



Universal Electronics Inc. Global Supplier Code of Conduct

Effective Date: October 1, 2025

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Dear Supplier,

At Universal Electronics Inc. and its affiliated companies (“UEI”), we view ethical conduct as both a moral obligation and a foundation for long-term business success. This Global Supplier Code of Conduct (“Code”) defines our expectations for all suppliers, vendors, contractors, consultants, agents, and service providers (“Suppliers”) engaged with UEI now or in the future. By aligning with this Code, Suppliers help UEI meet regulatory obligations, uphold shared values, and build sustainable, transparent partnerships.

As a committed member of the Responsible Business Alliance (RBA), UEI upholds the RBA Code of Conduct and expects Suppliers to adopt its principles or equivalent standards. This includes completing self-assessments when applicable and cooperating with audits or evaluations conducted by UEI or its partners. Suppliers are also encouraged to promote these standards throughout their own supply chains. The RBA Code of Conduct can be found at www.responsiblebusiness.org.

Supplier's Responsibilities and Obligations

1. Human and Labor Rights

1.1 Prohibition of Forced Labor

Suppliers must uphold fundamental human rights and must not use any form of forced, bonded, indentured, or prison labor, including labor obtained through slavery or human trafficking. This includes the recruitment, harboring, or transportation of persons through coercion, threat, or fraud. Workers must have freedom of movement within facilities and living quarters. Suppliers must implement reasonable due diligence processes to prevent and address risks of forced labor in their operations and supply chains. Suppliers are required to provide training on the prevention of forced labor and human trafficking to all relevant employees.

1.2 Ethical Recruitment and Hiring

Suppliers must provide all workers with a written employment agreement, in their native language or its local equivalent, outlining terms and conditions of the employment. Foreign migrant workers must receive this agreement before departing their home country. All work must be voluntary. Workers may resign without penalty, given reasonable notice. Suppliers and their agents must not retain or confiscate identity documents unless legally required, and even then, workers must have access to them at all times. Recruitment fees must not be charged to workers. If found, such fees must be reimbursed or returned to workers. Suppliers should monitor third-party recruiters to ensure compliance with these standards.

1.3 Working Hours and Rest

Suppliers must comply with all applicable laws on working hours and wages. Workweeks must not exceed 60 hours or the maximum number prescribed by applicable local laws, whichever is lower, including overtime, except in emergencies. Overtime must be voluntary and compensated at legally mandated rates. Workers must receive at least one day off every seven days.

1.4 No Child Labor

Suppliers must comply with the International Labour Organization (ILO) Conventions 138 and 182 related to minimum age and worst forms of child labor. Suppliers must not employ anyone who is younger than 15 years old, the age at which compulsory education ends, or the legal minimum age for employment in their country, whichever of these is highest. Workers under 18 must not perform hazardous work or night shifts. Student workers must be properly managed, fairly compensated, and protected under applicable laws. If child labor is discovered, suppliers must provide remediation. Suppliers must maintain robust age verification procedures.

1.5 Fair Working Conditions

Suppliers will promote fair and respectful working conditions and ensure open communication with workers that is conducted in a language and manner they clearly understand. Suppliers should implement grievance mechanisms that allow workers to raise concerns anonymously and without retaliation.

1.6 Wages and Benefits

Suppliers must comply with all wage and benefit laws, including minimum wage, overtime, and social insurance. Workers must receive clear, timely wage statements. Overtime must be paid at appropriate rates in compliance with local laws and regulations. Wage deductions or withholding as discipline are prohibited.

1.7 Non-Discrimination and Harassment

Suppliers must hire and promote based on merit. Discrimination or harassment based on race, ethnicity, religion, age, nationality, gender, marital status, political affiliation, sexual orientation, disability, or other protected characteristics is prohibited. No worker shall be subject to violence, abuse, coercion, or harassment. Disciplinary policies must be clearly communicated. Suppliers must provide reasonable accommodations for religious practices and disabilities. Medical testing must not be used in a discriminatory manner and should only be conducted if legally required. Suppliers are encouraged to train managers on inclusive practices and anti-harassment policies.

1.8 Freedom of Association and Collective Bargaining

Suppliers must respect workers' rights to form or join trade unions, bargain collectively, and engage in peaceful assembly. Where these rights are restricted by law, suppliers must allow alternative lawful forms of worker representation. Workers must be able to communicate openly with management without fear of retaliation.

2. Safe and Healthy Working Conditions

2.1 Safe Working Environment

Suppliers must provide a safe and healthy workplace in compliance with all applicable laws, including maintaining effective policies on workplace safety, accident prevention and investigation, hazardous materials handling, and ergonomics. If housing is provided, it must also meet all health and safety standards. Suppliers should regularly assess and improve safety practices.

2.2 Hazard Identification and Risk Control

Suppliers must identify, assess, and mitigate health and safety risks. Where risks remain, workers must be provided with appropriate, well-maintained personal protective equipment (PPE) and training. Gender-responsive measures must be implemented, including, at a minimum, the prohibition of hazardous work for pregnant or nursing workers, and the provision of reasonable accommodations to support nursing mothers.

2.3 Occupational Injury and Illness Management

Suppliers must implement systems that prevent, track, and report injuries and illnesses; encourage worker reporting without fear of retaliation; provide medical treatment and support return-to-work efforts; and investigate incidents thoroughly while implementing corrective actions. Workers must be allowed to remove themselves from imminent danger without fear of reprisal.

2.4 Industrial Hygiene

Suppliers must identify, evaluate, and control exposure to chemical, biological, and physical agents. When risks cannot be fully mitigated, PPE must be provided free of charge. Suppliers must monitor workplace conditions and worker health and provide ongoing occupational health programs and training. Suppliers should maintain records of exposure assessments and health monitoring.

2.5 Emergency Preparedness

Suppliers must identify potential emergencies and implement response plans that include emergency reporting and evacuation procedures, worker training and drills, fire detection and suppression systems, clearly marked exits and accessible emergency contact information, as well as recovery and continuity plans. Plans must prioritize the protection of life, the environment, and

property. Emergency drills must be conducted at least once per year, or more frequently if required by local laws, whichever requirement is stricter.

2.6 Training and Communication

Suppliers must provide workers with training and information about workplace hazards and health and safety policies that is clearly communicated in a language they understand. Health and safety information must be posted in accessible locations and in local languages. Workers must be encouraged to raise concerns or report grievances through anonymous and retaliation-free channels, such as ethics hotlines or whistleblower systems.

3. Environmental Protection and Management

3.1 Environmental Responsibility and Compliance

Suppliers must operate in a manner that protects the environment and complies with all applicable environmental laws and regulations. Suppliers must obtain, maintain, and comply with all required environmental permits, approvals, and registrations. All environmental reporting obligations must be met. Suppliers must maintain complete records of all environmental monitoring and reporting activities and make them available to UEI or relevant authorities upon request. Suppliers must also meet any additional environmental requirements in product specifications or contracts with UEI. Suppliers are encouraged to adopt environmental management systems (e.g., ISO 14001) to support continuous improvement.

3.2 Environmental Impact Minimization

Suppliers must minimize adverse impacts on the environment, natural resources, and surrounding communities. Suppliers must assess environmental risks throughout their operations and supply chains and implement appropriate mitigation strategies. Suppliers must reduce waste by implementing measures such as process optimization, material substitution, and the recycling or reuse of materials. Hazardous materials must be identified and managed to ensure safe handling, storage, use, transport, and disposal. All wastewater and solid waste must be properly classified and monitored, treated as necessary prior to discharge or disposal, and managed in full compliance with applicable laws and regulations. Air emissions must be identified and regularly monitored, effectively controlled, and properly treated before being released into the environment.

3.3 Energy and Greenhouse Gas (GHG) Emissions

Suppliers must monitor and manage their energy use and greenhouse gas (GHG) emissions in compliance with applicable laws. This includes measuring Scope 1, Scope 2, and, where feasible, Scope 3 emissions. Upon request, suppliers must provide UEI with accurate and timely emissions data and other relevant environmental metrics. Suppliers are encouraged to improve energy efficiency, reduce emissions intensity, and publicly disclose their emissions performance and reduction targets. Suppliers are encouraged to set emissions reductions targets, such as those under the Science Based Targets initiative (SBTi).

4. Legal and Ethical Compliance

4.1 Compliance with Laws and Trade Regulations

Suppliers must comply with all applicable local, national, and international laws and regulations in the jurisdictions where they operate. Suppliers are expected to monitor legal developments and

update their compliance programs accordingly. Suppliers must implement adequate procedures to ensure that transactions with third parties do not violate economic embargoes, sanctions, or trade, import, and export control regulations, including those related to anti-terrorism and anti-money laundering. Suppliers are expected to conduct appropriate due diligence and implement controls to prevent such violations throughout their supply chain. All suppliers are expected to exercise due diligence in managing their supply chains and to take all reasonable measures to ensure that their own suppliers fully comply with all applicable laws and regulations. Suppliers must establish and maintain effective monitoring systems, conduct regular assessments, and promptly address any instances of non-compliance. Each supplier is responsible for fostering transparency, promoting ethical practices, and ensuring that legal standards are consistently upheld across every tier of their supply network.

4.2 Anti-Corruption

Suppliers are required to comply with all applicable anti-bribery and anti-corruption laws in the jurisdictions where they operate. Suppliers must not, directly or indirectly, offer, give, solicit, or accept bribes, kickbacks, or anything of value intended to gain an improper business advantage or influence decision-making. They must not provide facilitation payments to government officials to expedite routine actions, nor may they offer gifts, favors, or anything of value to UEI employees with the intent to influence business decisions. Suppliers must also refrain from engaging in any conduct that would cause UEI to violate applicable anti-corruption laws or regulations. Suppliers must also ensure that all relevant personnel, agents, subcontractors, and authorized representatives are informed of their obligations under this policy and must maintain accurate books and records for all transactions involving UEI.

4.3 Protection of Confidential Information and Intellectual Property

Suppliers must protect all confidential information from unauthorized disclosure or misuse, in accordance with any non-disclosure agreements with UEI and all applicable laws governing trade secrets and data protection, and must also respect and safeguard the intellectual property rights of UEI and any third parties.

4.4 Fair Competition

Suppliers must uphold fair and open competition and must not enter into anti-competitive agreements with competitors, customers, or distributors; engage in price-fixing, market allocation, or bid-rigging; or exchange competitively sensitive information with competitors.

5. Violations, Reporting, and Remedies

5.1 Continuing Compliance, Recordkeeping, and Audit

This Code is an integral part of UEI's relationship with its suppliers. While the Code cannot cover every situation, suppliers are expected to act with honesty, integrity, and sound judgment at all times. Suppliers must keep accurate records to show compliance with this Code and regularly conduct internal reviews, audits, and risk-based due diligence to prevent violations. UEI may verify compliance through audits or assessments. Suppliers must promptly correct any identified issues.

5.2 Violations and UEI's Remedies

Suppliers are expected to cooperate fully with UEI in any compliance-related inquiries, audits, or investigations. If a supplier is found to be in violation of this Code, or if there is credible evidence of inconsistent compliance, UEI reserves the right to take action proportionate to the severity of the violation or non-compliance. Remedies may include, but are not limited to:

- Suspension or termination of the business relationship without notice or compensation
- Revocation of supplier's vendor qualification
- Legal action to recover damages or penalties
- Reporting the violation to relevant authorities for investigation or prosecution

Suppliers agree to indemnify and hold UEI harmless from any liabilities, damages, penalties, or fines incurred as a result of the supplier's violation of this Code, including violations committed by subcontractors, agents, or upstream suppliers acting on the supplier's behalf.

5.3 Reporting Violations

Suppliers are required to report any known or suspected violations of this Code or applicable laws.

Reports may be submitted through the UEI Ethics Reporting Portal at ethicsline.uei.com.

Anonymous reporting is permitted to the extent permissible by law or as investigations allow.

Alternatively, suppliers may contact the Global Compliance team directly at

globalcompliance@uei.com.

6. Supplier’s Acknowledgement

Supplier hereby represents and warrants as follows: It has reviewed and understood this Code of Conduct in its entirety. As a trusted supplier of UEI, in addition to adhering to all contractual obligations with UEI, Supplier will adhere to all aspects of this Code. Supplier will also timely correct any violations and noncompliance. By signing, Supplier commits to comply with the content of this Code of Conduct.

Supplier Company Name: _____

Address: _____

Name of Signing Person: _____

Title of Signing Person: _____

Authorized Signature: _____

Date: _____

Company Chop (if applicable)