Universal Electronics Inc.
Code of Conduct

November 2, 2026 (As Amended)

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A MESSAGE FROM OUR CEO

Dear UEI Directors, Officers, and Employees,

Our Code of Conduct is a foundational framework that defines UEI's core values and guides our decision-making across all levels of the organization. It reflects our unwavering commitment to ethical behavior and fosters trust among stakeholders while supporting long-term growth and success.

Every UEI stakeholder plays a crucial role in upholding these principles. Let this Code be a reference point, reminding us to act with fairness, honesty, and accountability in everything we do.

By embracing these values together, we cultivate a professional environment where integrity and mutual respect are the cornerstones of our achievements. Thank you for your continued dedication to these ideals. Together, we will uphold UEI's reputation as a company built on excellence and ethical leadership.

Sincerely,
Wade M. Jenke

APPLICATION OF THE CODE

The Board of Directors of Universal Electronics Inc. has adopted the following Code of Conduct (hereinafter "Code" or "Code of Conduct") as part of its commitment to integrity, honesty, and compliance with law and with the highest standards of ethical conduct. This Code of Conduct applies to all employees, officers, and directors of UEI, as well as all subsidiaries and affiliates in which UEI directly or indirectly holds the majority of voting control. UEI also expects third-party partners, including contractors, consultants, suppliers, and other relevant external affiliates, to uphold the principles and standards outlined in this Code when conducting business on behalf of or in collaboration with UEI.

This Code sets forth certain basic rules regarding the way in which all UEI directors, officers, and employees (hereinafter "personnel" or "you" to refer to all employees, officers, and directors, and 'we' or 'us' when referring to the company as a whole) must conduct themselves, as well as practical advice to ensure UEI conducts its business in an ethical and compliant manner. It also provides guidance as to how to recognize certain ethical and legal issues and how to resolve them in conducting the Company's business.

The UEI Code of Conduct serves as a foundational guide for ethical behavior and responsible decision-making. However, it does not cover every situation or policy requirement. UEI maintains a wide range of internal policies, procedures, and standards, both global and local, that provide additional guidance on specific topics. These resources may go beyond the scope of this Code and are essential for ensuring full compliance. You are responsible for knowing and following the policies, procedures, and standards relevant to your role. These documents may be housed in the internal corporate policies webpage or various local policy and procedure directories maintained by regional teams. If you are unsure about how to proceed or which

policy applies, you are encouraged to seek guidance from your supervisor, the Global Compliance Department (hereinafter "Global Compliance"), or the appropriate policy owner.

You should use good common sense and judgment in handling problems not specifically addressed in the Code, always resolving issues by complying with legal and ethical requirements. If you have any questions about the topics covered in this document, if you do not know what to do about a problem, or if you are not sure how the requirements of the Code apply, you should consult your supervisor, or contact Global Compliance at GlobalCompliance@UEI.com. If any provision of the Code is in conflict with local laws, you should contact Global Compliance to determine how such a potential conflict should be resolved.

If, following a thorough investigation, the Company determines that the personnel has violated the provisions of this Code, appropriate disciplinary action will be taken. This may include, but is not limited to, formal warnings, counseling, additional training, suspension, or termination of employment, depending on the severity and circumstances of the violation.

Your Responsibility

At UEI, we expect everyone who works for or with us, regardless of role, rank, or responsibility, to uphold this Code of Conduct in their daily work. We ask that you carry out your duties with honesty, objectivity, and diligence, and demonstrate loyalty in all matters related to UEI's business. UEI firmly believes that ethical behavior and principled decision-making by all who represent us are essential to sustaining our reputation and achieving our goals.

All UEI personnel are expected to report any suspected or observed misconduct, legal violations, or breaches of our Code of Conduct through appropriate channels. To support this, we offer the confidential UEI Ethics Line (as further discussed below), available to anyone who wishes to raise concerns in good faith. You can access the Ethics Line at https://ethicsline.uei.com. The Company guarantees that no personnel who in good faith makes a complaint or reports a violation or suspected violation of the Code of Conduct pursuant to these procedures will be penalized in any manner for providing such information.

Fair Dealing

UEI is committed to conducting all business relationships with personnel, customers, vendors, competitors, and other stakeholders with fairness, respect, and integrity. We expect everyone representing UEI to act honestly and ethically in all interactions. No one should seek to gain an unfair advantage through manipulation, concealment, misuse of privileged information, misrepresentation of material facts, or any other form of unethical conduct. Fair dealing also means respecting the rights and property of others, including intellectual property, and refraining from any improper use or exploitation.

HUMAN RIGHTS

We are committed to upholding the fundamental human rights and dignity of those impacted by our operations and in our supply chain. Our approach is grounded in internationally recognized standards, including the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We comply with all applicable laws and regulations related to human rights. We do not tolerate human rights abuses in any part of our business or supply chain.

To support this commitment:

- Speak Up: Promptly report any suspected or actual human rights violations, whether within our operations or those of our business partners, to your manager or through the UEI Ethics Line.
- Act with Respect: Uphold human dignity in all interactions with colleagues, customers, suppliers, and communities.
- Stay Informed: Participate in training and remain aware of your role in identifying and preventing human rights risks.
- Support Due Diligence: Cooperate with our ongoing efforts to assess and mitigate human rights risks across our supply chain, including audits and supplier engagement.

Together, we are responsible for ensuring that our business practices reflect our values and our commitment to ethical conduct. If you have any questions or need further clarification, please contact Global Compliance.

COMPLIANCE WITH LAW

UEI is committed to operating in full compliance with the laws and regulations of every country, state, and locality where we do business. We expect all personnel to understand and follow the legal requirements that apply to their roles. If you have questions about any legal obligation, including the key areas highlighted in this Code, contact Global Compliance for guidance.

Accurate Financial Information and Disclosures

Our financial records and public disclosures must be full, fair, accurate, timely, and understandable. This is not only a legal requirement but also essential to maintaining trust with our investors, regulators, and the public. All accounting entries must be supported by appropriate documentation and comply with applicable accounting standards. Personnel involved in financial reporting must ensure that all information is complete and correct. Any attempt to falsify records, misstate results, or omit material facts is a serious violation of our policies. If you become aware of inaccurate or uncorrected entries, report the matter immediately.

Insider Trading

It is illegal to trade in UEI securities based on material, non-public information. This includes information about earnings, forecasts, product launches, business strategies, mergers, acquisitions, or leadership changes. Such information must be kept confidential until it is publicly disclosed.

These rules apply to all personnel, regardless of their role or how they obtained the information. Sharing inside information with others, including family or friends, is also prohibited. If you are unsure whether information qualifies as “inside,” or whether a transaction may be inappropriate, consult Global Compliance or the Legal Department (hereinafter “Legal”) before taking any action.

Anti-Bribery and Anti-Corruption

UEI has zero tolerance for bribery and corruption. We comply with all applicable anti-bribery laws, including the United States Foreign Corrupt Practices Act. Personnel must not offer, give,

promise, authorize, solicit, or accept anything of value to gain an improper advantage, whether dealing with public officials or private entities.

This includes a ban on facilitation payments, which are small, unofficial payments made to expedite routine government actions. Even if such payments are legal in some jurisdictions, they are not permitted under UEI policy. Bribes, kickbacks, and other forms of improper influence are strictly prohibited. When in doubt, seek guidance from Global Compliance.

Gifts, Entertainment, and Hospitality

Sometimes, business customs involve the exchange of gifts, entertainment, or hospitality. Examples include invitations to dine at restaurants, attend theater or sporting events, exchange gifts during the holidays, or receive hotel accommodations for a conference. These offers may come from individuals or organizations that currently do business with the Company or are seeking to do so. Similarly, your role at UEI may occasionally require you to host or entertain individuals or groups with whom the Company does or intends to conduct business.

To avoid both the appearance and the reality of improper relationships with current or potential business partners, whether public or private, UEI personnel must follow these principles:

- Gifts, entertainment, and hospitality must serve a legitimate and lawful business purpose and align with clear, appropriate objectives. They must not create a sense of obligation or undue expectations for the recipient.
- Expenses should never be perceived as attempts to improperly influence business decisions or public policy. Transparency and proper documentation are essential to ensure compliance with all applicable laws and regulations.
- All gifts, entertainment, and hospitality must be reasonable in value, appropriate in nature, and consistent with industry norms. Their frequency and scale should be moderate and proportionate to the occasion.
- For any gifts, entertainment, or hospitality that exceed established thresholds or that involve sensitive contexts, prior approval must be obtained from both your supervisor and Global Compliance to ensure appropriateness and adherence to Company guidelines.

If you have any questions or need further clarification, please contact Global Compliance.

Political Contributions

Company funds or assets must never be used for political contributions, directly or indirectly. This includes donations to political parties, candidates, or campaigns. Personnel may not pressure others to make political donations or participate in political activities. Personnel are free to participate in personal political activities on their own time and at their own expense, but must not imply company endorsement or use company resources in doing so. If you have questions about political contributions or related laws, contact Global Compliance before taking any action.

International Trade Compliance

UEI is committed to conducting international business ethically and in compliance with all applicable trade laws. This includes import and export controls, customs regulations, and economic sanctions. Personnel involved in cross-border transactions must ensure accurate classification, valuation, and documentation of goods and services. Be especially cautious if there is a potential that you are dealing with embargoed countries, sanctioned individuals, or dual-use technologies that may require special licenses. Before engaging third parties or

sourcing from restricted countries, consult Global Compliance or Legal to confirm compliance with applicable laws.

Antitrust Laws

We believe in fair and open competition. Personnel must not engage in practices that restrict competition, such as price fixing, market allocation, bid rigging, or sharing sensitive information with competitors. Examples of prohibited conduct include agreements with competitors to set prices or divide markets, and sharing non-public pricing or sales terms. Even informal conversations or exchanges of information with competitors can raise serious legal concerns. Antitrust laws are complex. If you are unsure whether an action is appropriate, consult Global Compliance or Legal.

Dealing with Government Agencies

When interacting with government officials or agencies, always be honest, transparent, and cooperative. If you receive a request for information or an inspection of UEI property on behalf of UEI, notify your supervisor and Global Compliance immediately to ensure the request is handled appropriately. You should always be courteous and provide only the information that is legally required. Never attempt to obstruct or mislead government officials. If you are unsure about the scope of a request or how to respond, seek guidance from Global Compliance or Legal before proceeding. This notification requirement does not apply to any communication you choose to make on your own behalf with a government agency, as described under "Protected Communications with Government Agencies" below.

CONFLICTS OF INTEREST

The success of UEI and the integrity of our workplace depend on prioritizing the Company's interests. A conflict of interest arises when a personnel's private interests, or those of a family member, friend, or associate, interfere with, or appear to interfere with, the interests of the company. Conflicts can take many forms. They may involve financial interests, personal relationships, outside employment, or the use of company resources for personal gain. Even the appearance of a conflict can damage trust and should be avoided. If you are unsure whether a situation presents a conflict, consult your supervisor, Global Compliance, or Legal. When in doubt, disclose the situation and seek guidance.

Related Party Transactions and Personal Gain

Personnel must avoid participating in or influencing any business decision that involves a person or entity in which they, or a close family member, have a financial interest or employment relationship. Additionally, personnel may not use their role at UEI to pursue business opportunities for personal benefit or for the benefit of family or friends.

If, through your work at UEI, you become aware of a potential opportunity, such as a new partnership, investment, or product idea, you must not act on it for personal gain. This includes situations where you or someone close to you has a financial stake in, or is employed by, a company that does business with UEI. This may include vendors, suppliers, consultants, or service providers. If you are unsure whether something qualifies as a company opportunity, consult your supervisor or Global Compliance before taking any action.

Hiring and Supervising Friends and Relatives

At UEI, we are committed to hiring the most qualified candidates based on merit. Personnel should not hire or supervise a relative, spouse, domestic partner, or significant other within the same departmental hierarchy, especially in situations where they would have direct or ultimate supervisory responsibility over that individual. Any exceptions to this policy must be approved in advance by Global Compliance and the Human Resources Department (hereinafter "Human Resources"). If you have questions about potential conflicts of interest related to hiring or work assignments, please contact Global Compliance and Human Resources for guidance.

Charitable Contributions

Periodically, personnel may receive requests for corporate contributions from charities and other non-profit organizations. All such requests must be referred to Global Compliance for review. Contributions will be evaluated based on established criteria, including alignment with company values, reputational risk, and compliance with anti-bribery and anti-corruption policies. Under no circumstances should personnel commit company resources without prior written approval.

PRIVACY, CONFIDENTIALITY, AND COMPANY ASSETS

Protecting Confidential and Proprietary Information

At UEI, protecting confidential and proprietary information is essential to our continued success and reputation. This includes all non-public data that, if disclosed, could benefit competitors or cause harm to the company, its personnel, or its customers. Examples of such information include business strategies, financial data, customer and supplier information, trade secrets, technical data, internal communications, and intellectual property.

Personnel are expected to maintain the confidentiality of all sensitive information and refrain from disclosing it to unauthorized individuals, whether inside or outside the company. All computer systems and data must be treated as confidential and protected from unauthorized access or misuse. Improper use or disclosure of confidential information can result in legal consequences, competitive harm, and damage to the company's reputation. If there is any uncertainty about whether information is confidential, personnel should seek guidance from Global Compliance or Legal. These confidentiality obligations are subject to "Protected Communications with Government Agencies" described below.

Use and Protection of Company Assets

Personnel are responsible for protecting company assets and using them efficiently and ethically. Company assets include both physical and intangible property. Tangible assets encompass items such as computers, phones, office supplies, manufacturing equipment, and written records. Intangible assets include intellectual property, trade secrets, proprietary data, and software.

All company assets should be used only for legitimate business purposes. Theft, carelessness, or waste directly impacts the company's profitability and productivity. Any intellectual property developed during your work at UEI, including scientific discoveries, engineering plans, manufacturing processes, and software, is considered company property and must be safeguarded accordingly.

Intellectual Property

During the course of employment at UEI, individuals may access or create intellectual property, including trademarks, copyrights, patents, proprietary know-how, and technical innovations. This information is considered company property and must be handled with the highest level of care and discretion. The use of third-party intellectual property is permitted only when proper authorization have been obtained. The obligation to protect intellectual property continues beyond the term of employment or engagement with UEI, in accordance with applicable laws and contractual agreements.

Data Privacy and Security

UEI is committed to protecting the personal and confidential information of its personnel, customers, and partners. Our data privacy and security practices are designed to meet the highest standards and ensure the ethical handling of information across all business operations. The disclosure of personal employee information to anyone outside the organization is prohibited unless required by law or authorized by the relevant employee.

Use of AI

We are committed to using Artificial Intelligence (AI) and automated systems responsibly, in ways that respect fairness, human oversight, and the trust our customers place in our products. Employees involved in the design, development, or use of AI must ensure that systems are accurate, transparent, and secure, and that they comply with all applicable laws and company standards. AI should support—not replace—sound human judgment. Any personnel with concerns about the ethical or appropriate use of AI should seek guidance from Global Compliance or Legal.

Responsible Digital and Social Media Use

In today's digital environment, personnel are expected to use digital platforms and social media responsibly. Whether communicating in a personal or professional capacity, it is important to reflect UEI's values and protect confidential and proprietary information. Personnel should maintain respectful and professional conduct in all digital interactions and avoid sharing any information about the company online, including sensitive information.

EMPLOYMENT AND WORKPLACE PRACTICES

Culture of Belonging

At UEI, we are committed to fostering a culture of belonging. We believe that our differences make us stronger and that innovation thrives when people from varied backgrounds, experiences, and perspectives come together with mutual respect and shared purpose.

We expect all personnel to treat one another with dignity, fairness, and professionalism. Cultural awareness, inclusive communication, and mutual respect are essential to maintaining a positive and collaborative work environment. Discrimination, harassment, or any behavior that undermines the dignity of others, whether based on race, gender, ethnicity, religion, disability, sexual orientation, or any other protected characteristic, is strictly prohibited and may result in disciplinary or legal action. Creating a culture of belonging is a shared responsibility. It requires ongoing commitment, open dialogue, and a willingness to learn from one another.

Equal Employment Opportunity

UEI is an equal opportunity employer. We are committed to fair and inclusive employment practices across all our global operations. Employment decisions are made without regard to race, ethnicity, age, national origin, ancestry, citizenship, religion, sex, marital status, pregnancy, sexual orientation, gender identity or expression, disability, medical condition, genetic information, military or veteran status, or any other characteristic protected by applicable law.

Workplace Health and Safety

At UEI, maintaining a safe and healthy work environment is a top priority. We are committed to upholding the highest safety standards and fostering a culture where personnel feel empowered to report safety concerns without hesitation. Emergency protocols are in place to ensure swift and effective responses, safeguarding the well-being of all team members. UEI prohibits weapons of any kind on all company premises, including parking areas and company vehicles, unless otherwise permitted by law and explicitly authorized by the company. This is in place to ensure the safety and security of all personnel and visitors. If you have any questions, please contact Human Resources.

Harassment-Free Workplace

UEI has zero tolerance for harassment or inappropriate conduct, whether verbal, physical, or digital. Harassment includes any unwelcome behavior that interferes with an employee's ability to work or creates a hostile or intimidating environment. This applies regardless of whether the behavior occurs on company premises, off-site, or through digital communication channels. Personnel who experience or witness harassment are encouraged to report it promptly to Human Resources, Global Compliance or to the UEI Ethics Line. We also prohibit any form of harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, corporal punishment, coercion, bullying, or public shaming. Our workplace must remain a space where everyone feels safe and respected.

Substance Use

UEI is committed to fostering a safe, healthy, and productive work environment. To support this goal, the company maintains a zero-tolerance stance on the use, possession, or distribution of illegal drugs, as well as the misuse of legal substances, during work hours, on company premises, or while conducting company business. Personnel are expected to report to work unimpaired by alcohol, illegal drugs, or misused prescription medications. Recognizing that substance use disorders may qualify as disabilities under local law, UEI encourages personnel to seek help without fear of retaliation. The company is committed to providing reasonable accommodations in accordance with applicable laws.

Freedom of Association and Collective Bargaining

UEI supports open communication and direct engagement between personnel and management. Personnel are free to express concerns, share ideas, and discuss workplace conditions without fear of retaliation. In accordance with local laws, we respect the right of personnel to form or join trade unions, engage in collective bargaining, and participate in peaceful assembly. Where such rights are limited by law, we support alternative lawful forms of worker representation.

SUSTAINABILITY AND CORPORATE RESPONSIBILITY

At UEI, our commitment to sustainability and corporate responsibility is a core part of how we do business. We are dedicated to conducting our operations in a way that respects the environment, supports our communities, and upholds the highest ethical standards. Personnel at all levels are encouraged to contribute ideas, take initiative, and act as stewards of our environmental and social commitments.

Environmental Stewardship

UEI is committed to minimizing our environmental footprint. We strive to reduce emissions, conserve resources, and limit the use of hazardous substances in our operations. We encourage recycling and responsible waste management at all facilities. Our manufacturing and logistics processes are designed to reduce adverse effects on the environment and surrounding communities while maintaining the health and safety of our personnel and the public. Environmental responsibility is a shared duty, and we expect our partners and suppliers to uphold similar standards in their operations.

Community Engagement and Volunteerism

We believe that strong communities are essential to a thriving business. UEI encourages personnel to actively participate in community service and volunteer efforts. This may include company-sponsored initiatives, local outreach programs, or individual volunteer activities. While participation is entirely voluntary and has no impact on employment status, we are proud to support and recognize those who give their time and talents to make a difference. Our community engagement efforts are designed to foster meaningful relationships, promote social equity, and contribute to the well-being of the regions where we live and work.

THE REPORTING PROCESS

We encourage all personnel, vendors, and stakeholders to report any concerns related to unethical behavior, legal violations, or breaches of our Code of Conduct. We are equally committed to protecting individuals who raise concerns in good faith from any form of retaliation.

Reporting Concerns

Any individual may report a concern, complaint, or suspected violation of applicable laws, company policies, or the UEI Code of Conduct. Reports should be made in good faith, based on a reasonable belief that misconduct or a violation may have occurred. All reports are taken seriously and will be reviewed promptly and thoroughly.

Concerns or complaints regarding accounting, internal accounting controls, or auditing matters will be referred to, and their treatment overseen by, the Audit Committee. Such concerns may be submitted confidentially and anonymously through the Ethics Line.

Confidentiality and Non-Retaliation

UEI strictly prohibits retaliation against anyone who reports a concern or participates in an investigation. We have implemented a confidential reporting mechanism to ensure that

individuals can raise concerns without fear of dismissal, discrimination, or any adverse employment consequences. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct a thorough investigation and as permitted by law.

Protected Communications with Government Agencies

Nothing in this Code or any other UEI policy or agreement should be interpreted to restrict or interfere with your right or ability to (i) communicate, without notice to or approval by UEI, with any governmental agencies as provided for by applicable law; (ii) participate in any investigation or proceeding that may be conducted by any government agency, including providing documents or other information, without notice to UEI; or (iii) receive a benefit from any government agency for information provided to any such government agency, except where limited or prohibited by law.

You are also permitted to speak freely about your wages, hours, or about employment terms and working conditions, including information about harassment, discrimination, or any other conduct you have reason to believe is unlawful, and nothing in the Code or any other UEI policy or agreement, should be interpreted as being restrictive of your right to do so.The Ethics Line

To support our commitment to ethical conduct, UEI provides access to the UEI Ethics Line. Operated by an independent third party, the Ethics Line ensures confidentiality, allowing individuals who report to remain anonymous if they choose, where legally applicable and as investigations allow. The Ethics Line is available 24 hours a day, 7 days a week, and is available in multiple languages. The Ethics Line is open to all UEI stakeholders and serves as a vital tool for upholding our values, detecting misconduct, and promoting respect for human rights across all areas where UEI operates.

You can access the Ethics Line at https://ethicsline.uei.com.Additional Support

For questions or further guidance, you may contact UEI's Global Compliance Department at GlobalCompliance@UEI.com.

Waivers of the Code

Any waiver of the Code for our directors, executive officers or principal accounting officer may be made only by our Board of Directors, and will be disclosed as required by law or applicable listing rules.