

GLOBAL SUPPLIER STANDARDS OF CONDUCT





Table of Contents

| | | |
|-----|---|---|
| 1.0 | PURPOSE | 4 |
| 2.0 | SCOPE | 4 |
| 3.0 | DEFINITIONS | 4 |
| 4.0 | EMPLOYMENT PRACTICES | 4 |
| 4.1 | FORCED LABOR | 4 |
| 4.2 | CHILD LABOR | 5 |
| 4.3 | DISCRIMINATION AND HARASSMENT | 5 |
| 4.4 | HEALTH AND SAFETY | 5 |
| 4.5 | FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING | 5 |
| 4.6 | WORKING HOURS AND COMPENSATION | 5 |
| 5.0 | LEGAL AND REGULATORY COMPLIANCE | 5 |
| 5.1 | ANTI-BRIBERY AND CORRUPTION | 5 |
| 5.2 | FAIR COMPETITION | 5 |
| 5.3 | TRADE CONTROL | 6 |
| 5.4 | ENVIRONMENTAL LAWS | 6 |
| 5.5 | OTHER LEGAL REQUIREMENTS | 6 |
| 6.0 | BUSINESS PRACTICES | 6 |
| 6.1 | ACCURACY OF BUSINESS RECORDS | 6 |
| 6.2 | CONFIDENTIALITY | 6 |
| 6.3 | CONFLICTS OF INTEREST | 6 |
| 6.4 | GIFTS & ENTERTAINMENT | 6 |
| 6.5 | INTELLECTUAL PROPERTY | 7 |
| 7.0 | MONITORING AND COMPLIANCE | 7 |
| 7.1 | DUE DILIGENCE | 7 |
| 7.2 | SELF-MONITOR OF COMPLIANCE | 7 |
| 7.3 | UL'S EXPECTATION | 8 |
| 8.0 | COMMUNICATION AND REPORTING | 8 |
| 8.1 | COMMUNICATION TO SUPPLIER'S EMPLOYEES AND BUSINESS PARTNERS | 8 |
| 8.2 | ASKING QUESTIONS OR REPORTING CONCERNS | 8 |



A Message from Keith Williams, President & CEO

At UL, our guiding principle is integrity. Over more than 110 years, UL has built its reputation for integrity and independence based on a policy of strict compliance with the law and the highest standards of moral and ethical conduct. UL's reputation for ethical and legal behavior is critical to our Public Safety Mission, our business and our commitment to Corporate Social Responsibility. The UL Standards of Business Conduct establishes our global business ethics standards which apply to all UL employees.

Suppliers play an important role in helping UL fulfill its Public Safety Mission. A UL Supplier is any business or individual, including subcontractors, agents, manufacturers, distributors and consultants that provides goods and services to Underwriters Laboratories Inc. or any UL subsidiary or affiliate or acts on UL's behalf. UL is committed to only doing business with companies that carryout business fairly, openly and honestly. UL will not do business with a company if that company is not committed to doing business without bribery. Suppliers must operate in full compliance with the laws, rules and regulations of the countries and communities in which they operate. UL believes in doing business with those Suppliers who demonstrate high standards of ethical business behavior.

Although our Suppliers are independent entities, their actions and decisions when doing business with or on behalf of UL can impact our business and reputation for integrity. UL expects Suppliers to embrace its commitment to integrity and high standards for moral and ethical conduct. All Suppliers, their employees, agents and subcontractors, are expected to comply with this Global Supplier Standards of Conduct and UL's Anti-bribery and Corruption Policy.

Through compliance with these Standards, our Suppliers help maintain our reputation for excellence, independence and integrity. However, these Standards define only the minimum requirements for doing business ethically with or on behalf of UL. We encourage our Suppliers to go above and beyond these minimum requirements to fulfill the letter and spirit of these Standards.

A handwritten signature in blue ink, appearing to read 'KLO' followed by a stylized monogram.

Keith Williams
President & CEO



1.0 Purpose

UL believes in doing business with those Suppliers who demonstrate high standards of ethical business behavior and can only do business with those suppliers that conduct business fairly, openly and honestly. UL will not do business with a company if that company is not committed to doing business without bribery. Although our Suppliers are independent entities, their actions and decisions when doing business with or on behalf of UL can impact our business and reputation for integrity. UL expects Suppliers to embrace its commitment to integrity and high standards for moral and ethical conduct. All Suppliers, their employees, agents and subcontractors, are expected to comply with this Global Supplier Standards of Conduct and UL's Anti-bribery and Corruption Policy.

2.0 Scope

The statements of business conduct requirements contained herein have been prepared to guide the conduct of any business or individual, including subcontractors, agents, manufacturers, distributors and consultants, that provides goods and services to Underwriters Laboratories Inc. or any UL subsidiary or affiliate or acts on UL's behalf. Suppliers must operate in full compliance with the laws, rules and regulations of the countries and communities in which they operate. UL believes in doing

business only with those Suppliers who demonstrate high standards of ethical business behavior.

3.0 Definitions

Bribe or Bribery: A bribe is an offer, payment, promise or authorization to pay money, gifts or anything of value, including but not limited to bribes, entertainment, facilitation payments, kickbacks or any benefit, directly or indirectly, to any person or company whether a public official or private person or company, in order to induce an improper performance of responsibilities or to obtain, retain or secure an improper advantage in the conduct of business for UL. Further, a bribe includes a solicitation or acceptance by any UL employee, contractor other agent of UL of any payment or other benefit as defined above in connection with the performance of any service or other activity on behalf of UL.

Child — The term "child" refers to any person under the age of 15, or any person who is under the legal employment age in the country in which the Supplier operates, whichever is higher.

Confidential Information — Information about UL, its customers, suppliers and other parties with which we conduct business that is not generally known or readily available to the public. Confidential Information can be obtained (and improperly disclosed) in a variety of ways

including verbally, physically (e.g., paper/hard copy documents or product samples), and electronically (e.g., email, Word, PDF and PowerPoint documents, file transfers, etc.).

Conflict of Interest — A conflict of interest may arise in situations in which a UL employee or family member is employed by or has a financial interest in the Supplier's business.

Improper Advantage — Refers to something to which the Company was clearly not entitled.

Supplier — Any business or individual, including subcontractors, agents, manufacturers, distributors and consultants that provides goods and services to Underwriters Laboratories Inc. or any UL subsidiary or affiliate, or acts on UL's behalf.

4.0 Employment Practices

UL believes in treating employees, customers and everyone with whom we interact fairly and with dignity and respect. We expect our Suppliers to comply with all applicable employment laws and regulations, including:

4.1 Forced Labor

Suppliers will not use forced or involuntary labor, whether in the form of indentured labor, bonded labor, prison labor or debt servitude.

4.2 Child Labor

Any UL Supplier will not use child



labor. The term “child” refers to any person under the age of 15, or any person who is under the legal employment age in the country in which the Supplier operates, whichever is higher.

4.3 Discrimination and Harassment

Suppliers must be committed to a workplace free of harassment and unlawful discrimination. Suppliers will not discriminate on the basis of personal characteristics or beliefs, including race, color, religion, national origin, sex, sexual orientation, age or disability.

4.4 Health and Safety

Suppliers will provide safe and healthy working environments for their employees.

4.5 Freedom of Association and Collective Bargaining

Suppliers will respect the rights of employees to lawfully associate or not to associate with groups of their choosing. Suppliers will recognize the lawful rights of their employees to choose or not choose collective bargaining representation. Suppliers should not interfere with, obstruct or prevent legitimate related activities.

4.6 Working Hours and Compensation

Compensation paid by Suppliers will comply with all applicable wage and hour laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

5.0 Legal and Regulatory Compliance

UL follows the highest ethical standards in all our business transactions around the world. While UL abides by local business customs and market practices, we do not allow or participate in corrupt business practices. UL expects its Suppliers to conduct their business with and/or on behalf of UL free from corruption and illegal activity.

5.1 Anti-Bribery and Corruption

Suppliers must not solicit, accept, offer or pay bribes or engage in other corrupt practices in the performance of activities on behalf of UL, and must comply with all applicable anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act or UK Bribery Act, of the countries in which they operate. Further, Suppliers must abide by and cooperate

with UL’s Anti-Bribery and Corruption Policy.

5.1.1 Suppliers must comply with all anti-bribery laws.

5.1.2 Suppliers will not, directly or indirectly, offer, receive, promise to pay or authorize the payment of money or anything of value to any individual or company in an effort to influence any decision that would assist UL in obtaining or retaining business or securing any improper business advantage or induce any improper performance of responsibilities.

5.1.3 Suppliers will not solicit or accept money or any other thing of value directly or indirectly in connection with the performance of any service or other activity for or on behalf of UL other than the negotiated fees for the services rendered by the Supplier and/ or the reimbursement of reasonable business expenses directly related to its performance.



5.2 Fair Competition

UL is firmly committed to free and open competition. It is in UL's best interests to promote vigorous competition in a free market. UL Suppliers are expected to comply with all applicable antitrust and fair competition laws.

5.3 Trade Control

UL does not allow or participate in prohibited transfers of technology. UL expects all Suppliers to comply with all applicable export, re-export and import laws and regulations.

5.4 Environmental Laws

UL conducts business in a manner that respects and protects the environment, and expects its Suppliers to comply with all applicable environmental laws and regulations in the countries in which they operate.

5.5 Other Legal Requirements

UL expects Suppliers to comply with all applicable laws not otherwise set forth in these Standards. "Applicable laws" include all applicable local, state, provincial, and national laws, codes, rules and regulations as well as all applicable treaties.

6.0 Business Practices

UL expects its Suppliers to conduct

business with integrity, in full compliance with applicable laws and in accordance with their obligations under any specific agreements they have with UL.

This includes compliance with the following business practices:

6.1 Accuracy of Business Records

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.

6.2 Confidentiality

Suppliers are expected to safeguard UL's confidential information and that of its clients by keeping it secure and limiting access to those who need to know to do their job. Confidential information is information that is not generally known or readily available to others and may belong to either UL or our customers. Confidential information may include business and marketing plans, financial information, test records, test reports, status of testing of products, client information, client drawings or schematics, internal company correspondence, plans to acquire or enter partnerships or alliances

with other companies, plans for new and/or current products or services, and/or confidential policy submissions to U.S. and foreign governments.

The obligation to safeguard UL's confidential information is ongoing, even after the Supplier's business relationship with UL ends. For additional information, refer to UL's Confidential Information and Trade Secrets Policy.

6.3 Conflicts of Interest

Suppliers are expected to make business decisions that are in the best interests of UL. A conflict of interest may arise in situations in which a UL employee or family member is employed by or has a financial interest in the Supplier's business. UL employees are required to disclose all actual or potential conflicts of interest immediately. UL employees may not serve as officers, directors, employees, agents or consultants of a Supplier, except with the consent of UL Management in consultation with UL's General Counsel. Any such disclosure will be reviewed on a case-by-case basis. Final determination on the business relationship will be made by UL's General Counsel. Suppliers must immediately disclose to UL Management



actual or potential conflicts of interest, including any business relationship and/or any financial interest of a UL employee in a Supplier's business.

For additional information, refer to UL's Conflicts of Interest Policy.

6.4 Gifts & Entertainment

Gifts, favors or entertainment are not necessary in order to conduct business with UL. UL recognizes that gift giving and entertainment practices may vary in different cultures and countries.

However, accepting inappropriate gifts and entertainment from other parties could cause others to question our independence and integrity. UL employees must,

- Never solicit gifts, entertainment or favors of any value from persons or firms with which UL does business or may do business with in the future, and
- Never act in a manner that would place any supplier or customer in a position where he or she may feel obligated to make a gift, provide entertainment or provide personal favors to do business or continue to do business with UL.
- Money gifts of any amount may never be accepted. If any money gift is received, it must be turned over to the UL employee's supervisor

and reported to the Ethics & Compliance Office.

- Non-money gifts that are infrequent and of nominal value (e.g. promotional pens, shirts, calendars, commemorative items, etc.) may be accepted provided the gifts meet all of the following criteria:
 - The gift is consistent with local custom and usual business practice,
 - Cannot be construed as a bribe or kickback, or otherwise given in exchange for service,
 - Does not violate any law and, to the employee's knowledge, does not violate the giver's company's rules,
 - Would not embarrass UL if disclosed publicly,
 - Offers of gifts of more than nominal value must be disclosed to an employee's Supervisor and/or UL's Ethics & Compliance Office, and
 - Does not exceed any specific value limits established by local management.

Further, certain types of entertainment, hospitality or other forms of social events are a normal and appropriate part of UL's relationship with other

parties. Invitations to functions of an expense or magnitude that could be construed as intended to influence UL's independent judgment or of type that UL could not or would not be likely to return in kind, must be graciously declined by UL personnel.

Suppliers must contact UL immediately if they believe that any UL employee's conduct has violated or potentially violated the gifts and entertainment policy.

Finally, it is expected that Supplier's personnel will follow similar standards regarding gifts, meals and entertainment when acting for or on behalf of UL.

6.5 Intellectual Property

UL Suppliers will comply with the intellectual property ownership rights of UL and others including, but not limited to, copyrights, patents, trademarks and trade secrets.

Supplier will use software, hardware and content only in accordance with their associated license or terms of use.

7.0 Monitoring and Compliance

7.1 Due Diligence

Supplier will comply with all requirements of UL's Anti-Bribery and Corruption policy including, where applicable, completing the Anti-Bribery and Corruption



Third Party Due Diligence form and assisting with the completion of the Third Party Due Diligence Questionnaire.

7.2 Self-Monitor of Compliance

UL Suppliers are expected to self-monitor compliance with these Standards of Conduct. Suppliers should also be aware of the fact that UL will engage in various monitoring activities to confirm compliance with these Standards, which may include auditing Supplier compliance.

7.3 UL'S Expectation

UL expects all Suppliers to live up to these Standards, cooperate with any investigation or confirmation of compliance and correct any practices that are not compliant. A Supplier's failure to observe and abide by these Standards may result in termination of the Supplier's business relationship with UL. Furthermore, in addition to any other rights UL may have under its agreement with the Supplier, including contract damages or other remedial action as appropriate, UL may require the immediate removal of any representative of the Supplier whose conduct is unlawful or inconsistent with these Standards or any UL policy.

8.0 Communication and Reporting

8.1 Communication to Supplier's Employees and Business Partners

UL expects Suppliers to communicate the Standards' requirements to their employees and business partners, including agents, subcontractors and consultants, and ensure that their employees and business partners understand and comply with these Standards.

8.2 Asking Questions or Reporting Concerns

Suppliers are expected to report promptly any violations of these Standards. Suppliers may ask questions, raise concerns or report violations by contacting their usual UL Global Sourcing Commodity Owner or by contacting UL at ethics@us.ul.com. To ask questions, raise concerns or report violations anonymously, Suppliers may contact UL's confidential UL Global Ethics helpline at 1-800-715-7482 (North America) or visit the UL Global Ethics website for additional information.