

	<b>Legal</b>	<b>Document Number: 00-LE-P0030</b> <b>Issue #: 9.0</b> <b>Issued Date: 04/09/2010</b> <b>Revision Date: 2020-10-30</b> <b>Effective Date: 2020-10-30</b> Page 1 of 6
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## ANTI-BRIBERY & CORRUPTION POLICY

Approval and Revision History Table:

Issue 1.0 – Original Issuance of Policy			
Issue 1.1 - One minor revision by KWW not requiring Chris Gangemi review. Wording was changed to the second sentence in 3.0 to now be as follows: Every employee must promptly report any bribe, solicitation or offer of an improper payment or advantage coming to their attention.			
Issue 2.0 – Considerable changes to policy providing additional direction for staff.			
Issue 3.0 - Corrected branding issues, revised Appendix 2 and embedded Appendixes into Policy.			
Issue 4.0 - Changes to policy and forms to provide clearer directions on process.			
Issue 5.0 - Changes to policy and forms including a change in process and change of document owner.			
Issue 6.0 – Changes to policy including improvement of AB Certification, clarification on risk rating form and addition of trade sanctions language.			
Issue 6.1 – Minor typo changes of numbering, change auto date on last revised footer and upload translated versions of policy.			
Issue 6.1 – Removed references of former employees name on risk rating forms and email template.			
Issue 6.2 – Minor revision to Paragraph 2.5.1. Wording added to second sentence to be read as follows: If payments are made under these circumstances, they should be immediately reported to UL's Ethics & Compliance Office for proper accounting.			
Issue 7.0—Changes to third party process and elimination of unnecessary forms. New Section 2.1 and subparts.			
Issue 7.1 - Removed Appendixes 1, 2 and 3 and replaced with 00-LE-F0855, 00-LE-F0856 and 00-LE-F0857			
Issue 8.0 - Jackie McLaughlin replaces Terry as Owner			
Issue 9.0 – Complete policy rewrite.			
SVP & Chief Legal Officer (Document Owner)  Jackie McLaughlin		President & CEO (Approver)  Jenny Scanlon	

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## 1.0 PURPOSE

UL's Mission (working for a safer, more secure and sustainable world) depends upon our core value of integrity. Customers, regulators and the public trust UL 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.

Obeying the law is also part of integrity. As a global company, UL 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 is acting corruptly.

## 2.0 SCOPE

This policy applies to all business conducted by or on behalf of UL. All Associates of UL must follow this policy as well as UL's Gift and Entertainment Policy, Conflict of Interest Policy, and Engagement of Government Officials Policy. UL Associates must also comply with the anti-bribery and anti-corruption laws of the USA, the nations and communities where they work, and the UK Bribery Act.

## 3.0 DEFINITIONS

- A **UL Associate** is a UL employee, member of the Boards of Trustees and/or Directors of UL and its subsidiary and related companies, and any third parties (such as subcontractor laboratories, sales agents and consultants) who work as agents or intermediaries on behalf of UL.
- A **bribe** is a thing of value given to influence the recipient. 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 prohibits bribery.

UL 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 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 Associates may NOT offer, pay, promise or authorize giving money or any thing of value to any person, Government Official, or company to secure the performance of functions or to gain influence or other advantage.

UL Associates will report any incidents of bribery or corruption, as well as any solicitations or requests for bribes, to their supervisor and/or to the Ethics & Compliance Office. Managers will promptly notify the Ethics & Compliance Office.

#### **5.0 RULES AND EXAMPLES**

Payments by or to UL must be strictly in exchange for goods or services rendered, in an amount reasonable and customary or in accordance with contract. UL Associates may request payments be made to UL in exchange for UL's 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.

In most instances, UL 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 may make payments to government agencies in accordance with written contracts known and acknowledged by both UL and the government agency. UL Associates must notify the Ethics & Compliance Office when providing meals, travel expenses, hospitality, or things of value ancillary to UL's services. See, Engagement of Government Officials Policy .

Facilitation payments are small payments made to low-level Government Officials in order 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 Associates may NOT make facilitation payments.

#### Giving Gifts, Hospitality and Other Things of Value

UL 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 and the recipient only in accordance with UL's Gift and Entertainment Policy. UL respects the gift and hospitality rules of our customers, suppliers, and other organizations. UL 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 may ONLY provide these type of things with the written approval of a UL General Manager, Vice President or Director or higher UL Officer AND of the Ethics & Compliance Office. See, Gift and Entertainment Policy.

#### Giving to Charity

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

#### Accepting Gifts, Hospitality and Other Things of Value

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

#### Reporting Incidents or Concerns

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

#### Personal Risk Exception

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

### Supplier and Third-Party Compliance

UL could be held liable for the corrupt actions of service suppliers and other third-parties who act for and on behalf of UL. UL requires and expects that all suppliers comply with UL's Supplier Code of Conduct and to do business fairly, honestly, and in compliance with law. In addition, UL 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 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