

Vetting Specification for External Staff USA/Puerto Rico

Valid as of 29 July 2024

Pre-offer and Pre-start vetting may be started no earlier than 3 months before the UBS Group start date. For Credit and Criminal, where this check is permissible, document(s) need to be original and current.

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, 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. 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
Registered Status / Statutory Disqualification	Result of FINRA BrokerCheck (www.finra.org)	To be verified that BrokerCheck reflected that (i) there were no disciplinary or regulatory "events" disclosed regarding the proposed Staff and (ii) the proposed Staff was not "suspended or inactive with any regulator". FINRA BrokerCheck reflecting either events disclosed and / or suspension or inactivity with a regulator shall result in proposed staff being deemed as having failed this requirement.	Confirmation registered status. No disciplinary or regulatory events or suspended or inactive status based on a search of the FINRA BrokerCheck (www.finra.org).	Pre-UBS start date
Fingerprinting	- Fingerprinting (US/PR only)	Onboarding: document(s) need to be original and current; e.g. dated not older than 3 months from the start date). Periodic Vetting: Note: No Fingerprinting is conducted for periodic vetting.		Pre-UBS start date (non-registered hires); Post-UBS start date (registered hires)
Criminal Record Check	- Felony Criminal Disclosure AND - Misdemeanour Criminal Disclosure as to the extent permitted by applicable local state and federal law.	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 6 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 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. Inquiries related to criminal offenses must be post-conditional offer.	No entries found in respective document(s).	Pre-UBS start date

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Credit Check	Credit Report from one of the reputable, widely recognized Consumer Credit Agencies (TransUnion or Experian or Equifax). Credit check to be performed in accordance with Fair Credit Reporting Act and any other applicable, local, state or federal law.	<p>Credit checks can only be accessed and used for persons responsible for UBS Funds or Assets, Registered Personnel, Wealth Management Americas staff, Sensitive Data Access Users or IT Privileged / Highly Privileged Users.</p> <p>Identified risk-sensitive staff mainly include persons that are Officers (rank DI+), Registered persons, WMA Branch staff, Sensitive Data Access Users or HPUs, therefore a credit check would apply unless prohibited by local applicable laws</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 6 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 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>	<p>Cumulative total from any combination of debt types totalling less than 10'000 USD:</p> <p>a. Sum of unsatisfied or unpaid public records with liability b. Sum of current negative accounts (under collection) with past due amounts c. Sum of accounts charged off as bad debt.</p>	Pre-UBS start date
External Directorship (Database Search)	Public database	<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 6 months over the last 5 years (required address history)</p>	No hits, no discrepancies between self-declaration and database search	Pre-UBS start date
ESSENTIAL FOOTNOTES:				
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>			