

# Vetting Specification for External Staff ITALY

Valid as of 01 April 2023

Pre-offer and Pre-start vetting may be started no earlier than 6 months before the UBS 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).

| Check   | Sources / Tools  | Requirement / Validation   | Successful Vetting Check Criteria                                      | Timing             |
|---|--|--|--|--------------------|
| <b>Identity Check</b>                                 |  | This check is the responsibility of the supplier   |  | Pre-UBS start date |
| <b>Right to work verification</b>                     |  | This check is the responsibility of the supplier   |  | Pre-UBS start date |
| <b>Global Background Check (COSIMA, GTS, Rehire)</b>  | COSIMA / GTS <b>not allowed</b> in Italy for employment screening purposes for onboarding<br>Rehire check in Internal HR Systems is allowed<br><br>COSIMA is allowed for Periodic Staff Vetting  | <b>Onboarding Vetting</b><br>Cosima is NOT allowed<br><br>Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons)<br><br><b>Periodic Vetting</b><br>All Risk sensitive roles in scope for Periodic Staff Vetting are permitted. Those roles are Managing Directors, External Non-Executive Directors, Regulatory (Registered Roles), Group Internal Audit, Members of the Special Review Group, Group Treasury, Enhanced Benchmark Submitters responsible for the daily labor 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 GCGR 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 C&RA and CoS team (i) Group Investigations (i.e. Criminal Investigations & IT Forensics team, eDiscovery/GTS team and Data Analytics & Tools team), (ii) CCS staff, (iv) Cyber testers in C&RNC, Cf, (v) staff with access to the PEP cockpit reporting  | No hits  | Pre-UBS start date |
| <b>Relatives &amp; Relationship</b>                   | Self-declaration or 'Stato di Famiglia'  | Candidate needs to be asked whether he/she has family or personal relationships with UBS employees.<br>- 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.<br>- Personal relationship: management reporting line.<br><br>Answers are adequately documented.   | No family relationship with UBS  | Pre-UBS start date |
| <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 interest with UBS to disclose.<br><br>Answers are adequately documented.   | No external directorship and positions                                 | Pre-UBS start date |
| <b>Registered Status / Statutory Disqualification</b> |  | Not applicable for External staff in Italy.  |  | N/A                |
| <b>Criminal Record Check</b>                          | National Criminal Record Registry to the Prosecutor's Office at the Ministry of Justice  | <b>Onboarding Cases</b><br><b>Checks are only permitted for onboarding cases if any of the following criteria is met:</b><br>- Management roles (external staff with senior responsibilities) or personal assistants and board administrators with access to confidential financial information<br>- Functions which involve the handling of confidential financial information, including financial systems (e.g. highly privileged users, regulated, certified and client facing roles)<br>- Staff of control functions per Policy 1-C-007976 or staff responsible for control activities in non control functions<br><br>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).<br><br>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).<br><br><b>Periodic Vetting</b><br>All Risk sensitive roles in scope for Periodic Staff Vetting are permitted. Those roles are Managing Directors, External Non-Executive Directors, Regulatory (Registered Roles), Group Internal Audit, Members of the Special Review Group, Group Treasury, Enhanced Benchmark Submitters responsible for the daily labor 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 GCGR 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 C&RA and CoS team (i) Group Investigations (i.e. Criminal Investigations & IT Forensics team, eDiscovery/GTS team and Data Analytics & Tools team), (ii) CCS staff, (iv) Cyber testers in C&RNC, Cf, (v) staff with access to the PEP cockpit reporting<br><br>Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. 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).<br><br>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 entries found in respective document                                | Pre-UBS start date |
| <b>Credit Check</b>                                   |  | Credit Check is <b>not allowed</b> in Italy for employee screening purposes.   |  | N/A                |
| <b>External Directorship (Database Search)</b>        | Public database InfoCamere®  | Database check to identify any external directorships and assess candidate integrity based on external directorship self-declaration.<br><br>The check 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)  | No hits, no discrepancies between self-declaration and database search | Pre-UBS start date |
| <b>ESSENTIAL FOOTNOTES:</b>                           |  |  |  |                    |
| <b>Supplier Vetting Obligations</b>                   | 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.<br><br>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.<br><br>A reminder that any decisions made by you should not expose UBS to any reputational or operational risk.<br><br>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).<br><br>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.<br><br>The country specifications define the acceptable documentation and/or data sources for use within a candidate's country of hire.<br><br>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.<br><br>Please note that at all times you should be guided by the country specifications of the onboarding country. |  |  |                    |