Vetting Findings Guidelines

Important:

- **Any reportable/adverse finding(s)** (e.g. credit check, criminal check, employment check, etc.) or the inability to conduct any check as outlined in the applicable country specification must be reported to UBS
- Reportable/adverse findings must be reported through a standardized email template for each candidate individually
- The email template must be addressed to SH-Krakow-GlobalStaffVetting@ubs.com (NOT your UBS business contact)
- Supporting documents should be attached when you report adverse findings to UBS

Name of Check	Description of Check *(detailed UBS country specifications supersede below generic description)*	Finding Thresholds
Criminal Record Check / Civil Litigation Check (as applicable)	Document(s) need to be original and current; e.g. dated not older than 2 months from receiving and 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. An appropriate address verification shall be performed for the current address. 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.	Criminal record convictions **other than Minor Traffic Offences** shall constitute a "Finding**".** Examples of "Minor Traffic Offences" include the following: • parking violation • limited speeding excess (without accidents) • disregarding red light (without accidents) • drunk driving (minor, single violation without accidents) **A finding shall not serve as an automatic disqualification to assignment at UBS. Rather, the Level 1 Supplier shall make its decision based upon a review assessment that is in accordance with applicable law.**
Credit Check / Bankruptcy Check (as applicable)	Document(s) need to be original and current; e.g. dated not older than 2 months from receiving and cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months over the last 5 year. An appropriate address verification shall be performed for the current address. 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.	The following shall be considered a finding: **A cumulative total** of any debt default, e.g. • overdue amounts / collections / litigations • unsatisfied or unpaid public records with liability • current negative accounts (under collection) with past due amounts • accounts charged off as bad debt **in excess of the amount indicated below:** **CH/EMEA: CHF 10'000.-** **UK: GBP 5'000.-** **APAC: USD 10'000.-** **Americas: USD 10'000.-** **A finding shall not serve as an automatic disqualification to assignment at UBS. Rather, the Level 1 Supplier shall make its decision based upon a review assessment that is in accordance with applicable law.**
Identity Check	Document(s) shall be valid. Identity of the candidate must be verified by obtaining a readable copy of an official identification document.	Failure to obtain **Valid ID Document(s)** as specified by UBS in the vetting checks specifications, **shall constitute a disqualifying finding**.
Right to work verification	Document shall be valid. Identity of the candidate must be verified and a readable copy of an official right to work document must be obtained.	Failure to obtain all **legally required right to work documents / permissions shall constitute a disqualifying finding.**
Global Background Check	Check against UBS internal compliance database (COSIMA / GTS)	Checks completed internally by UBS.
Professional Qualification and Highest Level of Education	Highest education and most relevant professional qualifications must be verified at source. In cases where this is not possible (e.g. source does not have records, no longer exists or does not respond), appropriate supporting documents must be adequately verified and documented. Highest non-university education prior to 10 years is not required to be verified.	**Any of the following shall constitute a disqualifying finding:** • no record of attendance, • no degree / diploma earned where candidate claimed one, • misrepresentation of degree / diploma or educational institution, unaccredited educational institution
Employment History	Detailed information containing the employment history of the past 5 years. 'Employment history must be verified at source. In cases where this is not possible (e.g. source no longer exists, does not respond or is legally not allowed to confirm employment) appropriate supporting documents must be adequately verified and documented (e.g. supporting documents, e-mail trail, etc.). For employment gaps of more than 6 months, the candidate must confirm the following: "I herewith confirm that during the mentioned period(s) of time I was not involved or had not participated in any kind of activity which represents a current or could lead to a future conflict of interest with UBS AG. Such activities include but are not limited to bribery, money laundering, corruption, fraud, involvement in lawsuits against UBS or any other criminal activities leading to negative legal, financial or reputational consequences for UBS AG." In cases where the candidate cannot confirm the above, the case must be escalated according to UBS standard practice. **US**: The above statement is covered by the fingerprinting process. Confirmation of statement not required.	The inability of the candidate to confirm the employment gap statement shall constitute a finding and must be disclosed to UBS for further review (except in the US). **Any of the following shall constitute a disqualifying finding:** • no record of employment • terminated for cause / not eligible for rehire

Family Relationship	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.	**Any relationship** (as specified by UBS in the vetting checks specifications) **shall constitute a finding** and must be disclosed to UBS for further review.
External Directorship and Positions	Candidate needs to be asked whether he/she has any external directorship that could raise a conflict of interest with UBS to disclose.	**Any external directorship or position shall constitute a finding** and must be disclosed to UBS for further review.
Registered Status / Statutory Disqualification	If applicable for specific country / position: Verification that candidate is registered, that there are no disciplinary or regulatory events disclosed and that he / she is not suspended or inactive with any regulator.	**Any of the following shall constitute a disqualifying finding:** • candidate does not hold required license, • disciplinary or regulatory "events" exist, • candidate was suspended or inactive with any regulator, • statutory disqualification