

Vetting Specification for External Staff Bermuda

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
Criminal Record Check	Bermuda Police Service	<p>Police records are checked for any reckonable criminal convictions. The check will only confirm if the individual has any criminal convictions recorded in Bermuda or not. Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date.</p> <p>Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date.</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 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. Identification of any records associated with the candidate.</p>	No entries found in respective document.	Pre-start
Credit Check	Credit Check / -Report via search conducted through the local credit bureau and/or debt collectors.	<p>Document(s) need to be original and current; e.g. dated not older than 3 months from UBS start date.</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 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</p> <p>b. Sum of current negative accounts (under collection) with past due amounts</p> <p>c. Sum of accounts charged off as bad debt.</p>	Pre-start
Identity Check		This check is the responsibility of the supplier.		Pre-start
Right to work verification		This check is the responsibility of the supplier.		Pre-start
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-start
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 3 months over the last 5 years (required address history).</p>	No hits, no discrepancies between self-declaration and database search	Pre-start
Family Relationship	Self-declaration	<p>Candidate needs to be asked whether he/she has family or personal relationships with UBS employees.</p> <p>- 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.</p> <p>- Personal relationship: management reporting line.</p> <p>Answers are adequately documented.</p>	No family relationship with UBS.	Pre-start
External Directorship and Positions	Self-declaration	<p>Candidate needs to be asked whether he/she has any external directorship that could raise a conflict of interest with UBS to disclose.</p> <p>Answers are adequately documented.</p>	No external directorship and positions.	Pre-start
Registered Status / Statutory Disqualification		Prospective directors, senior officers and executives will be required to report any denial of admission, registration or renewal of any membership or registration; involvement with an application for regulatory approval in any jurisdiction where that application has been refused or withdrawn and any dismissal from any office or employment or barred from entry to any profession or occupation		Pre-start

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Current State			
Check	Sources / Tools	Requirement / Validation	Successful Vetting Check Criteria
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> <p>Please note that at all times you should be guided by the country specifications of the onboarding country.</p>	