

UNIVERSAL INSURANCE HOLDINGS, INC.

POLICY FOR HANDLING COMPLAINTS REGARDING ACCOUNTING, AUDITING AND CODE OF CONDUCT MATTERS

Revised as of October 24, 2018

This Policy for Handling Complaints Regarding Accounting, Auditing and Code of Conduct Matters (“Policy”) of Universal Insurance Holdings, Inc. and its subsidiaries (collectively, the “Company”) establishes procedures for:

- the receipt, retention and treatment of complaints received by the Company regarding (i) accounting, internal accounting controls or auditing matters (“Accounting Matters”) or (ii) violations of the Company’s Code of Business Conduct and Ethics (“Code of Conduct Matters”); and
- the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters.

The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices and its Code of Business Conduct and Ethics (“Code of Conduct”). Employees are reminded that it is their duty to report evidence of misconduct and to raise concerns through any of the channels available to them, including supervisors, the legal department, or the procedures set forth under this Policy. The Audit Committee has adopted this Policy and oversees treatment of employee concerns in this area.

I. Scope of Matters Covered by This Policy

This Policy sets forth procedures whereby an employee of the Company or a third party may submit a complaint or concern relating to any questionable Accounting Matters or Code of Conduct Matters on a confidential, anonymous basis. Such matters may include, without limitation:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiency in or noncompliance with the Company’s internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company; or deviation from full and fair reporting of the Company’s financial condition; and

- potential violation of the Company's Code of Conduct or any other act or omission that could be or could lead to illegal or unethical behavior.

II. Submission of a Complaint

Employees are encouraged to go to their immediate supervisors or through other normal channels to discuss complaints or concerns or ask questions about this Policy, should they feel comfortable doing so. Although an employee is not expected to prove the truth of any allegation, he or she should be able to demonstrate that the complaint or concern is in good faith with reasonable factual support. In the event that an employee would prefer to submit any complaint or concern on a confidential basis, he or she may do so as described below.

Hotline. The Company has established the following toll-free telephone number, **877-778-5463**, maintained by an independent third-party contractor, whereby employees and third parties may submit any complaint or concern regarding questionable Accounting Matters or Code of Conduct Matters. Complaints or concerns submitted through the toll-free number are transcribed and forwarded to the Audit Committee with a copy sent to legal counsel of the Company for record keeping. An employee of the Company has the option to disclose his/her identity or remain anonymous. Individuals are encouraged to identify themselves to permit the Company to further investigate the matter, ask follow-up questions and to report the remedial action taken to the submitter. However, identification for employees is not mandatory. All non-employees must identify themselves.

Mail: An employee of the Company, or third party, may also submit a concern or complaint regarding any Accounting Matter or Code of Conduct Matter by mail addressed to the Chair of the Audit Committee as follows:

PRIVILEGED AND CONFIDENTIAL
Audit Committee Chair
c/o Universal Insurance Holdings, Inc.
1110 West Commercial Boulevard
Fort Lauderdale, Florida 33309

III. Reporting and Retention of Complaints

Each complaint or concern will be reviewed to determine whether it pertains to an Accounting Matter or a Code of Conduct Matter. Complaints or concerns relating to Accounting Matters will be handled under the Audit Committee's direction. Complaints or concerns relating to the Code of Conduct will be referred to the Company's Audit Committee for review as provided for under the Code of Conduct. When possible, the receipt of the complaint or concern will be acknowledged.

Confidentiality will be maintained to the fullest extent possible and legally permitted, consistent with the need to conduct an adequate review. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee or its designee conducting the review. In determining whether the Audit Committee should require special treatment of any

Accounting Matter or Code of Conduct matter, the Audit Committee will consider, among any other factors that are appropriate under the circumstances, who the alleged wrongdoer is, the severity of the alleged wrongdoing, the credibility of the allegation and whether similar allegations have been made in the past.

A log will be maintained of all complaints, tracking their receipt, investigation and resolution. Copies of complaints and related records will be maintained in accordance with the Company's document retention policy.

IV. Treatment of Complaints; No Retaliation

Any employee of the Company may submit a good faith complaint regarding Accounting Matters or Code of Conduct Matters to the Audit Committee or management of the Company without fear of dismissal or retaliation of any kind.

The Company will protect the confidentiality of those making reports of possible misconduct to the maximum extent permitted by law, consistent with the need to conduct an adequate review. In no event will there be any retaliation against someone for reporting an activity that he or she in good faith believes to be a violation of any law, rule, regulation or internal policy. It is unlawful to retaliate against a person, including with respect to their employment, for providing truthful information to a U.S. federal regulatory or law enforcement agency, Congress or a person with supervisory authority over an employee regarding conduct that the employee reasonably believes violates U.S. securities or antifraud rules. Any supervisor intimidating or imposing sanctions on someone for reporting a matter will be subject to discipline up to and including termination.

This policy is intended to encourage and enable employees to raise good faith concerns about questionable or illicit conduct to designated personnel at the Company prior to providing any notification outside the Company. However, nothing in this policy is intended to prevent or discourage an employee from reporting information to the appropriate governmental agency when the employee has reasonable cause to believe that a violation of law has occurred.

V. Communication to Employees

This Policy and any procedures implementing the Policy will be periodically communicated to the employees of the Company and posted on the Company's internal website.

VI. Amendments

This Policy may be amended from time to time as determined by the Audit Committee.