

## Global Supplier Policy

# Compliance Policy

**WHY**

To help us stay compliant with our regulatory requirements.

**WHEN**

Whenever you have:

- i) any Onboarded Staff, or
- ii) any Staff with access to Unpublished Price Sensitive Information.



**WHAT** to know about **HOW** to comply

**1. Procedures and policies for Onboarded Staff**

- When working for us, we expect Onboarded Staff to meet the same standards as other UBS personnel. Unless we inform you otherwise, you'll ensure that Onboarded Staff comply with our policies and procedures. Onboarded Staff will be required to affirm compliance through our Affirmation Online portal at or shortly after the start of their work with us.
- You'll make sure that all Onboarded Staff are informed that, in accordance with Applicable Laws, we routinely monitor the activities of Onboarded Staff when working for us (e.g. by monitoring usage of computer systems and/or CCTV or use of security pass controls).

**2. Whistleblowing by Onboarded Staff**

- You must have a whistleblowing policy in place that protects Onboarded Staff from having their contracts terminated, being demoted, suspended, threatened, harassed or discriminated against or subject to any detriment when they use a UBS whistleblowing channel to report information which they believe constitutes a violation of laws, regulations, professional standards, or any relevant UBS policies, codes of conduct and ethics, rules or professional standards.

**3. Training of Onboarded Staff**

- You will make sure that all Onboarded Staff complete UBS induction training, and any further training required by us from time to time. This may be necessary in order for you and Onboarded Staff to comply with our internal policies and procedures, or in order for you or UBS to comply with Applicable Laws.

**4. Block leave for Onboarded Staff**

- You'll make sure that all Onboarded Staff identified by us as being sensitive for block leave purposes take a minimum of ten consecutive working days leave in any calendar year. This leave may include offsite training days

or work on a separate project unconnected to us.

- Where any Onboarded Staff have less than sixteen days' holiday per year this block leave requirement is lowered to a minimum of five consecutive working days. Onboarded Staff located in India, Japan, China, USA and Puerto Rico will ordinarily need to take five consecutive working days' leave to fulfill the block leave obligation.
- Where Onboarded Staff have access to our HR system, block leave must be registered in our HR system at least two working days before the start of the block leave.
- Where Onboarded Staff don't have access to our HR system, you must monitor block leave taken and provide details to us on request.

**5. Share dealing by Staff**

- You'll maintain policies and procedures reasonably designed to ensure that you comply with Applicable Laws in relation to share dealings by Staff who have access to Unpublished Price Sensitive Information (and their Connected Parties) and provide details to us or our Regulators on request.
- You will require such Staff to comply with any process for monitoring, approving and recording share dealings that we may implement.

**6. Insider Lists and Onboarded Staff**

- You acknowledge that the provision of Services or Products to UBS and its Affiliates may involve certain Onboarded Staff having access to Unpublished Price Sensitive Information.
- UBS will determine whether such Onboarded Staff may or will have access to such information and we will notify them if that is the case.
- You acknowledge that, in accordance with the External Staff Privacy Notice available [here](#), such Onboarded Staff will be required by UBS to provide details of their full name, previous name(s) (if any), date of birth, personal residential address, telephone numbers (work and personal, fixed and mobile) and national identifier(s) (for example national insurance number, national identification number or social security number) to UBS and that UBS will share such information with any Regulator if requested by such Regulator.
- You will ensure that each Onboarded Staff member understands and complies with such requirements. If any Onboarded Staff member is unable to provide the required information, you acknowledge that they will not be permitted to be onboarded to UBS and you agree to replace such Staff member with another suitable Staff member at no additional cost to UBS.