

Vetting Finding Guidelines

Principles

Integrity is highly important for UBS as it is a fundamental element of our organization's personality. UBS places the highest value on the honesty and integrity of our external staff members. Honesty in fulfilling UBS's required vetting documentation for all UBS external staff is therefore a pre-requisite. All information supplied by your employees as part of the onboarding / vetting process must be correct, truthful and complete. When a potential integrity conflict arises, UBS expects suppliers to consider such while conducting the appropriate risk assessment. Providing misinformation (i.e. information that is not correct, truthful and / or complete or failing to disclose required information) or unresponsiveness of external staff is grounds for automatic disqualification.

Adverse Findings as outlined in the Finding Thresholds require Suppliers to perform an Individualized Assessment in accordance with applicable law. Please always consider that the decision made should not expose UBS to any reputational or operational risk. In the case that your employee needs to be withdrawn from the onboarding process or providing services to UBS, please inform the relevant Regional Staff Vetting Operations Team and your business contact immediately.

Important

- **All Family Relationship and External Directorship** must be reported to UBS. This applies for the self-declaration and the External Directorship Database Search. Disclosures in the database search need to be raised to UBS, unless the same finding was disclosed during the self-declaration and UBS cleared it. Any discrepancy between the self-declaration and the database search (as specified by UBS in the vetting checks specifications) **shall constitute a finding and must be disclosed to UBS for further review**. Please send an email to the relevant Regional Staff Vetting Operations Team (NOT to your UBS business contact)
 - sh-hr-externalstaffvetting-apac@ubs.com
 - sh-hr-externalstaffvetting-emea@ubs.com
 - sh-hr-externalstaffvetting-americas@ubs.com
- Any inability to conduct a check as outlined in the applicable country specification must be reported to UBS. Please send an email to the relevant Regional Staff Vetting Operations Team (see contacts above)

Name of Check	Description of Check (detailed UBS country specifications supersede below generic description)
Criminal Record Check / Civil Litigation Check (as applicable)	<p>Document(s) need to be original and current; e.g. dated not older than 2 months from receiving.</p> <p>Onboarding: Document(s) must 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 (required address history).</p> <p>Periodic Vetting: Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months over the period equal to the frequency of periodic vetting (e.g. if the frequency of periodic vetting is 3 years, the check / address history must cover the last 3 years).</p> <p>For both Onboarding and Periodic Vetting 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.</p>
Credit Check / Bankruptcy Check (as applicable)	<p>Document(s) need to be original and current; e.g. dated not older than 2 months from receiving.</p> <p>Onboarding: Document(s) must 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 (required address history).</p>

Finding Thresholds

Criminal record convictions **other than Minor Alcohol or Traffic Related Offences** shall constitute a "Finding". Some examples of "Minor Offences" can include the following:

- public intoxication (US)
- open container (US)
- 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 an Individualized Assessment that is in full adherence to all applicable law. An Individualized Assessment, generally includes, but is not limited to a review of the role (and the role linked to access rights) / type of activity in relation to any findings, the nature and gravity of the offense(s), rehabilitation efforts after the offense(s), and any other factors required by applicable law.

Certain criminal convictions are subject to "regulatory disqualification" and may preclude a candidate from being assigned to UBS.

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.-

Periodic Vetting: Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 3 months over the period equal to the frequency of periodic vetting (e.g. if the frequency of periodic vetting is 3 years, the check / address history must cover the last 3 years).

For both Onboarding and Periodic Vetting 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.

A finding shall not serve as an automatic disqualification to assignment at UBS. Rather, the Level 1 Supplier shall make its decision based upon an Individualized Assessment that is in full adherence with all applicable law.

An Individualized Assessment, generally includes, but is not limited to a review of the role (and the role linked to access rights) / type of activity in relation to any findings, proof of debt resolution efforts, and any other factors required by 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 / investigations databases (Compliance Structured Intelligence Management (COSIMA) / Global Tracking System (GTS), Human Resources databases).	Checks completed internally by UBS.
External Directorship Database Search	Database search on publicly available data to identify any external directorships the candidate may hold and pose a conflict of interest with UBS. Assess candidate integrity comparing database search results with the external directorship self-declaration.	Any discrepancy between the self-declaration and the database search (as specified by UBS in the vetting checks specifications) shall constitute a finding and must be disclosed to UBS for further review.
Self-Declaration of family relationship and external directorship (Personal Disclosures)	Candidate needs to be asked whether he / she has any family relationships ¹ with UBS employees, and / or holds any external directorship positions that may pose a conflict of interest with UBS. ¹ Family relationship: spouse, domestic partner or civil partner (or similar as recognized by law), parent (or parent-in-law), sister or brother (or in-law), child, step child.	Any family relationship and/or external directorship disclosures (as specified by UBS in the vetting checks specifications) shall constitute a finding and must be disclosed to UBS for further review.
Regulatory Enforcement Actions (regulated positions only)	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: <ul style="list-style-type: none"> • candidate does not hold required license, • disciplinary or regulatory "events" exist, • candidate was suspended or inactive with any regulator, • statutory disqualification