

Vetting Specification for External Staff TURKEY

Valid as of 20 January 2021

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 not allowed in Turkey for employment screening purposes. Internal HR systems	Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons).	No hits	Pre-UBS start date, Pre-offer, latest pre-UBS start date
Family Relationship	Self-declaration and an "ID Registration Sample" (<i>Vukuatlı Nüfus Kayıt Örneği</i>)	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 relationships within UBS.	Pre-UBS start date, Pre-offer, latest 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, Pre-offer, latest pre-UBS start date
Registered Status / Statutory Disqualification		Not applicable for staff in Turkey.		N/A

<p>Criminal Record Check</p>	<p>Criminal Record Check "Archived Penal Clearance" (Arşivli Sabika Kaydı). Candidate to apply / order the report via https://turkiye.gov.tr/adli-sicil-kaydi or in person at a Public Prosecutor's Office (<i>Savcılık</i>) in Turkey, a District Governor's Office (<i>Kaymakamlık</i>) in Turkey, the General Management of Criminal Record and Statistics in Turkey (<i>Adalet Bakanlığı Adli Sicil ve İstatistik Genel Müdürlüğü</i>) or a Turkish consulate/embassy.</p>	<p>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). 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.</p>	<p>No entries found in respective document.</p>	<p>Pre-UBS start date, latest 4 weeks after UBS start date</p>
<p>Credit Check</p>	<p>Credit Check can only be performed via the following routes: (i) through the Risk Centre of the Turkey Bank Association (<i>Türkiye Bankalar Birliği Risk Merkezi</i>); OR (ii) through Findeks, which is an organization established by the Credit Reference Bureau (<i>Kredi Kayıt Bürosu A.Ş.</i>), which allows its members to check their bank account activities and assess their credibility through their citizenship number. Source of the check: VV (in the package it is called International financial integrity check)</p>	<p>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). 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. Check the summary of the candidate credit and bankruptcy history and compare with the address history.</p>	<p>No debt defaults (overdue amounts, collections, litigations) Candidate has not been legally declared a bankrupt.</p>	<p>Pre-UBS start date, latest 4 weeks after UBS start date</p>
<p>External Directorship (Database Search)</p>	<p>Public database</p>	<p>Database check to identify any external directorships and assess candidate integrity based on external directorship self-declaration.</p>	<p>No hits, no discrepancies between self-declaration and database search</p>	<p>Pre-UBS start date, latest 4 weeks after UBS start date</p>