

# Vetting Specification for External Staff ITALY

Valid as of 20 January 2021

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 <b>not allowed</b> in Italy for employment screening purposes. Rehire check in internal HR systems is allowed.	Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons)	No hits	Pre-UBS start date, <del>Pre-offer, latest pre-UBS start date</del>
Family Relationship	Self-declaration or 'Stato di Famiglia'	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, <del>Pre-offer, latest pre-UBS start date</del>
External Directorship and Positions	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, <del>Pre-offer, latest pre-UBS start date</del>
Registered Status / Statutory Disqualification		Not applicable for External staff in Italy.		<del>Pre-UBS start date</del>
Criminal Record Check	Casellario Giudiziario and Carichi pendenti	<b>Onboarding Cases</b> <b>Checks are only permitted for onboarding cases if any of the following criteria is met:</b> - 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. 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). <b>Periodic Vetting</b> 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. 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).  <del>For both Onboarding and Periodic Vetting an appropriate address verification shall be performed for the current address.</del> 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, <del>latest 4 weeks after UBS start date</del>
Credit Check		Credit Check is <b>not allowed</b> in Italy for employee screening purposes.		<del>Pre-UBS start date, latest 4 weeks after UBS start date</del>
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, <del>latest 4 weeks after UBS start date</del>