



# UL's Stand on Modern Slavery

**Introduction:** This statement sets out UL Inc.'s actions and actions of its affiliated companies to understand potential modern slavery risks related to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supplychains. This statement relates to actions and activities during 2020.

As part of Public Safety Industry, UL recognises its responsibility to take a strong stance against slavery and human trafficking. UL is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. In 2019, UL joined the United Nations Global Compact, stating its commitment to its sustainability principles, including respecting the protection of internationally proclaimed human rights and eliminating all forms of compulsory labour, while working to ensure UL is not complicit in human rights abuses.

In 2020, UL revised its Standards of Business Conduct and Global Supplier Code of Conduct expressly addressing UL's dedication. These documents set out UL's expectations of everyone working with us or on our behalf to support and uphold our values of integrity and respect. They provide guidance for employees, partners and agency workers to report any suspicions or concerns relating to compliance with the law or UL's policies.

**Organisational structure and supply chains:** This statement covers the activities of UL Inc. and its affiliated companies (collectively, "UL.")

UL helps companies demonstrate safety, confirm compliance, enhance sustainability, manage transparency, deliver quality and performance, strengthen security, protect brand reputation, build workplace excellence, and advance societal wellbeing. Some of the services offered by UL include: inspection, advisory services, education and training, testing, auditing and analytics, certification software solutions, and marketing claim verification.

## *Countries of operation*

UL currently operates in over 100 locations, in 35+ countries on six continents. UL's UK sites include facilities in Basingstoke, Berkshire, Cambridge, Edinburgh, Nottingham, Surrey, Telford, and Warrington.

## *Modern slavery risk*

UL assesses its business as low risk for forced labour or modern slavery because it does not manufacture or sell tangible products. As a service provider in the field of testing, inspection, and certification, much of UL's work is conducted remotely or in laboratory settings. UL's business requires that its workers have specialized knowledge and skills, including high levels of education and training, making forced labour less likely.

## *Responsibility*

UL's Ethics and Compliance Office is responsible for the organisation's Standards of Business Conduct and works with the Human Resources team on issues related to human rights and fair labour policies.



UL's Corporate Sustainability Council steers UL's efforts to fulfill our safety mission and achieve commercial success while embracing good global citizenship. The Sustainability Council leads UL's initiatives to achieve the United Nations Sustainable Development Goals (SDGs) and the Ten Principles of the United Nations Global Compact. We commit to optimizing our human, financial and brand capital to implement the sustainable strategies required to realize these goals and principles.

**Relevant policies:** UL operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **UL Standards of Business Conduct** - The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. <https://www.ul.com/about/ethics-and-compliance>
- **UL Global Supplier Standards of Conduct** - The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. <https://www.ul.com/about/ethics-and-compliance>

**Risk Assessment:** The Ethics and Compliance Steering Committee conducts an annual risk assessment survey of ethics and compliance risks.

**Investigations/due diligence:** The organisation undertakes due diligence on its suppliers.

UL has multiple methods of reporting questionable conduct or perceived violations of UL's Standards, including an ethics e-mail box and an independent ethics helpline. All reports are investigated through the Ethics and Compliance Office, in partnership with the other business units and functional areas involved. Moreover, as part of its testing and inspection business, UL conducts responsible sourcing audits on behalf of its customers.

**Training:** All employees at UL comply with the UL Standards of Business Conduct and must complete training and to certify compliance with the Standards annually. UL's Standards cover legal compliance and ethical areas. The Standards apply to all UL employees, regardless of their location. They include provisions on respect for human rights and fair treatment of employees.

**Board approval:** This statement has been approved by the organisation's Board of Directors at its meeting on November 18, 2020. The Board will review and update it annually.