

PILOT – UL Supplier Code of Conduct – Approved for Distribution Aug 2020

Trust, Integrity, and Respect

UL (“UL” or “Company”) is recognized for outstanding service, trust and integrity as we fulfill our Public Safety Mission. UL has a global reputation for doing the right thing. The safety, security and sustainability of people is at the core of our business. We therefore expect our Suppliers to practice responsible sourcing, foster safe work environments, exhibit transparency and ensure the secure distribution of goods. We are committed to the continued pursuit of the highest ethical standards and require both our own employees and our Suppliers to comply with all national and international legal and regulatory requirements and highest industry standards. We strive to go beyond mere legal compliance and fully support the United Nations Global Compact, its principles and Sustainable Development Goals.

We and our Suppliers operate in a fast-changing and complex world with different cultural, social and legal frameworks. We commit to optimizing our human, financial and brand capital to implement the sustainable strategies required to achieve these goals and principles. In order to fulfil our commitments, our requirements for our own operations and our Suppliers are aligned with law and internationally agreed standards. The UL Supplier Code of Conduct encourages our Suppliers to go beyond minimum requirements to advance social and environmental responsibility and business ethics.

We require our own workers and all Suppliers to act with integrity, and to behave fairly, honestly and openly. We encourage our Suppliers to think progressively about how to ensure respect for human rights without compromise. 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. This includes cascading these requirements down to their own suppliers and ensuring they fulfil these requirements.

While not all issues can immediately be resolved, UL requires our Suppliers to strive to continuously improve and to demonstrate integrity and respect in their operations.

Integrity and Compliance

UL follows 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 expects Suppliers to conduct business with integrity, legally, and in accordance with their obligations under their contracts and agreements with UL. We expect Suppliers to provide transparency into their operations, policies, processes, and relevant records, providing them to UL or any designated third party upon reasonable request. Our Suppliers must conduct their business with and on behalf of UL free from corruption and illegal activity.

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 UL’s 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. Make reports through UL’s independent helpline, www.ulglobalethics.com

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 prohibits bribery and corruption, which will not be tolerated under any circumstance.

UL does not allow bribes, facilitation payments, illegal kickbacks, or secret or other improper payments in any form. UL 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's Ethics and Compliance Office, www.ulglobalethics.com.

As a global company, UL complies with anti-bribery and corruption laws and regulations everywhere it operates. UL 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 may make payments, or provide gifts, benefits, or other things of value ONLY in accordance with written contracts known and acknowledged by UL, the Supplier, and the recipient. Suppliers may not provide any things of value to government officials on behalf of UL. UL does not make political contributions, and Suppliers may not contribute to political campaigns on UL's behalf.

Fair Competition

UL is committed to fair and open competition and to a free market economy. UL 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's 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 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.

Use of assets

UL's assets must be used for valid business purposes and for the benefit of UL. 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, our customers, or our associates, to provide personal gain for others or themselves.

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

Intellectual Property

Suppliers must comply with the intellectual property ownership rights of UL and others including, but not limited to, copyrights, patents, trademarks and trade secrets. Suppliers must use software, hardware and content only in accordance with their associated license or terms of use.

Confidentiality

UL depends on information that is unknown or not readily available to the general public. Confidential information, may belong to UL, our customers or our co-workers. Suppliers with access to confidential information belonging to UL, our customers or associates must use it properly and only in connection with UL's business. We expect and require Suppliers to protect confidential information against unauthorized disclosure, including inadvertent or accidental disclosures. The obligation to safeguard UL's confidential information is ongoing, even after the Supplier's relationship with UL ends.

When confidential information is improperly disclosed — regardless of why or how disclosure occurred — Suppliers are required to promptly notify UL and the owners of the disclosed information.

www.ulglobaletics.com

Conflict of Interest

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

Subcontracting

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

Respect for People

UL 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, 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.

Modern Slavery

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

Child Labor

UL 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.

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

Privacy

Suppliers must comply with all data privacy laws. Where employers collect employee information they should make efforts to limit the collection of any data and ensure that all employee data is kept private. Employees should always be given access to their own personal data.

Freedom of Association and Collective Bargaining

UL 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 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 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 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.

The grievance procedure should record and track grievances and employees shall be made aware of the progress or resolution of any raised grievances.

Environmental action and compliance

UL 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's attention where positive effects can be increased.

Responsible Minerals

UL 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.

Where products supplied to UL 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 upon request.

Monitoring and Evaluation

UL Suppliers are expected to self-monitor compliance with this Supplier Code of Conduct. UL 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 and its representatives access to facilities and relevant records.

UL 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 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's facilities or account, termination of the agreement and relationship with the Supplier, refund of fees, and/or payment of damages.

Communication and Reporting

Communication to Workers and Suppliers

UL 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's account.

Asking Questions or Reporting Concerns

Suppliers are expected to report promptly to UL any violations of this Code. To ask questions, raise concerns or report violations, Suppliers may contact UL's independent and confidential UL Global Ethics helpline: www.ulglobalethics.com. Suppliers may ask questions, raise concerns or report violations anonymously, contact UL's Sourcing Team at Global.Sourcing@ul.com .

ACKNOWLEDGE AND AGREED:

Print Name: _____

Title: _____

Signed: _____

Date: _____