Code of Ethics

Why We Have This Policy.

This Code of Ethics (Code) sets the expectations for how we conduct ourselves at SRS Acquiom and its subsidiaries (SRSA) as individuals and as an organization. All team members and contractors are expected to uphold the principles in this Code. As we strive toward our core Purpose of *innovation to simplify complex transactions*, we are committed to conducting all of our business honestly and with a high standard of personal and business ethical behavior. Our collective commitment to uphold this Code in everything we do is the foundation for living up to our stated core Values (refer to the Team Member Guidebook):

- *Collaborative*
- *Highest Integrity*
- *Hate to Lose*
- *Respectful*
- *Builders*

Behavior that is contradictory to our core Values prevents us from abiding by the principles of this Code and violates this Code. By upholding this Code, together we create a workplace rooted in trust, fairness, and integrity, strengthening our reputation and enabling our long-term success.

Core Ethical Principles

Integrity –we act honestly and consistently, even when no one is watching.

- We communicate truthfully and do not misrepresent facts or conceal information.
- We honor our commitments and take responsibility for our decisions.
- We admit mistakes, learn from them, and correct them promptly.
- We use company resources responsibly and for legitimate business purposes.

Fairness - we make decisions impartially and avoid favoritism, bias, or prejudice, and we engage in fair dealing.

- We treat clients, vendors, and competitors ethically.
- We avoid personal and/or financial interest that could interfere or give the appearance of interfering with our duties (conflicts of interest), and we are fully transparent if conflicts exist.

Compliance - we follow all applicable laws, regulations, internal policies, and contractual obligations.

- When in doubt, we seek guidance before acting.
- We report potential violations promptly and in good faith.

Confidentiality - we protect sensitive information belonging to the organization, our clients, partners, and team members.

- We do not share confidential information without authorization.

- We do not improperly use confidential information.
- We safeguard data in all forms—digital, verbal, and written.

What we need to do to accomplish the intent of this Policy

Reference to any policy in this Code, incorporates that policy by reference.

Note: team members who are associated (Associated Persons) with our broker-dealer entity, Acquiom Financial LLC, are also subject to certain specific obligations as outlined in the Compliance and Supervisory Procedures Manual (AFL Compliance Manual).

Conflicts of Interest

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, you should discuss the matter with your supervisor or the Head of Risk.

While this is not an exhaustive list, the following are examples of conflicts of interest.

- Working/contracting for or investing in competitors - Having any role with a competitor of SRSA, or owning a significant financial interest in a competitor of SRSA.
- Moonlighting without permission - Please refer to the Team Member Guidebook, and for Associated Persons, refer to the AFL Compliance Manual regarding outside business activities.
- Misusing company assets - such as using company equipment, software, or time for your own personal projects or business; expensing trips or part of trips that have marginal or no business purposes and are primarily for personal purposes; or using internal company information gained through your position with SRSA for personal gain. Please refer to the *Acceptable Use Policy,* the Travel and Expense Policy, and Team Member Guidebook (and policies further referenced therein) for guidance.
- Giving excessive gifts and entertainment - Reasonable business gifts and ordinary entertainment are meant to create goodwill and sound working relationships and not to be so excessive as to create the perception of attempting to improperly affect the judgement of the recipient (this is also a misuse of company assets).

  For acceptable business entertainment, the SRSA team member must be in attendance; otherwise it is just a gift (e.g., giving tickets to an extravagant sporting or entertainment event without attending, or offering the company credit card for someone to take out their team without including the SRSA team member, is a gift that may create the perception of impropriety).

  Also keep in mind that giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act under some statutes, such as the U.S. Foreign Corrupt Practices Act. For Associated Persons, gifts to customers of our regulated services are subject to specific caps, subject to limited exceptions. Please refer to the AFL Compliance Manual for guidance.
- Receiving valuable gifts and favors - Gifts, payment, or favors from vendors or partners that could influence or appear to influence your business decisions should not be

accepted (i.e., they are not customary holiday or promotional gifts or are not reasonable and usual industry business entertainment). If circumstances are beyond your rejecting the gift, please report immediately to the Head of Risk for non-Associated Persons and to the Director of Regulatory Compliance for Associated Persons, to determine how best to handle. Please refer to the Team Member Guidebook and the AFL Compliance Manual for guidance.

- Insider trading - Buying or selling stock based on confidential information you learned via your position at SRSA. Please refer to *Insider Trading Policy*.
- Conducting SRSA business transactions with your family member or a business in which you have a significant financial interest (related party transactions).
- Exercising supervisory authority over a co-worker who is also a family member. Please refer to the Team Member Guidebook for guidance.

Confidentiality

Team members who have received or have access to confidential or proprietary information, whether belonging to SRSA or its clients and partners, should take care to keep this information confidential. Unauthorized use or disclosure of this information could harm SRSA or others and would damage the trust in SRSA, and it could also be illegal and result in civil liability and/or criminal penalties. Some information may be protected by patent, trademark, copyright, and trade secret laws. In addition, sensitive information about individuals, whether team members or individual customers, is protected by the privacy policies of SRSA and we must handle that information in accordance with the applicable policy. Please refer to the Team Member Guidebook (and policies further referenced therein) for guidance.

Legal Compliance. Our success depends upon team members operating within legal guidelines. We expect team members to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. While we do not expect you to memorize every detail of these laws, rules and regulations, we do expect that you will seek out the answers from your supervisor or a member of the Legal Department if you do not know or are unsure of legal and regulatory rules that may affect your area of responsibility.

Fair Dealing

We strive to outperform our competition fairly and honestly, through superior performance of our products and services, not through unethical or illegal business practices. For example, we expect our team members to honor their confidentiality obligations to former employers. We also must abide by applicable antitrust and unfair competition laws, which prohibit deceptive practices or misrepresentations in connection with sales activities and prohibit illegal agreements (even verbal or implied) with competitors involving price fixing or allocations of customers, territories, or contracts.

Communications with Customers and the Public

Our communications should be based on principles of fair dealing and good faith, and must not make false, exaggerated, unwarranted or misleading statements or claims. Only

the sales and marketing materials that have been approved by Legal and Marketing are permitted for external use and distribution. No team member should talk about company matters with members of the media, either on or off the record, unless previously authorized. Media inquiries should be immediately directed to the Chief Marketing Officer. Please refer to the AFL Compliance Manual, Meeting and Presentation Recording Policy, and Crisis Communications Policy for guidance.

Leadership Responsibilities

Leaders at all levels set the tone for ethical behavior. As the leaders we model the standards in this Code. Leaders encourage open communication and support team members who raise concerns and ensure team decisions follow legal and ethical expectations.

Exceptions

Any exceptions to this policy must be approved by the General Counsel.

Team Member Responsibilities

We employ smart professionals and place a significant amount of trust in our team members. Given the nature of the work we do, it is important that our policies are consistently followed. Team members are responsible for understanding and following them. This is important to building the culture and work environment we all want to be a part of and to consistently delivering an exceptional customer experience. In the unlikely, and hopefully rare, event that there is any violation of our policies, when feasible, we will strive to discuss the matter with the individual and together learn from any mistakes. We may determine to take whatever actions the company deems appropriate in light of applicable facts.

Report Any Concerns

We must speak up when we encounter behavior that may violate this Code. In conjunction with our Speak Up Policy, if you have concerns regarding the achievement of this or any other policy please report this to your supervisor or use the Team Member Hotline at 866-794-6031 or www.ethcomp.com/SRSAcquiom. All reports will be reviewed and investigated promptly and fairly. Please refer to the Investigations Policy for further information.

Who Can Approve the Policy and Changes

This policy can be amended at any time by the Enterprise Risk Committee. Any amendment that is purely stylistic or constitutes neither a material nor substantive change or modification of this Policy may be approved and adopted by the General Counsel without submitting such proposed amendment or modification to the Enterprise Risk Committee.

Responsible Team Member Area

The Legal Department will be responsible for the maintenance of this Policy.

Review Date

This Policy will be reviewed and updated as necessary but at least every other year. The next review date is March 2028.

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Related Documents

Acceptable Use Policy
Acquiom Financial Compliance and Supervisory Procedures Manual
Crisis Communications Policy
Insider Trading Policy
Investigations Policy
Meeting and Presentation Recording Policy
Speak Up Policy
Travel and Expense Policy
Team Member Guidebook