

# Vetting Specification for External Staff GERMANY

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).  <b>Onboarding</b> Cosima check only permissible in cases where criminal check is performed. For criteria, see section "Criminal Record Check".  <b>Periodic Vetting</b> Cosima check not permitted	No hits	Pre-UBS start date
Family Relationship	Self-declaration Applicable for external staff (freelancer/ contractor) and agency/temp staff	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 Germany		
Criminal Record Check	Police Clearance Certificate (Polizeiliches Führungszeugnis) issued by the Federal Central Register of the Public Prosecutor General at the Federal Court of Justice.  External staff to apply for a Police Clearance Certificate (Führungszeugnis) from the Federal Central Register of the Public Prosecutor General at the Federal Court of Justice. German residents must apply personally for a Police Clearance Certificate through their local Registration Office (Meldebehörde).	<b>Onboarding Cases</b> <b>Checks are only permitted for onboarding cases if any of the following criteria is met:</b> Criminal Record Checks can only be carried out in relation to roles involving: (i) cash or non-cash transactions of customers, (ii) the onboarding of new business relationships, or (iii) positions where money laundering or terrorist financing could be promoted.  Where this check is permissible, document(s) need to be original and current; e.g. dated not older than 2 months from receiving. <b>Onboarding:</b> 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). <b>Periodic Vetting:</b> All risk sensitive roles are in scope for Periodic Staff Vetting according to the regulation in the country. 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(s)	Pre-UBS start date
Credit Check	Self-Assessment (Selbstauskunft) on form provided by UBS Germany and signed by each External Staff. Document where the individual confirms, that his financial situation is appropriate and that he / she hasn't a oath of disclosure (Offenbarungs Eid - insolvent). This document contains the confirmation that there has been no affidavit of means / insolvencies in the past 5 years. Consumer Credit Report (e.g. by SCHUFA) not allowed for staff screening purpose.	<b>Onboarding Cases</b> <b>Checks are only permitted for onboarding cases if any of the following criteria is met:</b> Criminal Record Checks can only be carried out in relation to roles involving: (i) cash or non-cash transactions of customers, (ii) the onboarding of new business relationships, or (iii) positions where money laundering or terrorist financing could be promoted.  Where this check is permissible, document(s) need to be original and current; e.g. dated not older than 2 months from receiving. <b>Onboarding:</b> 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). <b>Periodic Vetting:</b> All risk sensitive roles are in scope for Periodic Staff Vetting according to the regulation in the country. 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.	Signed form must not be older than 3 month when external staff starts at UBS.	Pre-UBS start date
External Directorship (Database Search)		Not applicable in Germany		