



POLICY ON HUMAN RIGHTS, HUMAN CAPITAL DEVELOPMENT AND INFORMATION PROTECTION

GENERAL

Respect for human rights, the development of human capital, and corporate social responsibility and sustainability are fundamental values of Focus Financial Partners Inc. (“*Focus*”)¹ and its subsidiaries, including its partner firms. Additionally, Focus is committed to maintaining a preeminent work environment for its employees.

HUMAN RIGHTS COMMITMENT

In accordance with the UN Guiding Principles on Business and Human Rights, Focus and its subsidiaries, including its partner firms, are committed to protecting and promoting the human rights of their existing and prospective employees (including without limitation women and minority groups, as described further below) through appropriate policies and procedures. At a minimum, each of Focus and its subsidiaries, including its partner firms, complies with all applicable labor and employment-related laws, rules and regulations, and Focus upholds the human rights of all existing and prospective employees, and treats them with dignity and respect, as guided by the principles articulated in the UN Universal Declaration of Human Rights and the Organisation for Economic Co-operation and Development (“*OECD*”) Guidelines for Multinational Enterprises. In furtherance of the foregoing, Focus and its subsidiaries, including its partner firms, will continue to:

- employ only those individuals who meet the applicable minimum legal age requirements, and in no event utilize child labor; the minimum age for employment will be the greater of (i) the

¹ When we use the term “Focus” in this document, we mean Focus Financial Partners Inc. and other headquarters entities, including Focus Financial Partners, LLC and Focus Operating, LLC, and we specify where we intend to refer to our other subsidiaries, including our partner firms, where applicable.

minimum age under local law, (ii) the minimum age pursuant to the Convention Concerning Minimum Age for Admission to Employment adopted by the International Labor Organization or (iii) 15, provided that workers below the age of 18 shall not be involved in work activities likely to jeopardize their health, safety or morals, or interfere with their compulsory education;

- not use or engage in any indentured or forced labor, slavery or servitude, human trafficking or compulsory labor;
- ensure that employees are entitled to working hours, breaks, holidays and leave periods in compliance with all applicable laws, rules and regulations;
- ensure that employees are paid at least the minimum legal wage under applicable law or a wage that meets local industry standards, whichever is greater; that all other applicable benefits are provided as required by applicable law, including, as applicable, paid leave, pension, statutory insurance, health benefits, maternity leave, parental leave, family care leave and childcare benefits; that all overtime work is compensated in accordance with applicable law; and that workers receive communications about compensation as and when required under applicable law;
- employ workers on the basis of their ability to do the job, and not engage in or permit corporal punishment or threatened or actual violence;
- respect employees' freedom of association and their right to collective bargaining and to join or not join any lawful organization, including but not limited to trade unions and works councils, and communicate these rights to employees, as required by applicable laws, rules and regulations;
- ensure a safe and healthy work environment and minimize physical hazards for all employees, including as described further below, including by ensuring that employees are properly trained and have access to appropriate safety and emergency equipment;
- ensure workplace security for employees by maintaining a workplace free of violence, intimidation and other unsafe or disruptive conditions and providing security safeguards for employees, as needed, while maintaining respect for employee privacy and dignity;
- provide employees with ongoing training, development and educational programs to enable them to realize their full potential and ensure they act in a compliant manner at all times, as described further below;
- ensure the protection of water rights for all employees in recognition of the human rights implications that water use may have, as well as the human need for sustainable water supplies, safe drinking water and protection of ecosystems and communities through proper sanitation; and

- assess our potential and actual impacts on human rights on a regular basis.

Focus is also committed to protecting the human rights of the personnel of the suppliers and vendors of Focus and its subsidiaries, including its partner firms, including as set forth in Focus's Vendor Code of Conduct, as well as the personnel of other relevant stakeholders, including clients of Focus' partner firms, and Focus is committed to ensuring that it is not complicit in any human rights violations.

It is also essential that we engage in meaningful stakeholder engagement, with both our internal and our external stakeholders, in our efforts to meet our responsibility to protect and promote human rights. We are therefore committed to continuing to engage with our stakeholders in further developing, improving and implementing this policy, and evaluating the effective outcomes of this policy's implementation.

HUMAN CAPITAL DEVELOPMENT AND SOCIAL RESPONSIBILITY

Workplace Diversity and Inclusiveness; Policy Against Discrimination, Abuse and Harassment

Focus recognizes that the diversity of the employees of Focus and its subsidiaries, including its partner firms, is a tremendous asset, and is firmly committed to providing equal opportunity in all aspects of employment in order to attract, retain and develop human capital. Accordingly, Focus will not tolerate any discrimination, abuse or harassment of any kind based on an individual's race (including traits historically associated with race, such as hair texture and protective hairstyles), religious creed, color, national, social or ethnic origin, sex (including pregnancy, childbirth, breastfeeding and/or related medical conditions), gender, gender identity, gender expression, sexual orientation, status as a victim of domestic violence, stalking or sex offenses, age, ancestry, physical disability, mental disability, medical condition, predisposing genetic characteristics or other genetic information, marital or family status, political affiliation, citizenship status, protected military or veteran status (including status as a Vietnam-era veteran) or any other status or basis, or any other status protected by any applicable federal, state or local ordinances or laws.

Focus's non-harassment policy details its commitment to providing equal employment opportunities and a workplace that is respectful, productive, and free from abuse, harassment (including sexual harassment), or unlawful discrimination of any kind.² For example, Focus prohibits discrimination against qualified employees, interns and applicants in all aspects of employment, including but not limited to recruitment, interviewing, hiring (or failure or refusal to hire), evaluation, compensation, promotion, job assignment, transfer, demotion, training, leaves of absence, layoff, benefits, use of facilities, working conditions, termination, and employer-sponsored activities and programs, including wellness, social and recreational programs. This policy, which is laid out in Focus's Code of Business Conduct and Ethics and in its Employee Handbook, outlines clear procedures for reporting and responding to issues of concern. Focus investigates all complaints filed and any possible violation of the policy of which it is notified. If Focus determines that an employee has engaged in activities that violate or are inconsistent with the policy, Focus will take appropriate disciplinary action against the offending employee, up to and including termination of employment.

As an example of our commitment, each employee of Focus and its subsidiaries, including its partner firms, is required to complete Focus's annual "Anti-Sexual Harassment Training Program," which focuses on creating a respectful work environment and prevention of harassment, abuse and discrimination, specifically including sexual harassment.

² Harassment is unwelcome behavior which entails verbal, physical, or psychological harassment or abuse of any nature. It includes slurs, epithets, threats, inappropriate comments or visual depictions, unwelcome jokes or teasing related to a person's protected classification. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors or other verbal, visual or physical conduct of a sexual nature when it: (i) is made an explicit or implicit condition of employment; (ii) is used as the basis for employment decisions; (iii) unreasonably interferes with an individual's work performance; or (iv) creates an intimidating hostile or offensive working environment. The following is a non-exhaustive list of the types of conduct prohibited by this policy: (i) unwanted sexual advances or propositions (including repeated and unwelcome requests for dates); (ii) offers of employment benefits in exchange for sexual favors; (iii) making or threatening reprisals after a negative response to sexual advances; (iv) visual conduct (e.g., leering, making sexual gestures, displaying of pornographic or sexually suggestive images, objects, pictures, cartoons, graffiti, posters or websites on computers, emails, cell phones, bulletin boards, etc.); (v) verbal conduct (e.g., making or using sexist remarks or derogatory comments based on gender, innuendos, epithets, slurs, sexually explicit jokes, whistling, suggestive or insulting sounds or lewd or sexual comments about an individual's appearance, body, dress, sexuality, sexual experience, etc.); (vi) verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings; (vii) physical conduct (e.g., unwelcome or inappropriate touching of employees or partners, physical violence, intimidation, assault or impeding or blocking normal movements, etc.); (viii) hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or the status of being transgender, such as (x) interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job, (y) sabotaging an individual's work; and (z) bullying, yelling, name-calling; and (ix) retaliation for making reports or threatening to report sexual harassment.

OUR CULTURE

Focus is guided by our culture, and we are committed to developing the following four fundamental behaviors and skills to further our mission to be the globally recognized leader in independent fiduciary financial advice:

- Be Entrepreneurial;
- Be Collaborative;
- Be Curious; and
- Be Professional.

Focus seeks to develop and reinforce these behaviors and skills through frequent on-site, off-site and remote training sessions, programs and presentations, and how we work with one another every day.

HEALTH, SAFETY AND WELLNESS

Focus is committed to ensuring a healthy and safe environment and the wellness of its employees, including as follows:

- Focus offers a number of formal wellness programs to its employees, including yoga and a personal training program and complimentary flu shots;
- Our headquarters office in New York City features a complimentary in-house gym and game room for use by all employees at that office;
- Our offices feature dedicated lactation space; and
- Focus provides a complimentary weekly in-house lunch to all employees to facilitate collaboration and camaraderie and foster Focus' culture, as well as complimentary drinks and healthy snacks and refreshments.

Although access to the programs described above has been limited or restricted as a result of the coronavirus (Covid-19) pandemic, we expect such access to resume as soon as it is possible to do so safely and in compliance with applicable laws, rules and regulations. And during the pendency of the pandemic, Focus has provided regular bi-weekly onsite Covid-19 testing to employees choosing to work onsite at our New York City and Long Island offices, free of charge to those employees.

In addition, consistent with its obligations to provide its employees with a safe and healthy workplace in compliance with all applicable laws, rules and regulations, Focus will implement and maintain all other appropriate health and safety programs, and will ensure that required health and safety-related information is clearly posted as required in its offices.

MENTAL HEALTH MANAGEMENT AND WORK-LIFE BALANCE

Eligible employees may use paid sick and safe time for the employee's mental illness, care or treatment of a mental illness, or to care for an eligible family member who needs medical diagnosis, care or treatment of a mental illness. Focus also provide a competitive package of benefits to all eligible employees including health insurance, health reimbursement arrangements and short term disability covering mental illness.

Focus also promotes a healthy work-life balance among its employees by allowing for flexible work arrangements, and will consider a number of arrangements for eligible employees, including working remotely by teleworking or telecommuting, as well as flexible time, job sharing or compressed work-week arrangements. Focus will also consider adjustments regarding work-load, content and hours, and return-to-work programs for eligible employees to alleviate mental health problems.

MATERNITY, PARENTAL AND OTHER LEAVES

Focus offers paid maternity and parental leave benefit to qualifying full-time employees following the birth, adoption or foster care placement of a child. Focus will pay eligible employees 100% of their full salary for up to six weeks as maternity leave to recover from pregnancy disability, childbirth or other related medical conditions. Focus will also pay eligible employees 100% of their full salary for up to two weeks as parental leave for bonding after the birth, adoption or foster care of the employee's child within 12 months following birth or foster care placement of the child. Focus also offers other leave programs to eligible employees in accordance with applicable law, rule and regulation, including to allow employees to participate in providing care, including physical or psychological care, for the employee's spouse, child, parent, grandchild, grandparent, or domestic partner with a serious health condition, or due to a qualifying exigency for the employee's spouse, domestic partner, child, or parent who is on active military duty or has been notified of an impending call to active duty.

EMPLOYMENT SECURITY AND RESPONSIBLE WORKFORCE RESTRUCTURING

Focus is committed to ensuring the job security of its employees (including minimalization of compulsory redundancies) and to responsible workforce restructuring, and to not implementing large-scale redundancies or significant job cuts except to the extent that the Focus Board of Directors (the "*Board*")

determines that doing so is an economic imperative. If Focus is required to effectuate workforce reductions, it is committed to ensuring that those reductions are carried out responsibly, with the utmost respect for the individuals concerned and to mitigate the negative consequences to those individuals, and in all cases in compliance with all applicable laws, rules, regulations and Focus plan benefit guidelines and other policies and procedures. In the past three years, Focus has not implemented any large-scale redundancies or significant job cuts.

TYPES OF EMPLOYMENT AND NON-REGULAR EMPLOYMENT

Focus is committed to utilizing non-regular employment (i.e., temporary and non-direct employment) only on a limited basis when required and appropriate, and in such cases will utilize measures to reduce any possible negative side effects of such non-regular employment.

COMPENSATION PRACTICES

Focus is confident that its compensation practices ensure that all employees of Focus and its subsidiaries, including its partner firms, receive compensation meeting or exceeding the amount for their basic living needs, above the legal minimum and living wages in the relevant jurisdictions. We are also confident that our pay practices are based on a number of factors, such as experience, role, and impact, and that gender is not a driver of pay for our employees. In addition, all employees of Focus (as well as consultants and members of the Board) are eligible to receive equity compensation awards pursuant to our 2018 Omnibus Incentive Plan.

TRAINING, PERFORMANCE MANAGEMENT AND RECOGNITION, AND TUITION ASSISTANCE PROGRAM

In addition to connecting employee compensation opportunities to the performance of the individual and of our company, we also promote a culture that appreciates and celebrates achievement regularly throughout the year, at all levels. We regularly monitor employee satisfaction and engagement, and through our performance management process, including regular performance appraisals, feedback and follow-up, employees are expected to understand goals and expectations for their roles through ongoing dialogues with their managers, and to have performance plans that help them focus on specific goals in their role with us, including goals focused on supporting our culture and growth. Employees also participate in regular onsite, offsite and remote training programs, including weekly and bi-weekly all-hands meetings focusing on a variety of relevant topics, including with respect to compliance and related matters and environmental, social and governance (“ESG”) topics, as well as specialized training programs provided by third parties in areas such as spreadsheet programs and accounting. In addition, managerial and leadership development training is provided to employees who we believe are future leaders of our

company. Compliance and business ethics training is also provided to the employees of our partner firms, including at a minimum to the extent required by applicable SEC and other laws, rules and regulations. In addition, members of our team are encouraged to be participants and presenters at industry, investor and similar conferences.

Under our Tuition Assistance Plan, we also provide tuition assistance benefits to eligible, selected employees to encourage them to maintain or improve skills required by their current or anticipated future positions at Focus.

BOARD AND SENIOR MANAGEMENT RESPONSIBILITY FOR ESG MATTERS

The Nominating, Governance and Sustainability Committee of the Board, in accordance with its charter, is responsible for assisting the Board in overseeing and monitoring Focus's initiatives, strategies, policies, programs and associated risks relating to sustainability, including with respect to ESG matters.

In addition, the Compensation Committee of the Board considers progress on ESG initiatives as part of its qualitative assessment in determining the variable remuneration of senior management.

TAX BASE EROSION AND PROFIT SHIFTING

Focus does not have, and is committed not to have, any transfer-pricing arrangements with its non-U.S. subsidiaries. Although certain overhead expenses (such as insurance) are allocated, there is no mark-up on those allocations. Focus is also not present, and is committed not to be present, in any jurisdictions that enable tax base erosion and profit sharing. In fact, the jurisdictions in which Focus is present – the United States, the United Kingdom, Australia and Canada – are all members of the OECD/G20 Inclusive Framework on BEPS (Base Erosion and Profit Shifting). Focus and its subsidiaries do not currently have employees in any jurisdictions other than the United States, the United Kingdom, Australia and Canada, and Focus only maintains legal entities in the jurisdictions in which it has actual operations, and is committed to continuing to do so.

POLITICAL PARTICIPATION

In accordance with U.S. federal law, Focus may not contribute corporate funds or make in-kind contributions to candidates for federal office or to national party committees. Focus also does not contribute corporate funds to candidates, political party committees, political action committees or any political organization exempt from federal income taxes under Section 527 of the Internal Revenue Code. In addition, Focus has elected not to spend corporate funds directly on independent expenditures,

including electioneering communications, and does not currently engage in “grassroots lobbying” or support or oppose ballot initiatives. Focus does currently pay an annual membership fee to the Investment Adviser Association which, among other things, serves its members in part by representing the interests of SEC-registered investment advisory firms before Congress, the SEC, CFTC, and other regulators.

GOVERNMENT PAYMENTS

Focus does not make payments to the governments of any jurisdictions, other than payments of taxes, licensing and similar fees in the ordinary course of business. Focus also does not receive payments from the governments of any jurisdictions that represent grants, special tax relief or other similar financial benefits, or implicit or explicit government guarantees, deposit insurance or public bailouts.

DATA SECURITY/CYBERSECURITY AND PRIVACY

Focus understands the significance of data security, including cybersecurity, to all of its stakeholders. We are actively engaged in the oversight of cybersecurity and data security risk management for Focus and our subsidiaries, including our partner firms. We are committed to implementing leading data protection standards.

The Audit and Risk Committee of our Board has responsibility for assisting the Board with oversight of enterprise risk generally. Our Audit and Risk Committee provides oversight of the management of our cybersecurity risk, information technology systems, business continuity and resiliency and similar matters, as well as Focus’s assessments and reviews of such matters. Senior management reports quarterly to the Chief Executive Officer and the Board at its regular meetings on the status of Focus’s cybersecurity risk, risk management policies and risk assessment initiatives.

Additionally, cybersecurity assessments are conducted of Focus and of each of our partner firms by an independent third-party. The recommendations contained in those assessments are then reviewed and thereafter expected to be implemented as appropriate. An annual cybersecurity monitoring program has also been implemented for our partner firms by an independent third-party. This program is based on the NIST standards and includes, among others, penetration and vulnerability testing, access controls and employee education. We also retain external vendors to perform penetration testing and vulnerability scanning with respect to Focus itself.

Focus also mandates cybersecurity and data security education and training for all employees of Focus and its partner firms. For example, all Focus and partner firm employees are required to take quarterly cybersecurity training modules. As part of our ongoing employee cybersecurity and data security training efforts, we also arrange for all employees to periodically receive simulated socially engineered “phishing” emails in order to test and improve their awareness. Employees who “click” or otherwise fail these tests

receive immediate notifications and are required to undergo additional testing or training. Such employees may also receive individual emails from senior management.

Focus' cybersecurity and data security risk program also provides for evolving targets and objectives and incorporates expertise and suggested best practices from external consultants and other outside experts. Focus and its partner firms also regularly monitor relevant guidance provided by applicable regulators, such as the SEC, which oversees our partner firms that are U.S. registered investment advisory firms.

Our cybersecurity and data security risk program also delineates a structure with clear organizational roles and responsibilities. As described above, our Audit and Risk Committee is responsible for governance by setting overall strategic direction with respect to cybersecurity and data security risk mitigation. A Focus IT steering committee is led by a senior member of management and tasked with recommending policies, budgets and priorities relating to cybersecurity and data security risk mitigation for approval by senior management, and also for assessing the user experience and overseeing our cybersecurity and data security risk program generally. Focus has also engaged a virtual Chief Technology Officer, who is responsible for implementing and executing these policies, budgets and priorities, managing vendors, providing technical advice and managing our cybersecurity and data security risk program generally.

Focus also recently enhanced its vendor risk assessment, due diligence and engagement process (including its contracting process with vendors and the inclusion of updated contractual protections in vendor agreements) with the goal of better protecting confidential or sensitive information. Vendors that handle confidential or sensitive information for Focus are expected to go through an initial risk assessment, and thereafter, periodic assessments will generally be conducted depending on the risk profile for the relevant vendor (for example, based on the type of information being stored or processed by that vendor). In addition, we expect our vendors to implement adequate measures to ensure the security of confidential or sensitive information. In accordance with our business principles and applicable laws, rules and regulations, including the laws, rules and regulations that apply to our partner firms, we have also implemented a number of physical and technical standards, procedures, tools and other safeguards for protecting the personal information of our employees, clients and other business partners, including data security and privacy policies and controls for handling personal data. For example, Focus has posted a formal privacy policy on its website that describes the types of personal information we may collect about users when they use the Focus website, the purposes for which we may use that information, and the circumstances in which we may share or disclose that information. In addition, the majority of Focus' partner firms are regulated entities with their own mandated privacy policies.

We also have an information security incident response team tasked with handling cybersecurity and data security incidents. That team works with our internal and external resources as necessary with the goal of containing, mitigating and remediating cybersecurity or data security risks. In addition, we are implementing a new emergency notification system in an effort to provide prompt notification to potentially affected users of potential cybersecurity or data security incidents using appropriate means of transmission (for example, using phone calls and text messages for potential issues impacting e-mail systems). Procedures are also in place for our partner firms to escalate issues to the IT steering committee or other appropriate Focus team members when any of our partner firms are potentially impacted by a cybersecurity or data security incident.

REPORTING CONCERNS

All employees are strongly encouraged to raise concerns regarding violations of Focus's policies. Employees have many options for reporting concerns, including to their manager, to Focus's Chief Operating Officer or General Counsel, or through Focus's Confidential and Anonymous Reporting Hotline or intranet. The Focus hotline toll-free number is 844-399-5153, and the intranet site is located at <http://www.openboard.info/FOCS/>. Focus takes complaints of discrimination, harassment and retaliation very seriously, and does not require any employee to follow any formal chain of command when reporting concerns. Focus expressly prohibits retaliation of any kind against any individual who reports a concern or assists with an inquiry or investigation in good faith, and any employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, up to and including termination. Focus will investigate all reports confidentially to the extent reasonably possible (recognizing that some disclosure may be necessary to effectively investigate the complaint). Additional information about how Focus employees can make complaints regarding accounting and compliance matters can be found in Focus's Policy for Complaint Procedures for Accounting and Compliance Matters.

RESPONSIBILITY FOR UPHOLDING OUR COMMITMENT

Each employee of Focus and its subsidiaries, including its partner firms, is responsible for complying with this Policy, including Focus's equal employment opportunity and non-harassment policies, at all times. All employees share the responsibility for assuring compliance with and continued implementation of these policies, and are responsible for reporting any suspected or actual occurrence of illegal, unethical or inappropriate conduct or events, or any suspected or actual violations of law or regulations that govern the operations of Focus and its subsidiaries, including its partner firms, in accordance with Focus's policies, so that Focus can address and correct such conduct or events. Employees are also expected to cooperate in internal investigations of misconduct. Any employee who is found to have violated any of these policies may be subject to disciplinary action, up to and including termination of employment.

Adopted: March 20, 2020

Amended: April 1, 2021