

Vetting Specification for External Staff UNITED ARAB EMIRATES

Valid as of 20 January 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).	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, 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	Only applicable for registered "Authorised Individual" roles, as defined by the Dubai Financial Services Authority (DFSA) / Securities & Commodities Authority, i.e. CFO, SEO, COO, Head Compliance, Money Laundering Reporting Officer.	To be verified that Check reflected that (i) there were no disciplinary or regulatory "events" disclosed regarding the proposed Staff and (ii) the proposed Staff was not "suspended or inactive with any regulator". Check reflecting either events disclosed and / or suspension or inactivity with a regulator shall result in proposed staff being deemed as having failed this requirement. The check relates to the appointment of authorized individuals with the Regulator and managed by Business Risk Dubai.	Confirmation registered status. No disciplinary or regulatory events or suspended or inactive status based on a search via the Dubai Financial Services Authority / Securities & Commodities Authority.	Pre-UBS start date
Criminal Record Check	- Criminal Clearance Certificate issued by the Directorate General for Criminal Security, Ministry of Interior (Abu Dhabi only) and / or - Certificate of Good Conduct issued by the Criminal Investigation Affairs Dubai Police Headquarters, Dubai Ministry of Interior (Dubai residents only) depending where the candidate resided / worked. Candidate has to order and collect the certificates personally with the Authorities.	Document(s) need to be original and current; e.g. dated not older than 2 months from receiving. Onboarding: 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: 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	Access to credit information via UAE banks who have an agreement with Al Etihad Credit Bureau and financial institutions in the UAE.	Document(s) need to be original and current; e.g. dated not older than 2 months from receiving. Onboarding: 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: 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. Check the summary of the candidate credit and bankruptcy history and compare with the address history.	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 self-declaration; no matches on DIFC company register.	Pre-UBS start date