

Vetting Specification for External Staff ITALY

Valid as of 19 February 2022

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 not allowed in Italy for employment screening purposes for onboarding Rehire check in Internal HR Systems is allowed. COSIMA is allowed for Periodic Staff Vetting	Onboarding Vetting Cosima is NOT allowed Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons) Periodic Vetting All Risk sensitive roles in scope for Periodic Staff Vetting are permitted. Those roles are Managing Directors, External Non-Executive Directors, Regulatory (Registered Roles), Group Internal Audit: Members of the Special Review Group, Group Treasury: Enhanced Benchmark Submitters responsible for the daily libor 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	No hits	Pre-UBS start date
Family Relationship	Self-declaration or 'Stato di Famiglia'	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
External Directorship and Positions	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
Registered Status / Statutory Disqualification		Not applicable for External staff in Italy.		N/A
Criminal Record Check	Casellario Giudiziario and Carichi pendenti	Onboarding Cases Checks are only permitted for onboarding cases if any of the following criteria is met: - 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 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). Periodic Vetting All Risk sensitive roles in scope for Periodic Staff Vetting are permitted. Those roles are Managing Directors, External Non-Executive Directors, Regulatory (Registered Roles), Group Internal Audit: Members of the Special Review Group, Group Treasury: Enhanced Benchmark Submitters responsible for the daily libor 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 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 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). 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.	No entries found in respective document	Pre-UBS start date
Credit Check		Credit Check is not allowed in Italy for employee screening purposes.		N/A
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