

# Vetting Specification for External Staff LUXEMBOURG

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).  <b>Cosima check only permissible in cases where criminal check is performed. For criteria, see section "Criminal Record Check".</b>	No hits	Pre-UBS start date, <del>Pre-offer, latest pre-UBS start date</del>
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, <del>Pre-offer, latest pre-UBS start date</del>
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, <del>Pre-offer, latest pre-UBS start date</del>
Registered Status / Statutory Disqualification		Not applicable		Pre-UBS start date
Criminal Record Check	Criminal Record check is <b>not allowed</b> to be performed by UBS (or its vendors) for external staff working/providing services to UBS entities in Luxembourg.  The supplier must have a confirmation that <del>it received original extract(s) of the criminal record</del> - it has conducted the criminal record check by reviewing and assessing the <b>original</b> extract(s) of the criminal record and found the candidate eligible (eligible = no convictions)	<b>Onboarding Cases</b> <b>Checks are only permitted for onboarding cases if any of the following criteria is met:</b> - 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). <b>Periodic Vetting</b> All Risk sensitive roles 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).  <del>For both Onboarding and Periodic Vetting an appropriate address verification shall be performed for the current address.</del> 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.	Confirmation of eligibility	Pre-UBS start date, <del>latest 4 weeks after UBS start date</del>
Credit Check		Not allowed for employment screening purposes.		Pre-UBS start date, <del>latest 4 weeks after UBS start date</del>
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, <del>latest 4 weeks after UBS start date</del>