

## Global Supplier Policy

# Compliance Policy for Onboarded Staff

**WHY**

To help us stay compliant with our regulatory requirements.

**WHEN**

Whenever you use Onboarded Staff in the provision of the Services.



**WHAT** to know about **HOW** to comply

**1. Procedures and policies**

- When working for us, we expect Onboarded Staff to meet the same standards as other UBS personnel. Unless we inform you otherwise, you'll ensure that Onboarded Staff comply with our policies and procedures. Onboarded Staff will be required to affirm compliance through our Affirmation Online portal at or shortly after the start of their work with us.
- You'll make sure that all Onboarded Staff are informed that, in accordance with Applicable Law, we routinely monitor the activities of Onboarded Staff when working for us (e.g. by monitoring usage of computer systems and/or CCTV or use of security pass controls).

**2. Whistleblowing**

- You must have a whistleblowing policy in place that protects Onboarded Staff from having their contracts terminated, being demoted, suspended, threatened, harassed or discriminated against or subject to any detriment when they use a UBS whistleblowing channel to report information which they believe constitutes a violation of laws, regulations, rules, code of ethics, policies or professional standards.

**3. Training**

- You'll make sure that:
  - all Onboarded Staff complete induction training conducted by you (if off-premises) or us (if on-premises) to familiarize Onboarded Staff with our policies and procedures; and
  - all Onboarded Staff complete any other online training required by us.

**4. Block leave**

- You'll make sure that all Onboarded Staff identified by us as being sensitive for block leave purposes take a minimum of ten or more consecutive working days leave in any calendar year. This leave may include offsite training days or work on a separate project unconnected to us.
- Where any Onboarded Staff have less than sixteen days' holiday per year this block leave requirement is lowered to a minimum of five consecutive working days. Onboarded Staff located in India, Japan, China, USA and Puerto Rico will ordinarily need to take five consecutive working days' leave to fulfill the block leave obligation.
- Where Onboarded Staff have access to our HR system, block leave must be registered in our HR system at least two working days before the start of the block leave.
- Where Onboarded Staff don't have access to our HR system, you must monitor block leave taken and provide details to us on request.

**5. Share dealing**

- You'll monitor, approve in advance and record all share dealings by Onboarded Staff who have access to Unpublished Price Sensitive Information (and on our request Connected Parties to such Onboarded Staff) and provide details to us on request.
- You will require such Onboarded Staff to comply with any process for monitoring, approving and recording share dealings that we may implement.