

FOCUS FINANCIAL PARTNERS INC.
POLICY FOR COMPLAINT PROCEDURES FOR ACCOUNTING
AND COMPLIANCE MATTERS

<i>What Is a Quick Summary of This Policy?</i>	<ol style="list-style-type: none">1. <i>You can make a good faith complaint about any questionable accounting or compliance matter. You can do so anonymously if you wish.</i>2. <i>You will not be retaliated against for making a complaint in good faith.</i>3. <i>The Audit and Risk Committee will oversee the review of your complaint.</i>
<i>What Is the Purpose of This Policy?</i>	To facilitate the reporting of complaints about questionable accounting and compliance matters.
<i>Who Is Covered by This Policy?</i>	Any director, officer or employee of Focus and any director, principal, officer or employee of any Focus partner firm or subsidiary.
<i>What Accounting Matters Should I Report Under This Policy?</i>	Any matters involving accounting, internal controls or auditing, including: <ul style="list-style-type: none">• Fraud in the preparation or audit of any Focus financial statements or records;• Deficiencies in Focus’s internal accounting controls;• Misrepresentations about Focus’s financial records, financial statements or audit reports by or to a senior officer or accountant; and• Any failure to fully and fairly report Focus’s financial condition.
<i>What Compliance Matters Should I Report Under This Policy?</i>	Potential violations of applicable laws, rules or regulations or any of Focus’s codes, policies or procedures.
<i>How Do I Make a Complaint About a Questionable Accounting or Compliance Matter?</i>	<p>You can make your complaint in person, by phone or in writing to the Chief Compliance Officer or a principal of your firm, or to Focus’s General Counsel. Complaints made to Chief Compliance Officers and principals of Focus partner firms will be forwarded to Focus’s General Counsel.</p> <p>Alternatively, you can make your complaint through Focus’ anonymous whistleblower hotline, which can be reached by phone at 844-399-5153 or online at http://www.openboard.info/FOCS/. You should only make complaints under this Policy in good faith.</p>
<i>What Happens After I Make a Complaint?</i>	<p>Focus’s General Counsel will acknowledge receipt of the complaint if possible. This will not be possible if your complaint is anonymous.</p> <p>Focus’s General Counsel or another person deemed appropriate by the Audit and Risk Committee will review the complaint under the oversight of the Audit and Risk Committee.</p> <p>Confidentiality of the complaint will be maintained to the fullest extent possible.</p>
<i>What if I am Retaliated Against for Making a Complaint Under This Policy?</i>	If you believe you have been harassed, threatened, demoted, dismissed, discriminated against or otherwise retaliated against for making a complaint under this Policy, you may file a complaint with Focus’s General Counsel. Focus will promptly take appropriate corrective action.
<i>How will the Audit and Risk Committee be Kept Informed About Complaints Made Under This Policy?</i>	Focus’s General Counsel will log the receipt, investigation and resolution of all complaints about questionable accounting or compliance matters. Periodically, Focus’s General Counsel will provide a summary report to the Audit and Risk Committee.

Adopted: July 25, 2018

Amended: November 12, 2020