

Vetting Specification for External Staff POLAND

Valid as of 23 February 2021

Check	Current State			Successful Vetting Check Criteria	Timing
	Sources / Tools	Requirement / Validation			
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 and Internal HR systems for the termination reason as per the work certificate only	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 and the termination reason as per the work certificate only. Cosima check only permissible in cases where criminal check is performed. For criteria, see section "Criminal Record Check".		No hits	Pre-UBS start date, Pre-offer, latest pre-UBS start date
Family Relationship	Self-declaration Check only allowed on candidate's voluntary consent.	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. If a relationship disclosed, further analysis to be performed by Line Manger with Compliance. Candidate cannot be refused if the relationship is revealed.	Pre-UBS start date, Pre-offer, latest pre-UBS start date
External Directorship and Positions (self declaration)			Not allowed for employment screening purposes		N/A, Pre-UBS start date, Pre-offer, latest pre-UBS start date
Registered Status / Statutory Disqualification			Not applicable for external staff		N/A, Pre-UBS start date
Criminal Record Check	Excerpt from the National Criminal Record (Krajowy Rejestr Karny Sądowy)	Level 1 suppliers: Onboarding Cases Checks are only permitted for onboarding cases if any of the following criteria is met: - Management roles (external staff with senior responsibilities) or personal assistants and board administrators with access to confidential financial information - Functions which involve the handling of confidential financial information, including financial systems (e.g. highly privileged users, regulated, certified and client facing roles) - Staff of control functions per Policy 1-C-007976 or staff responsible for control activities in non control functions Where this check is permissible, document(s) need to be original and current; e.g. dated not older than 2 months from receiving. Performing a check on foreign address history is not permitted, document(s) must cover all the jurisdictions / countries only Polish addresses where the candidate has resided, was employed, attended school or lived more than 3 months over the last 5 years (required address history). Periodic Vetting All Risk sensitive roles in scope for Periodic Staff Vetting are permitted. Document(s) need to be original and current; e.g. dated not older than 2 months from receiving. Performing a check on foreign address history is not permitted, document(s) must cover all the jurisdictions / countries only Polish addresses 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 3 years, the check / address history must cover the last 3 years). For both Onboarding and Periodic Vetting an appropriate address verification shall be performed for the current address. 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. Level 2 suppliers: Not allowed for employment screening purposes for onboarding and periodic vetting.	No entries found in respective document(s).	Pre-UBS start date, latest 4 weeks after UBS start date	
Credit Check			Not allowed for employment screening purposes		N/A, Pre-UBS start date, Pre-offer, latest pre-UBS start date
External Directorship (Database Search)			Not allowed for employment screening purposes		N/A, Pre-UBS start date, Pre-offer, latest pre-UBS start date