



## **ANTI-BRIBERY & CORRUPTION POLICY**

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## 1.0 PURPOSE

The UL Solutions Mission (working for a safer world) depends upon our core value of integrity. Customers, regulators and the public trust UL Solutions (“UL Solutions”) because of our independence and fairness, treating similar things in similar ways. Bribery and corruption are the opposite of fairness, giving special or more favorable treatment to some over others. Giving or accepting bribes, gifts or other things of value could cause others to question our independence and integrity.

Obedying the law is also part of integrity. As a global company, UL Solutions must comply with the anti-bribery and corruption laws and regulations everywhere it operates. This Anti-Bribery and Corruption Policy reduces risks of bribery or perceptions that UL Solutions is acting corruptly.

## 2.0 SCOPE

This policy applies to all business conducted by or on behalf of UL Solutions. All Associates (as defined below) of UL Solutions must follow this policy as well as UL Solutions Gift and Entertainment Policy, Conflict of Interest Policy, and Engagement of Government Officials Policy. UL Solutions Associates (as defined below) must also comply with all applicable anti-bribery and anti-corruption laws, including those in the USA, the nations and communities where they work, and the U.K. Bribery Act.

## 3.0 DEFINITIONS

- A **UL Solutions Associate** is a UL Solutions employee, officer or director of UL Solutions (or any of its related companies) and any third parties (such as subcontractor laboratories, sales agents and consultants) who work as agents or intermediaries on behalf of UL Solutions.
- A **bribe** is a thing of value given in expectation of inappropriate action in return or to obtain an inappropriate advantage. Bribes are often given to obtain an unfair advantage, gain preferential treatment or reduce scrutiny from inspections or evaluations.
- **Corruption** is the abuse of entrusted power or authority for private gain. Corruption includes, but is not limited to, bribery, embezzlement, trading in influence, abuse of office or authority and obstruction of justice.
- A **gift** is something given voluntarily without the expectation of payment, reciprocation or action in return.
- A **Government Official** is any elected or appointed official, candidate for public office, employee or consultant with government-owned or controlled companies, official in a political party, or anyone acting on behalf of a public international organizations (such as the United Nations).
- **Hospitality** or **entertainment** means providing food, lodging or amusements (such as sporting, cultural or recreational events).

- A **thing of value** includes (but is not limited to) money, goods or merchandise, hospitality, access to or discounts on educational or entertainment events, charitable donations and offers of employment, internships or payments in the future.

#### 4.0 POLICY STATEMENT

UL Solutions prohibits bribery.

UL Solutions Associates may NOT receive or solicit money or other things of value to alter, ignore or falsify the results of a test, the findings of an inspection or a certification report.

UL Solutions Associates must NOT offer, pay, solicit or accept (directly or indirectly) bribes, illegal kickbacks or other improper payments in any form (money or other things of value). UL Solutions Associates may NOT offer, pay, promise or authorize giving money or anything of value to any person, Government Official or company to secure the performance of functions or to gain influence or other advantage.

UL Solutions Associates will report any incidents of bribery or corruption, as well as any solicitations or requests for bribes, to the Ethics & Compliance Office.

#### 5.0 RULES AND EXAMPLES

Payments by or to UL Solutions must be strictly in exchange for goods or services rendered, in an amount reasonable and customary or in accordance with a contract. UL Solutions Associates may request payments be made to UL Solutions in exchange for UL Solutions performance of services or issuance of a certification.

##### Giving to Government Officials

Government Officials are at risk of corruption because they are entrusted with power. Laws intended to mitigate this risk are complex. Any incidents of bribery or corruption, including solicitations or requests for bribes, must be reported to the Ethics & Compliance Office.

UL Solutions Associates may NOT provide payments, gifts, hospitality or any things of value to Government Officials without prior written approval from the Ethics & Compliance Office. UL Solutions may make payments to government agencies in accordance with written contracts known and acknowledged by both UL Solutions and the government agency. UL Solutions Associates must also obtain advance written approval from the Ethics & Compliance Office before providing meals, travel expenses, hospitality or things of value ancillary to UL Solutions services. See, Engagement of Government Officials Policy.

Facilitation payments are small payments made to low-level Government Officials to expedite or secure performance of routine governmental actions over which the official has no discretion, such as permits, licenses, visas, work orders, police protection, mail service, phone service, power, water, cargo shipment or inspection. UL Solutions Associates may NOT make facilitation payments.

### Giving gifts, hospitality and other things of value

UL Solutions Associates may give gifts or entertain customers and other people outside of UL for marketing, to mark occasions or to enhance a relationship between UL Solutions and the recipient only in accordance with UL Solutions Gift and Entertainment Policy. UL Solutions respects the gift and hospitality rules of our customers, suppliers and other organizations. UL Solutions Associates may NOT give gifts or provide hospitality that would cause the recipient to violate their organization's policies or rules.

Educational opportunities or admissions to courses, conferences or trade shows are things of value. UL Solutions may ONLY provide these types of things with the written approval of the Ethics & Compliance Office. See Gift and Entertainment Policy.

### Giving to charity

Bribes could be disguised as charitable donations. UL Solutions donates to charities that are legitimate. UL Solutions Ethics & Compliance Office and Sustainability Department must undertake a review of the charity before any donation is made. UL Solutions assets (money, goods or services) may be donated to charities ONLY with the written approval of a UL Solutions Vice President or higher UL Solutions officer.

### Accepting gifts, hospitality and other things of value

UL Solutions Associates may accept modest gifts, hospitality, entertainment or other things of value from customers, suppliers and others outside of UL Solutions ONLY in accordance with UL Solutions Gift and Entertainment Policy. UL Solutions Associates may NOT solicit or accept cash or cash equivalents (like gift cards) from UL Solutions customers or suppliers.

### Reporting incidents or concerns

UL Solutions Associates must promptly report any bribe, solicitation or offer of an improper payment or advantage to the Ethics & Compliance Office or through the UL Solutions Global Ethics Helpline. Reports to the UL Solutions Global Ethics Helpline will be treated in a confidential manner within the limits of the law.

### Personal risk exception

The safety of UL Solutions Associates is our company's priority. Payments may be made to preserve the life or physical safety of UL Solutions Associates, even if otherwise prohibited by this policy. Any payments made under this exception must be approved by the Chief Legal Officer and the Chief Executive Officer. Report any threats to the physical safety of UL Solutions Associates to the Global Security Department.

Supplier and third-party compliance

UL Solutions could be held liable for the corrupt actions of service suppliers and other third parties who act for and on behalf of UL Solutions. UL Solutions requires and expects that all suppliers comply with UL Solutions Supplier Code of Conduct and to do business fairly, honestly and in compliance with law. In addition, UL Solutions performs due diligence reviews and may seek additional anti-corruption assurances from suppliers who are, or are likely to be viewed as, representatives of UL Solutions in accordance with applicable procedure.

**6.0 RELATED POLICIES AND DOCUMENTS**

00-LE-P0906 Gift and Entertainment Policy

00-GC-P1014 Engagement of Government Officials Policy

00-LE-G0852 Anti-Bribery and Corruption Due Diligence for Service Suppliers

00-LE-P0027 Supplier Code of Conduct