



Universal Electronics Inc. (UEI) Statement on Modern Slavery and Child Labor

May 2025

This statement may contain forward-looking statements that are made pursuant to the Safe-Harbor provisions of the Private Securities Litigation Reform Act of 1995. Words and expressions reflecting something other than historical fact are intended to identify forward-looking statements. These forward-looking statements involve a number of risks and uncertainties, including those related to UEI's ethics and sustainability program, human rights due diligence processes, supply chain due diligence processes, labor-related policies and procedures, human rights-related policies and procedures, and other factors described in UEI's filings with the Securities and Exchange Commission. The actual results that UEI achieves may differ materially from any forward-looking statement due to such risks and uncertainties. UEI undertakes no obligations to revise or update any forward-looking statements in order to reflect events or circumstances that may arise after the date of this release. This report, and related information available on our website are not incorporated by reference into any report or document we file with the SEC.

Commitment to Prevent and Reduce Risks of Modern Slavery and Child Labor

At UEI, respect for human rights is a core tenet both within our organization and when working with our suppliers. We acknowledge our responsibility to ensure that human rights are protected, respected, and upheld in all aspects of our global business operations and throughout our supply chain. We are dedicated to ensuring that our operations and our supply chains are free from modern slavery and child labor.

We have set forth clear public goals related to modern slavery and child labor within our ethics and sustainability program. These goals, along with key performance indicators aligned with our ethical principles, undergo thorough evaluation during monthly management reviews. The UEI Ethics and Sustainability Executive Steering Committee and the UEI Board of Directors receive progress reports on these objectives quarterly to ensure accountability and transparency in our commitment to combat modern slavery.

UEI uses internationally recognized standards, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Responsible Business Alliance (RBA) Code of Conduct, to define modern slavery and child labor. Modern slavery involves various forms of exploitation where individuals are coerced, deceived, or forced into situations against their will, including forced labor, debt bondage, involuntary prison, indentured, and human trafficking. Child labor refers to the employment of individuals under the age of 15, or the local legal minimum age for employment if greater than 15 years of age, in work that deprives them of their childhood, interferes with their education, and is harmful to their health and development, as prohibited by international standards.

Organization Structure and Supply Chains

Universal Electronics Inc. is the global leader in universal wireless control solutions for the home. The company brings to life millions of innovative control products each year that focus on a user-centric approach to designing and creating solutions and applications that simplify user interaction with highly

complex technologies in the home and removing interoperability challenges as a roadblock for user adoption, with a privacy first and secure by design approach to today's smart devices. We design, develop, manufacture, ship and support millions of innovative products each year which are used by the world's leading brands in the consumer electronics, subscription broadcast, security, home automation, hospitality and climate control markets. Universal Electronics Inc. was incorporated under the laws of Delaware, USA in 1986 and began operations in 1987. The principal executive offices are in Scottsdale, Arizona, USA. We currently operate vertically integrated manufacturing and assembly factories in the People's Republic of China (PRC), Vietnam, Mexico, and Brazil and use selected third-party manufacturers and suppliers in Asia. We are a large consumer of integrated circuits. Distribution methods for our control solutions vary depending on the sales channel, both domestically and internationally.

UEI utilizes third-party suppliers as well as third-party employment or labor agencies. We apply a comprehensive approach to map the value chain, utilizing a variety of tools to gather critical information. This includes identifying the location of suppliers, understanding the flow of materials and key dependencies, assessing suppliers' ability to provide goods and services, and evaluating risks related to the delivery of goods and services. Additionally, UEI considers sustainability risks, including human rights risks. To achieve this, UEI leverages internal supply chain mapping and program management tools, supply chain management (SCM) systems, external third-party due diligence tools, and the Responsible Business Alliance's supply chain and CSR management platform (RBA Online). The scope of this mapping encompasses tier 1 suppliers who provide raw materials, material components, and services. All tier 1 direct suppliers are included in UEI's supply chain mapping, along with critical tier 1 indirect suppliers. For the purposes of this document, direct suppliers provide goods or services such as raw materials, components, machinery, and equipment that are directly used in the production process or are integral to the final product, while indirect suppliers provide goods or services like office supplies, maintenance services, IT support, and utilities that support business operations but are not directly involved in the production process.

Policies in Relation to Slavery and Human Trafficking

Our Global Human Rights Policy is aligned with internationally recognized human rights principles defined by the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. Our due diligence procedure incorporates international labor and human rights standards into UEI's ethics and sustainability management system, including evaluating and addressing human rights concerns in our supply chain. Our UEI Global Supplier Code of Conduct sets forth our global expectations for our suppliers to respect human rights and to not engage in any involuntary or forced labor and to fully comply with all laws and regulations pertaining to the appropriate and dignified treatment of all workers. UEI's Code of Conduct outlines our commitment to ethical business practices, and we expect all employees and relevant UEI representatives to adhere to these standards diligently. The UEI Code of Conduct, Supplier Code of Conduct, and Global Human Rights Policy have been translated into local languages and are accessible to all employees through our intranet. English versions of these policies are available on our public website.

Modern Slavery and Child Labor Risks

UEI has identified components of our activities and supply chains that carry a risk of forced labor or child labor being used and will continue to strive to identify emerging risks:

- The locations of activities, operations, or factories
- The types of products sourced
- The raw materials or commodities used in supply chains
- The use of outsourced, contracted, or subcontracted labor

UEI has identified the following sectors and industries that represent a risk to forced labor or child labor risks in activities and supply chains:

- Mining, quarrying, and/or oil and gas extraction
- Manufacturing
- Professional, scientific, and technical services

UEI has not identified forced labor or child labor in our activities and supply chains and has not identified loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labor or child labor in our activities and supply chains.

Steps to Prevent and Reduce Risks of Modern Slavery and Key Performance Indicators

RBA guidelines are followed for the supplier risk assessment process. All major suppliers, as defined by the RBA, are required to complete the RBA self-assessment questionnaire (SAQ). We utilize third-party due diligence platforms to screen major suppliers for sustainability and ethics concerns. Onsite audits for supplier onboarding and annual recertification are conducted as part of the supplier quality management (SQM) system to ensure quality and CSR compliance across the supply chain. A key component of SQM audits is a CSR audit which evaluates suppliers' sustainability practices using the RBA VAP Standard. Based on the results of these various risk assessments, 50% of high-risk direct suppliers and 25% of high-risk indirect suppliers are required to complete an on-site third-party RBA Validated Audit Process (VAP) audit or equivalent acceptable third-party process.

Universal Electronics supports ending the violence and human rights violations in the mining of certain minerals from a location described as the "Conflict Region," which is situated in the Democratic Republic of the Congo (DRC) and surrounding countries. We have conducted a good faith reasonable country of origin inquiry (RCOI) regarding minerals included in our products to determine whether any of the minerals originated in the conflict region and/or whether any of the minerals may be from recycled or scrap sources. Where applicable, we have conducted additional due diligence regarding the sources of the Subject Minerals.

UEI has established a third-party ethics hotline, the UEI Ethics Line, which is a crucial avenue for individuals to report their concerns. Information about the Ethics Line is distributed to all employees in

their local language through onsite training and company-wide communications, and the link is available to all stakeholders on our website. To better enforce our zero tolerance of forced labor, we provide mandatory compliance training to all our employees which includes courses on the identification and reporting of forced labor and other unlawful labor practices. These trainings are done through a combination of e-learning platforms and onsite classroom training.

A summary of our efforts related to Modern Slavery include:

- Conducting internal and external human rights risk assessments in our operations and supply chains.
- Developing and implementing an action plan for addressing modern slavery and child labor.
- Assessing employee recruitment practices and controls to ensure employees are recruited voluntarily.
- Requiring suppliers to maintain policies and procedures prohibiting forced labor in their activities and supply chains.
- Developing and implementing grievance mechanisms.
- Implementing third-party auditing of suppliers and engaging in third-party audits in our factories.
- Conducting a good faith reasonable country of origin inquiry (RCOI) for sourced minerals.
- Supplier engagement, capacity building, and training in areas of ethics and compliance.
- Training our employees to identify signs of forced labor and how to report concerns directly to management or through the UEI Ethics Line.
- Training of supply chain personnel on ethical procurement practices.
- Implementing tools to identify risks related to human trafficking and child labor in our supply chain.
- Conducting reviews and audits of the organization's policies and procedures related to forced labor and child labor.
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms, and numbers of contracts with anti-forced labor and -child labor clauses.

Approval and Attestation

At Universal Electronics Inc, we take our commitment to ethical business practices and compliance with all applicable laws and regulations very seriously. We are steadfast in our dedication to eradicating forced labor and child labor and safeguarding human rights, continuously working to guarantee the integrity of our supply chains by preventing any instances of exploitation or mistreatment.

UEI will continue to operate in compliance with all applicable modern slavery and child labor laws and relevant international standards including the Responsible Business Alliance (RBA) Code of Conduct.

I, Richard A. Firehammer, Jr., have performed a comprehensive examination the Universal Electronics Inc. (UEI) Statement on Modern Slavery and Child Labor and attest to its completeness and accuracy.

Sincerely,

Richard A. Firehammer, Jr.
Senior Vice President, General Counsel and Head of Global Compliance
Universal Electronics Inc.