

**FOCUS FINANCIAL PARTNERS INC.  
POLICY REGARDING ETHICAL AND SUSTAINABLE INVESTING**

Focus Financial Partners Inc. (“*Focus*”)<sup>1</sup> encourages and facilitates the consideration of environmental, social and governance (“*ESG*”) factors by its partner firms in their investment decision processes. Focus’ partner firms are comprised of fiduciary wealth management firms that retain their entrepreneurial culture and independence as part of the Focus partnership. Accordingly, Focus partner firms each establish their own investment decision-making processes. Focus, however, encourages its partner firms to consider ESG factors, such as the environment and climate change, human rights, human capital development, health and safety, social opportunity, corporate governance and ethics, along with other appropriate factors, to assess the expected performance and risk over time of the investments they manage for clients. Focus is an advocate for ethical and sustainable investment decisions by its partner firms, and supports their engagement with investee companies regarding social and environmental issues, which Focus will continue to promote and facilitate in a number of ways. For example, Focus will work to raise awareness of ESG and related investing issues among its partner firms through periodic presentations at its conferences and other educational opportunities and guidance, including discussions at Focus’ partner meetings and CIO forums and summits each year. Focus works to provide regular updates about ESG and related investing issues to its partner firms through partnership-wide emails and other communications. In addition, Focus makes resources available to help particular partner firms develop firm-specific targets and goals for ethical and sustainable investing.

In addition, Focus encourages its partner firms to implement investment policies to consider ESG factors in managing investments for clients, such as positive and negative screening for ESG criteria when investing client assets in equity and other securities, mutual funds and exchange-traded funds (ETFs), including investing in ESG-focused index funds.

Furthermore, as required by SEC rules, Focus’ partner firms that are SEC registered investment advisers describe their respective proxy voting policies and procedures in their respective Form ADV filings with the SEC.

**Adopted: March 20, 2020**

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<sup>1</sup> 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.