

Political Involvement Policy

It is the policy of Universal Display Corporation (UDC) not to make contributions to candidates or political parties in federal elections, at the state or local levels, or outside the United States. Similarly, it is the policy of UDC not to make any direct lobbying expenditures. UDC will file all information statements required by United States federal, state and local campaign finance and disclosure laws. UDC strives to comply with all applicable laws that require reporting on lobbying and related activities.

UDC does not spend any corporate funds on political advocacy and therefore does not have any related political recipients or objectives. Prior approval from the President of UDC would be required before any UDC funds could be used for political contributions or lobbying purposes. In such a scenario, if President approval is received, the company would update this Political Involvement Policy and disclose the use, amount and recipient of such funds.

UDC does not control, direct or influence any employee's political activities or affiliations. Employees engaging in personal political activity must do so as private citizens, not during paid work hours, and without using company resources for political purposes. Employees must comply with all applicable laws in this regard, and those individual efforts must not in any way suggest UDC's support. Any employee who believes that there is a conflict between applicable law and our policies, or who feels that a violation of a policy has occurred may report such through the Director of Human Resources.

UDC reviews this policy periodically and we reserve the right to update, change or replace any part of it at any time, at our discretion, with or without prior notice.

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