

Check	Sources / Tools	Requirement / Validation	Vetting Check Status	Timing
Criminal Record Check	Both the "Certificato Penale Generale del Casellario Giudiziale (Fedina Penale)" AND the "Certificato dei Carichi Pendenti della Procura" are required. HR Italy confirmed that this information comes straight from the tribunal. The candidate must fill out a form at the tribunal (in some locations they get the report immediatly, in others it takes a couple of days and is sent to home address).	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 to ensure full coverage of criminal history. Identification of any records associated with the candidate.	No entries found in respective document.	Pre-start, latest on 4 weeks after start
Credit Check	Credit Check is not allowed in Italy for employee screening purposes.			
Identity Check	- Italian Citizens: Passport or ID Card. - EU / EEA Citizens: Passport or ID Card - Non EU / non EEA Citizens: Passport	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.	- Italian Citizen: Passport or ID Card - EU / EEA Citizen: Passport or ID Card - Non EU / EEA Citizens: Passport.	Pre-start, latest on the first day
Right to work verification	- Italian Citizens: Do not need a work permit - EU / EEA Citizens: Passport AND Residence Permit (Permesso di Soggiorno) - Non EU / non EEA Citizens: Passport AND Residence Permit or Work Visa (Visto Nazionale) AND Work Permit (Nulla Osta al Lavoro).	Documents shall not be expired more than 4 weeks. Supplier adequately verifies the identity of the candidate and confirms that all documents are valid.	- Italian Citizens: Colour Copy of ID Document - EU / EEA Citizens: Colour Copies of Passport AND Residence Permit - Non EU / non EEA Citizens: Colour Copies of Passport AND Residence Permit or Work Visa AND Work Permit.	Pre-start
Global Background Check	*COSIMA, GTS not allowed in Italy for employment screening purposes.			
Professional Qualification and Highest Level of Education	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
Employment History	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
Family Relationship	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
External Directorship and Positions	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
Registered Status / Statutory Disqualification	Not applicable for external staff in Italy.			

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)	
Identity Check	required	required	required	required
Right to Work Verification	required	required	required	required
Criminal Record Check	required	required	required ¹	required
Credit Check	required	required		
Global Background Check	done by UBS			
Professional Qualification & Highest Level of Education	required			not required
Employment History	required		not required	
Family Relationship	required			
External Directorship	required			
Registered Status	required, if applicable	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)

- ¹ 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"> • Access to IT applications / systems / infrastructure (UBS Logon), OR • Access to sensitive infrastructure <p>Staff of this category</p> <ul style="list-style-type: none"> • Must be registered in the UBS HR system and therefore have a GPN • Must not necessarily have access to a UBS building <p>Groups concerned are</p> <ul style="list-style-type: none"> • Staff augmentation onsite or offsite, billable (contractor and offshore development center with UBS Logon) • Staff augmentation onsite, non-billable (supplier account manager with UBS Logon) • Managed services onsite or with UBS Logon (driven by delivery of a service) • Professional services onsite or with UBS Logon (consultants, advisory, audit, legal, facility management for sensitive infrastructure) 	<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"> • Access to information, data or physical documents, AND • No access to IT applications / systems / infrastructure (without UBS Logon) or sensitive infrastructure, AND • May have limited access to UBS premises for facility management duties (CH only) <p>Staff of this category</p> <ul style="list-style-type: none"> • Has no UBS Logon • Are not registered in the UBS HR system and therefore do not have a GPN • Could have limited access to a UBS building via access control system (CH only) <p>Groups concerned are</p> <ul style="list-style-type: none"> • Professional services offsite and without UBS Logon (consultants, advisory, audit, legal, business process outsourcing, software as a service) • Construction workers • Event staff 	<p>This category includes external staff with</p> <ul style="list-style-type: none"> • Unsupervised physical access to UBS premises, AND • No access to IT applications / systems / infrastructure (without UBS Logon) or sensitive infrastructure, AND • No access to sensitive information, data or physical documents <p>Staff of this category</p> <ul style="list-style-type: none"> • Must be registered in the UBS HR system and therefore must have a GPN • Has no UBS Logon <p>Groups concerned are</p> <ul style="list-style-type: none"> • Staff augmentation onsite, non-billable (supplier account manager without UBS Logon; badge holder) • Managed services onsite and without UBS Logon • Professional services without UBS Logon (facility management) • Benefits services onsite (hair dressers / fitness trainers / dry-cleaning worker / massage services / physiotherapists / dentists / doctors / etc.) • Business University Trainers

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.