## **Vetting Specification for External Staff SPAIN**

## Valid as of 01 July 2023

Pre-offer and Pre-start vetting may be started no earlier than 6 months before the UBS 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		
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> , Internal HR systems	Use UBS internal HR systems to review potential previous engagement information (e.g. termination reasons).  Periodic Vetting Not permitted	No hits	Pre-UBS start date		
Relatives & 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 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 in Spain.					
Criminal Record Check	Onboarding Cases/Periodic Vetting  Criminal Record Check is not allowed in Spain for employee screening purposes.					
Credit Check	Onboarding Cases/Periodic Vetting  Credit Record Check is not allowed in Spain for employee screening purposes.			N/A		
External Directorship (Database Search)	Public database Empresia - Business directory <b>©</b>	Database check to identify any external directorships and assess candidate integrity based on external directorship self-declaration.  The check must cover all the jurisdictions / countries where the candidate has resided, was employed, attended school or lived more than 6 months over the last 5 years (required address history)	No hits, no discrepancies between self-declaration and database search	Pre-UBS start date		
ESSENTIAL FOOTNOTES:				<u> </u>		

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	Current State					
Check	Sources / Tools	Requirement / Validation	Successful Vetting Check Criteria	Timing		
Supplier Vetting Obligations	agreed with you by the UBS Vetting Decision Authority at the Any deviations to the country specs or agreed approach must have the capability to lead from the UBS vetting Decision Authority (DA) to perform a form from the candidate. The Self declaration needs to be a audit. A self-declaration only fulfills the condition of a chauthority (DA).  In case a candidate does not have the required documents However, such a self-declaration shall only be obtained who fulfilling the required conditions for a check. The self-declatime of the level 1 supplier audit.	gally perform a particular check (as defined in the country specifications), the supplier should obtain approval nalternative. In such cases (post approval from the DA) the Level 1 supplier may obtain a self-declaration completed and dated prior to the start date at UBS and must be available for review at the time of the level eck not being completed if this has been approved prior to onboarding by the UBS vetting Decision  / registration for a check to be performed, the supplier must obtain a self-declaration from the candidate. Here a check is legally permissible in the "hiring" location but cannot be conducted due to candidate not ration must be completed and dated prior to the start date at UBS and must be available for review at the station and/or data sources for use within a candidate's country of hire.  pecifications, and if the candidate has background history or footprint within additional countries outside the surces applicable as per that country must be considered.				