

Check	Sources / Tools	Requirement / Validation	Vetting Check Status	Timing
<b>Criminal Record Check</b>	Extract of the Police Records (Extrait du Casier Judiciaire, Bulletin No. 3) issued by the Palais de Justice (via MyGuichet) in Luxembourg City. Candidate to obtain Bulletin No. 3 by himself and hand it over to the External Staff Provider (Employer). External Staff Provider confirms that it has conducted the criminal record check by reviewing and assessing the Extract of the Police Records and informs UBS of the result (eligible / not eligible with regards to the criminal record check).	Document(s) need to be original and not older than 2 months (date of issuance) 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 to ensure full coverage of criminal history. Identification of any records associated with the candidate. Decision to be taken by External Staff Provider (Employer) as follows: A Candidate is not eligible to provide services to UBS, if there are any convictions in the Extract of the Police Records.	No convictions found in respective document.	Pre-start, latest on 4 weeks after start
<b>Credit Check</b>	Credit Check is not allowed in Luxembourg for employee screening purposes.			
<b>Identity Check</b>	- Luxembourg Citizens: Passport or ID Card - EU / EEA Citizens: Passport or ID Card - Non EU / non EEA Citizens: Passport or "ID Card for foreign Nationals".	Documents shall not be expired more than 4 weeks. Supplier adequately verifies the identity of the candidate and confirms this verification with signature (place / date) on the colour copy of the official identification document.	- Luxembourg Citizen: Passport or ID Card - EU / EEA Citizens: Passport or ID Card - Non EU / non EEA Citizens: Passport or "ID Card for foreign Nationals".	Pre-start, latest on the first day
<b>Right to work verification</b>	- Luxembourg Citizens: Do not need a work permit - EU / EEA Citizens: Passport <b>AND</b> Residence Permit - Non EU / non EEA Citizens: Passport <b>AND</b> "ID Card for foreign Nationals" <b>AND</b> Work Permit.	Documents shall not be expired more than 4 weeks. Supplier adequately verifies the identity of the candidate and confirms that all documents are valid.	- Luxembourg Citizen: Colour Copy of ID Document - EU / EEA Citizen: Colour Copies of Passport <b>AND</b> Residence Permit - Non EU / non EEA Citizen: Passport <b>AND</b> "ID Card for foreign Nationals" <b>AND</b> Work Permit.	Pre-start
<b>Global Background Check</b>	COSIMA, GTS	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. Cosima team will check any hit and make a recommendation.	No hits	Pre-offer, latest pre-start
<b>Professional Qualification and Highest Level of Education</b>	CV, certificates and diplomas	Highest education and most relevant professional qualification is validated at source and adequately documented Highest non-university education prior to 10 years is not required to be verified. Discrepancies between CV and professional qualification resp. highest level of education will not be accepted, update of CV required.	Highest education and most relevant professional qualification could be verified at source. No discrepancies between CV and verified professional qualification and highest education.	Pre-start, latest on 8 weeks after start
<b>Employment History</b>	CV, confirmations of employers	Detailed information containing the employment history of the past 5 years. Employment history (employment time, position) must be verified at source. Gaps of more than 3 months have to be explained comprehensively and evidenced. Discrepancies between CV and confirmations of employment will not be accepted, update of CV required.	Confirmations at source could be obtained for all the employment history of 5 years. Gaps of more than 3 months could be explained comprehensively and are evidenced. No discrepancies between CV and confirmations.	Pre-start, latest on 8 weeks after start
<b>Family Relationship</b>	Self-declaration	Candidate needs to be asked whether he / she has family relationships with UBS employees. Answers are adequately documented.  Family relationship: the relationship with the following persons is counted as "family relationship"; marriage partner, companion in life, registered partner, parent, sister, brother, child (including stepchild) and in-laws of the same degree (e.g. father-in-law, brother-in-law).	No family relationship with UBS	Pre-offer, latest pre-start
<b>External Directorship and Positions</b>	Self-declaration	Candidate needs to be asked whether he / she has any external directorship that could raise a conflict of interests with UBS to disclose. Answers are adequately documented.  Candidate is not allowed to accept external directorship positions or functions that could raise a conflict of interest or might be regarded as a conflict of interest with UBS.	No external directorship and positions	Pre-start
<b>Registered Status / Statutory Disqualification</b>	Check only for key function holders (e.g. authorized managers) and roles of the three internal control functions. Check to be made via Luxembourg Commission de Surveillance du Secteur Financier (CSSF).	Check confirms (i) that the candidate has required license, (ii) that there were no disciplinary or regulatory "events" disclosed and (iii) the candidate was not suspended or inactive with any regulator and no statutory disqualification exist. The validation is documented appropriately.	Check confirms that candidate is registered, that there are no disciplinary or regulatory events and candidate was not suspended or inactive with any regulator.	Pre-start

# Global Mandatory Vetting Checks & External Staff Categories

## Staff category defines risk sensitivity and vetting checks to be executed

- **Category I:** Access to IT-applications, IT-systems/infrastructure (UBS-Logon) or access to sensitive infrastructure (registered with GPN on UBS HR system)
- **Category II:** Access to sensitive information, data or physical documents and no access to IT or sensitive infrastructure (are not registered in UBS HR system, have no GPN)
- **Category III:** Access to UBS premises and no access to IT or sensitive infrastructure and no access to sensitive information, data or physical documents (registered either via GPN or access badge)

Global Mandatory Check	Category I	Category II *		Category III
		A)	B)	
<b>Identity Check</b>	<b>required</b>	required	required	<b>required</b>
<b>Right to Work Verification</b>	<b>required</b>	required	required	<b>required</b>
Criminal Record Check	<b>required</b>	required	required <sup>1</sup>	<b>required</b>
Credit Check	<b>required</b>	required		
Global Background Check	<b>done by UBS</b>			
Professional Qualification & Highest Level of Education	<b>required</b>			not required
Employment History	<b>required</b>		not required	
<b>Family Relationship</b>	<b>required</b>			
<b>External Directorship</b>	<b>required</b>			
Registered Status	<b>required, if applicable</b>	not applicable		not applicable

**Note:** Checks in bold are required to be completed before external staff commences providing service to UBS; US only: Domestic Credit and Domestic Criminal Check (incl. Fingerprinting) need to be completed pre-start.

\* **Category II - Suppliers are required to provide a contractual warranty that they conduct these checks:**

**A)** Access to sensitive information, data or physical documents AND no access to IT applications / systems / infrastructure (without UBS logon)

**B)** Premises access on a limited basis only (specifically construction firms or catering events staff)

- <sup>1</sup> criminal check at a reduced level: last 2 years or last 2 places of residence

For **Category II** workers the following vetting check requirements are slightly different compared to the requirements for Category I and III:

Criminal Record Check	Check needs to cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months covering the period of 5 years.
Credit Check	Check needs to cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months covering the period of 5 years.

## External Staff Categories – Details

Category I	Category II	Category III
<p>This category includes external staff with</p> <ul style="list-style-type: none"> <li>• Access to IT applications / systems / infrastructure (UBS Logon), <b>OR</b></li> <li>• Access to sensitive infrastructure</li> </ul> <p>Staff of this category</p> <ul style="list-style-type: none"> <li>• Must be registered in the UBS HR system and therefore have a GPN</li> <li>• Must not necessarily have access to a UBS building</li> </ul> <p>Groups concerned are</p> <ul style="list-style-type: none"> <li>• Staff augmentation onsite or offsite, billable (contractor and offshore development center with UBS Logon)</li> <li>• Staff augmentation onsite, non-billable (supplier account manager with UBS Logon)</li> <li>• Managed services onsite or with UBS Logon (driven by delivery of a service)</li> <li>• Professional services onsite or with UBS Logon (consultants, advisory, audit, legal, facility management for sensitive infrastructure)</li> </ul>	<p>For staff of this category suppliers are contractually bound to warrant background screening but are not required to follow UBS vetting process as no onboarding on UBS system takes place. Background screening requirements may differ depending on the service provided to / roles performed for UBS.</p> <p>This category includes external staff with</p> <ul style="list-style-type: none"> <li>• Access to information, data or physical documents, <b>AND</b></li> <li>• No access to IT applications / systems / infrastructure (without UBS Logon) or sensitive infrastructure, <b>AND</b></li> <li>• May have limited access to UBS premises for facility management duties (CH only)</li> </ul> <p>Staff of this category</p> <ul style="list-style-type: none"> <li>• Has no UBS Logon</li> <li>• Are not registered in the UBS HR system and therefore do not have a GPN</li> <li>• Could have limited access to a UBS building via access control system (CH only)</li> </ul> <p>Groups concerned are</p> <ul style="list-style-type: none"> <li>• Professional services offsite and without UBS Logon (consultants, advisory, audit, legal, business process outsourcing, software as a service)</li> <li>• Construction workers</li> <li>• Event staff</li> </ul>	<p>This category includes external staff with</p> <ul style="list-style-type: none"> <li>• Unsupervised physical access to UBS premises, <b>AND</b></li> <li>• No access to IT applications / systems / infrastructure (without UBS Logon) or sensitive infrastructure, <b>AND</b></li> <li>• No access to sensitive information, data or physical documents</li> </ul> <p>Staff of this category</p> <ul style="list-style-type: none"> <li>• Must be registered in the UBS HR system and therefore must have a GPN</li> <li>• Has no UBS Logon</li> </ul> <p>Groups concerned are</p> <ul style="list-style-type: none"> <li>• Staff augmentation onsite, non-billable (supplier account manager without UBS Logon; badge holder)</li> <li>• Managed services onsite and without UBS Logon</li> <li>• Professional services without UBS Logon (facility management)</li> <li>• Benefits services onsite (hair dressers / fitness trainers / dry-cleaning worker / massage services / physiotherapists / dentists / doctors / etc.)</li> <li>• Business University Trainers</li> </ul>
<p>Please note: If a non-vetted person requires access to a UBS building, this person will be considered as a visitor and will be therefore accompanied during the complete visit. Also, access cards will only be delivered to persons having a GPN, which means that these would have been vetted previously. This is also valid for emergency access.</p>		