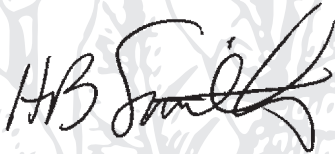


Non-Retaliation Policy

Each employee, officer, and director has an obligation to report possible violations of the Code of Conduct so the conduct can be considered and Universal can address the situation and take appropriate action.

No one in the Universal family will take any adverse action against anyone for providing truthful information relating to a violation of law or Universal policy.

Universal will not tolerate **any** retaliation against persons asking questions or making good faith reports of possible violations of the Code of Conduct. **Anyone** who retaliates or attempts to retaliate will be disciplined. Any person who believes he or she has been retaliated against should immediately follow the instructions in the “What to Do” section of the Code of Conduct.



Harvard B. Smith
Chief Compliance Officer

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