s) must cover only Polish addresses 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 All Risk sensitive roles in scope for Periodic Staff Vetting are permitted. Those roles are Managing Directors, HPU's, External Non-Executive Directors, Regulatory (Registered Roles) Group M&A & Equity Investments: staff with involvement into strictly confidential Group M&A projects OR involvement in managing Equity Holdings projects, Group CFO: Investor Relations staff with regular involvement into strategic projects of strictly confidential nature, Group Treasury: Enhanced Benchmark Submitters responsible for the daily labor submission process administered by ICE, Group Compliance Regulatory and Governance: In addition to Group Compliance, Regulatory and Governance-based EC members the following sub-MD GCRG staff is considered to require the highest level of personal integrity or own a risk sensitive, which grants them enhanced authority due to privileged access to systems, networks, data and knowhow owned by UBS: (i) regulatory Affairs team lead, assistant to Head G&RA and CoS team (ii) Group Investigations (i.e. Criminal Investigations & IT Forensics team, eDiscovery/eDTS team and Data Analytics & Tools team), (iii) GSS staff, (iv) Cyber testers in C&ORC GF, (v) staff with access to the PEP cockpit reporting</p> <p>Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. Performing a check on foreign address history is not permitted, document(s) must cover only Polish addresses 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>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>Level 2 suppliers: Not allowed for employment screening purposes for onboarding and periodic vetting.</p>	No entries found in respective document(s).	Pre-UBS start date
Credit Check		Not allowed for employment screening purposes		N/A
External Directorship (Database Search)		Not allowed for employment screening purposes		N/A