Vetting Specification for External Staff POLAND

Valid as of 1 April 2026

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 and Internal HR systems for the termination reason as per the work certificate	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 and the termination reason as per the work certificate. EDD flag, ER portal and PMM checks are not allowed for employment screening purposes. **Cosima or equivalent / 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** Only the following risk sensitive roles are permitted for Periodic Staff Vetting: Managing Directors, HPUs, External Non-Executive Directors, Regulatory (Registered Roles), Group M&A & Equity Investements: staff with involvement into strictly confidential Group M&A projects OR involvement in managing Equity Holdings projects, Group CFO: Investor Relations staff with regular involvment into strategic projects of strictly confidential nature, Group Treasury: Enhanced Benchmark Submitters responsible for the daily libor submission process administered by ICE, Group Compliance Regulatory and Governance: In addition to Group Compliance, Regulatory and Governance-based EC members the following sub-MD GCRG staff is considered to require the highest level of personal integrity or own a risk sensitive, which grants them enhanced authority due to privileged access to systems, networks, data and knowhow owned by UBS: (i) regulatory Affairs team lead, assistant to Head G&RA and CoS team (ii) Group Investigations (i.e. Criminal Investigations & IT Forensics team, eDiscovery/eDTS team and Data Analytics & Tools team), (iii) GSS staff, (iv) Cyber testers in C&ORC GF, (v) staff with access to the PEP cockpit reporting. Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. Performing a check on foreign address history is not permitted, document(s) must cover only Polish addresses 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 hits	Pre-UBS start date
Relatives & Relationship	Self-declaration Check only allowed on candidate's voluntary consent.	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. If a relationship disclosed, further analysis to be performed by Line Manger with Compliance. Candidate cannot be refused if the relationship is revealed.	Pre-UBS start date
External Directorship and Positions (self declaration)	Not allowed for employment screening purposes			N/A
Registered Status / Statutory Disqualification	Not applicable for external staff			N/A
Criminal Record Check	Not applicable for external staff			N/A
Credit Check	Not allowed for employment screening purposes			N/A
External Directorship (Database Search)	Not allowed for employment screening purposes			N/A
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.			