

# Vetting Specification for External Staff HONG KONG

Valid as of 01 July 2025

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, Global database check)	Cosima, GTS, Internal HR systems, Global database check	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	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
Mandatory Reference Check (MRC)	Previous FI where candidate was hired	This check is required for all staff who will be hired into roles under the Hong Kong Monetary Authority by UBS. UBS must conduct an MRC check, (conduct related information covering the seven years prior to the application) for such position. Misconduct information to be reported includes (i) breach of legal or regulatory requirements; (ii) incidents which cast doubt on an individual's honesty and integrity; (iii) misconduct reports filed with the HKMA; (iv) internal or external disciplinary actions arising from conduct matters; and (v) ongoing internal investigations.  This check is applicable for Registered status / Regulatory roles only.	No negative findings on serious or material misconduct or concerns of ongoing investigations is disclosed.	Pre-start
Registered Status / Statutory Disqualification	Registration search via Regulator's website / database - Hong Kong Monetary Authority (HKMA).	Registered status check only applicable for regulated roles.	Search confirms that the person is registered and that no statutory disqualification exist.	Pre-UBS start date
Criminal Record Check	Civil Litigation Check done by - Credit on Demand Service  Criminal Record Check is not available in Hong Kong for employment screening purpose. Criminal and credit checks are legally allowed, however 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	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). <b>Onboarding:</b> 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). <b>Periodic Vetting:</b> 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 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
Credit Check	Bankruptcy Check is available by Hong Kong Trade Development Council (TDC) and Official Receiver Office.  No Credit Check is available in Hong Kong for employment screening purpose. Criminal and credit checks are legally allowed, however 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	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). <b>Onboarding:</b> 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). <b>Periodic Vetting:</b> 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 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. Check the summary of the candidate credit and bankruptcy history and compare with the address history.	No debt defaults (overdue amounts, collections, litigations) Candidate has not been legally declared a bankrupt.	Pre-UBS start date
External Directorship (Database Search)	Public database	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
<b>ESSENTIAL FOOTNOTE:</b>				

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Current State				
Check	Sources / Tools	Requirement / Validation	Successful Vetting Check Criteria	Timing
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>			
	<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>			