

Vetting Specification for External Staff NETHERLANDS

Valid as of 01 September 2021

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	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). Cosima check only permissible in cases where criminal check is performed. For criteria, see section "Criminal Record Check". Periodic Vetting All Risk sensitive roles are in scope for Periodic Staff Vetting are permitted.	No hits	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
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
Registered Status / Statutory Disqualification		Not applicable in the Netherlands		
Criminal Record Check	Certificate of Good Conduct (Verklaring Omtrent het Gedrag VOG) issued by the Ministry of Security and Justice. Certificate to be obtained from the Population Affairs Department (Burgerzaken / Publiekszaken) of the respective municipality of registration.	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 2 months from receiving. 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 are in scope for Periodic Staff Vetting are permitted. Document(s) need to be original and current; e.g. dated not older than 2 months from receiving. 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

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Credit Check	Credit Report by a widely recognized Consumer Reporting Agency (e.g. Stichting Bureau Krediet Registratie (BKR) or Experian Netherlands).	<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 2 months from receiving. 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 All Risk sensitive roles are in scope for Periodic Staff Vetting are permitted. Document(s) need to be original and current; e.g. dated not older than 2 months from receiving. 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>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>	No debt defaults (overdue amounts, collections, litigations) Candidate has not been legally declared a bankrupt.	Pre-UBS start date
External Directorship (Database Search)	Public database	Database check to identify any external directorships and assess candidate integrity based on external directorship self-declaration.	No hits, no discrepancies between self-declaration and database search	Pre-UBS start date