UBS

Global Supplier Policy

Staff Vetting Policy

WHY

Vetting is required to comply with regulatory and legal requirements and to manage and control legal, regulatory, operational, financial, and reputational risks that would arise from the use of inadequately vetted Staff.

WHEN

The Staff Vetting Policy applies to all Category I Staff and Category III Staff (as described on our Supplier Staff Vetting website), involved in the provision of Products or Services to UBS.

WHAT to know about HOW to comply

1. Who needs to be Vetted?

- The following Staff are subject to Vetting checks by UBS:
  - Category I Staff; and
  - Category III Staff,

  unless we approve an exemption or there are Vetting records on file at UBS for the relevant Staff which are no older than 12 months.

2. UBS's responsibilities in the Vetting process

- We're responsible for defining the minimum global Vetting standards.
- We may delegate responsibility for conducting Vetting checks to another internal function, or to an external Vetting Service Provider of our choosing. Delegation won't change our applicable Vetting requirements.
- We may initiate Vetting checks as early as 6 months in advance of your Staff member's UBS start date (3 months for Staff onboarded in Americas).
- When initiating vetting checks, we will request from you mandatory vetting and onboarding forms for your Staff.
- We will retain Vetting documentation for 12 months and store the Vetting results (i.e. pass/fail) for 10 years, or in accordance with regulatory requirements.
- When conducting Vetting, we'll:
  - supervise any appointed Vetting Service Providers;
  - comply with Data Protection Laws;
  - ensure that Vetting data is only accessed on a "need-to-know" basis and for the time period necessary to conduct the Vetting;
  - take reasonable measures to guard against unlawful access, loss or destruction of Vetting data; and
  - notify you if any Staff have failed to meet Vetting Check Requirements.
- If we require that your Risk-Sensitive Staff be re-vetted, we'll provide you with a Risk-Sensitive Staff listing for validation.
- If we undergo a corporate restructure or change of control, we may initiate Vetting checks and we may require rehire checks on any Staff with past engagement history with UBS or its Affiliates.

3. Mandatory Vetting checks

- Staff performing roles with access to UBS Systems, networks or valuables (e.g. servers, treasury rooms) have a higher risk profile than roles with access to UBS premises only. For roles where the risk is anticipated to be lower, certain checks are not required. The table in section 10 of this Policy specifies the applicable checks for Category I and Category III Staff. Where the table indicates that a check is to be conducted by you, you must identify and mitigate identity fraud risks in accordance with Industry Standards when conducting that check.
- Credit, criminal records and internal compliance / sanctions checks, where permitted under local Applicable Laws, are required for Risk-Sensitive Staff.
- Additional checks for existing Staff will be required if their classification is changed from Category III to Category I.
- UBS maintains Vetting Specifications at a country level, adhering to local Applicable Laws. These are available on UBS' Supplier Staff Vetting website and include country-specific requirements (e.g. permissible checks, evidentiary requirements, timing requirements).

4. Timing of Vetting check completion

- No Staff may provide any Products or Services until they've passed all relevant Vetting Check Requirements, and the Agreement is effective.
- We'll delay a start date for any Staff member if the pre-start checks are incomplete (including clearance of any adverse findings) or the Agreement isn't effective yet.
- Risk-Sensitive Staff will be re-vetted every four years, unless a Regulator requires this to be completed more frequently, or if the Risk-Sensitive Staff's last vetting checks did not include credit, criminal, or compliance / sanctions checks, where permitted under local Applicable Law.

5. Disclosure of information to UBS

- You must let us know:
  - if you believe that any Vetting Specification would breach any Applicable Laws (including Data Protection

Laws), and work with us to facilitate alternative Vetting checks which are compliant with Applicable Laws;
- of anything you think will adversely impact or change the Vetting outcome for any Staff;
- of any delay to Vetting which may adversely impact the delivery of any Products or Services; or
- if you're aware of any matters not considered in the Vetting process that may reasonably result in the disqualification of any Staff from provision of the Products and/or Services.

6. Your responsibilities to assist in our Vetting activities

- You must provide reasonable support to us, including timely provision of the required vetting and onboarding forms, obtaining any necessary prior consent from Staff, to complete Vetting on a timely basis.
- You agree to your Staff being vetted in advance of the Effective Date.
- You must submit a Staff Vetting Declaration Form (from our Supplier Staff Vetting website) and provide us with:
  - your authorization to perform mandatory checks in accordance with the Vetting Check Requirements and our Vetting Specifications;
  - confirmation that you have informed your Staff of the Vetting pre-conditions and the relevant Vetting Specifications prior to engagement;
  - all data necessary (e.g. legal name, birth date, nationality and physical locations of your Staff and any Subcontractors) for us or our Vetting Service Provider to conduct the Vetting; and
  - confirmation that all Staff assigned to perform the Products and/or Services are legally eligible and authorized to work in the jurisdiction(s) in which the Approved Location(s) are located.
- You agree that any adverse finding in self-declarations or directorship database searches of Staff must be reported to and cleared by us prior to providing any Products or Services.
- You agree to validate and re-validate your listing of Risk-Sensitive Staff on a timely basis.
- If we notify you that any Staff have failed to meet the Vetting Check Requirements, you'll ensure that such Staff do not provide (or continue to provide) Products or Services to us. This doesn't mean that you're required to terminate the employment of the affected Staff.
- You agree and accept that:
  - for Vetting purposes, Staff data may need to be transferred cross-border, including to Vetting Service Providers, in accordance with Data Protection Laws; and
  - if a Vetting check can't be conducted for any reason, we may conduct alternative checks.

7. Changes to country Vetting Specifications

- The Vetting Specifications may be amended by us at any time. The amended Vetting Specifications will be published on UBS' Supplier Staff Vetting website. Where there is a difference between the Vetting Check Requirements in the table under section 10 of this Policy and the applicable Vetting Specification, the Vetting Specification shall prevail.

8. Change of position

- You must inform us before a Staff member changes from Category I to Category III or vice versa, or Staff intends to change the country from which he or she provides any Products or Services. We'll then determine if additional Vetting will be required before the Staff member can continue providing the Products and/or Services.

9. Onboarding Staff to UBS

- You must only onboard (i.e. issue a UBS logon ID, GPN or access badge) Category I Staff and Category III Staff to a UBS entity that is established in a country which contains a UBS location, as listed here.
- In order to be onboarded to a UBS entity, the Staff member must have the right to work in that country.
- Once onboarded to the UBS entity in that country, the Staff member may only work in that country, apart from incidental temporary travel to another country for business or recreational purposes.

10. Mandatory Vetting checks table

- The mandatory Vetting checks for onboarding Category I Staff and Category III Staff are as follows:

Mandatory Vetting checks	Categories of External Staff	
	Category I	Category III
Identity Check	**O**	**O**
Right to Work Verification	**O**	**O**
Criminal Record Check	✓	✓
Credit Check	✓	**X**
Global Background Checks / Sanctions, Re-engagement Check	✓	✓
Registered Status/ Statutory Disqualification (global regulated positions only)	✓	**X**
Relatives and relationships (Self-Declaration)	✓	**X**
External Directorships and Positions (Self-Declaration)	✓	**X**
External Directorships and Positions (Database Search)	✓	**X**
Fingerprinting (US only)	✓	✓
Highest Level of Education	**X**	**X**
Employment History	**X**	**X**

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