



GIFT AND ENTERTAINMENT 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. Providing or accepting inappropriate gifts and entertainment could cause others to question our independence and integrity. While respecting local business customs and market practices, UL Solutions does not allow or participate in corrupt business practices.

This Gift and Entertainment Policy is designed to minimize the risk of bribery and conflicts of interest while simultaneously minimizing the risk that UL Solutions will be perceived as acting corruptly.

2.0 SCOPE

This policy and the specified procedures apply to hospitality and entertainment provided by UL Solutions or received by a UL Solutions Associate in their capacity as an employee or agent of UL Solutions. All UL Solutions Associates must follow this and other applicable policies, including UL Solutions Anti-Bribery and Corruption Policy and, if government agencies or personnel are involved, UL Solutions Engagement of Government Officials policy.

This policy does NOT apply to gifts given or incentives paid from UL Solutions to a UL Solutions Associate or gifts from one UL Solutions Associate to another UL Solutions Associate.

3.0 DEFINITIONS

- A **UL Solutions Associate** is an 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 something of value given to inappropriately influence the recipient. Bribes are often given to obtain an unfair advantage, gain preferential treatment or reduce scrutiny from inspections or evaluations.
- A **gift** is something of value given voluntarily without the expectation of payment, reciprocation or expectation of inappropriate action in return.
- A **Government Official** is any elected or appointed official, candidate for public office, employee or consultant of a government-owned or controlled company, official in a political party, or anyone acting on behalf of a public international organization (such as the United Nations).
- **Hospitality** or **entertainment** means providing food, lodging or amusements of any sort (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

Payments by or to UL Solutions must be strictly for goods or services rendered, paid in the agreed amount to the organization or individual providing the goods or services, and in an amount reasonable and customary. Giving or receiving money or other things of value outside of ordinary contractual events or routine purchases are considered gifts or entertainment and must be done in accordance with this and other relevant policies.

UL Solutions Associates may give and receive gifts or other things of value that are:

- Infrequent in time;
- Modest in value;
- Culturally appropriate; and
- Perceived as gifts rather than bribes.

UL Solutions Associates may NOT give or receive gifts or other things of value that are:

- Cash or cash equivalents (such as gift cards or certificates, loans, securities;)
- Frequent or repetitious (such as subscription services, monthly packages;)
- Excessive in value (such as precious gems or minerals, rare collectibles)
- Prohibited by local law or regulation (such as alcoholic beverages in certain jurisdictions;)
- Intended to gain preferential treatment, obtain or retain business advantage;
- Appear to unduly influence the recipient; or
- Culturally inappropriate.

UL Solutions Associates may extend and accept hospitality and entertainment if the event is reasonable in value and directly related to a business or educational purpose. UL Solutions Associates will report any gifts or hospitality given or received if the value of the thing given is greater than \$100 (USD).

UL Solutions prohibits bribery. 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 in expectation of inappropriate action in return or to obtain an inappropriate advantage. See, Anti-Bribery and Corruption Policy.

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. See Anti-Bribery and Corruption Policy.

5.0 RULES and EXAMPLES

Giving gifts and hospitality

UL Solutions Associates may give gifts or entertain customers and other people outside of UL Solutions for marketing, to mark occasions or to enhance a relationship between UL Solutions and the recipient. In addition to following UL Solutions policy, UL Solutions Associates must respect and comply with applicable law and the recipient’s policies (which may be stricter and may prohibit the receipt of any gifts).

The process for giving gifts on behalf of UL Solutions depends on the value of the thing given.

Thing given by UL Solutions	Action required
Value < \$100 (USD)	
Examples: <ul style="list-style-type: none"> • Book, pen, notepad • Clothing, hat, shirt • Backpack, satchel • Snacks or sweets • Modest meal at meeting or conference 	Follow Travel and Expense Policy and procedures
Value > \$100 (USD)	
Examples: <ul style="list-style-type: none"> • Tablet computer • Sports equipment • Ticket to sports event or theatre that UL Solutions Associate also attends • Charitable contribution • Bottle of wine or liquor 	Follow Travel and Expense Policy and procedures, AND Obtain prior written approval of a UL Solutions General Manager, Vice President or Director or higher UL Solutions officer; AND Report to the Ethics & Compliance Office through the E&C Disclosures Page

Giving to Government Officials

Additional and stricter rules apply when Government Officials are involved. UL Solutions Associates may NOT provide payments, gifts 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.

Accepting gifts

UL Solutions Associates may accept gifts from customers, suppliers and other people outside of UL Solutions to mark occasions, or to enhance a relationship between UL Solutions and the recipient. In addition to following this policy, UL Solutions Associates must comply with applicable law and the rules set by UL Solutions local management and business divisions (which may be stricter and may prohibit the receipt of any gifts). The process UL Solutions Associates must follow regarding accepting gifts depends on the value of the thing given.

Thing offered to UL Solutions Associate	Action required
Value < \$100 (USD)	
Examples: <ul style="list-style-type: none"> • Book, pen, notepad • Clothing, hat, shirt • Backpack, satchel • Snacks or sweets • Modest meal at meeting or conference 	Advise direct supervisor to confirm acceptance of the gift complies with local and division rules. Gifts of this value can usually be accepted.
Value > \$100 (USD)	
Examples: <ul style="list-style-type: none"> • Tablet computer • Sports equipment • Ticket to sports event or theatre • Charitable contribution • Bottle of wine or liquor • Significant discounts on consumer goods 	Advise direct supervisor to confirm acceptance of the gift complies with local and division rules AND Report to the Ethics & Compliance Office through the E&C Disclosures Page . Gifts of this value should be considered carefully and declined if inappropriate or if the receipt could create the appearance of impropriety.

If the item offered or given is not compliant with this Policy or other UL Solutions rules, it must be politely declined or returned. The Ethics & Compliance Office provides templates for acknowledging and returning gifts.

Accepting hospitality, entertainment or travel expenses

Attendance at some social events, including entertainment and meals, are a normal and appropriate part of UL Solutions relationship with other parties. Nevertheless, attendance at social functions or recreational activities could be construed as intended to influence UL Solutions integrity and independent judgment. In general, UL Solutions Associates may accept hospitality and entertainment if the event has a business or educational purpose. Whether attending an event is appropriate is dependent on context. Individual business units, locations and divisions may have more detailed rules for the acceptance of meals, entertainment and hospitality. UL Solutions Associates must comply with the strictest rules for their location and division and should confirm with their manager or the Ethics & Compliance Office whether acceptance of hospitality, entertainment or travel expenses is appropriate.

Examples:

Situation	Action required
Professional conference, seminar, trade show, supplier’s user group meetings, educational event	UL Solutions pays for UL Solutions Associate’s travel, meals and lodging in accordance with the Travel and Expense Policy. UL Solutions may accept reimbursement from the event sponsor per written agreement. UL Solutions Associate should NOT accept paid invitation directly.

Meal at a business meeting	UL Solutions Associate may accept modest food and beverages served during a business meeting. Inspectors, auditors and field engineers should consult with their supervisors about whether off-site meals are appropriate.
Travel to a Customer’s location	UL Solutions pays for UL Solutions Associate’s travel, meals and lodging in accordance with the Travel and Expense Policy. The customer may pay UL Solutions for these costs as part of the contract price.
Entertainment event with Supplier	Advise direct supervisor to confirm acceptance of the invitation complies with local and division rules AND Report to the Ethics & Compliance Office through the E&C Disclosures Page If there is a business or educational purpose, attendance is usually permitted.
Use of recreation facility (gym, holiday home, club membership) owned by UL Solutions Customer or Supplier without a business or educational purpose.	UL Solutions Associate must decline the free use of a supplier’s or customer’s recreational facility.

6.0 BAN ON BRIBES AND IMPROPER PAYMENTS

UL Solutions prohibits bribery. UL Solutions Associates must NOT offer, pay, solicit or accept (directly or indirectly) bribes of any kind, illegal kickbacks or other improper payments in any form (money or other things of value.) UL Solutions Associates will report any solicitations or requests for bribes to the Ethics & Compliance Office.

7.0 HONORARIA

An honorarium is a payment of cash, cash-equivalent or other gift to an individual employee in recognition for services such as speaking engagements and presentations, and writing, editing or other contributions. In most instances, if the services are rendered on behalf of, or related to, the work the UL Solutions Associate does for UL Solutions, honoraria should NOT be accepted. Accepting gifts or cash payments for services on behalf of or related to UL Solutions may cause others to question our independence and integrity.

If a UL Solutions Associate makes a presentation or other contribution on behalf of or related to UL Solutions and receives an honorarium, the UL Solutions Associate must give the honorarium to their supervisor and consult the Ethics & Compliance Office. The Ethics & Compliance Office will: (1) return the honorarium to the offeror, (2) donate the honorarium to charity, (3) return a

small tangible gift item to the UL Solutions Associate or (4) take other appropriate action(s). Honoraria do not include fees appropriately paid to UL Solutions for knowledge solutions, training or other professional services. Such payments shall be made to UL Solutions, not to individual UL Solutions Associates.

Written approval from a UL Solutions Vice President or higher UL officer is required when UL Solutions provides honoraria. If the recipient of the honorarium is a Government Official, then written approval from the Ethics & Compliance Office is also required. See, Engagement of Government Officials Policy.

8.0 EXCEPTIONAL CIRCUMSTANCES

Exceptions to this Policy must be specifically approved in writing by the Chief Legal Officer or his/her designee.

Work group or location specific rules

Individual business units, divisions and locations may issue additional guidelines for the giving and receiving gifts, and for the extension and acceptance of hospitality and entertainment. UL Solutions Associates are expected to comply with the strictest of this Policy and all other applicable laws and rules.

Giving to charity

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.

Corporate giving/sustainability grants are generally more than \$10,000 (USD) and are made in accordance with UL Solutions Grant Application & Compliance Package.

9.0 RELATED POLICIES

- 00-LE-P0030 Anti-Bribery and Corruption Policy
- 00-LE-P0026 Conflict of Interest Policy
- 00-FI-P0043 Travel and Expense Policy
- 00-GC-P1014 Engagement of Government Officials Policy