

LPL Financial Vendor Code of Conduct

Purpose

LPL's [Mission Statement](#), "We take care of our advisors, so they can take care of their clients," reflects our passion in serving our advisors, who make a positive impact on the lives of millions of people across the country. Our many Vendors and business partners that provide products and services to LPL play a critical role in supporting our achievement of this mission.

We believe that our Vendors and their actions are an extension of our own. In this sense, we expect our Vendors to act in accordance with our values, not only to reflect LPL's commitment to doing what's right, but also to fulfill the expectations of our advisors. LPL's responsibility of conducting our business in a lawful, professional, and ethical manner must extend to those with whom we do business.

This Vendor Code of Conduct establishes our expectations for our Vendors in relation to conducting their business ethically, committing to human rights, pursuing environmental stewardship and promoting diversity, equity, and inclusion. These standards draw on internationally recognized standards including the [United Nations Universal Declaration of Human Rights](#), [United Nations' Guiding Principles for Business and Human Rights](#) and the ILO Declaration on Fundamental Principles and Rights at

Work. This code also aligns to our [LPL Financial Human Rights Statement of Principles](#), and the [LPL Financial Code of Conduct](#).

This Vendor Code of Conduct applies to all LPL Vendors and business partners. Further, to the extent that Vendors subcontract any portion of their obligations, this code also applies to subcontractors. LPL expects Vendors to communicate and uphold these expectations throughout their operations and supply chain by adopting policies, procedures and training. As LPL has always required, our Vendors must also abide by all applicable local laws, regulations, and other contractual agreements. If conflict between local laws or regulations and this Vendor Code of Conduct exist, Vendors are expected to work with us to reach a mutually agreeable solution that ensures compliance with the local law(s) or regulation(s). This code does not constitute an employment contract or create an employment relationship between Vendor employees and the Company.

We offer these principles with the knowledge that many of our Vendors have been pioneers in establishing supply chain standards and best practices. We acknowledge and thank these Vendors for their leadership and example in establishing guidance and best practices. In the spirit of continuous improvement, LPL is committed to working with and supporting our Vendors to meet, and when possible, exceed, the requirements in this Vendor Code of Conduct. The minimum standards set forth are not intended to limit or discourage anyone from reaching higher standards. Rather, LPL uses this code to consider how our Vendors are achieving basic standards of conduct.

By its acceptance of any purchase order from LPL Financial, the Vendor acknowledges its acceptance of the Vendor Code of Conduct and intention to comply with its requirements.



LPL Financial Vendor Code of Conduct

Ethical Business Practices

LPL's approach to day-to-day business and long-term development always starts from our values. Conducting ourselves in a lawful, professional and ethical manner is integral to the way we do business. Our [Financial Code of Conduct](#) identifies the business and professional standards that everyone is expected to follow. We expect our vendors to have similar practices and standards:

- **Anti-Bribery and Anti-Corruption:** Vendors should have a zero-tolerance for bribery and corruption. We expect our Vendors to have effective policies to prevent cases from occurring and hold those who engage in bribery or corruption accountable. Vendors are prohibited from engaging in activity that constitutes bribery and/or corruption, or any activity that could be perceived as engaging or tolerating bribery and/or corruption.
- **Anti-Money Laundering:** Vendors are prohibited from money laundering in any form, including doing business with those engages in illicit activities such as terrorism financing, human trafficking, and slavery.
- **Conflicts of Interest:** We expect our Vendors to disclose any potential conflicts of interest prior to initiating their relationship with LPL, or as soon as a potential conflict is made apparent after initiating a relationship.
- **Gifts and Political Contributions:** Vendors may not give, solicit, or accept gifts or entertainment that could influence or have the potential to influence their judgment of others involved in a business relationship

with LPL, other Vendors, or government officials.

- **Information and Property Privacy:** The protection and privacy of advisor and client information are critical to a strong reputation and continued business success. All sensitive information exchanged between LPL and its Vendors must be kept confidential, secured, and used in accordance with the law. This includes personal information, material non-public information, proprietary information, and intellectual property.

Respecting Human Rights

We take the impact our employees and advisors have on millions of people across the country very seriously and believe that an integral part of this work is ensuring we make a positive difference in the world. This includes an unceasing commitment to fundamental human rights. We expect our vendors to uphold the same commitment to human rights:

- **Child Labor:** LPL does not tolerate any form of child labor in our supply chain. We expect our Vendors to ensure that there is no child labor within their organizations and supply chains. A "child" is any person under the age of 15 (or 14 where the law permits), or under the local legal minimum age for work or mandatory schooling, whichever is greatest. International Labor Organization Fundamental Conventions 138 and 182 provide further detail.
- **Discrimination and Harassment:** Vendors will offer equal employment to all, treat all workers with dignity and respect, and

maintain an environment free from intimidation, violence, and abuse. Discrimination or harassment on any grounds, including but not limited to race, color, creed, religion, sex (including pregnancy, childbirth, or related medical conditions), genetic information, gender, gender identity, gender expression, sexual orientation, national origin, citizenship status, age, ancestry, marital status, medical conditions, disability (both physical and mental), military and veteran status, or any other factors prohibited by applicable law, is prohibited.

- **Fair Wages, Benefits, and Working Hours:** Vendors will provide fair and competitive compensation, benefits, and hours to their workers that meet or exceed the requirements of applicable law or, where statutory provisions do not exist, provide for a just and adequate standard of living for all employees. Vendors will respect the right of their employees to organize and bargain collectively for their work.
- **Modern Slavery, Forced Labor, and Human Trafficking:** Vendors will not engage in any practice that could be considered as employing or encouraging any form of modern slavery, including forced labor and human trafficking. This includes practices such as withholding wages or security payments, confiscating identity documents, the payment of recruitment fees by workers and/or restricting movement of workers. All workers must be provided with written contracts in a language that they easily understand, and that have been entered into voluntarily,

LPL Financial Vendor Code of Conduct

prior to commencing work. No involuntary work of any type is permitted, including forced or compulsory labor, trafficked labor, indentured labor, bonded labor, involuntary prison labor, or forced overtime. International Labor Organization Fundamental Conventions 29 and 105 provide further detail.

- **Safe Working Conditions:** Vendors will provide safe and healthy working conditions to prevent accidents, injuries, and exposure to health risks. This includes providing substantive occupational health, safety and fire programs, the provision of relevant and quality personal protective equipment, potable drinking water, clean toilet facilities, adequate lighting, temperature, ventilation, sanitation, and, if applicable, safe, healthy, and dignified worker accommodations.

Diversity, Equity and Inclusion

LPL's culture is grounded in inclusion and teamwork, realized through an environment in which we all support, inspire, and respect one another throughout the Company. In addition to workplace diversity and inclusion, LPL recognizes the importance of having and promoting diversity in our supply chain and business partnerships. We actively screen diverse suppliers, which includes minority-, women-, and veteran-owned businesses.

We encourage Vendors to include diverse-owned businesses in their own supply chains and partnerships. We also encourage Vendors to actively promote a diverse, inclusive, and equitable environment through specific programs, policies, and

practices to recruit, develop, and retain diverse talent. We encourage Vendors to report on their success and future ambitions as it relates to diversity, equity and inclusion.

Environment

LPL is devoted to environmental stewardship and continuing to develop sustainable practices within our business. We expect our Vendors to comply with all federal and local environmental laws and regulations including those related to waste disposal, hazardous waste, greenhouse gas emissions, wastewater, and toxic substances. Where possible, we also encourage our Vendors to:

- Fully comply with all federal and local environmental laws and regulations including those related to waste disposal, hazardous waste, greenhouse gas emissions, wastewater and toxic substances.
- Actively measure, manage and disclose environmental impacts in areas such as Greenhouse Gas (GHG) emissions, water and waste as well as to set targets and implement action plans for reducing environmental impacts. Public reporting on annual environmental performance is encouraged.

Grievance Mechanism

LPL expects Vendors to provide grievance mechanisms that are transparent, responsive, anonymous, unbiased, and confidential to workers and other parties across the value chain. We expect our Vendors to provide all workers and affiliates with accessible and confidential mechanisms or processes for

reporting concerns or violations of law, ethics, or this code. Specifically, we expect:

- Workers know of and have access to grievance mechanisms which allow for anonymous reporting. Reported concerns and violations are addressed in a timely manner and follow a clearly outlined process.
- Workers who speak up in good faith are protected from retribution, retaliation and reprisal.
- LPL is notified if any concerns or violations are reported through the grievance mechanism that are in direct violation of this Code.

Violations and concerns may also be reported directly to LPL via LPL's Whistleblower and Integrity Hotline at any time using the following phone number and/or mailing address:

LPL Whistleblower and
Integrity Hotline
(866) 418-2852

Attention: Integrity Ombudsperson
LPL Financial LLC
75 State Street, 22nd Floor
Boston, MA 02109

Or by contacting the Chief Legal Officer, in writing, in person, or by phone to:

Michelle Oroschakoff,
Chief Legal Officer

LPL Financial LLC
4707 Executive Drive
San Diego, CA 92121
Telephone: (800) 877-7210
Email: michelle.oroschakoff@lpl.com

Implementation and Compliance

LPL expects Vendors to ensure that adequate and effective management

LPL Financial Vendor Code of Conduct

oversight, management systems, policies, procedures, self-monitoring and training are in place to ensure ongoing compliance with the Vendor Code of Conduct.

LPL reserves the right to monitor Vendor compliance with this code. This may include verification through self-assessment, on-site audits, or other means of due diligence. If requested, Vendors are expected to provide written information, including policies, procedures, and data regarding the topics in this code.

We recognize that some businesses may be challenged to meet the expectations we have set forth. LPL is committed to working with these businesses to achieve a mutually acceptable level of compliance with this code. If a Vendor is found to

be in violation of the requirements of this Code, LPL expects that vendor to inform us immediately and remedy any such violation in a timely and sensitive manner. Failure to agree upon and execute a remediation plan could result in diminished potential for being awarded additional work or result in termination.

As LPL continues building on its Vendor Management Program initiatives, Vendors may anticipate increased engagement and monitoring. LPL's Chief Financial Officer, SVP of Sourcing and Procurement, and Vendor Management Program has direct oversight over this Vendor Code of Conduct.

LPL is committed to continuously reviewing and updating this Code. Therefore, this Code is subject to

modification from time to time. In the event of any non-compliance to the requirements of this Code or breach of contract, LPL reserves its rights and retains the sole discretion to exercise any rights under this Code, any relevant contract and/or local laws and regulations.

The failure or omission by LPL to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights. In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant contract with any vendor, the provisions of that contract will prevail.

