



UNIVERSAL TECHNICAL INSTITUTE, INC.

Human Rights Policy

At Universal Technical Institute, Inc. (the “**Company**”), we believe that demonstrating strong financial performance while also promoting awareness and respect for fundamental human rights is an essential part of our vision and corporate success. Although many of the Company’s policies evidence its commitment to respecting and promoting human rights, we continuously seek to address and improve our approach to the advancement of this global issue. We support the human rights principles generally reflected in the following:

- International Labour Organization’s Declaration on Fundamental Principles and Rights at Work;
- UN Guiding Principles on Business and Human Rights; and
- Universal Declaration of Human Rights.

Although governments have the ultimate responsibility for establishing and enforcing the fundamental human rights of their citizens, we believe it is our social responsibility to contribute to the advancement of human rights throughout our operations. We believe that businesses in general can play a meaningful role in promoting human rights through collaboration and corporate accountability. Our Company strives to conduct its business in a manner that is consistent with fundamental human rights principles, including:

- opposing forced or compulsory labor and human trafficking (ILO 29, 105, 138 and 182);
- opposing child labor (ILO Conventions 138 and 182); and
- opposing discrimination relative to employment and occupation (ILO Conventions 100 and 111).

We believe that honoring and promoting fundamental human rights is consistent with our commitment to operating in accordance with the legal and ethical considerations. These principles are outlined in the Company’s Code of Conduct (the “**Code**”). We strive to operate in compliance with all applicable laws wherever we do business and believe in exercising sound judgment and acting ethically even where the law is not specific.

Adoption and Oversight

The Nominating and Corporate Governance Committee is charged with considering and advising the Company's Board of Directors on social responsibility matters, reviewing and recommending appropriate social responsibility goals, policies and practices, and reviewing and monitoring key performance targets relating to social responsibility matters. In furtherance of this responsibility, the Nominating and Corporate Governance Committee commissioned the formation of a management-level Environmental, Social and Governance Steering Committee (the "ESG Committee") that is tasked with adopting corporate responsibility policies and practices, and strategically implementing them into the Company's business operations.

Scope

We seek to understand our impact to human rights across our operations, including our activities at our corporate offices, campuses, in our supply chain, and with our vendors and other business partners. We strive to create a safe, inclusive, and respectful atmosphere in which our operations can flourish, and we expect the same commitment from the customers, vendors and partners we engage with. We strive to avoid contributing to adverse human rights impacts and seek to address, analyze and mitigate the human rights risks that arise in connection with our operations.

Human Rights Core Values

Equal Employment Opportunity. We offer equal employment opportunities to all our employees without distinction as to the employee's demographic status (e.g., age, gender, religion, marital status, belief, race, ethnicity or nationality, political orientation, maternal status, sexual orientation or disability).

Anti-Discrimination. We are against discrimination of any kind and strive to ensure that all employees are treated with the dignity and respect they deserve regardless of their demographic status (e.g., age, gender, religion, marital status, belief, race, ethnicity or nationality, political orientation, maternal status, sexual orientation or disability). We support accessibility and work to ensure that those with disabilities are provided with accommodations.

Ethical Behavior. We ensure that all of our employees receive regular training on the requirements of the Code and other corporate policies, including the Company's policies relating to reporting violations or concerns, insider trading, and the principles outlined in this policy.

Privacy. We conduct our business in line with the letter and spirit of applicable law and are committed to protecting individual employee data.

Community Development. We seek to foster a corporate culture where our many stakeholders, including our employees, students, vendors and partners engage on the topic of community development and collaborate to extend resources towards the advancement of this principle.

Fair and Competitive Compensation. We are committed to compensating our employees fairly and at competitive industry rates while, at the same time, monitoring our compensation programs to ensure we are continuously attracting and retaining top talent.

Training and Development. We are committed to training and developing talent within our organization and, under the guidance of our executive management team, continuously seek opportunities to identify, train and promote employees to more senior positions.

Retention. We continuously seek to understand and identify positions within our operation, if any, that are at a greater risk of employee turnover and strive to mitigate such risks through training and development programs tailored to specific positions or roles.

Safe Workplace. We have zero-tolerance for any kind of violence, threats of violence, harassment or intimidating conduct, in any manner, in the workplace or at work related functions. We strive to ensure that all our employees are free to work in an environment that is safe from violence, threats of violence, harassment or intimidating conduct.

Health and Wellness. We strive to create a safe and sustainable work environment where our employees are free to perform their jobs absent exposure to job-related illness or workplace accidents. We seek to provide our employees with competitive health and wellness benefits and ensure that they receive adequate and periodic health and safety training. We strive to identify, monitor, address and record workplace accidents should they arise with the aim of initiating preventative measures and ensuring business continuity.

Workplace Continuity. We believe that each of our employees plays a significant role in our organization and that sustainability is important to any long-term successful operation. In pursuing business continuity, we strive to ensure that our eligible employees have the means to work remotely in the event that need should arise provided their primary responsibilities can be performed remotely.

Child Labor & Forced Labor. In furtherance of the international efforts led by the UN, ILO and other organizations, we strive to uphold the highest level of ethics and responsibility when it comes to opposing child and force labor.

Ethical Supply Chain. We are committed to mitigating human rights and other social risks in our operations, including our interactions with vendors and other strategic partners.

Policies Within Our Society

We strive to perform the role of a responsible corporate citizen and to positively contribute to the advancement of human rights within our operations and our local communities. We believe that a responsible corporate citizen has a social responsibility to partner with organizations to promote a culture of social responsibility within its community. In furtherance of this belief, we strive to partner with and support local charitable organizations that we believe are contributing to the growth and development of the community. Where appropriate we strive to support multi-collaborative efforts to advance fundamental human rights standards for all businesses.