

Vetting Process for External Staff

Supplier Information (L2)



Context

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1 Background to UBS external staff vetting

All UBS staff (internal UBS staff, external supplier staff - inclusive of subcontractors) are subject to the same minimum vetting standards in accordance with the Global Staff Vetting Policy.



Why

- Provides consistent standards to the vetting of all UBS external and internal staff, in all locations
- Reduces UBS's operational and reputational risk
- Protects our clients
- Complies with regulatory expectations



How

- UBS's Global Staff Vetting Policy applies to all staff and addresses the minimum standard of vetting for all staff who have access to UBS information and/or premises
- Processes are applicable globally following local rules and regulations
- Re-vetting of risk-sensitive staff (as defined by UBS) ensures that individuals are re-vetted as circumstances may have changed since vetting was last performed.



Involved Parties

- Suppliers
- Staff of Suppliers (this includes subcontractors – e.g. 4th Party Staff)
- UBS Business Contact ('Hiring Manager')
- UBS Regional Staff Vetting Operations Teams
- UBS certified Vetting Vendors
- UBS HR Advisory Lead for External Suppliers

Region	UBS certified Vetting Vendor
EMEA, CH, Poland	HireRight (UK)
Americas	Cisive (US)
APAC	First Advantage (Singapore)
South Africa	MIE

Global mandatory vetting checks & external staff categories

All vetting checks must be completed before a member of staff is admitted access to UBS premises, data or systems.

Staff category defines risk sensitivity and vetting checks to be executed

- **Category I:** Access to UBS Group systems, UBS valuables (e.g. treasury room, server rooms) and/or UBS Group's confidential information and issued with a UBS logon ID or a GPN;
- **Category II*:** Access to confidential / strictly confidential information, data or physical documents and no access to IT or unsupervised physical access to infrastructure (no GPN)
- **Category III:** No access to UBS IT Systems, no access to UBS valuables and no access to UBS's Confidential Information, but are issued with a GPN or provided with an access badge, and have access to UBS premises

Mandatory Vetting checks	Categories of External Staff	
	Category I	Category III
Identity Check	○	○
Right to Work Verification	○	○
Criminal Record Check	✓	✓
Credit Check	✓	✗
Global Background Checks, Re-engagement Check	✓	✓
Registered Status/ Statutory Disqualification (global regulated positions only)	✓	✗
Relatives and Relationships (Self-Declaration)	✓	✗
External Directorships and Positions (Self-Declaration)	✓	✗
External Directorships and Positions (Database Search)	✓	✗
Fingerprinting (US only)	✓	✓
Highest Level of Education	✗	✗
Employment History	✗	✗

***For external staff category II,** suppliers must ensure that the following checks have been completed: Identity check, Right to Work Verification and Criminal Check, where permissible pursuant to relevant federal, state and/or local laws.

✓ = UBS performs checks; ○ = Supplier performs checks; ✗ = no check

- **General rules**

- UBS's vetting policy and minimum standards clearly require that all external staff (inclusive of subcontractors – e.g. 4th party staff) who have access to UBS systems and premises, must be vetted to the same standard as UBS requires for internal staff performing similar roles. UBS is obliged to distinguish between 3rd party (e.g. your direct employees) and subcontractors (e.g. 4th party staff) and, to record the subcontractor company name, as applicable. Supplier must ensure that for all its Staff (including subcontractors), vetting has been completed in line with the Vetting Specifications, taking into account the requirements of the respective external staff category.
- External staff onboarding requests may now be initiated on a drafted contract ID and vetting may be initiated as early as six months (three months for the Americas) before the new joiner's start date
- As soon as a draft contract is recorded in the contracting tool, your UBS business contact should initiate staff vetting via the HR portal (UBS legal entities only) or via email to staff vetting operations (CS legal entity onboardings), so HR can start the vetting process.
- To start the vetting process, supplier agrees to submit the [Staff Vetting Declaration](#) (can be downloaded from the document library of the [L2 Staff Vetting Website](#)) and all other required information and documentation for each staff member to be assigned to UBS within the timelines prescribed by UBS. The staff vetting declaration provides UBS with the necessary information we require to initiate vetting and onboarding for your staff and your subcontractors. As a supplier of UBS, you also acknowledge contractual requirements (e.g. identity and right to work verification have been performed by you as an employer). Namely:
 - all staff assigned to perform services are legally eligible and authorized to work in the jurisdiction where they are performing services;
 - all staff assigned to perform services have all appropriate and applicable visas, work permits and permissions to do so; and
 - it will comply with all applicable laws in particular with (i) immigration laws and regulations of the relevant jurisdiction and (ii) data protection laws;
 - it will not prevent or discourage staff from applying for or obtaining appropriate and applicable visas, work permits or permissions to enable them to continue to work in any given location.
- When executing the vetting, UBS shall:
 - be responsible and liable for choosing, instructing and supervising vetting service providers;
 - comply, and will procure the vetting service providers to comply, with all applicable laws, including the relevant data protection laws;
 - ensure that vetting data is accessible only to the personnel of UBS and the relevant vetting service providers on a "need-to-know" basis and for a restricted period of time; and
 - use commercially reasonable efforts to guard against the unauthorized or unlawful access, loss or destruction of vetting data.

- **Vetting**

- UBS and/or a vetting service provider designated by UBS will execute the vetting for category I staff and category III staff (including any subcontractors / 4th party staff) in line with the minimum requirements of the Global Staff Vetting policy. Supplier agrees to provide all reasonable support to UBS, including obtaining all prior consents and permissions from the staff as may be required in order to provide the requested information to UBS and/or the vetting service provider, so that the vetting can be completed on a timely basis
- Based on the vetting results, UBS will reasonably determine if any staff has failed to meet the vetting check requirements and will notify the supplier if such staff should not provide (or continue to provide) services to UBS. For the avoidance of doubt, this does not mean that supplier is required to terminate the employment of the affected staff i.e. supplier may reassign the affected staff to other work or assignments for supplier's other clients as supplier deems appropriate.
- Supplier agrees and accepts that within the course of the vetting process, the staff's data may be transferred cross-border, including, but not limited to, to the vetting service providers
- No staff shall provide any services to UBS before pre-start vetting has been completed
- UBS will ensure that the supplier is notified of the decision whether a staff member is eligible or not to provide any services to UBS. Based on the vetting results, UBS will reasonably determine if any staff has failed to meet the vetting check requirements and will notify the supplier if such staff should not provide services to UBS. Upon receiving the information, the supplier will not engage the candidate or withdraw the candidate from the engagement for UBS with immediate effect

- **Country vetting specifications**

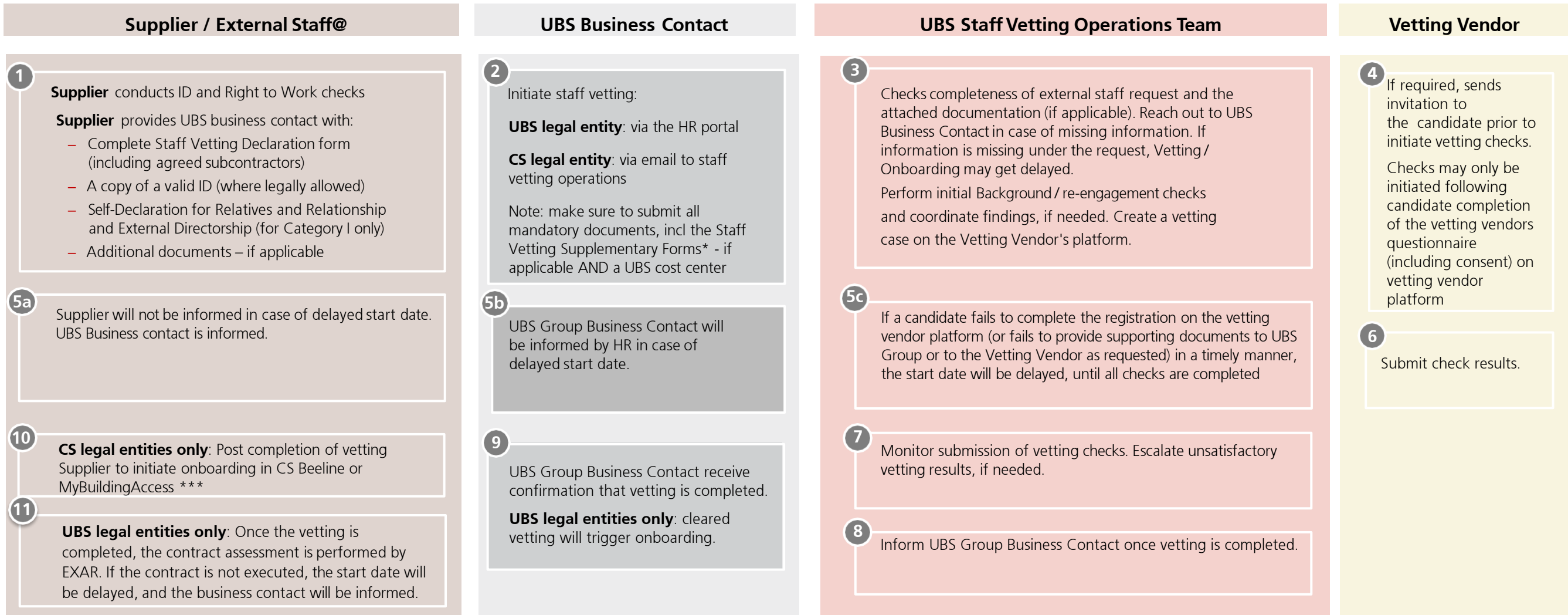
- The country vetting specifications set out the minimum requirements for vetting as determined and defined by UBS
- The country vetting specifications may be amended by UBS at any time to the extent deemed necessary or appropriate by UBS (e.g. in case of changes of legislation). Any changes will be posted in advance of the effective date on the Level 2 supplier site. Changes will apply to all future vetting cases, initiated no earlier than the effective date

- **Change of position, periodic staff vetting (re-vetting)**

- Before a staff member changes position or role which leads to a change of external staff category or before a staff member changes the country where he/she is performing the services, supplier shall inform UBS about such change, and UBS shall determine if a new vetting process for such staff should be initiated, in order for UBS to assure itself that the affected staff member meets the applicable vetting check requirements for the new external staff category or the new country of services, as the case may be.
- Risk-sensitive staff are subject to pre-defined periodic vetting as determined by UBS. UBS, however, reserves the right at any time to require vetting of any already vetted risk-sensitive staff, irrespective of whether positions have changed or not, if deemed necessary or appropriate by UBS.

4 Process flow chart as of 1 May 2024

The UBS Group business contact can only raise a vetting / onboarding request when contract is draft, draft amendment or published. Staff vetting may only be initiated after data protection eligibility assessments (e.g. **Supplementary form**) has been considered for the vetting process. Onboarding for staff of a CS legal entity may only be initiated after vetting clearance.



• This applies for the following countries: Austria, Denmark , France, Guernsey, Hungary, Ireland, Italy, Lichtenstein, Luxembourg, Netherlands, Poland, Portugal, Romania, Sweden, UK, Switzerland, Australia, Singapore, Brazil and Mexico.
 @New joiners can start only after successful clearance of UBS vetting requirements (or an approved vetting exception)
 our contracting tool (Logistics Platform) reflects a contract status of Published, Draft Amendment, or Pending with a start date on or before the new joiner’s start date
 ***For onboarding in non-core locations, outside India, US, UK, Poland, Switzerland, Hong Kong, Singapore, the Internal Business Partner will request onboarding in Beeline.

Vetting process for category I and III for UBS Group onboardings (1/3)

Vetting initiation – Supplier (action may be taken as early as 6 months (3 months for the Americas) prior to the new joiner's start date)

Action by Supplier:

- Complete and sign the Level 2 Staff Vetting Declaration form (if possible, do not wait until the contract is signed. However, you must have contractually agreed to UBS's vetting standards prior to onboarding)
- Important: Identify whether the candidate is your direct employee/not your direct employee. Add the correct name of the subcontractor (e.g., 4th party staff) as it appears in formal company registers in case the staff it is not your direct employee
- Ask the candidate to complete and sign the Self-Declaration for External Directorship and Relatives and Relationship form (for Category I only)
- Obtain a copy of a valid ID document (where legally allowed)
- Submit all of the above documents/information (and any additional upon request) to the UBS Group Business Contact

Note: Missing or incomplete information will delay the vetting/onboarding process

- Ensure that the candidate is aware of the UBS vetting process and that he/she completes the vetting vendor questionnaire within 5 business days – a delay might lead to a change in start date.
- CS legal entities, post successful completion of vetting by UBS, the supplier is to raise onboarding request in CS Beeline* and upload the required completion email. Please note for UBS Legal entities, the onboarding will automatically be initiated post successful completion of vetting.

Staff Vetting Declaration form



UBS Group External staff

Level 2 Staff Vetting – Declaration

Missing or incomplete information may delay the onboarding process!

Section 1: Candidate & Supplier Information

Supplier Vetting Level

Corresponding declaration to be filled out on next page

Not a level 2 supplier? Click [here](#) for the Level 1 supplier (D/D) Approved by UBS Group to either conduct the vetting themselves and/or by engaging a vetting vendor operating in line with the UBS global vetting specifications. Level 1 vetting annex executed between supplier and UBS.

Level 2 (tick box to confirm supplier level is correct) Agree that the vetting is executed by UBS Group and/or a UBS-certified vetting vendor in line with the UBS global vetting specifications. The Level 2 supplier is also accountable for adhering to local data privacy law. Vendor/UBS online policy agreement or Level 2 vetting annex executed between supplier and UBS (legally).

Legal First Name (as stated on passport/ID)

Middle Name (as stated on passport/ID)

Legal Last Name (as stated on passport/ID)

Please provide candidate "preferred name" and/or any names previously used while working for UBS, (if applicable)

Date of Birth (dd-Mmm-yyyy) e.g. 04-Jan-2002

Work Location Country (valid Organization Unit (OU) in the physical location is required – additional guidance [here](#))

Candidate Email Address

Candidate Home Phone Number (Americas Only)

Note: Tentative start date will be issued by HR upon receipt of the onboarding request.

UBS External Staff Category (Tick relevant box)
The category is determined based on the access that the candidate will require to UBS Group premises. IT applications, IT systems and infrastructure. Your UBS Group business contact can clarify the correct staff category.

Category I

External staff having a UBS Logon ID or a GPN and access to UBS systems/UBS valuables (e.g. treasury room) and/or access to UBS confidential information. Staff of this category must be registered in the UBS HR system or CS Beeline and therefore have a GPN / Employee ID.

Candidate Status (Tick relevant box)

New UBS Group Engagement

International Transfer

UBS Group Re-engagement

Change of External Staff Category (III to I) – IT access is not provisioned automatically. Individuals with access to the internal UBS systems can login and click [here](#) to view guidance on IT Account Provisioning for staff onboarded to a UBS entity. For staff onboarded to a CS legal entity, IT account provisioning will take place after the CS Beeline request is entered.

Supplier Information

Supplier Company Name

What type of staff is this candidate? (Tick relevant box)

Direct employee or Direct Contractor/UBS on Demand Worker

Not a direct employee (fourth party supplied staff – including staffing firms providing their employees or contractors to the contracted service)
Fourth party contracting company name required

If the candidate is not your direct employee, provide the official fourth party company name as it appears in formal company registers.

If you are unsure of the supplier level contact the regional UBS Regional Staff Vetting Operations Team for clarification.

PHR-ExternalStaffVetting-APAC@ubs.com (for external staff working in the APAC region)

PHR-ExternalStaffVetting-EMEA@ubs.com (for external staff working in the EMEA region)

PHR-ExternalStaffVetting-AMERICA@ubs.com (for external staff working in the Americas region)

PHR-ExternalStaffVetting-UK@ubs.com (for external staff working in the UK region)

Individuals employed by a Third Party and on loan (with a person loan contract/Überlassungsvertrag von Arbeitnehmern) to UBS or self-employed, and who directly or indirectly report to a UBS line manager, providing capacity or capability as incremental or replacement resource and who have this job in the interim and could be replaced by a permanent employee, and for whom employee benefits are not provided by UBS, and who are not part of an outstanding agreement, and who are supplied by a Vendor as part of a contract, sub-contract or outsourcing agreement.

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Content Owner: Justin Jacobs

High-level overview

High-level overview of the Vetting Check Requirements for Cat I and Cat III.

Check	Category I	Category III
1 By Supplier	required	required
2 Performed by Supplier	required	required
3 Criminal Record Check*	required	required
4 Credit Check*	required	not required
5 Performed by UBS	required	required
6 Only performed by UBS	required	not required
7 Declaration	required	not required
8 Database search	required	not required
9 Only	required, if applicable	not applicable

Required to be completed pre-start. The candidate will not be allowed to join UBS before all mandatory checks are completed.

All the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 6 months over

required checks, specific requirements, timeline and potential restrictions on the population for every country is available to [a Website for Level 1 Supplier](#) and via [Staff Vetting Website for Level 2 Supplier](#) (please refer to country specification)

Self Declaration

Completed by suppliers who are approved by UBS Group as a Level 2 Supplier.

Indicate that UBS Group will:

1) case with vetting vendor

2) First Adversity/ADV/ Singapore (APAC), Cruise US (AME)

3) Background Check

4) Indicate on how UBS Group processes the candidate's data, the candidate's rights and how to exercise these

5) Indicate to the following link: [Vendor Employee Privacy Notice](#)

6) Start date with UBS Group if the mandatory prestart checks are not completed on time and to UBS's

7) ID card is attached to the submission (as a standalone document)

8) Consent shall be provided for the following countries: Hungary, Korea, Poland)

9) Consent for "External Directorship and Family Relationship" is attached to the submission

10) Indicate Staff Category (I)

11) Candidate is registered with a financial regulator e.g. FCA, FINRA

12) Candidate is actually obliged to ensure that

13) Candidate is legally eligible and authorized to work in the jurisdiction where Services are performed,

14) Candidate is legally eligible and applicable visas, work permits and permissions to do so.

15) Candidate is aware of all applicable immigration laws and regulations of the relevant jurisdiction and will not prevent or

16) Candidate is not late to continue to work in any given location.

17) Candidate is suitably qualified, skilled and experienced to provide the Services in a professional and timely manner and

18) Candidate is suitable to UBS.

19) Signature (candidate signature only accepted in case of self-employed persons)

20) Signature is valid for 3 months from signature date)

Date (dd-Mmm-yyyy)

Last Name, First Name

Signature

(Signatures accepted: digital image / photo of signature, tablet / e-pen / scanned with physical signature.)

Font typed or mouse drawn signatures .psst accepted.)

Signature

(Signatures accepted: digital image / photo of signature, tablet / e-pen / scanned with physical signature.)

Font typed or mouse drawn signatures .psst accepted.)

Vetting process for category I and III for UBS Group onboardings (2/3)

Vetting initiation – UBS Group business contact.

Action by UBS Group business contact ('hiring manager')

- Completes the Staff Vetting Supplementary form* declaration (if applicable for hiring country).
- Once a contract ID is available in the logistics platform, initiates the staff vetting including the submission relevant documentation from the supplier and a UBS cost center as follows:
 - UBS legal entities: create an external staff onboarding request via the HR Portal
 - CS legal entities: email to the vetting operations team
- Defines the staff category. The category is based on the access required when the candidate commences engagement at UBS (see slide 3).
- Submits and plans the new joiner's start date in consideration of the 20-day lead time for vetting.
- Reviews supplier documentation and ensure it is complete and correct prior to submission to HR.
- Only for exceptional cases: Raises an exception to the Global Staff Vetting policy request (supported by required business approvals) with HR's staff vetting operations team if the candidate meets required criteria; if the exception is approved, shares the details with the supplier.
- Note (UBS legal entity onboardings only): if the vetting case clears earlier and the contract is executed, you may request HR to move your new joiner's start date earlier.
- (For CS legal entity onboardings only) Ensures the initiation of onboarding
 - for CS Beeline onboarding in core locations, provides supplier with the email confirming vetting clearance or exception granted.
 - for CS Beeline onboarding in noncore locations, initiates onboarding directly in Beeline and upload the vetting clearance email were requested.
 - for onboarding with access to premises only, raise the request in MyBuildingAccess tool and upload the vetting clearance email were requested.

Examples: Staff vetting supplementary forms



US Staff Vetting Supplementary Form Eligibility assessment for US credit check requirements for UBS Group external staff

This form

The form for (including engagement)

SECTION TO BE COMPLETED BY UBS BUSINESS GROUP CONTACT

PART 1 - Candidate Information

Legal First Name (as stated on passport / ID)

Legal Last Name (as stated on passport / ID)

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GERMANY Staff Vetting Supplementary Form Eligibility assessment for vetting checks required for UBS Group external staff

This form is only applicable to the following countries: EU countries (Austria (AUT), Denmark (DEN), France (FRA), Guernsey (GUE), Hungary (HUN), Ireland (IRE), Italy (ITA), Liechtenstein (LIE), Luxembourg (LUX), Netherlands (NED), Poland (POL), Portugal (POR), Romania (ROM), Sweden (SWE)), UK, Switzerland, Australia, Singapore, Brazil and Mexico.

The form must be filled out by the UBS Group business contact for all external staff (inclusive of subcontractors) pertaining to the following circumstances: a.) new onboarding engagement, b.) re-engagement or c.) change in staff category.

SECTION TO BE COMPLETED BY UBS BUSINESS GROUP CONTACT

PART 1 - Candidate Information

Legal First Name (as stated on passport / ID)

Legal Last Name (as stated on passport / ID)

Legal First Name (as stated on passport / ID)

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Legal Last Name (as stated on passport / ID)

Legal First Name (as stated on passport / ID)



Basic / Enhanced Vetting Supplementary Form Eligibility assessment for vetting checks required for UBS Group external staff

This form is only applicable to the following countries: EU countries (Austria (AUT), Denmark (DEN), France (FRA), Guernsey (GUE), Hungary (HUN), Ireland (IRE), Italy (ITA), Liechtenstein (LIE), Luxembourg (LUX), Netherlands (NED), Poland (POL), Portugal (POR), Romania (ROM), Sweden (SWE)), UK, Switzerland, Australia, Singapore, Brazil and Mexico.

The form must be filled out by the UBS Group business contact for all external staff (inclusive of subcontractors) pertaining to the following circumstances: a.) new onboarding engagement, b.) re-engagement or c.) change in staff category.

SECTION TO BE COMPLETED BY UBS BUSINESS GROUP CONTACT

PART 1 - Candidate Information

Legal First Name (as stated on passport / ID)

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Content Owner: Tanja Heintz

*US Staff Vetting Supplementary Form, Germany Staff Vetting Supplementary Form, or the "basic / enhanced" Staff Vetting Supplementary Form applicable to the following countries: Austria, Denmark, France, Guernsey, Hungary, Ireland, Italy, Liechtenstein, Luxembourg, Netherlands, Poland, Portugal, Romania, Sweden, UK, Switzerland, Australia, Singapore, Brazil and Mexico

Vetting and onboarding initiation – Human Resources

Action by UBS Group HR:

- Validate the external staff request and mandatory documentation – in case of missing/incorrect information, the Regional Staff Vetting Operations team will reach out to the Supplier and/or the UBS Business Contact – Vetting will not be started, and onboarding may get delayed
- If a vetting exception to start has been raised by the UBS Group Business Contact, review the exception, confirm that the contract ID is “published”, “draft amendment” or “pending”, confirm that the contract ID has a contract effective start date on or before the new joiner’s start date, and decide whether it can be granted (in line with agreed exception process); inform the UBS Business Contact about the final exception decision.

Note: Contract completion is a Procurement Policy requirement. HR cannot grant contracting exception and will therefore reject the vetting exception request.

- Review the Staff Vetting Supplementary forms to apply vetting restrictions – if applicable
- Perform initial "in-house" vetting checks (Background Checks (e.g. sanctions) / Re-engagement checks) and coordinate activities related to unsatisfactory vetting results
- Create a vetting case on the vetting vendor's platform. The vetting vendor sends an invite to the candidate to register and fill-out the questionnaire
- Send an email notification to the candidate about the vetting initiation
- Monitor the vetting case. For UBS legal entities only: the UBS business contact will be informed of any start date delays.
- Provided all initial vetting checks are ok/cleared, information to be sent to the UBS Group business contact.

For UBS legal entities: GPNs are created in parallel to the vetting process. If the contracting or vetting is not complete 3 days prior to the anticipated start date, the start date will be postponed, and notifications will be sent to UBS Group Business Contact.

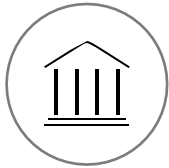
For CS entity onboardings: the onboarding will be initiated via CS Beeline or MyBuildingAccess.

- Candidates cannot start services until all vetting checks are completed/cleared and the contracting requirements are met

Data security matters

Vetting vendors to perform criminal check, credit check and external directorship check – if applicable in the respective country*

Data protection



1. Vetting evidence must be archived and purged as required by the legislator of each country.



2. Vetting results (ok, not ok) will be retained for 10 years.



3. Access to vetting results within UBS HR is limited and controlled. Data access within UBS is provided on a strict need-to-know basis.

Additional information - for the US only



US: Fingerprint Collection:

- ✓ UBS Regional Staff Vetting Operations Team provides fingerprinting collection instructions to the external staff candidate (copying the UBS Business Contact ('Hiring Manager')) and the Supplier.
- ✓ Fingerprints are collected from the external staff candidate at a UBS home office location or BIG Fieldprint location to identify any criminal arrests/charges. On request of UBS Regional Security Services only, the vetting vendor conducts criminal record checks within the jurisdiction(s) where criminal charges were identified.
- ✓ The vetting vendor will provide the vetting results directly to UBS Regional Security Services who will escalate any finding to determine the eligibility of the external staff candidate.

UBS level 2 supplier webpage



Access to the UBS level 2 supplier webpage



- The level 2 vetting information site is available on the internet, which allows for external access for suppliers/ vendors who are onboarding staff to UBS.
- All content is proprietary to UBS and should only be shared with staff requiring this information to support onboarding e.g. human resources, recruitment, account management, and staff that require vetting for an engagement/assignment at UBS).



Website



- <https://www.ubs.com/global/en/external-staff-vetting-level-two.html>



Look out for UBS page



UBS External Staff Vetting

Select domicile ▾ Locations 🔍 UBS logins ▾

Overview and background Vetting Process Vetting Checks and Timeframes Country specification Periodic Staff Vetting Contact Staff Categories More ▾

External Staff Vetting

External Staff Vetting - Level 2 Information Site

All external staff at UBS are required to have vetting checks in line with the UBS global vetting specifications. This site provides information for companies who provide staff to UBS to explain the process for level 2 vetting, which vetting checks are applicable to your staff and other important information.

If you are new to UBS vetting (external staff) you should read the information in the link below which provides an overview and background.