

Vetting Specification for External Staff JAPAN

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).

| Current State | | | | |
|---------------|-----------------|--------------------------|-----------------------------------|--------|
| Check | Sources / Tools | Requirement / Validation | Successful Vetting Check Criteria | Timing |

Vetting checks detailed below can only be conducted at the discretion of the employer of staff based in Japan.

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|--|---|---|--|--------------------|
| Identity Check | | This check is the responsibility of the supplier. | | Pre-UBS start date |
| Right to work verification | | This check is the responsibility of the supplier. | | Pre-UBS start date |
| Global Background Check (COSIMA, GTS, Rehire) | Check Not Applicable Internal HR systems, Cosima & GTS, will be applicable only if the vetting is applicable for the supplier. | *This check will be applicable only if the vetting is applicable for the supplier. Background check to identify records of terrorist/criminal activities or networking; personal misconduct / reputation problem / hostility against UBS or conflict of interest with UBS, negative references concerning trustworthiness, work ethics, reputation. Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons). | No hits | Pre-UBS start date |
| Relatives & Relationship | Check Not Applicable *This check will be applicable only if the vetting is applicable for the supplier as such Self Declaration form to be collected from the candidate as a part of the mandatory documents. | *This check will be applicable only if the vetting is applicable for the supplier. Candidate needs to be asked whether he/she has family or personal relationships with UBS employees. - Family relationship: spouse, domestic partner or civil partner (or similar as recognised by law), parent (or parent-in-law), sister or brother (or in-law), child, step child. - Personal relationship: management reporting line. Answers are adequately documented. | No family relationship with UBS | Pre-UBS start date |
| External Directorship and Positions (self declaration) | Check Not Applicable *This check will be applicable only if the vetting is applicable for the supplier as such Self Declaration form to be collected from the candidate as a part of the mandatory documents. | *This check will be applicable only if the vetting is applicable for the supplier. Candidate needs to be asked whether he/she has any external directorship that could raise a conflict of interest with UBS to disclose. Answers are adequately documented. | No external directorship and positions | Pre-UBS start date |
| Registered Status / Statutory Disqualification | Check Not Applicable Japan Securities Dealers Association Check (JSDA) check for staff with employment history in financial firms. To check in JSDA database to see if the staff had breached the law, or had engaged in misconduct in the past. | *This check will be applicable only if the vetting is applicable for the supplier. JSDA database Only applicable for agency/temp workers | No breach/misconduct | Pre-UBS start date |
| Criminal Record Check | Check Not Applicable Civil Litigation Check by Tokyo District Court AND Anti-Social Forces (ASF) Check - Traces records back to the 1960s is an alternative for JPN - Search through private database which based on media articles - It reveals the potential relation to the so-called Yakuzas - Database is maintained by a Private organization: security protection Network Co., Ltd. No Criminal Record Check is available in Japan for employment screening purpose. Criminal and credit checks are not legally allowed in general. Authorities do not issue relevant records for vetting purposes (as a substitute, civil litigation and bankruptcy to be done). If applicable, international credit and criminal checks to be done for candidates. | *This check will be applicable only if the vetting is applicable for the supplier. 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). Onboarding: 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). Periodic Vetting: 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). 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 |

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| Check | Sources / Tools | Requirement / Validation | Successful Vetting Check Criteria | Timing |
| Credit Check | <p>Check Not Applicable</p> <p>Bankruptcy Check / Report by Japan Government Gazette (National Printing Bureau).</p> <p>No Credit Check is available in Japan for employment screening purpose. Criminal and credit checks are not legally allowed in general. –Authorities do not issue relevant records for vetting purposes (as a substitute, civil litigation and bankruptcy to be done). If applicable, international credit and criminal checks to be done for candidates.</p> | <p>*This check will be applicable only if the vetting is applicable for the supplier.</p> <p>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).</p> <p>Onboarding: 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).</p> <p>Periodic Vetting: 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).</p> <p>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>No debt defaults (overdue amounts, collections, litigations) Candidate has not been legally declared a bankrupt.</p> | Pre-UBS start date |
| External Directorship (Database Search) | <p>Check Not Applicable</p> <p>Public database</p> | <p>*This check will be applicable only if the vetting is applicable for the supplier.</p> <p>Database check to identify any external directorships and assess candidate integrity based on 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 3 months over the last 5 years (required address history)</p> | <p>No hits, no discrepancies between self-declaration and database search</p> | Pre-UBS start date |
| ESSENTIAL FOOTNOTE: | | | | |
| Supplier Vetting Obligations | <p>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.</p> <p>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.</p> <p>A reminder that any decisions made by you should not expose UBS to any reputational or operational risk.</p> <p>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).</p> | | | |

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| | <p>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.</p> <p>The country specifications define the acceptable documentation and/or data sources for use within a candidate's country of hire.</p> <p>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.</p> <p>Please note that at all times you should be guided by the country specifications of the onboarding country.</p> | | | |