Vetting Specification for External Staff DENMARK

Valid as of 01 November 2025

Pre-offer and Pre-start vetting may be started no earlier than 6 months before the UBS Group start date. For Credit and Criminal, where this check is permissible, document(s) need to be original and current; e.g. dated not older than 3 months from vetting case completion (or from the start date, whichever is earlier).

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, Sanctions, GTS, Rehire)	Cosima, CS Global Check, 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 / GTS** check only permissible in cases where criminal check is performed. For criteria, see section "Criminal Record Check". Where criminal check is not permissible, Sanctions checks will be completed using CS Global Check. **GTS Check:** This check only permissible when the candidate is a known rehire. In addition, negative media information held within GTS cannot be considered for vetting purposes **Periodic Vetting** All Risk sensitive roles as defined in the RIsk Sensitivity Matrix in scope for Periodic Staff Vetting are permitted.	No hits	Pre-UBS start date
Relatives & 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 for external staff in Denmark			N/A
Criminal Record Check	National Police Authority (Rigspolitiet)	Onboarding Cases Checks are only permitted for onboarding cases if any of the following criteria is met: Checks are only permitted for onboarding cases if any of the following criteria is met: i. External staff with senior responsibilities (similar to Director or above) or a personal assistant or external board administrator with access to sensitive information (e.g., privy to unpublished price-sensitive information) ii. Staff member responsible for at least one of the following: - handling confidential financial information and/or - accessing trade, payment or asset transfer systems (either as user, super user, developer or product owner) and/or - having a "Highly Privileged User" entitlement (elevated access rights to critical infrastructure, applications, or databases) and/or - holding either a Front Office ('Front') or Revenue Generating ('REV') role according to the "job function code" per the UBS GRCF Landscape iii. Staff member working within a control function (per Policy 1-C-007976 Risk Control; Compliance, Regulatory & Governance; Finance; Legal; Human Resources) or working in a non-control function responsible for control activities Where this check is permissible, document(s) need to be original and current; e.g. dated not older than 3 months from vetting case completion (or from the start date, whichever is earlier). Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 6 months over the last 5 years (required address history). Periodic Vetting All Risk sensitive roles in scope as defined in the Risk Sensitivity Matrix for Periodic Staff Vetting are permitted. Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 6 months over the period equal to the frequency of periodic vetting (e.g. if the frequency of periodic vetting is 4 years, the check / address history must cover the last 4 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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Current State				
Check	**Sources / Tools**	**Requirement / Validation**	**Successful Vetting Check Criteria**	**Timing**
Credit Check	Credit Report provided by Bisnode through the Debitor Registret A/S	Onboarding Cases Checks are only permitted for onboarding cases if any of the following criteria is met: Checks are only permitted for onboarding cases if any of the following criteria is met: i. External staff with senior responsibilities (similar to Director or above) or a personal assistant or external board administrator with access to sensitive information (e.g., privy to unpublished price-sensitive information) ii. Staff member responsible for at least one of the following: - handling confidential financial information and/or - accessing trade, payment or asset transfer systems (either as user, super user, developer or product owner) and/or - having a "Highly Privileged User" entitlement (elevated access rights to critical infrastructure, applications, or databases) and/or - holding either a Front Office ('Front') or Revenue Generating ('REV') role according to the "job function code" per the UBS GRCF Landscape iii. Staff member working within a control function (per Policy 1-C-007976 Risk Control; Compliance, Regulatory & Governance; Finance; Legal; Human Resources) or working in a non-control function responsible for control activities Where this check is permissible, document(s) need to be original and current; e.g. dated not older than 3 months from vetting case completion (or from the start date, whichever is earlier). Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 6 months over the last 5 years (required address history). Periodic Vetting All Risk sensitive roles as defined in the Risk Sensitivity Matrix in scope for Periodic Staff Vetting are permitted. Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 6 months over the period equal to the frequency of periodic vetting (e.g. if the frequency of periodic vetting is 4 years, the check / address history must cover the last 4 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 Central Business Register	Database check to identify any external directorships and assess candidate integrity based on external directorship self-declaration. The check must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 6 months over the last 5 years (required address history)	No hits, no discrepancies between self-declaration and database search	Pre-UBS start date
ESSENTIAL FOOTNOTES:				
Supplier Vetting Obligations	As a Level 1 Supplier you are required to follow the country specifications published on our webpage. This however has to be in line with the approved approach agreed with you by the UBS Vetting Decision Authority at the time you were awarded the label of being a UBS level 1 supplier. Any deviations to the country specs or agreed approach may result in a finding at the time of the level 1 audit e.g., the use of an unapproved vetting vendor. A reminder that any decisions made by you should not expose UBS to any reputational or operational risk. In case a Level 1 supplier does not have the capability to legally perform a particular check (as defined in the country specifications), the supplier should obtain approval from the UBS vetting Decision Authority (DA) to perform an alternative. In such cases (post approval from the DA) the Level 1 supplier may obtain a self-declaration form from the candidate. The Self declaration needs to be completed and dated prior to the start date at UBS and must be available for review at the time of the level 1 audit. A self-declaration only fulfills the condition of a check not being completed if this has been approved prior to onboarding by the UBS vetting Decision Authority (DA). In case a candidate does not have the required documents / registration for a check to be performed, the supplier must obtain a self-declaration from the candidate. However, such a self-declaration shall only be obtained where a check is legally permissible in the "hiring" location but cannot be conducted due to candidate not fulfilling the required conditions for a check. The self-declaration must be completed and dated prior to the start date at UBS and must be available for review at the time of the level 1 supplier audit. The country specifications define the acceptable documentation and/or data sources for use within a candidate's country of hire. A vetting check is deemed permissible as per the country specifications, and if the candidate has background history or footprint within additional countries outside the "hiring" country acceptable documentation and/or data sources applicable as per that country must be considered. Please note that at all times you should be guided by the country specifications of the onboarding country.		