

Vetting Specification for External Staff SPAIN

Valid as of 01 July 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
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)	Cosima / GTS not allowed , Internal HR systems	Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons). Periodic Vetting Not permitted	No hits	Pre-UBS start date
Relatives & Relationship	Self-declaration	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)	Self-declaration	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		Not applicable in Spain.		N/A
Criminal Record Check		Onboarding Cases/Periodic Vetting Criminal Record Check is not allowed in Spain for employee screening purposes.		N/A
Credit Check		Onboarding Cases/Periodic Vetting Credit Record Check is not allowed in Spain for employee screening purposes.		N/A
External Directorship (Database Search)	Public database Empresa - Business directory	Database check to identify any external directorships and assess candidate integrity based on 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)	No hits, no discrepancies between self-declaration and database search	Pre-UBS start date
ESSENTIAL FOOTNOTES:				

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Current State				
Check	Sources / Tools	Requirement / Validation	Successful Vetting Check Criteria	Timing
Supplier Vetting Obligations				