

# Vetting Specification for External Staff GERMANY

Valid as of 29 July 2024

Pre-offer and Pre-start vetting may be started no earlier than 6 months before the UBS Group 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, Sanctions, GTS, Rehire)	Cosima / GTS <b>NOT</b> allowed, CS Global Search, Internal HR systems	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. Where criminal COSIMA check is not permissible, Sanctions checks will be completed using CS Global Check 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 Applicable for external staff (freelancer/ contractor) and agency/temp staff	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 Germany		N/A
Criminal Record Check	Candidate to apply for: Federal Central Register of the Public Prosecutor General at the Federal Court of Justice; (Führungszeugnis)	<b>Onboarding Cases</b> <b>Checks are only permitted for onboarding cases if any of the following criteria is met:</b> Criminal Record Checks can only be carried out in relation to roles involving: (i) cash or non-cash transactions of customers, (ii) the onboarding of new business relationships, or (iii) positions where money laundering or terrorist financing could be promoted.  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> Only the following risk sensitive roles are permitted for Periodic Staff Vetting: Managing Directors, HPUs, staff with full booking center access to CID, Permanent Insiders, Corporate Insiders, External Non-Executive Directors, Regulatory (Registered Roles), IB, WM and AM Divisions: Selected Staff (incl. EA/PA level) or Units directly supporting the Divisional President or Business Unit Head. Staff with physical access to high value concentration rooms (vault) for banknotes, precious metals or easy redeemable securities (bearer bonds, cheques etc) with total replacement value > 100m CHF. Group Treasury. Enhanced Benchmark Submitters responsible for the daily labor submission process administered by ICE. Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. 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 4 years, the check / address history must cover the last 4 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(s)	Pre-UBS start date

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Current State				
Check	Sources / Tools	Requirement / Validation	Successful Vetting Check Criteria	Timing
Credit Check	<p>Self-Assessment (Selbstauskunft) on form provided by UBS Germany and signed by each External Staff. Document where the individual confirms, that his financial situation is appropriate and that he / she hasn't a oath of disclosure (Offenbarung Eid - insolvent). This document contains the confirmation that there has been no affidavit of means / insolvencies in the past 5 years. Consumer Credit Report (e.g. by SCHUFA) not allowed for staff screening purpose.</p>	<p><b>Onboarding Cases</b></p> <p><b>Checks are only permitted for onboarding cases if any of the following criteria is met:</b> Credit Record Checks can only be carried out in relation to roles involving: (i) cash or non-cash transactions of customers, (ii) the onboarding of new business relationships, or (iii) positions where money laundering or terrorist financing could be promoted.</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>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).</p> <p><u>Periodic Vetting</u> Only the following risk sensitive roles are permitted for Periodic Staff Vetting: Managing Directors, HPUS, staff with full booking center access to CID, Permanent Insiders, Corporate Insiders, External Non-Executive Directors, Regulatory (Registered Roles), IB, WM and AM Divisions: Selected Staff (incl. EAVPA level) or Units directly supporting the Divisional President or Business Unit Head. Staff with physical access to high value concentration rooms (vault) for banknotes, precious metals or easy redeemable securities (bearer bonds, cheques etc) with total replacement value &gt; 100m CHF. Group Treasury: Enhanced Benchmark Submitters responsible for the daily labor submission process administered by ICE. Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date. 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 4 years, the check / address history must cover the last 4 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>	Signed form must not be older than 3 month when external staff starts at UBS.	Pre-UBS start date
External Directorship (Database Search)		Not applicable in Germany		N/A
<b>ESSENTIAL FOOTNOTES:</b>				
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>			