



# UL Solutions Supplier Code of Conduct

## Introduction

UL Solutions Inc. (“UL Solutions” or “Company”) is recognized for outstanding service, trust and integrity as we fulfill our Public Safety Mission. We are committed to the continued pursuit of the highest ethical standards and require our Suppliers to comply with all legal and regulatory requirements and meet or exceed applicable industry standards in all jurisdictions where UL Solutions and our Suppliers operate. We strive to go beyond mere legal compliance and fully support the United Nations Global Compact, its principles, and Sustainable Development Goals.

The UL Supplier Code of Conduct encourages our Suppliers to go beyond minimum requirements to advance social and environmental responsibility and business ethics.

Suppliers should develop appropriate due diligence mechanisms and management systems to promote integrity, fairness and compliance, and to detect and correct adverse human rights impacts in their own operations as well as in their respective supply chains.

UL Solutions requires our direct Suppliers to cascade these requirements down to their own suppliers to ensure these requirements are complied with throughout UL Solutions’ Supply chain.

This Supplier Code of Conduct is in addition to the terms and conditions in the contractual documents (e.g., Master Services Agreement, Purchase Order Terms & Conditions, SOW, etc.) between UL Solutions and the Supplier.

This Supplier Code of Conduct is not intended to address every potential situation that relates to our Suppliers behavior, however, fraud, dishonest, unethical or criminal conduct on the part of our Suppliers or their Suppliers will not be tolerated.

## Overview

This Supplier Code of Conduct reflects UL Solutions values and sets forth at a minimum what is required and expected of our Suppliers:

- Ethics, Integrity and Compliance
- Company Resources
- Inclusion and Diversity
- Employment, Working Conditions and Human Rights
- Wellbeing, Health and Safety
- Environmental Sustainability
- Compliance with the Code



## Ethics, Integrity, and Compliance

UL Solutions is committed to upholding the highest ethical standards in all our business transactions around the world. We act with integrity, and we conduct all business fairly and in accordance with applicable laws and regulations. UL Solutions expects Suppliers to conduct business with integrity, legally, and in accordance all applicable laws, rules and regulations as well as with their obligations under their contracts and agreements with UL Solutions. We expect Suppliers to provide transparency into their operations, policies, processes, and relevant records, providing them to UL Solutions or any designated third party upon reasonable request. Our Suppliers must conduct their business with and on behalf of UL Solutions free from corruption and illegal activity.

### Anti-Bribery and Corruption

Bribery — offering, promising, giving, accepting, or soliciting an advantage as an inducement for action — is often illegal and inherently unfair. Corruption — the abuse of entrusted power for private gain — is by definition a breach of trust. UL Solutions prohibits bribery and corruption, which will not be tolerated under any circumstance.

UL Solutions does not allow bribes, facilitation payments, illegal kickbacks, or secret or other improper payments in any form. UL Solutions' Suppliers must not offer, pay, solicit or accept — either directly or indirectly — bribes of any kind. Suppliers must report any solicitations or request for bribes to UL Solutions Ethics and Compliance Office, [www.ulglobalethics.com](http://www.ulglobalethics.com).

As a global company, UL Solutions complies with anti-bribery and corruption laws and regulations everywhere it operates. UL Solutions and our Suppliers do not make facilitation payments (payments to government employees or officials to expedite performance of routine government actions.) Giving or receiving money or other things of value might be mistaken for bribes. Suppliers acting on behalf of UL Solutions may make payments, or provide gifts, benefits, or other things of value ONLY in accordance with written contracts known and acknowledged by UL Solutions, the Supplier, and the recipient. Suppliers may not provide any things of value to government officials on behalf of UL Solutions. UL Solutions does not make political contributions, and Suppliers may not contribute to political campaigns on UL Solutions behalf.

### Conflict of Interest

Suppliers are expected to make business decisions that are in the best interests of UL Solutions. Suppliers must immediately disclose to UL Solutions actual or potential conflicts of interest, including any business relationship and/or any financial interest of a UL Solutions employee in a Supplier's business.

### Gifts and Entertainment

Suppliers must not offer or accept any gift or anything else of value to obtain improper advantages or improperly influence the Supplier or for UL Solutions employees or their family members. Gifts include but are not limited to benefits, fees, commissions, dividends, cash, gratuities, services, or any inducements.

#### Disclaimer

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### Fair Competition

UL Solutions is committed to fair and open competition and to a free market economy. UL Solutions' Suppliers must make business decisions without directly or indirectly entering into any formal or informal understandings or agreements with competitors or suppliers that restrict competition, fix or set prices, divide or allocate customers, territories or markets, limit production or sales, boycott certain suppliers or customers or otherwise unreasonably restrain trade. Because antitrust and fair competition laws are complex and vary by county, Suppliers are expected to avoid situations that violate the principles of fair competition, and to obtain guidance from appropriate legal counsel.

### Trade Control

Many countries have laws and regulations that restrict or prohibit trade with other governments, and with certain businesses, organizations, or individuals. Non-governmental groups sometimes organize boycotts, or a refusal to do business with, certain entities. UL Solutions Suppliers must obey the laws of the nations and communities they work in, including trade control laws, sanctions laws and regulations, and laws regarding participation in boycotts.

### Accuracy and Integrity of Business Records and Communications

UL Solutions Suppliers are expected to maintain accurate and honest business records in full compliance with legal and regulatory requirements. Suppliers must never falsify documents, records or business information. All communications must be truthful, accurate, and complete.

### Subcontracting

UL Solutions requires all Suppliers to inform us when any subcontractors are used to deliver services or goods for UL Solutions. Suppliers should send information about any subcontractors used to [Global.Sourcing@ul.com](mailto:Global.Sourcing@ul.com). UL Solutions reserves the right to review and approve any subcontractors used for services.

## Company Resources

### Use of assets

UL Solutions' assets must be used for valid business purposes and for the benefit of UL Solutions. Suppliers must respect and protect Company property, including tangible assets, such as money, facilities, inventory, office supplies, technology, and equipment, as well as intangible assets such as brand, goodwill, trademarks, copyrights, patents, and other intellectual property. Suppliers may not take or use property belonging to UL Solutions, our customers, or our associates, to provide personal gain for others or themselves.

Suppliers may use UL Solutions' facilities, materials, supplies, technology and equipment, belonging to UL Solutions or our customers only in accordance with their contracts and for conducting business on UL Solutions' behalf. UL Solutions' assets should not be used for the Supplier's own, or their workers' personal benefit.

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## Inclusion and Diversity

### Respect for People

UL Solutions treats employees, customers and all parties we interact with fairly, with respect and dignity. All Suppliers must commit to a work environment that respects each worker's inherent dignity and we encourage our Suppliers to promote diversity in their operations. This Supplier Code of Conduct uses the term "worker" to describe any worker who works for an employer for wages, a fee or a salary.

### No Discrimination or Harassment

We do not tolerate discrimination or harassment of any kind based on a person's characteristics, such as race, disability, religion, age, sex, sexual orientation, gender identity or expression or any other characteristics protected by law.

Suppliers must treat all workers with dignity and respect and ensure that workers are not subject to verbal or physical abuse, sexual or other harassment or any threats thereof during recruitment or in their place of work.

## Employment, Working Conditions and Human Rights

### Modern Slavery

UL Solutions prohibits all forms of modern slavery, including forced or involuntary labor, whether in the form of indentured labor, bonded labor, prison labor, trafficked persons or debt servitude. Suppliers shall ensure that all work is performed voluntarily and that workers can terminate employment and leave their place of work freely. Employers must never retain any worker's personal identification documentation or property.

Workers should never pay to work and where Suppliers work with recruitment agents, they must ensure that workers are not charged recruitment fees or other fees related to them securing or commencing employment. Where the Supplier finds that fees have been paid by workers, these fees should be repaid to the worker.

### Employment

All work must be based on a recognized and documented employment or contractual relationship in compliance with applicable local law and recognized industry practice.

We encourage our Suppliers to provide workers with secure and fair employment relationships and to seek to avoid or progressively minimize precarious employment relationships. Suppliers should not seek to undermine workers' rights to wages or other legally mandated benefits. We encourage Suppliers to introduce clear and fair working conditions, including open and transparent rules

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around payment, contracting, and projects. We recommend Suppliers to align with leading initiatives and codes addressing such irregular employment relationships.

### Child Labor

UL Solutions prohibits child labor and Suppliers shall not employ individuals under the age of fifteen (15) or under the legal working age, whichever is stricter. Where Suppliers employ juveniles under the age of eighteen (18) all working conditions must not jeopardize the health, safety or morals of juvenile workers, in compliance with applicable law. We require any training and apprenticeship schemes to also be conducted in full compliance with legal requirements.

### Freedom of Association and Collective Bargaining

UL Solutions requires Suppliers to respect all workers' rights to freely associate or not associate with groups of their choosing. Suppliers will recognize the lawful rights of their workers to choose or not choose collective bargaining representation or other legal forms of worker representation. Suppliers should not interfere with, obstruct or prevent legitimate activities.

We encourage Suppliers to recognize and interact with alternative forms of worker representation where formal trade unions are not legally recognized or where the nature of the work or the employment status limits workers' ability to join traditional trade unions.

### Working Hours and Compensation

Compensation paid by Suppliers must comply with all applicable wage and hour laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In any event, UL Solutions encourages Suppliers to pay a living wage. Overtime should be voluntary; overtime should be required only under exceptional circumstances and as permitted by law.

UL Solutions requires our Suppliers to ensure that work of equivalent value is remunerated equally, regardless of a worker's personal or social characteristics.

### Worker Feedback and Reporting Mechanisms

UL Solutions believes in the importance of fostering open and honest communication with workers and we encourage our Suppliers to invite worker feedback where appropriate and where there are immediate impacts on workers' working conditions.

Suppliers shall implement confidential grievance and reporting mechanisms such as worker hotlines and ensure that issues related to the items covered in this Code are properly investigated and acted upon. Those making reports shall not be punished or reprimanded for reporting an allegation or raising a concern in good faith.

Suppliers grievance/reporting procedure should record and track grievances and concerns and employees shall be made aware of the progress or resolution of any raised grievances as well as to UL Solutions to the extent applicable.

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## Wellbeing, Health and Safety

### Health & Safety

Suppliers must provide safe and healthy working environments where workers' health and safety is not compromised in any way and that, at minimum, meet all legal health and safety requirements. Policies and procedures in support of these requirements shall be clearly defined and communicated to Suppliers' workers.

UL Solutions recommends that Suppliers conduct regular risk assessments to identify and mitigate or remove areas of risk.

## Environmental sustainability

### Environmental action and compliance

UL Solutions conducts business in a manner that respects and protects the environment, and we require our Suppliers to comply with all applicable environmental laws and regulations in the countries in which they operate. We encourage our Suppliers to set science-based targets to reduce carbon footprints, preserve natural resources and minimize environmental impacts.

Suppliers should assess the environmental impacts of their own operations and wider business and implement adequate measures to prevent or minimize adverse effects on the community, natural resources and the overall environment; the public's health and safety should be safeguarded. Special attention should be paid to opportunities to conserve water, improve energy efficiency, reduce carbon footprint, and reduce waste. We also encourage our Suppliers to use sustainable supply sources and encourage them to bring other initiatives to UL Solutions' attention where positive effects can be increased.

### Responsible Minerals

UL Solutions is committed to not sourcing any products containing minerals whose extraction and trade have contributed to conflict and human rights violations. We expect our Suppliers to perform due diligence on their respective supply chains to identify adverse human rights impacts and to identify the source and chain of custody of minerals used in the manufacturing of products supplied to UL Solutions.

Where products supplied to UL Solutions contain tin, tantalum, tungsten or gold, Suppliers must ensure that all metals are only sourced from conflict-free smelters and all due diligence measures should be available to UL Solutions upon request.

## Compliance with the Code

### Monitoring and Evaluation

UL Solutions Suppliers are expected to self-monitor compliance with this Supplier Code of Conduct.

Page | 6

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UL Solutions reserves the right to verify Supplier's compliance through reasonable internal and external assessment and audit mechanisms. Suppliers shall cooperate with any verification activity connected to the Supplier Code of Conduct, such as granting UL Solutions and its representatives access to facilities and relevant records.

UL Solutions expects all Suppliers will meet the requirements of this Supplier Code of Conduct. If deviations or violations of the Supplier Code of Conduct are found, then UL Solutions may exercise any rights legally available, including (but not limited to): requiring the Supplier take corrective action, removal of a Supplier's worker or representative from UL Solutions' facilities or account, termination of the agreement and relationship with the Supplier, refund of fees, and/or payment of damages.

### Communication and Reporting

All Suppliers are responsible for promptly reporting integrity concerns or issues. We welcome reports of possible and potential issues and protect those who speak up in good faith. Reporters will not be punished or reprimanded for reporting an allegation, raising concerns or asking questions about violations of this UL Solutions Supplier Code of Conduct or other applicable policies, laws or rules that the reporter reasonably believes occurred. Suppliers are expected to have a similar no retaliation policy and practice. Reports should be made through UL Solutions' independent helpline, [www.ulglobalethics.com](http://www.ulglobalethics.com).

### Communication to Workers and Suppliers

UL Solutions expects Suppliers to communicate the principles of integrity and respect for business, property, people and planet to their workers and suppliers, including agents, subcontractors and consultants working on UL Solutions' account.

### Asking Questions or Reporting Concerns

Suppliers are expected to report promptly to UL Solutions any violations of this Code. To ask questions, raise concerns or report violations, Suppliers may contact UL Solutions' independent and confidential UL Global Ethics helpline: [www.ulglobalethics.com](http://www.ulglobalethics.com). Suppliers may also ask questions, raise concerns by contacting UL Solutions' Sourcing Team at [GlobalSourcingTeam@ul.com](mailto:GlobalSourcingTeam@ul.com).

### Changes to the Code

If a conflict exists between this Supplier Code of Conduct and applicable law, Suppliers must comply with the applicable law. Where this Supplier Code of Conduct requires obligations beyond applicable laws, Suppliers must follow these requirements within the bounds of applicable law.

UL Solutions reserves the right to update or change this Supplier Code of Conduct at any time.

**Revised Date: June 5, 2024**

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