



CONFLICTS OF INTEREST 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 we maintain high standards of integrity, honesty and fairness in conducting our business. Yet everyone who works for UL Solutions has roles and connections outside of UL Solutions. If outside or personal interests appear to interfere with UL Solutions work, that could cause others to question our independence and integrity.

This Conflicts of Interest Policy helps minimize risks of personal relationships or activities unfairly influencing decisions made on behalf of UL Solutions or perceptions that UL Solutions is acting corruptly.

2.0 SCOPE

This policy applies to all UL Solutions Associates in their capacity as an employee or agent of UL Solutions. All Associates of UL Solutions must follow this policy as well as UL Solutions Gift and Entertainment Policy and Anti-Bribery and Corruption Policy. UL Solutions Associates must also comply with the anti-bribery and anti-corruption laws of the USA and the nations and communities where they work, including, without limitation, 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 **conflict of interest** arises when a UL Solutions Associate takes an action or has a personal interest that may make it difficult or appear to make it difficult for them to perform their duties objectively, or when a UL Solutions Associate, or Family Member (as defined below), receives improper benefits because of an Associate’s position with UL Solutions.
- **Outside Employment** means working for a business or organization other than UL Solutions in exchange for compensation or a share of the profits. Outside Employment includes working for oneself as an entrepreneur, in a partnership or joint venture as an owner of a company, and any other consulting or work activity (including but not limited to serving on a board).
- A **Family Member** means any person related by blood or marriage or whose relationship with the UL Solutions Associate is like that of persons who are related by blood or marriage, including without limitation a UL Solutions Associate’s spouse, partner, child, parent, stepparent, siblings, stepsibling, nephew, niece, aunt, uncle, grandparent, grandchild, in-law or people who live in the same home as the UL Solutions Associate.
- **Material Financial Interest** is ownership of 10% or more of a business or an investment that is 10% or more of a business’s capital.
- An **Invested Company** is a business or organization in which a UL Solutions Associate has a Material Financial Interest.
- A **Supplier** is a business or individual, including subcontractors, agents, manufacturers and consultants, that provides goods or services to the UL Solutions family of companies.

4.0 POLICY STATEMENT

Associates of UL Solutions must act in the best interest of UL Solutions and must not allow personal interests or divided loyalties to influence their judgment. UL Solutions Associates must avoid both actual and apparent conflicts of interest. Associates of UL Solutions must disclose actual and potential conflicts of interest and cooperate with UL Solutions management to recuse themselves from making decisions for UL Solutions where they may be influenced by outside relationships or personal interests.

UL Solutions Associates must:

- Review their own activities and connections to identify those that could conflict with their duties at UL Solutions;
- Disclose all potentially conflicting activities and connections;
- Develop and implement a plan to mitigate the conflict by abstaining from UL Solutions work that could be affected by the conflicting activities or connections; and,
- Conduct themselves in a manner that avoids the appearance of having their judgment or performance of duties compromised.

UL Solutions Associates must NOT:

- Use their position with UL Solutions for private gain or personal benefit, directly or indirectly.
- Use their position with UL Solutions to benefit a Family Member or any other person, business, or organization.
- Become involved with UL Solutions customers, Suppliers, competitors or others in a way that might influence business decisions or actions or impair trust in UL Solutions.

UL Solutions Associates shall make disclosures of potential conflicts of interest to the Ethics & Compliance Office and to their managers by completing the Conflict of Interest Disclosure form on the [E&C Disclosures Page](#). UL Solutions may request and collect information about UL Solutions Associate's other activities and interests to prevent or reduce the risk of conflicts of interest.

UL Solutions Associates will report any solicitations or requests for bribes to the Ethics & Compliance Office.

5.0 RULES AND EXAMPLES

Outside Employment

UL Solutions Associates may have multiple jobs and work for other businesses or organizations in addition to UL Solutions if the Outside Employment is unrelated to their work for UL Solutions and is disclosed and approved by their manager and the Ethics & Compliance Office. UL Solutions Associates must disclose any Outside Employment by completing the Conflict of Interest Disclosure form on the [E&C Disclosures Page](#)

If the outside employer is a direct or indirect competitor of UL Solutions, a Supplier, a customer of UL Solutions, or does business with or is seeking to do business with UL Solutions, then the UL Solutions Associate must recuse themselves from any UL Solutions decisions related to the outside employer as part of an appropriate plan approved by management and the Ethics & Compliance Office.

Government or public office

UL Solutions Associates may hold public office or government appointments while working for UL Solutions if the public or government service is unrelated to their work for UL Solutions and is disclosed and approved by their manager and the Ethics & Compliance Office. UL Solutions Associates must disclose any public office or government appointments by completing the Conflict of Interest form on the [E&C Disclosures Page](#).

If the government or public agency does business with or is seeking to do business with UL Solutions or is otherwise in a position to affect UL Solutions activity, then the UL Solutions Associate must recuse themselves from any UL Solutions decisions related to the government or public agency as part of an appropriate plan approved by management and the Ethics & Compliance Office.

UL Solutions Officers (both non-executive and executive) and directors are prohibited from holding public office or government appointments while employed with UL Solutions, unless expressly approved by the Governance Committee of the Board of Directors.

UL Solutions Engagement of Government Officials Policy provides additional rules and guidance.

Charity, volunteer or political positions

While UL Solutions Associates may engage in work on behalf of charitable causes and political campaigns, UL Solutions Associates may NOT use the UL Solutions name or its influence to support any charitable or political cause. When UL Solutions Associates promote a charity or a political activity, they must clarify that they speak for themselves and not on behalf of UL Solutions.

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 by UL Solutions. 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.

Business ownership and investments

Associates of UL Solutions may own or invest in other businesses. UL Solutions Associates must not use confidential or private information learned through their position at UL Solutions for personal gain or advantage. Buying or selling the securities of a company based on non-public information or using non-public information for personal financial benefit (known as “insider trading”) is illegal in many countries, and people who supply non-public information to others who trade in securities can also be legally liable. UL Solutions employees may not use confidential or private information in the purchase or sale of

securities (e.g., stocks or bonds.)

If a UL Solutions Associate has a Material Financial Interest in a business that is seeking support from UL Solutions or that UL Solutions is interested in acquiring, selling, or otherwise establishing or ending business relations, then the UL Solutions Associate must disclose the interest to the Ethics & Compliance Office and recuse themselves from any UL Solutions decisions related to the Invested Company as part of an appropriate plan approved by management.

If a UL Solutions Associate has a Material Financial Interest in a business or organization that is a customer or Supplier or is seeking to become a customer or Supplier, then the UL Solutions Associate must disclose the interest to the Ethics & Compliance Office and recuse themselves from any UL Solutions decisions related to the Invested Company as part of an appropriate plan approved by management.

If a UL Solutions Associate has a Material Financial Interest in a business or organization that is working with, or seeking to work with, UL Solutions, AND the UL Solutions Associate is not aware of the connection between UL Solutions and the Invested Company, AND the UL Solutions Associate is not involved in any discussion or decisions about the Invested Company in connection with their work for UL Solutions, then the UL Solutions Associate will be considered in compliance with this section of the Conflict of Interest Policy without disclosure.

UL Solutions Associates must disclose any relevant Material Financial Interest by completing the Conflict of Interest form on the [E&C Disclosures Page](#).

Family relationships

It is in UL Solutions best interest for UL Solutions Associates to avoid conflicts of interest with Family Members or those with whom they have a close personal relationship. While UL Solutions welcomes employment referrals of Family Members of Associates, absent approval by UL Solutions Chief Human Resources Officer, Associates must not work within the same reporting structure as a Family Member or someone with whom they have a close personal relationship and must not be directly involved in employment-related decisions (e.g., assignments, compensation, performance assessments, disciplinary actions or promotions) of such individuals. Furthermore, UL Solutions will not hire a Family Member of an Associate under the following circumstances:

- One of the Family Members would supervise the other;
- One of the Family Members would assign, review or audit the work and/or performance of the other;
- The Family Members would be in conflict; or,
- The current UL Solutions Associate is a direct report to the CEO or a member of the Board of Directors.

UL Solutions Associates must disclose when their Family Member is an employee or owner of a Material Financial Interest in a UL Solutions customer, supplier or business that is seeking support from UL Solutions or that UL Solutions is interested in acquiring, selling or otherwise establishing or ending

business relations. UL Solutions Associates must recuse themselves from UL Solutions decisions related to the businesses their Family Members are affiliated with as part of an appropriate plan approved by management.

If a UL Solutions Associate has a Family Member who is an employee or owner of a Material Financial Interest in a UL Solutions customer, supplier, or business that is working with, or seeking to work with, UL Solutions, AND the UL Solutions Associate is not aware of the connection between UL Solutions and the Family Member’s employer or Invested Company, AND the UL Solutions Associate is not involved in any discussion or decisions about the employer or Invested Company in connection with their work for UL Solutions, then the UL Solutions Associate will be considered in compliance with this section of the Conflict of Interest Policy without disclosure.

Table of examples:

Potential conflict of interest	Action required
UL Solutions Associate teaches at trade school.	Disclosure to manager and through E&C Disclosures Page .
UL Solutions Associate consults and advises customer	Disclosure to manager and through E&C Disclosures Page and recusal from evaluation, inspection or decisions about customer’s and competitor’s products.
UL Solutions Associate elected to local library board	Disclosure to manager and through E&C Disclosures Page .
UL Solutions Associate’s spouse provides staffing services to UL Solutions	Disclosure to manager and through E&C Disclosures Page and recusal from decisions related to spouse’s staffing agency.
UL Solutions Associate’s son starts a business for a product type UL Solutions certifies.	Disclosure to manager and through E&C Disclosures Page and recusal from UL Solutions work related to son’s business.

6.0 BAN ON BRIBES AND IMPROPER PAYMENTS

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 inappropriate 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 at Ethics@ul.com.

Refer to UL Solutions Anti-Bribery and Corruption Policy for additional information.

7.0 ADDITIONAL RULES

The UL Solutions Human Resources team and the UL Solutions Employee Handbooks have additional rules about nepotism, personal relationships at work and other potential conflicts of interest. Individual business units, divisions and locations may issue additional guidelines related to conflicts of interest. UL Solutions Associates are expected to comply with the strictest of this Policy and all other applicable laws and rules.

7.1 RELATED POLICIES:

00- LE-P0030 Anti-Bribery and Corruption Policy

00-LE-P0906 Gift and Entertainment Policy

00- GC-P1014 Engagement of Government Officials Policy

[Employee Handbook](#)