



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 In the case that your staff needs to be withdrawn from the UBS onboarding process or providing services to UBS, please inform the relevant staff vetting operations team and your business contact immediately.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):

- [APAC](#)
- [EMEA](#)
- [AMERICAS](#)
- [SWITZERLAND](#)
- [UK](#)

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
<p>Criminal record check /</p> <p>Civil litigation check (as applicable)</p>	<p>Onboarding:</p> <p>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).</p> <p>*Information on required timeliness available at the bottom of this document</p> <p>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 of periodic vetting is 4 years, the check / address history must cover the last 4 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>	<p>Criminal record convictions other than minor alcohol or traffic related offences shall constitute a “finding”. Some examples of “minor offences” can include the following:</p> <ul style="list-style-type: none"> • 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) <p>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.</p>

Name of check	Description of check detailed UBS country specifications supersede below generic description)	Finding thresholds								
Credit check / bankruptcy check (as applicable)	<p>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).</p> <p>*Information on required timeliness available at the bottom of this document</p> <p>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).</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. Check the summary of the candidate credit and bankruptcy history and compare with the address history.</p>	<p>The following shall be considered a finding:</p> <p>A cumulative total of any debt default, e.g.</p> <ul style="list-style-type: none"> • 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: <table border="0"> <tr> <td>CH/ EMEA:</td> <td>CHF 10'000.-</td> </tr> <tr> <td>UK:</td> <td>GBP 5'000.-</td> </tr> <tr> <td>APAC:</td> <td>USD 10'000.-</td> </tr> <tr> <td>Americas:</td> <td>USD 10'000.-</td> </tr> </table> <p>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.</p> <p>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.</p>	CH/ EMEA:	CHF 10'000.-	UK:	GBP 5'000.-	APAC:	USD 10'000.-	Americas:	USD 10'000.-
CH/ EMEA:	CHF 10'000.-									
UK:	GBP 5'000.-									
APAC:	USD 10'000.-									
Americas:	USD 10'000.-									
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	<p>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.</p> <p>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)</p>	<p>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.</p> <p>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.</p>								
Self-declaration of relatives and relationships and External directorships (Personal disclosures)	<p>Candidate needs to be asked whether he / she / they have any family relationships or personal relationships¹ with UBS employees, and / or hold any external directorship position. ...</p> <p>¹Relatives 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.</p> <p>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.</p>	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.								

Name of check	Description of check	Finding thresholds
Registered status / Statutory disqualification (registered / certified staff only)	detailed UBS country specifications supersede below generic description)	<p>Any of the following shall constitute a disqualifying finding:</p> <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

VETTING CHECKS REQUIRED TIMELINES

Completion of the required checks, as outlined in the country specification, must be available for evidence or summarized in a vetting vendor report (e.g. a vetting vendor which was approved already by UBS).

The documents are expected to be no older than 6 months (3 months for staff onboarded in the Americas) from 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).

These documents are critical to proving vendor compliance with UBS’s vetting standards through UBS’s auditing requirement.

ESSENTIAL FOOTNOTES: Supplier vetting obligations

As a level 1 supplier you are required to follow the country specifications published on our webpage. This however must be in line with the approved approach agreed with you and HR at the time you were awarded the label of being a UBS level 1 supplier. Any deviations to the country specs or agreed approach may result in a finding at the time of the level 1 vetting compliance reviews e.g., the use of an unapproved vetting vendor.

A reminder that any decisions made by you should not expose UBS to any reputational or non-financial risk. In case you do not have the capability to legally perform a particular check (as defined in the country specifications), the you must obtain advance clearance from UBS HR to perform an alternative. In approved cases you 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 vetting compliance review. A self-declaration only fulfils the condition of a check not being completed if this has been pre-approved. 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 vetting compliance review. The country specifications define the acceptable documentation and/or data sources for use within a candidate’s country of hire. 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. Please note, that at all times you must be guided by the country specifications of the onboarding country.

*UBS equals UBS Group AG

June 2024