

Vetting Specification for External Staff RUSSIA

Valid as of 20 January 2021

| Check | Sources / Tools | Current State | | |
|--|---|---|---|--------------------|
| | | 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 |
| Family 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 or personal 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 for external staff | | N/A |
| Criminal Record Check | Police Criminal Records Certificate issued by the main information / analytical centre of the Russian Ministry of Internal Affairs. Candidate should apply for the criminal certificate directly himself / herself | Document(s) need to be original and current; e.g. dated not older than 2 months from receiving. 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). 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 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 | Credit Report by one of the widely recognized Russian credit reporting agency BKI-OKB. Candidate should apply for the criminal certificate directly himself / herself | Document(s) need to be original and current; e.g. dated not older than 2 months from receiving. 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). 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 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. The Russian credit check can only be conducted for Russian citizens. Any other nationality who has a residency in Russia, cannot have a Russia credit check. | 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. | No hits, no discrepancies between self-declaration and database search | Pre-UBS start date |