



Owner/Author:

Global Compliance Department

Revision Date:

10/12/2023

## Our Commitment

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Universal Electronics Inc. (“UEI” or “The Company”) is committed to upholding and respecting the fundamental human rights of all individuals affected by our operations, products, and services. UEI acknowledges its responsibility to ensure that human rights are protected, respected, and upheld in all aspects of our global business operations and throughout our supply chain. This policy is aligned with internationally recognized human rights principles defined by the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. As a member of the Responsible Business Alliance (RBA), we are also committed to adhere to the RBA’s Code of Conduct.

## Principles

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UEI is dedicated to the following core principles to protect and promote human rights:

- UEI will comply with all relevant international, national, and local laws, regulations, and treaties that protect human rights. This includes the California Transparency Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015.
- Under no circumstances will we ever tolerate forced labor in any form at any of our locations and we hold each of our employees to these standards.
- UEI strictly prohibits the use of child labor in any form within its operations and supply chain. We do not engage in any activities that exploit or employ individuals who are below the legal working age or fail to meet the local minimum working age standards as per applicable laws and international conventions.
- We are dedicated to upholding fair employment practices. This includes ensuring reasonable working hours that adhere to local laws and industry standards, promoting safe working conditions, and providing fair compensation in accordance with prevailing wage regulations. Employees must follow all applicable occupational safety and health laws.
- UEI is a fair and equal opportunity employer and strives to provide our employees with a work environment free of discrimination and harassment. We are committed to and respect all human rights to all employees regardless of a person’s race, color, age, national origin, ancestry, religion, sex, marital status or any other protected status. We are dedicated to protecting the rights of vulnerable groups, including women and minorities.
- UEI supports the rights of employees to freely associate and engage in collective bargaining in accordance with local laws, regulations, and labor relations and employment practices.
- UEI will ensure that its supply chain partners adhere to the same human rights principles, and we will work to prevent human rights violations in our supply chain.



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## **Due Diligence**

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UEI will conduct ongoing due diligence to identify, prevent, and mitigate potential adverse human rights impacts of our operations and business relationships. Our practice is to monitor, detect, and prevent instances of human trafficking and slavery in our business and supply chain. We employ processes and tools for due diligence of our employees and our suppliers at all tiers. Our human rights due diligence system includes conducting regular audits of our own facilities as well as auditing our supply chain. We align our due diligence human rights system with the globally recognized RBA standards to ensure robust monitoring processes.

## **Training**

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UEI provides company-wide training programs to ensure awareness and understanding of human rights. All employees are required to undergo this training. Additional training will be provided to employees with direct responsibility for supply chain management. We will regularly evaluate our training and awareness programs to assess needs and address changes in applicable laws and circumstances.

## **Reporting and Transparency**

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Our employees are encouraged to notify the Company if they notice or suspect any wrongdoing. UEI's confidential ethics hotline enables our employees to report any suspected violations of applicable laws or policies and any human rights concerns related to our operations. These grievances will be handled promptly, impartially, and, to the extent practicable, confidentially.

## **Review and Improvement**

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The UEI management team is responsible for ensuring that this policy is implemented and for acting against any violation of this policy.



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## Responsibility

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The UEI management team is responsible for ensuring that this policy is implemented and for acting against any violation of this policy.

## Applies To

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This policy applies to all global UEI locations and all employees, management, and members of the Board of Directors. Our suppliers are expected to adhere to this policy, the UEI Global Supplier Code of Conduct and Fair Competition Policy, and the RBA Code of Conduct.

## Reference Documents

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UEI policies are often associated with other policies and procedures, therefore, must be read in conjunction with other policies and procedures. All UEI Compliance policies and procedures can be found on [UEI's intranet](#). For any questions or queries, please contact Global Compliance at: [globalcompliance@uei.com](mailto:globalcompliance@uei.com)

## Revision History

No.	Description	Revision Date
1	Initial release	10/12/2023