UBS

Internal

Vetting Process for External Staff

Supplier Information
(L1)

July 2025

Content

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1 Background to UBS external staff vetting

All UBS staff (internal UBS staff, external supplier staff - inclusive of sub-contractors) are subject to the same minimum vetting standards in accordance with UBS's Global Staff Vetting Policy.

Why

- Provides consistent standards to the vetting of all UBS external and internal staff, in all locations
- Reduces UBS's operational and reputational risk
- Protects our clients
- Complies with regulatory expectations

How

- UBS's Global Staff Vetting Policy applies to all staff and addresses the minimum standard of vetting for all staff who have access to UBS information and/or premises
- Processes are applicable globally following local rules and regulations
- Re-vetting of risk-sensitive staff (as defined by UBS) ensures that individuals in risk-sensitive roles are re-vetted as circumstances may have changed since vetting was last performed

Involved Partners

- Suppliers
- Staff of Suppliers (this includes sub-contractors – e.g. 4th Party Staff)
- UBS Contract Managers
- UBS Business Contact ('Hiring Manager')
- UBS Regional Staff Vetting Operations Teams
- UBS HR Advisory Lead for External Suppliers

2 Global mandatory vetting checks & external staff categories

All vetting checks must be completed before a member of staff is admitted access to UBS premises, data or systems.

Staff category defines risk sensitivity and vetting checks to be executed

- **Category I:** Access to UBS systems, UBS valuables (e.g. treasury room, server rooms) and/or UBS's confidential information and issued with a UBS logon ID or a GPN;
- **Category II:** Access to confidential / strictly confidential information, data or physical documents and no access to IT or unsupervised physical access to infrastructure (no GPN)
- **Category III:** No access to UBS IT systems, no access to UBS valuables and no access to UBS's confidential information, but are issued with a GPN or provided with an access badge, and have access to UBS premises

checks	Staff	
	Category I	Category III
Identity Check	**Supplier contractually obligated to have cleared checks prior to UBS engagement, per supplier practice**	
Right to Work Verification		
Criminal Record Check	O	O
Credit Check	O	x
Global Background Checks, Re-engagement Check	✓	✓
Registered Status/ Statutory Disqualification (global regulated positions only)	O	x
Relatives and Relationships (Self-Declaration)	O	x
External Directorships and Positions (Self-Declaration)	O	x
External Directorships and Positions (Database Search)	O	x
Fingerprinting (US only)	✓	✓
Highest Level of Education*	**Supplier contractually obligated to provide skilled and qualified staff**	
Employment History*		

✓ = UBS performs checks; **O**= Supplier performs checks; **X** no check

***On demand workers (ODW) -** UBS hiring managers to perform a skills and qualification assessment on individuals put forward by the On Demand Worker team.

For external staff category II, suppliers must ensure that the following checks have been completed: Identity check, Right to Work Verification and Criminal Check, where permissible pursuant to relevant federal, state and/or local laws.

UBS

3 External staff vetting: UBS requirements (1/2)

- **Responsibilities and delegation of vetting**
  - UBS's vetting policy and minimum standards clearly require that all external staff (inclusive of sub-contractors – e.g. 4th party staff) who have access to UBS systems and premises, must be vetted to the same standard as UBS requires for internal staff performing similar roles. UBS is obliged to distinguish between 3rd party (e.g. supplier's direct employees) and sub-contractors (e.g. 4th party staff) and, to record the subcontractor company name, as applicable. Supplier must ensure that for all its Staff (including sub-contractors), Vetting has been completed in line with the vetting specifications taking into account the requirements of the respective External Staff Category.
  - Pre-start vetting checks may now be started no earlier than 6 months (3 months for Americas) before the UBS start date. The documents are expected to be no older than 6 months (3 months for the Americas) from the date of your direct employee's or subcontractor's UBS start date/engagement date. However, where credit and / or criminal checks are permissible for staff onboarded outside of the Americas, these document(s) must be original and dated no older than 3 months from vetting case completion (or from the UBS start date, whichever is earlier).
  - In the event there is an adverse finding for which there are reasonable grounds for the exclusion of a Supplier Staff from all or certain tasks or engagements of UBS, then the supplier will not engage that staff member or if already engaged shall withdraw such staff member from providing services to UBS. When the supplier performs his internal assessment in case of adverse vetting findings the supplier should take into consideration the UBS Vetting Finding Guidelines (as published on the staff vetting website).
  - Supplier shall notify UBS:
    - if supplier believes that any country vetting specification would breach applicable law or regulation. In such a case, supplier shall co-operate in good faith with UBS to determine other equivalent vetting checks which are compliant with applicable laws and regulations, or
    - of any event or circumstances under the control of supplier which supplier is aware of and believes will impact the vetting such that the vetting specifications are not or no longer fully met or that the vetting may be delayed such that the provision of services may be negatively affected; or
    - if supplier has reasonable grounds for the exclusion of a member of staff from all or certain tasks or engagements of UBS which have not been detected during Vetting.

- **Country vetting specifications**
  - The country vetting specifications set out the minimum requirements for vetting as determined and defined by UBS.
  - The country vetting specifications may be amended by UBS at any time to the extent deemed necessary from a legal or operational perspective (e.g. in case of changes of legislation to ensure compliance with applicable laws or regulations)

3 External staff vetting: UBS requirements (2/2)

- **Supplier will only use UBS pre-approved vetting vendors and apply UBS's vetting standards per UBS country vetting specifications**
- **Supplier shall keep a process document which details how the supplier is compliant with UBS vetting requirements**
  - Supplier shall make this document available to UBS for review as part of the yearly level 1 audit.
- **Collection and disclosure of information**
  - Supplier shall ensure that any collection, storage, disclosure and any other processing of personal data complies with applicable laws and regulations.
  - Supplier shall inform its staff of additional background checks which may be carried out by UBS if applicable such as fingerprinting in the US and the global background check.
- **Change of position, periodic staff vetting (re-vetting)**
  - Supplier shall perform any additional vetting required as a result of a staff member changing position or role which leads to a change of external staff category or changing the country of service.
    In the case of a change of country of service, additional vetting checks may be required.
  - Risk-sensitive staff are subject to pre-defined periodic vetting as determined by UBS. UBS, however, reserves the right at any time to require vetting of any already vetted risk-sensitive staff at supplier's costs, irrespective of whether positions have changed or not, if deemed necessary or appropriate by UBS.
- **Retention of and access to vetting records**
  - Supplier shall ensure that the vetting records are accessible for a minimum period of 12 months (or per local record retention requirements) after the commencement of the provision of services by the member of staff (inclusive of subcontractor vetting evidence).
  - During this retention period a review by UBS or an independent reviewer as agreed between UBS and the supplier shall, upon request, have the right to access the vetting records in order to do spot checks.
- **Background screening of category II staff and sub-contractors**
  - The supplier warrants that any supplier staff and any staff of a subcontractor as specified in the subcontractor annex (if applicable) without a UBS logon or group-wide personal number (GPN or equivalent) providing services to UBS, have completed background screening (identity check, right to work verification and criminal record check) prior to the engagement for UBS to the extent supplier or the relevant subcontractor may lawfully carry out or require the relevant individual to complete that background screening.

4 Process flow chart as of 1st July 2025

The UBS Group business contact can only raise a vetting / onboarding request when contract is draft, draft amendment or published. Staff vetting may only be initiated after data protection eligibility assessments (e.g., supplementary form) has been considered for the vetting process.

Supplier Level 1**

2

Conduct mandatory vetting checks for selected staff considering the information included in the Staff Vetting Supplementary Forms*

Report to UBS HR any findings in Self-Declaration of External Directorship and Relatives and Relationship. Escalate to UBS HR any findings of External Directorship Database searches via separate e-mail (if applicable).

Complete Staff Vetting Declaration (SVD) form **confirming that all vetting checks are complete, incl. date of completion for each check**; identify sub-contractors.

Add additional documents - if required.

7

Receive confirmation that onboarding is initiated.

UBS Group Business Contact

1

Agree on supplier / staff and provide the Staff Vetting Supplementary Forms* to the supplier at the earliest opportunity (e.g. up to 6 months prior to start date)

E-mail prior to submitting SVD form

3

Initiate staff vetting:

via the HR portal

Note: make sure to submit all mandatory documents, incl the Staff Vetting Supplementary Forms* - if applicable AND a UBS cost center

6

UBS Group Business Contact receive confirmation that vetting is completed.

Cleared vetting will trigger onboarding.

UBS Staff Vetting Operations Team

Coordinate activities in case of any finding in External Directorship checks and / or Relatives and Relationship check

4

Validates external staff request, creates the vetting case, and attaches mandatory documentation. Reach out to Business in case of missing/incorrect information.

Conduct UBS Global Background (e.g. sanctions) / re-engagement checks and escalates findings (if applicable).

5

Initiate onboarding in the UBS HR system and inform the business.

Staff starts working at UBS

*For further information on the Staff Vetting Supplementary Forms please review slide 8 and 13

** Level 1 suppliers are expected to identify staff and start the vetting process during the early stages of the contract negotiations

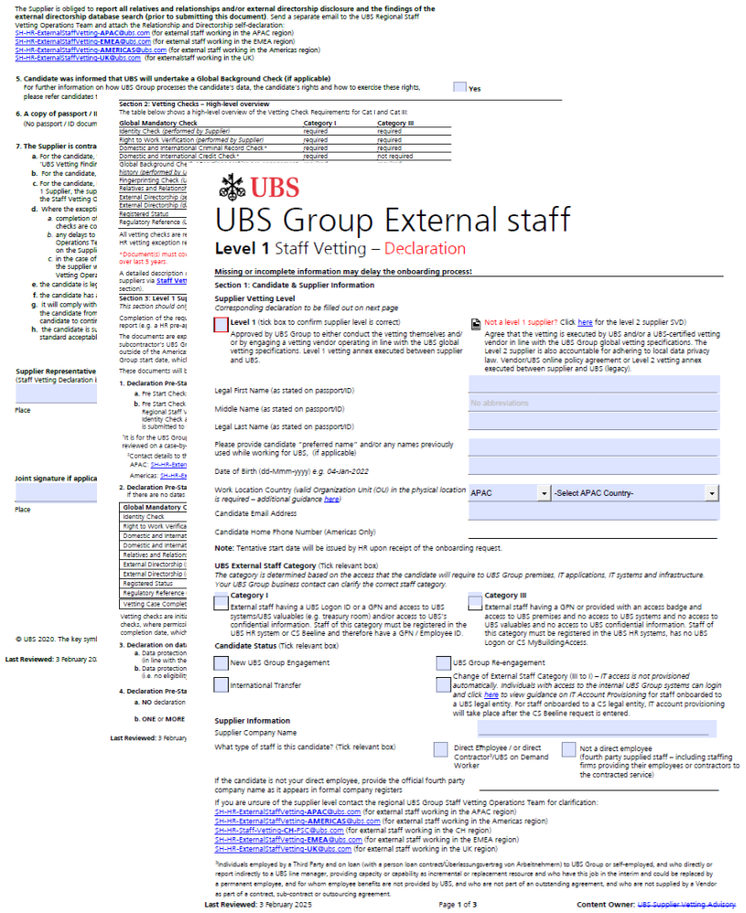
5 Vetting process for category I and III for UBS Group onboardings (1/4)

Vetting initiation – supplier (action may be taken as early as 6 months (3 months for the Americas) prior to the new joiner's start date)

Action by Supplier:

- Complete the vetting checks for the selected candidate early as six months. (three months for the Americas) before the new joiner's start date considering data protection rules in line with the relevant staff vetting supplementary forms* provided by UBS for respective countries.
- All relatives and relationships (self-declaration) and external directorship findings (self-declaration and database search) must be reported to UBS prior to start. For any other unsatisfactory vetting results perform an internal assessment taking into consideration the UBS vetting finding guidelines and applicable local law.
- Complete and sign the Level 1 staff vetting declaration form. Important points to include
  - Identify whether the candidate is your direct employee/not your direct employee (subcontractor)
  - Add the correct name of the subcontractor (e.g., 4th party staff) as it appears in the formal company register in case the staff is not your direct employee.
  - Provide the check completion dates (these will be used for your audit samples)
- Provide the staff vetting declaration form and additional documents as required for your location to your UBS business contact.
- The external staff cannot start the engagement with UBS before all vetting checks are ok/cleared AND the contract is executed with a contract effective start date in the past. If either of these requirements are not complete, the start date of your staff will be delayed.

Staff vetting declaration form



UBS

UBS Group External staff

Level 1 Staff Vetting – Declaration

Missing or incomplete information may delay the onboarding process!

Section 1: Candidate & Supplier Information

Supplier Vetting Level

Corresponding declaration to be filled out on next page

☐ **Level 1** (tick box to confirm supplier level is correct)

Approved by UBS Group to either conduct the vetting themselves and/or by engaging a vetting vendor operating in line with the UBS global vetting specifications. Level 1 vetting annex executed between supplier and UBS.

Not a level 1 supplier? Click here for the level 2 supplier SVD)

Agree that the vetting is executed by UBS and/or a UBS-certified vetting vendor in line with the UBS Group global vetting specifications. The Level 2 supplier is also accountable for adhering to local data privacy law. Vendor/UBS online policy agreement or Level 2 vetting annex executed between supplier and UBS (legacy).

Legal First Name (as stated on passport/ID)

Middle Name (as stated on passport/ID) — No abbreviations

Legal Last Name (as stated on passport/ID)

Please provide candidate "preferred name" and/or any names previously used while working for UBS, (if applicable)

Date of Birth (dd-Mmm-yyyy) *e.g. 04-Jan-2022*

Work Location Country *(valid Organization Unit (OU) in the physical location is required – additional guidance here)* — APAC -Select APAC Country-

Candidate Email Address

Candidate Home Phone Number (Americas Only)

Note: Tentative start date will be issued by HR upon receipt of the onboarding request.

UBS External Staff Category (Tick relevant box)

The category is determined based on the access that the candidate will require to UBS Group premises, IT applications, IT systems and infrastructure. Your UBS Group business contact can clarify the correct staff category.

☐ **Category I**

External staff having a UBS Logon ID or a GPN and access to UBS systems/UBS valuables (e.g. treasury room) and/or access to UBS's confidential information. Staff of this category must be registered in the UBS HR system or CS Beeline and therefore have a GPN / Employee ID.

☐ **Category III**

External staff having a GPN or provided with an access badge and access to UBS premises and no access to UBS systems and no access to UBS valuables and no access to UBS confidential information. Staff of this category must be registered in the UBS HR systems, has no UBS Logon or CS MyBuildingAccess.

Candidate Status (Tick relevant box)

☐ New UBS Group Engagement

☐ UBS Group Re-engagement

☐ International Transfer

☐ Change of External Staff Category (III to I) – *IT access is not provisioned automatically. Individuals with access to the internal UBS Group systems can login and click here to view guidance on IT Account Provisioning for staff onboarded to a UBS legal entity. For staff onboarded to a CS legal entity, IT account provisioning will take place after the CS Beeline request is entered.*

Supplier Information

Supplier Company Name

What type of staff is this candidate? (Tick relevant box)

☐ Direct Employee / or direct Contractor/UBS on Demand Worker

☐ Not a direct employee (fourth party supplied staff – including staffing firms providing their employees or contractors to the contracted service)

If the candidate is not your direct employee, provide the official fourth party company name as it appears in formal company registers

If you are unsure of the supplier level contact the regional UBS Group Staff Vetting Operations Team for clarification:

SH-HR-ExternalStaffVetting-APAC@ubs.com (for external staff working in the APAC region)

SH-HR-ExternalStaffVetting-AMERICAS@ubs.com (for external staff working in the Americas region)

SH-HR-Staff-Vetting-CH-FSC@ubs.com (for external staff working in the CH region)

SH-HR-ExternalStaffVetting-EMEA@ubs.com (for external staff working in the EMEA region)

SH-HR-ExternalStaffVetting-UK@ubs.com (for external staff working in the UK region)

[1]Individuals employed by a Third Party and on loan (with a person loan contract/Überlassungsvertrag von Arbeitnehmern) to UBS Group or self-employed, and who directly or report indirectly to a UBS line manager, providing capacity or capability as incremental or replacement resource and who have this job in the interim and could be replaced by a permanent employee, and for whom employee benefits are not provided by UBS, and who are not part of an outstanding agreement, and who are not supplied by a Vendor as part of a contract, sub-contract or outsourcing agreement.

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*For further information on the Staff Vetting Supplementary Forms please review slide 8 and 13

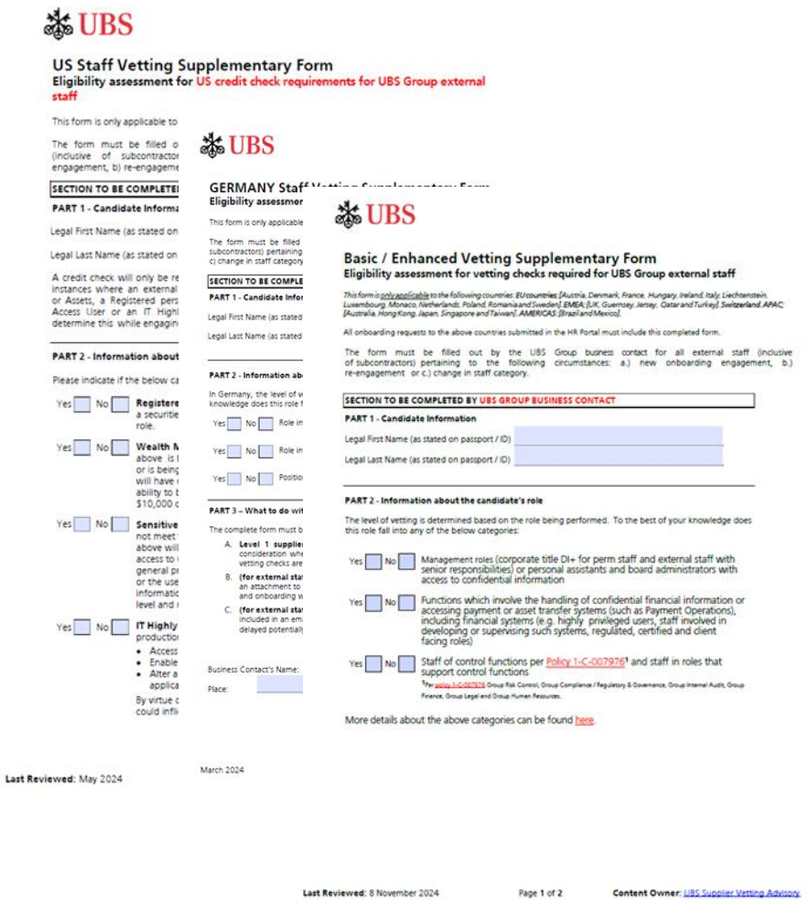
5 Vetting process for category I and III staff onboardings (2/4)

Vetting initiation - UBS Group business contact

Action by UBS Group business contact ('hiring manager'):

- Completes the staff vetting supplementary Form* declaration (if applicable for hiring country) and provide the completed form to the supplier
- Reviews supplier documentation and ensure it is complete and correct.
- Once a contract ID is available in the logistics platform, initiates the staff vetting as follows including the submission of relevant documentation from the supplier and a UBS cost center:
  - create an external staff onboarding request via the HR Portal
- Defines the staff category. The category is based on the access required when the candidate commences engagement at UBS (see slide 3).
- Submits and plans the new joiner's start date in consideration of the 4-day minimum lead time.
- Only for exceptional cases: Raises an exception to the Global Staff Vetting policy request (supported by required business approvals) with HR's staff vetting operations team if the candidate meets required criteria; if the exception is approved, shares the details with the supplier.
- Onboarding: vetting / onboarding are done in parallel. No action required.

Examples: Staff vetting supplementary forms



UBS

US Staff Vetting Supplementary Form

Eligibility assessment for US credit check requirements for UBS Group external staff

UBS

GERMANY Staff Vetting Supplementary Form

UBS

Basic / Enhanced Vetting Supplementary Form

Eligibility assessment for vetting checks required for UBS Group external staff

SECTION TO BE COMPLETED BY UBS GROUP BUSINESS CONTACT

PART 1 - Candidate Information

Legal First Name (as stated on passport / ID)

Legal Last Name (as stated on passport / ID)

PART 2 - Information about the candidate's role

Management roles (corporate title DI+ for perm staff and external staff with senior responsibilities) or personal assistants and board administrators with access to confidential information

Functions which involve the handling of confidential financial information or accessing payment or asset transfer systems (such as Payment Operations), including financial systems (e.g. highly privileged users, staff involved in developing or supervising such systems, regulated, certified and client facing roles)

Staff of control functions per Policy 1-C-007976 and staff in roles that support control functions

More details about the above categories can be found here.

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*US Staff Vetting Supplementary Form, Germany Staff Vetting Supplementary Form, or the "basic/enhanced" Staff Vetting Supplementary Form applicable to the following countries:
Austria, Denmark, France, Guernsey, Hungary, Ireland, Italy, Lichtenstein, Luxembourg, Netherlands, Poland, Portugal, Romania, Sweden, UK, Switzerland, Australia, Singapore, Brazil, Mexico, Japan, Taiwan, Hong Kong, Jersey, Monaco, Turkey, Qatar.
For China and South Africa there are country specific forms.

5 Vetting process for category I and III onboardings (3/4)

Vetting and onboarding initiation – staff vetting operations team

Action by UBS Group staff vetting operations team:

- Validate the external staff request and mandatory documentation - in case of missing/incorrect information, the staff vetting operations team will reach out to the UBS Group business contact – onboardingmay get delayed
- If an exception to start has been raised by the UBS business contact, review the exception, confirm that the contract ID is "published", "draft amendment" or "pending", confirm that the contract ID has a contract effective start date on or before the new joiner's start date, and decide whether it can be granted (in line with agreed exception process); inform the UBS Group businesscontact about the final exception decision
- Assess the submitted staff vetting supplementary forms to apply correct vetting restrictions
- Conduct the Global Background check / re-engagement checks / sanctions ("in-house" checks) (if applicable)
- Coordinate activities related to adverse findings in external directorship and relatives and relationships checks provided by the supplier and "in-house" checks
- Provided all vetting checks are ok/cleared, the staff vetting operations team initiates the on-boardingwhich triggers the following:
  - Global Personnel Number (GPN) creation
  - Access badge ordering
  - IT rights ordering (if required)
- A notification is sent to the UBS business contact ('hiring manager') to confirm that vetting has cleared and will advise on when the new joiner may start. If the contracting or vetting is not complete 3 days prior to the anticipated start date, the start date will be post-poned and notifications will be sent to UBS Group business contact)

5 Vetting process for category I and III onboardings (4/4)

L1 supplier vetting results.

Action by supplier:

- Identify your staff and start vetting as early as six months (three months for the Americas) prior to the UBS start date (may be initiated during the contract negotiation process).
- Do not provide services until contract is fully executed and not before the contract effective start date
- Inform UBS vetting operations teams immediately if there is any finding in candidate self-declarations or external directorship database searches prior to start date
- Perform an internal assessment in case of unsatisfactory vetting findings in vetting checks taking into consideration the UBS Vetting Finding Guidelines and applicable local law
- Inform the HR staff vetting operations team if a check cannot be performed according to the applicable country specifications
- In case of significant adverse finding identified after staff have already started, immediately inform the HR staff vetting operations team and UBS Group business contact if it is decided to withdraw the candidate from the onboarding process or providing services to UBS
- If an HR vetting exception has been granted for the candidate to start prior to the clearance of vetting checks, the supplier is obligated to report the completion of checks to UBS. This must be done within 4 weeks (28 days) after the start date. Any delays to the 4-week deadline must be reported in advance to the UBS HR staff vetting operations team via standardized e-mail template (available on the Level 1 webpage) at minimum 3 days prior to the applicable deadline
- Store the vetting results for a minimum of 12 months (or per local record retention requirements)

Vetting finding guidelines

UBS

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 staff (employees and subcontractors) as part of the UBS onboarding / vetting process must be correct, truthful, and complete. When a potential integrity conflict arises, UBS expects our 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 your staff is grounds for automatic disqualification.

Adverse Findings, as outlined in the Finding thresholds, require you 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 non-financial risk. In the case that your staff needs to be withdrawn from the UBS onboarding process or providing services to UBS, please inform the relevant staff vetting operations team and your business contact immediately.

Important

All relatives and relationships and external directorships must be reported to UBS. This applies for the self-declarations and the external directorship database search. Any disclosures resulting from the database search(es) 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 only send an email to the relevant 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 HR. Please send an email to the relevant staff vetting operations team (see contacts above)

Name of check	Description of check detailed UBS country specifications supersede below generic description)	Finding thresholds
Criminal record check / **Civil litigation check** (as applicable)	**Onboarding:** Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school, or lived more than 6 months over the last 5 years (required address history). *Information on required timeliness available at the bottom of this document **Periodic vetting / re-vetting:** Document(s) must cover all jurisdictions / countries where the candidate has resided, was employed, attended school, or lived more than 6 months over the period equal to the frequency of periodic vetting (e.g. if the frequency d periodic vetting is 4 years, the check / address history must cover the last 4 years). For both onboarding and periodic vetting an appropriate address verification shall be performed for the current address. Further proof dresidence 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 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 from assignment at UBS. Rather, you shall make your 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.

Name of check	Description of check detailed UBS country specifications supersede below generic description)	Finding thresholds
Credit check / bankruptcy check (as applicable)	**Onboarding:** Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school, or lived more than 6 months over the last 5 years (required address history). *Information on required timeliness available at the bottom of this document **Periodic Vetting / re-vetting:** Document(s) must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school, or lived more than 6 months over the period equal to the frequency of periodic vetting (e.g. if the frequency of periodic vetting is 4 years, the check / address history must cover the last 4 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.	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 from assignment at UBS. Rather, you shall make your 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	This check is the responsibility of the supplier and covered under contractual obligation.	Not applicable
Right to work verification	This check is the responsibility of the supplier and covered under contractual obligation.	Not applicable
Global background check / Re-engagement / sanctions / US Fingerprinting	Check against UBS internal compliance / investigations databases (Compliance Structured Intelligence Management (COSIMA) or equivalent / 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 poses a conflict of interest with UBS. Assess candidate integrity by comparing database search results with the external directorship self-declaration. The check must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school, or lived more than 6 months over the last 5 years (required address history)	All external directorships must be reported to UBS. This applies for both 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. 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 relatives and relationships and External directorships (Personal disclosures)	Candidate needs to be asked whether he / she / they have any family relationships or personal relationships* with UBS employees, and / or hold any external directorship position. . *Relatives include, but is not limited to spouse, domestic partner or civil partner (or similar relationship recognized under law), parent, sister, brother, child (including a stepchild), or equivalent in-laws, uncle, aunt, niece, nephew, or any other close familial relationships not listed here. Personal relationship refers to a relationship not primarily professional or business-related, including romantic relationships, a member of an employee's household not defined as a family relationship (e.g. a person who resides in the same household as the employee and who the employee financially supports), an individual over whose accounts the employee has control, close friend, or close family friendship.	Any relative and relationships and/or external directorship disclosures (as specified by UBS in the country vetting specifications) **shall constitute a finding and must be disclosed to UBS for further review.**

6 Data security matters

Data protection

1. Vetting evidence must be archived and purged as required by the legislator of each country.

2. Vetting results (ok, not ok) will be retained for 10 years.

3. Access to vetting results within UBS HR is limited and controlled. Data access within UBS is provided on a strict need-to-know basis.

7 Additional information for the US

US: Fingerprint collection

US: Fingerprint collection:

- ✓ The UBS Regional Staff Vetting Operations Team provides fingerprinting collection instructions to the external staff candidate (copying the UBS Business Contact ('Hiring Manager') and the Supplier),
- ✓ Fingerprints are collected from the external staff candidate at a UBS home office location or BIG Fieldprint location to identify any criminal arrests/charges. On request of UBS Regional Security Services only, the UBS vetting vendor conducts criminal record checks within the jurisdiction(s) where criminal charges were identified.
- ✓ The UBS vetting vendor will provide the vetting results directly to UBS Regional Security Services who will escalate any finding to determine the eligibility of the external staff candidate.

US: Credit checks

US staff vetting supplementary form - eligibility assessment for US credit check:

- ✓ UBS Business Contact completes the form and sends it to the supplier to accommodate credit check requirements
- ✓ Upon successful completion of the checks, supplier submits the completed Staff Vetting Declaration form, indicating whether they have applied or not applied credit checks
- ✓ The document must be stored for a minimum of 12 months

7 Additional information – eligibility assessment, basic vs enhanced

Eligibility Assessment: Credit and criminal checks

Basic / enhanced vetting supplementary form - eligibility assessment for vetting checks required for UBS Group external staff

- ✓ UBS business contact completes the form and sends it to the supplier to accommodate credit and/or criminal check requirements
- ✓ Upon successful completion of the checks, supplier submits the completed staff vetting declaration form, indicating whether they have applied or not applied respective credit and/or criminal checks
- ✓ The document must be stored for a minimum of 12 months

Germany staff vetting supplementary form - eligibility assessment for vetting checks

- ✓ For Germany, the same steps apply, however, a German-specific form is required to be completed by the UBS business contact

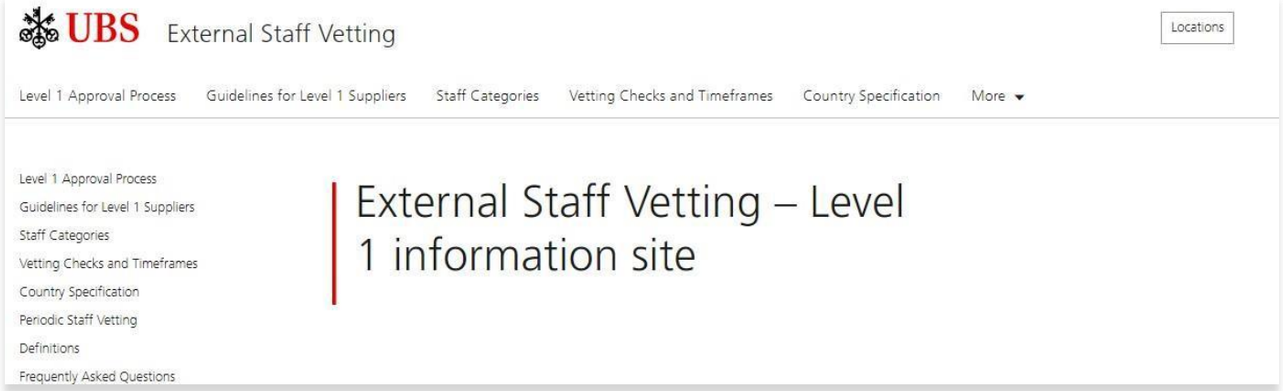
8 UBS level 1 supplier webpage

Access to the UBS Level 1 supplier webpage.

Access to the UBS level 1 supplier webpage

- UBS has created a webpage specifically for all level 1 suppliers where all relevant information is stored, and important updates are published on a regular basis.

Website

- https://www.ubs.com/global/en/external-staff-vetting.html

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