

Investnet Supplier Code of Conduct

This Supplier Code of Conduct (“Code of Conduct” or “Code”) applies to Investnet suppliers and their supply chain (“Supplier”). Our Supplier Code of Conduct is designed to reflect the values and ethics of Investnet and is Investnet’s minimum expectations concerning Supplier human rights, environmental practices, and business ethics. We ask our Suppliers to act in accordance with the principles outlined in this document and adherence to its principles is a material factor in our vendor due diligence processes.

This Code is not intended to create a contract or agreement between Investnet and its Suppliers. Violation of Investnet’s Supplier Code of Conduct may result in the termination of Supplier agreements with Investnet.

Our Values

INNOVATION is what differentiates Investnet’s products and services from our competitors. It is also the way we respond to client needs and industry trends, and drive productivity through continuous process improvement and the maximization of resources.

CLIENT SERVICE is the hallmark of Investnet’s brand. We build our business by exceeding our clients’ expectations, listening to, and anticipating their needs, and earning their trust; and we believe in treating our colleagues and partners with the same level of integrity and respect.

COLLABORATION is critical to Investnet’s ability to stay ahead of the demands of our ever-changing industry. Together, through a culture of generosity, open communication, and sharing, we can uphold our mission and shape our industry.

ACCOUNTABILITY is intrinsic to maintaining our clients’ trust, our colleagues’ confidence, and our own integrity. At Investnet we aim for transparency and responsibility in all that we do. By standing behind our work, we can build a stronger business and more lasting client relationships.

INCLUSION AND RESPECT is how we treat each other, partners, and clients. By nurturing these values and culture, we embrace differences, and appreciate the strength and value of a diverse workforce. We believe that a respectful, innovative, and collaborative workplace attracts the best talent and ultimately fosters the best financial outcomes for advisors and their investors.

Our Ethics

Investnet is committed to the long-term success of our business, as well as our shareholders, customers, and employees, through strong corporate governance and ethical business practices. Investnet fully supports the basic rights and freedoms of all individuals, including women and diverse groups, in accordance with the human rights principles enumerated in the United Nations Universal Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.

Investnet desires to do business with Suppliers that share our values, promote ethical business practices, and support the basic rights and freedoms of all individuals.

Compliance

Compliance With The Code

Supplier will self-monitor and demonstrate compliance to the Code, put appropriate management systems in place, and take necessary steps to comply with this Code, including transparency concerning policies, practices, and related employee education. Supplier will advise Envestnet of non-compliance with Code, laws, regulations, or events that will hinder the delivery of goods, services, or may affect Envestnet's reputation and/or business.

Reporting And Monitoring

Supplier will self-monitor their compliance with the Code when doing business with or on behalf of Envestnet. Adherence with this Code may be subject to periodic review by Envestnet.

Suppliers are encouraged to seek guidance on potential violations and self-report violations or noncompliance with the Code in a timely manner to Envestnet using the Suppliercodeofconduct@envestnet.com email address. Envestnet will promptly investigate all reported violations. Supplier is expected to cooperate in such investigations. If corrective action is required, Envestnet will decide what steps are to be taken to rectify the problem and avoid the likelihood of its recurrence.

Human Rights And Labor Rights

Supplier will uphold the human rights of their workers and treat them with dignity and respect. Disciplinary policies and procedures in support of these requirements will be clearly defined and communicated to workers.

Human Trafficking

Supplier has a responsibility to take a robust approach to identifying, eradicating, and preventing human trafficking from its operations and supply chains.

Envestnet will from time to time assess and review the risk that human trafficking may be occurring in Supplier. Envestnet may from time to time seek specific reassurances from Supplier; and seek to carry out due diligence or specific audits either itself or through third parties to satisfy itself that modern slavery and human trafficking violations are not occurring.

Humane Treatment

There is to be no harsh or inhumane treatment or the threat of: violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers of Supplier.

Freely Chosen Employment: All employment must be freely chosen by the workers of Supplier. Supplier is prohibited from using involuntary labor, such as slave labor or bonded labor, and must comply with all applicable laws. Supplier may not transport, harbor, or recruit persons by means of force, coercion, or fraud. Supplier may not hold employees' identity or immigration documents, unless required by law.

No Child Labor: Supplier must comply with applicable child labor laws and regulations. Supplier will not use Child labor. The term "Child" is any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country. Child labor will not be used in any stage of manufacturing. Supplier may not employ individuals under 18 to work in hazardous conditions. The use of legitimate workplace learning programs, which comply with all

laws and regulations, is supported. Supplier will provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices will be at least the same wage rate as other workers performing equal or similar tasks.

Wages, Working Hours, and Benefits: Supplier's workers' compensation, legally mandated benefits, and overtime hours and extra pay, must comply with applicable compensation laws. Supplier is prohibited from deducting wages as punishment. Working hours are not to exceed the maximum set by local law. A work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers will be allowed at least one day off every seven days.

Non-Discrimination: Supplier is committed to a workplace free of harassment and unlawful discrimination. Supplier may not make any employment decision, including decisions relating to recruitment, hiring, compensation, training, promotion, transfer, discipline, termination, or other personnel matters on the basis of age, race, gender, religion, religious creed, color, national origin, ancestry, citizenship status, physical or mental disability, medical condition, genetic information, marital or civil partner status, pregnancy, childbirth, breastfeeding, gender identity or expression, sexual orientation, military or veteran status, political association, immigration status, or any other characteristics that are protected categories under applicable law. We expect Supplier to maintain measures to prevent workplace harassment. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

Freedom of Association: Supplier must recognize and respect workers' legal rights relating to freedom of association, collective bargaining, and peaceful assembly. Supplier may not intimidate, harass, or discriminate against employees who exercise these rights.

Working Conditions: Supplier must follow applicable laws and regulations relating to health and safety in the workplace. Workers will be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier will be clean and safe, have appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with entry and exit privileges.

Emergency Preparedness: Supplier's potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures will focus on minimizing harm to life, the environment, and property.

Diversity & Inclusion

Prohibition Of All Forms Of Unlawful Discrimination And Harassment

Supplier's operation and supply chain should be free from harassment and discrimination. Supplier is expected to deter conduct that is offensive, degrading, demeaning, unwelcome, disrespectful, discriminatory, or that otherwise may create a hostile working environment.

Diversity And Inclusion

Supplier is expected to develop and support policies in their own organization that promote diversity and inclusion and where all individuals are treated with respect and dignity.

Equal Opportunity Employer And Non-Discrimination

Supplier is expected to be an Equal Opportunity Employer. Supplier is expected to be committed to non-discrimination and equal opportunity, including but not limited to recruiting, hiring, compensation, benefits, promotions, opportunities for advancement, transfers, training, social and recreational programs, and the administration of all other personnel decisions. Accordingly, Supplier will not tolerate discrimination on the basis of age, race, gender, religion, religious creed, color, national origin, ancestry, citizenship status, physical or mental disability, medical condition, genetic information, marital or civil partner status, pregnancy, childbirth, breastfeeding, gender identity or expression, sexual orientation, military or veteran status, political association, immigration status, or any other characteristics that are protected categories under applicable law.

Supplier Diversity

Investnet has an opportunity and desire to hire diverse Suppliers. A diverse supply chain increases the pool of vendors and increases productivity, creativity, and innovation through a range of talents, experiences, and skills. Supplier will endeavor to have a meaningful and effective diverse supplier program.

Access To Systems

When creating any deliverable each Investnet Supplier should endeavor to comply with the latest published version of the international accessibility standard Web Content Accessibility Guidelines (WCAG) Level A and AA, available at <https://www.w3.org/standards/techs/wcag#w3c>

Supplier will adhere to all legal, Investnet-provided accessibility requirements, and standards for creating accessible devices, products, websites, web-based applications, cloud services, software, mobile applications, content, or services.

Sustainability And Environmental

Supplier is expected to protect the environment and demonstrate a clear understanding of the environmental risks, impacts, and responsibilities associated with their operations, products, and services. Supplier will comply with the following standards and goals:

Sustainable Environmental Practices: Supplier will act to minimize any negative impacts on the environment that arise as by-products of their day-to-day operations and of their own vendor operations. This helps ensure sustainability considerations are managed across the entire value chain. Supplier should strive to monitor and manage environmental risks that are relevant to their industry, including but not limited to: Greenhouse Gas (GHG) Emission and Energy Consumption, Pollution

Prevention and Waste Reduction, Hazardous Substances, Water Consumption, Air Emissions Prevention and Reduction, Resource Usage, Biodiversity and Ecosystem Protection.

Energy Environmental Stewardship: Supplier will minimize or eliminate discharges of pollutants and generation of waste by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Responsible Sourcing of Minerals: Supplier will adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

Demonstrated Commitment to Climate Action and Environmental Sustainability: Supplier's leaders should demonstrate a commitment to climate action. Proper oversight of environmental initiatives is critical to ensuring long-term success.

Anti-Corruption, Conflict Of Interest, Data, Protecting Property, Right To Monitor

Anti-Bribery And Anti-Corruption

Supplier must comply with applicable laws relating to anti-corruption and anti-bribery, which may include but are not limited to the Foreign Corrupt Practices Act (United States) and the Bribery Act (United Kingdom). In addition to any restrictions set forth under applicable law, Envestnet prohibits Supplier from giving or accepting bribes of any type when conducting business with or on behalf of Envestnet.

Conflicts Of Interest

Supplier will disclose any personal or business relationship with any Envestnet employee that could be perceived as a conflict of interest. This includes, but is not limited to, close personal or family relationships with an Envestnet employee. Under no circumstances may a Supplier give an Envestnet employee a gift consisting of cash or any gift, entertainment, meal, or favor if offered in exchange for Envestnet data, services, future sales, or preferential treatment. Additionally, Supplier may not give an Envestnet employee any item of value if such item may create the appearance of improper influence.

Protecting Personal Data

Supplier must comply with all applicable privacy rules and regulations, including but not limited to Envestnet's Information Security and Data Privacy policies and applicable contracts. Supplier will honor data subjects' privacy choices. Supplier will commit to protecting the reasonable privacy expectations of personal information. Supplier will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Supplier will follow, when applicable, the General Data Protection Regulation (GDPR). Supplier is required to respect the intellectual property of third parties by observing copyrights, trade secrets, patents, or other intellectual property protections.

Protecting Property

Supplier may be granted access to Envestnet's data, property, equipment, technology, supplies, and other assets. Supplier must use these assets responsibly. Supplier will protect Envestnet's corporate systems and follow security protocols. Any data or intellectual property shared with Supplier may not be divulged to a third party or replicated without Envestnet's express permission. This includes but is not limited to trademarks, copyrighted material, and trade secrets.

Audio And Video Recording Policy

Supplier is prohibited from recording, or attempting to record, any person, conversation, communication, or activity that occurs at an Envestnet facility or while performing responsibilities for Envestnet unless all persons to be recorded are notified of, and consent to, the recording before it is made. This policy includes conversations or communications and activities that in any way involve Envestnet employees, any customers, or clients, or any other individual with whom Envestnet is doing business or intending to do business in any capacity, including but not limited to, vendors, consultants, attorneys, and independent contractors. Exceptions are the nature of the goods or services provided to Envestnet conducted via a contract or purchase order. Supplier will report incidents of unauthorized recordings to the contacts supplied above in Reporting and Monitoring.

Gifts, Travel & Entertainment

Supplier is prohibited from offering, and Envestnet employees are prohibited from soliciting, demanding, or receiving; any payment, bribe, kickback, gift, or other thing of value to or for the benefit of an Envestnet employee for the purpose of improperly influencing a business decision or obtaining any improper advantage in conducting business with Envestnet or representing Envestnet's interests.

Supplier should carefully consider when offering or providing business entertainment or gifts that could create the appearance of a conflict of interest for the Envestnet recipient. Suppliers are required to exercise sound judgment and comply with this Code and all applicable laws in all matters related to business entertainment and gifts.

Suppliers may provide permissible business entertainment, which includes meals, beverages, recreation, lodging, transportation, and tickets to sporting or other events, in each case if they are associated with a business purpose. Although what constitutes a gift of nominal value will depend upon the circumstances, Supplier should generally consider no more than \$100 per calendar year per Envestnet employee or other entity to constitute nominal value.