

### **Universal Electronics Inc.**

**Code of Conduct** 

### A message of our Chairman and Chief Executive Officer

March 25, 2024

To our employees:

The success of Universal Electronics is built on our reputation for integrity and excellence, not just of our products, but also on the way in which we conduct ourselves.

We share and uphold a common set of ethical values and objectives, the core of which is our commitment to doing the "right thing," even though it may not be popular. The business environment has never been more challenging or complex, particularly for a company like ours which does business all around the world.

Now more than ever, each of us needs to understand our individual responsibility for complying with legal requirements and upholding the highest ethical standards.

To help guide us in this endeavor, the Board of Directors has adopted a Code of Conduct with which we must all comply – me, you, and every one of our directors, officers, and employees around the world.

The Code provides each of us with a basic guide to certain precepts and practices that are critical to our ability to be a productive company, operating within the law's requirements and with respect for one another. It does not, however, cover all the situations in which our principles may be called into questions. But if we always put integrity and truthfulness first, we will come through with flying colors.

Please read the Code carefully. Compliance with its provisions is critical to our success.

Sincerely

Paul D. Arling

Chairman and Chief Executive Officer





## WHO WE ARE

Universal Electronics Inc. (NASDAQ: UEIC) (hereinafter "UEI" or "Company") is the global leader in wireless universal control solutions for home entertainment and smart home devices and designs, develops, manufactures, ships and supports hardware and software control and sensor technology solutions.

## APPLICATION OF THE CODE AND THE COMPANY'S POLICIES

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 sets forth certain basic rules regarding the way in which all UEI directors, officers, and employees 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 Code of Conduct cannot – and is not intended to – cover every legal and ethical issue that may arise. If you do not know what to do about a problem or are not sure how the requirements of the Code apply, you should consult your supervisor, or contact the Global Compliance Team directly.

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 any provision of the Code is in conflict with local labor laws and rules, the local labor laws and rules shall take precedence. In such a situation, you should contact Global Compliance to determine how such a potential conflict should be resolved.

The Company guarantees that no employee 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.

### VALUES

All of us have our own morals and values that guide us through life and help us make informed decisions. Values are the core of our being and we use them every day without much effort because they are fundamental and come naturally to us. UEI's values will enable the successful realization of the vision to drive the digital future to empower societies, inspiring everyone to fully maximize their true potential.

The values that encompass us as a company and guide everything we do are the following:

### Integrity (doing the right thing even if no one is watching)

Our decisions and actions are rooted in honesty, good intentions, and high ethical standards, ensuring trust in our commitments. Integrity is also about valuing transparency and prioritizing what is best for our consumers, mirroring our dedication to ethical practices in every aspect of our business.



### Innovation

This value drives the pursuit of ideal solutions, constantly refining and optimizing processes and offerings. It is about pushing boundaries to better serve employees, clients, and the organization, encouraging a culture where thinking outside the box is the norm to address complex challenges with unique, effective solutions.

### Human centric

Human centric as a company value is about making a positive impact on the communities, enhancing employee engagement, and maintaining a sharp focus on customer needs.

## Resilience

Resilience as a company value embodies the strength to manage and rebound from crises, drawing from the collective resolve to "bounce back" from challenges. It is about the agility to evolve the business model in response to the changing tides of demand, competition, technology, and regulation.

## Passion

Passion as a company value fuels excitement for our work and shared goals. It means building from the heart, balancing enthusiasm with wise decision-making, and harboring a zeal for innovation. It is a universal force that drives dedication, uplifts the organization's mission, and reinforces our commitment to respect and diversity.

### YOUR RESPONSIBILITY

We oblige everyone working for and with UEI, independent of role, rank/responsibility, to comply with this Code in their day-to-day operations and take actions that will preserve the trust that our customers and society place with us. We ask you to demonstrate honesty, objectivity, and diligence in the performance of your duties and responsibilities as well as loyalty in all matters pertaining to the affairs of UEI. UEI strongly believes that the ethical and integral actions of people working for and with UEI are a condition of our success.

# **Diversity and Inclusion**

At Universal Electronics Inc., we recognize and celebrate the richness that diversity and inclusion bring to our workplace. Our Company thrives on the myriad of cultures, backgrounds, and viewpoints that our employees embody. It is this tapestry of diverse talent and perspectives that fuel our innovation and growth. We are committed to fostering an environment where all employees are valued and given the opportunity to contribute their unique ideas and talents. Our dedication to diversity and inclusion is integral to the fabric of our corporate culture.

UEI strives to create a working environment that respects diversity and gives employees the opportunity to learn, grow and develop their talents. Employees, in turn, must treat each other and third parties respectfully and fairly.



Everyone shares responsibility for fostering an environment that allows and creates a diverse and inclusive workplace. One aspect to ensure that the diverse cultures are respected is that everyone working for and with UEI should act, speech, appearance appropriately, with sensitivity to cultural considerations.

UEI believes that everyone should be treated with dignity and respect, therefore, UEI prohibits all forms of discrimination, harassment, humiliation, threats of violence and abusive or offensive behaviour. The terms "discrimination" and "harassment" include sexual, racial, ethnic, and other forms of discrimination and harassment These behaviours are considered a serious act of misconduct and may subject you to disciplinary or legal action.

UEI has a zero-tolerance policy regarding substance abuse of any kind. All employees are prohibited from being at work or on company business whiles under the influence of alcohol or other illegal substances. Further, UEI prohibits weapons on all of the company's premises consistent with applicable laws. Everyone is empowered to take immediate action, regardless of role, rank, or responsibility when one sees a situation that interferes with UEI's standards of ethics and integrity.

## **HUMAN RIGHTS**

We are committed to respect for human rights and the dignity of every person, and we support all efforts to promote and protect human rights. We comply with all applicable laws relating to fair employment practices, freedom of association, privacy, collective bargaining, immigration, working hours, wages and hours, and laws prohibiting forced, compulsory, child labor, employment discrimination, and human trafficking.

We will not tolerate human rights abuses in our operations or in our supply chain. Each of us can help support efforts to eliminate human rights violations:

- Report any suspicions or evidence of human rights violations in our operations or those of our business partners to your line manager, or consider using <u>Ethics Line</u>
- Remember that respect for human dignity begins with our daily interactions with each other, our customers and business partners. It also includes promoting a diverse work culture, and our role in protecting the rights and dignity of everyone with whom we do business.

# INTELLECTUAL PROPERTY, KNOWHOW AND CONFIDENTIAL INFORMATION

During the course of their duties with UEI, employees and third parties gain knowledge of intellectual property (such as trademarks, copyrights, know-how, patents, research, technical data) and confidential information that belong to UEI and/or third parties.

Everyone who gains such information is trusted with maintaining the confidentiality of this valuable information. Be aware of and safeguard any intellectual property and confidential information that is in your possession, whether it belongs to UEI or a third party. The intellectual property of third parties can only be used with proper authorization. Failure to safeguard any intellectual property and confidential information can subject you and UEI to legal and regulatory proceeding, fines, and imprisonment.



Please be aware that you remain bound to maintain confidentiality even after the end of your employment at or cooperation with UEI in accordance with the applicable legislation period.

#### FAIR DEALING

UEI is committed to dealing with its employees, customers, vendors, competitors, and others with whom we work, with fairness, respect, and integrity. Relationships forged through fairness and integrity provide keys to the Company's success. No one should take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or through any other unfair-dealing practice. Fair dealing also prohibits taking advantage of or otherwise improperly using someone else's property, including intellectual property.

All positions with the Company are positions of trust and confidence, and the Company expects all employees to be scrupulous in all dealings with the Company.

The Company expects all employees to cooperate in any investigation conducted by the Company.

#### ACCURATE FINANCIAL INFORMATION AND DISCLOSURES

The Company's financial records and the financial statements that we release to the public in accordance with legal and stock market requirements must always be full, fair, accurate, timely, and understandable. Besides being required by law, UEI's credibility and reputation for honesty depend on it. The Company's ability to make accurate and timely disclosures to the public that are required by law depends on accurate and complete financial records. Therefore, it is very important that all accounting entries, as well as all information on which those entries are based, be correct and complete. Accounting entries must be made in accordance with appropriate accounting standards, and proper records supporting accounting entries must be maintained. Any employee who becomes aware of inaccurate or uncorrected accounting entries should report the matter in accordance with the procedures set forth in the Code of Conduct.

#### COMPLIANCE WITH LAW

At UEI, we are committed to operating our business in compliance with the laws and government rules and regulations of the countries, states, and localities in which we operate. Compliance with law forms a basic part of the Company's integrity as a business enterprise. This commitment includes complying with anti-corruption laws, upholding fair competition rules, and respecting international trade practices. We expect all employees to maintain these standards in every aspect of their business dealings, thereby upholding our company's integrity on the global stage. If you have questions about the law, including the seven areas of the law briefly highlighted in this Code, please contact the Global Compliance.

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## Insider Trading

It is illegal to trade in the Company's securities, including its common stock, on the basis of material "inside" information. "Inside" information is information about which you have knowledge, but which is not yet known to the public. You must keep all such "inside" information confidential until such time as the "inside" information becomes publicly known.

Inside information includes information such as:

- Earnings information
- Forecasts
- New product offerings
- Business strategies
- Potential mergers, sales, or acquisitions
- Management changes

The prohibitions on insider trading apply to all employees, regardless of their jobs in the Company and regardless of where or how they may have obtained the inside information.

Besides being illegal to trade in Company securities based on inside information, it is also illegal to pass inside information on to others, including family and friends. The penalties for violating the insider trading laws are severe.

### Anti - Corruption

It is imperative that all of us, as a part of global Company, comply with laws and regulations in the other countries in which the Company does business. In addition to the laws of other countries, there are special laws and regulations which apply to the import and export of products and technical data.

Anti-corruption laws prohibit employees from offering or paying any money or other thing of value, directly or indirectly, to any foreign government official, foreign political party or its officials, or candidate for public office, for the purpose of improperly obtaining or maintaining business or influencing governmental action favorable to a legal entity.



Prohibited payments of this nature include consulting, broker's, finder's or other fees paid to third parties where there is reason to believe that any part of such fees will be distributed to, or for the benefit of, foreign officials or political parties for those improper objectives.

## **Bribes and Kickbacks**

At all times we must conduct the Company's business in an honest, ethical fashion. Bribes and payoffs to government officials, suppliers, and others are strictly prohibited. Kickbacks, which are situations in which an employee receives or gives something in return for business or for making certain business decisions, are strictly prohibited.

## **Gifts and Entertainment**

Sometimes custom in the business world involves being entertained – for example, being taken to lunch or dinner, the theatre, sporting events, etc. – by people who do business or wish to do business with the Company. Similarly, there may be times when your position in the Company requires you to entertain people with whom UEI does or wants to do business. Business is often transacted in these situations, and at times employees may be asked to represent the Company in certain situations hosted by others.

To avoid both the reality and the perception of improper relations with existing or potential business partners, both public and private, UEI employees must adhere to the following principles:

**Giving Gifts & Entertainment** 

- Gifts or entertainment may be given only where appropriate and where there is no risk of creating the perception of influencing the recipient in his/her decision.
- Gifts must be of minimal value and entertainment must not go beyond what is reasonable. Lavish or inappropriate gifts or entertainment are strictly prohibited.
- Entertainment should be reasonable and in surroundings conducive to doing business (business discussion should take place during, before, or after the entertainment event).
- Approved by supervisors.
- Gifts and Entertainment should be properly reported and recorded.

Please note that specific rules and requirements may apply to giving Gifts & Entertainment to government officials and pre-approval may be required from Global Compliance.

Accepting Gifts & Entertainment.

- Demanding or soliciting gifts or entertainment of any kind is prohibited. This includes not only items but all kinds of advantages.
- Unsolicited gifts or entertainment may only be accepted if they do not go beyond common courtesy and are an accepted local business practice.



- Offers of entertainment may only be accepted if they arise out of the normal course of business, cannot be seen as lavish.
- Gifts and Entertainment should be properly reported and recorded.

Please note that specific rules and requirements regarding Gifts and Entertainment country's threshold may apply. Please contact Global Compliance to specify country specific thresholds.

# **Political Contributions**

The laws of the United States and other countries may prohibit or restrict contributions by a corporation to political parties or candidates. No Company funds or other assets may be contributed, used, or loaned, directly or indirectly, to any political party or for the campaign of any person for political office.

In addition, no employee, regardless of his or her position in the Company, may suggest or otherwise place pressure on another employee or member of an employee's family to make contributions in the employee's own name. If you have a question about the law on political contributions, contact Global Compliance.

# Follow International Trade Rules

Our business involves the movement of products, services, information, and technology around the world, including across international borders. We are committed to sourcing, importing, and exporting products and other items the right way. Conducting our international trade activities properly is critical to earning and maintaining trust in our business, allowing us to move these items as necessary to support our customers around the world.

# Integrity in Action

- Provide accurate information. Take care when providing classification, valuation, country of origin, and other applicable regulatory agency data.
- Follow trade compliance laws and our policies. If your work in the supply chain involves moving
  goods across international borders, know and follow the laws of countries where you do business.
  Understand that multiple countries' laws may apply. Prior to engaging a third party to assist in the
  movement of goods across international borders, ensure that such third parties have all necessary
  internal approvals.
- Follow sanctions laws and our policies. Before sourcing from a country, confirm that doing so is permitted under applicable law. Many governments keep a list of countries and people with whom companies may not do business.
- Seek guidance. Prior to negotiating international transactions, reach out to Global Compliance or Legal to discuss any trade implications.

# Antitrust Laws

The antitrust laws prohibit competitors, customers, and vendors from making agreements or having understandings that interfere with fair competition in the marketplace or that could result in price fixing. Employees may not conduct any business that violates the antitrust laws of the U.S., any state,



any foreign country, or any other international body. The antitrust laws can be very complicated, but these are some examples of conduct that would violate the law:

- Agreements among competitors to set prices, terms or conditions of sale, production, distribution, territories, or customers.
- Control of the resale pricing of any of the Company's products.
- Providing competitors with any competitive information, such as details of prices, terms or conditions of sale that could be viewed as anticompetitive.

Dealing with Government Agencies, employees must follow all regulatory requirements that relate to the development, manufacture, or distribution of the Company's products and the provision of the Company's services. It is in all of our best interests to maintain honest and direct relationships when dealing with government agencies.

Periodically, government inspectors may request information during inspections of facilities. To determine whether requests are appropriate, always contact Global Compliance if there is an information request from a government agency. You should always cooperate with and be courteous to government inspectors and provide them with the information they request during an inspection that they are entitled to under applicable law.

## **CONFLICTS OF INTEREST**

The success of our Company, the value we produce for shareholders and our jobs depend on putting the Company's interests first when we do business. A conflict of interest arises when an individual's private interests, including personal benefits that accrue because of an employee's position with the Company, interfere with the Company's interests as a whole. Conflicts can also arise when a member of an employee's family receives personal or business benefits as a result of the employee's position at the Company.

Employees should consult the Company's Related Party Transaction Policy or contact the Company's Legal Department if they have questions regarding the applicability of such related party transaction restrictions.

Each of us must avoid conflicts, as well as the appearance of conflicts of interest. Employees must exercise common sense and judgment to avoid conflicts. Judgment also involves asking your supervisor or Global Compliance how to handle a situation if you think you might have a conflict of interest.

# Doing Business with Suppliers and Consultants and Related Party Business Dealings

Purchasing decisions should be based on the best combination of quality, integrity, service, delivery, and price. Personal relationships should not be the basis for the purchase of goods or services. You must notify your manager and Global Compliance of any business relationship or proposed business transaction the Company may have with any person or entity in which you or anyone related to you has a direct or indirect interest or from which you or anyone related to you may derive a benefit or where anyone related to you is employed. Any such business relationship must first be approved in writing by Global Compliance in consultation with the Legal Department This requirement generally



does not apply if the related party interest exists solely as a result of your ownership, directly and indirectly, of less than 5 % of the outstanding publicly traded equity securities of such related party.

## Hiring and Supervising Friends and Relatives

Our policy is to hire only the best, most qualified workers. The Human Resources Department will assist employees in determining qualifications for any position and in evaluating applicants for those positions. As a general matter, no relative, spouse or domestic partner, or "significant other" should be hired to work within the same departmental hierarchy in circumstances when the employee has ultimate supervisory responsibility over the friend or relative being hired. Any exceptions must be approved by Global Compliance Questions about possible conflicts of interest in hiring and work assignments should be directed to Global Compliance

## **Charitable Contributions**

Periodically, employees may receive requests for corporate contributions from charities and other nonprofit organizations. The Company is committed to being a good corporate citizen. All such requests should be referred to the Chief Executive Officer.

## PROTECTION AND USE OF COMPANY ASSETS

### Company Property – In General

All employees should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability and the value it produces. All Company assets should only be used for legitimate business purposes. Company property includes both tangible and intangible property. Tangible property includes such items as computers, printers, manufacturing equipment, office supplies, inventories, cellular telephones, tablet computers, labor or log books, and written records of work in process. Intangible property refers to such things as trademarks, formulas, patents, copyrights, trademarks, secrets, and other intellectual property. As a Company that manufactures and distributes "high tech" equipment, we often, as individuals or teams, create new ideas and intellectual property. Scientific discoveries, formulas, engineering plans, manufacturing specifications, computer codes and programs, publications, and manufacturing processes are just a few examples of property that is created through the work of our minds. Any intellectual property created as a result of work at UEI automatically becomes the Company's property.

### Confidential and Proprietary Information

Certain information is confidential. Confidential information is often important to the Company's competitive advantage. It should neither be shared with anyone outside the Company nor provided to other employees except on a "need to know" basis.

The protection of the Company's confidential and proprietary information is essential to its continued success. This information is an important Company asset that requires the same protection as other Company assets.



Confidential information includes, among other things, all non-public information that might be of use to competitors, or that could be harmful to the Company or its customers, if disclosed.

Confidentiality also requires that you not discuss confidential information about customers with other customers or with other employees who have no need to know this information. You should treat all computer data as confidential, and you should protect computer data from use by any unauthorized person.

The Company's concern regarding the potential improper use of confidential information is to protect the Company's intellectual property, trade secrets and other non-public information that would be competitively sensitive or useful to competitors, or which, if disclosed, would otherwise violate the rights of a third party.

# EMPLOYMENT AND WORKPLACE PRACTICES

## Workplace Health and Safety

Ensuring a safe and healthy work environment is a top priority for Universal Electronics Inc. We are committed to providing a workplace that adheres to the highest safety standards and encourages employees to voice any safety concerns. Protocols are in place to effectively handle emergencies and safeguard the well-being of our entire workforce.

### Equal Employment Opportunity

The Company is committed to equal employment opportunities at all of its facilities worldwide, without regard to a person's race, color, age, national origin, ancestry, citizenship, religion, sex, marital status, pregnancy or childbirth, sexual orientation, gender, gender identity and gender expression, mental or physical disability, medical condition, genetic information, military service, veteran status, disabled or Vietnam veteran status, or based on denial of Family and Medical Care Leave, as all those terms are defined by law, or any other characteristic protected by law.

Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. We developed and implemented proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations.

# Freedom of Association and Collective Bargaining

We promote open communication and direct engagement between employees and management as the most effective ways to resolve workplace and compensation issues. Employees and/or their representatives are able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In conformance with local law, in alignment with these principles, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to



refrain from such activities. If the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers have a right to elect and join alternate lawful forms of worker representations.

## **Continuous Learning and Development**

Universal Electronics Inc. is dedicated to fostering a culture of continuous learning and professional development. We believe in empowering our employees through opportunities for training, skill enhancement, and career advancement. This commitment to growth and learning is a cornerstone of our success and the personal development of our employees.

## Harassment

UEI will not tolerate any kind of harassment or other inappropriate behavior on the part of employees or those with whom we deal, regardless of whether the behavior is verbal or physical, flagrant, or subtle. Harassment involves unwelcome verbal or physical conduct which has the effect of unreasonably interfering with an employee's job performance or which creates an intimidating, hostile or offensive environment, and is severe and pervasive. This type of conduct is prohibited regardless of whether it occurs on or off company premises or whether it occurs in person or through the mail, email, voicemail, or internet. Any employee who believes that has been subjected to or has observed harassment should promptly report it to the Human Resources Department, Global Compliance or the CEO.

Harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of employees is strictly prohibited.

# Data Privacy and Security

In today's digital era, the importance of data privacy and security cannot be overstated. At UEI, we are steadfast in our commitment to safeguarding the personal and confidential information of our customers and employees. Our policies and practices are meticulously crafted to align with the highest standards of data security, ensuring the responsible and ethical handling of information in all our business operations.

The Company will not disclose personal information about employees to anyone outside the Company unless required to do so by law or at the request of the employee.

# Digital and Social Media Usage

In the modern age of digital communication, the responsible use of digital platforms and social media is paramount. Employees of UEI are expected to use these tools in a manner that positively reflects the values of our Company and safeguards our proprietary information. It is crucial that personal and professional boundaries are respected in all forms of digital communication.



## Sustainability and Corporate Responsibility

Our dedication to sustainability and corporate responsibility is unwavering and reflects our commitment to ethical business practices. We strive to conduct our business in a way that not only respects the environment but also positively impacts the communities in which we operate. This commitment is evident in our efforts to reduce our carbon footprint, enhance recycling initiatives, and engage in sustainable business practices, thereby ensuring a better future for generations to come.

### **Community Engagement and Volunteerism**

UEI encourages employees to actively engage with their communities. This engagement can take the form of volunteer programs or company-sponsored community service initiatives. We believe in the power of giving back and are committed to making a positive impact in the communities where we operate. Participation in company-sponsored initiatives or any volunteer activities is non-compulsory, and an employee's lack of participation does not impact employment opportunities or the employment relationship.

## ENVIRONMENT

UEI executes all of its activities in an environmental responsible way. Our energy consumption is efficient, and we limit the emission of harmful substances. We reduce the amount of waste and encourage recycling. We contribute to the transition to a sustainable energy supply. Everyone in the Supply Chain should recognize that environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the community, the environment and the natural resources are to be minimised, whilst safeguarding the health and safety of the public.

# ACCOUNTABILITY FOR ADHERENCE TO THE STANDARDS OF CONDUCT

If, after investigation, the Company determines that an employee has breached the provisions of this Code, the employee will be subject to disciplinary procedures which may include termination of employment.

### PROMPT REPORTING OF COMPLAINTS AND PROBLEMS

Ethical conduct is every employee's business. Breaches of ethical conduct harm UEI and its working environment, and thus they harm all of us. You should report any breaches or suspected breaches of this Code promptly, so that they can be investigated accordingly.

### PROCEDURES FOR REPORTING COMPLAINTS

UEI upholds a strong policy for the reporting of ethical concerns or misconduct. We are committed to protecting whistleblowers from any form of retaliation. It is our responsibility to ensure a transparent and fair working environment where concerns can be reported without fear of reprisal.



Any person may submit a complaint, report, or concern, under the condition that such person has reasonable cause to believe that such complaint, report, or concern is true and which is made without malice or consideration of personal benefit, regarding suspected violations of applicable laws, or Universal Electronics' Code of Conduct, policies, or established procedures, without fear of dismissal or retaliation of any kind. We integrated a confidential reporting mechanism, designed to facilitate the reporting of suspected violations of UEI's Code of Business Conduct. The Ethics Line is open to our employees, vendors, and customers, ensuring that employee's objective business judgment is maintained.

Ethics Line upholds integrity, detects ethical violations, and fosters a culture of ethical conduct within UEI. The purpose of Ethics Line has evolved to facilitate the reporting of any infringements of the Code and promote the protection of human rights and respect for employees in all areas where UEI operates.

You may contact the Ethics Line at <a href="https://ethicsline.uei.com">https://ethicsline.uei.com</a>. The Ethics Line is available 24 hours a day, 7 days a week and is available in different languages. Suppliers can make anonymous reports to the Ethics Line to the extent allowed by law.

For any questions, please contact UEI's Global Compliance team at globalcompliance@uei.com