



# LPL HUMAN RIGHTS STATEMENT OF PRINCIPLES

At LPL Financial, how we conduct business is as important as the business we conduct. We believe it is the role of government to protect the human rights of its citizens. We also believe we can play a constructive role in helping to promote respect for human rights and as such, acknowledge recognized international standards in our values as a firm. Our company policies and practices are consistent with the UN Guiding Principles on Business and Human Rights and the Principles for Responsible Investment, and they are endorsed by our CEO and board of directors.

## **Our Commitment**

It is our commitment to conduct ourselves in a lawful, professional, and ethical manner. The work our LPL employees and independent advisors do every day makes a difference to millions of people across the country. We take that very seriously. We believe we can make a positive contribution to society when we respect the fundamental freedoms of human rights.

## **Our Employees**

LPL is committed to safeguarding the human rights of our employees through our employment policies and practices including our Code of Conduct, which includes the promotion of a diverse, ethical, and inclusive workplace free from violence, harassment and other unsafe or disruptive conditions. We offer equal employment opportunities based on merit, qualifications and abilities without regard to race, color, national origin, religion, sex, age, disability, sexual orientation, gender identity or any other protected characteristic. We comply with all labor, health and safety laws and regulations in all regions where we conduct business. We promote the right to equal pay, non-discrimination, and acknowledge the human right to water.

## **Our Financial Professionals, and Their Clients**

We take care of our financial professionals, so they can take care of their clients. That's our mission statement and it permeates everything we do—just as our corporate values guide us in how we work.

LPL and our financial professionals take seriously our responsibility to not deny access to investment advice based on race, religion, gender, sexual orientation, or socio-economic status. We also strive to ensure that all of our services are accessible and designed to serve the varied needs of the diverse populations we serve and the needs of those with disabilities.

### **Our Vendors**

LPL strives to work with vendors whose policies and practices regarding human rights are consistent with our own. Our supply chain mission is to:

- Deliver sustainable, ethical practices and leadership to enable the selection of external partners to drive the best service, quality, and value for LPL while appropriately mitigating risk.
- Provide leadership to our business partners through LPL's centrally led Vendor Management Program to ensure that any contractual and performance risks are effectively mitigated.
- Drive operational excellence through management of the requisition, contracting, payment processing and associated systems.

### **Modern Slavery and Human Trafficking**

LPL believes that human trafficking, slavery, and related exploitative practices such as servitude, forced labor, and child labor are egregious human rights abuses. We also do not approve of the use of prison labor in our supply chain. We have taken steps to regulate our network of vendors by implementing policies, procedures, risk assessments, and training to our Vendor Owner population.

### **Our Communities**

We are aware of the impact our business has beyond our bottom line and, as a result, we consider the upstream and downstream implications of running our business—including impacts on the communities and environments in which we operate.

Through support from the LPL Financial Foundation, LPL's charitable arm, and the volunteer hours donated by employees and advisors, LPL works to increase access to career pathways for under-resourced teens and young adults. Our efforts include mentoring underserved youth, providing resources for student success, and supporting educational guidance to help students stay in school, graduate, and attain a career. As part of the effort to increase access, LPL supports initiatives that help students manage their personal financial resources, including those that enhance familiarity and comfort with fundamental skills such as setting financial goals, budgeting, and managing funds.

Through our public policy advocacy, LPL helps to advance solutions that protect seniors and vulnerable adults from financial exploitation. We are proud to have assumed a leading role in the passage of the Senior Safe Act, legislation that enables financial institutions, government agencies, and adult protective services agencies to detect and address signs of senior fraud, exploitation, and abuse.

We are committed to improving peoples' lives, preserving the fundamental freedoms of all we connect within the communities we serve and, in the process, enriching the lives of our employees and advisors as well.

### **Privacy and Data Protection**

LPL complies with all data protection and privacy laws and regulations. We are committed to safeguarding and protecting the personal data and sensitive financial information of our customer, employees and other stakeholders to prevent the infringement of privacy rights. We prioritize the fair, ethical, and lawful collection, use, and processing of employees and customers' personal information, and respect individuals' privacy rights. We provide processes for individuals to assert their personal rights as required by state law, such as CCPA. If an incident occurs where there has been a violation of human rights as a result of LPL's data sharing practices, free credit monitoring may be provided to individuals or other remedies may be provided that are deemed necessary to resolve the issue.

Any stakeholder who believes LPL has not operated in accordance with this statement or has witnessed any action believed to be in violation of our Code, please, report it by calling the Whistleblower and Integrity Hotline at any time at (866) 418-2852 so that we can take appropriate remedial action.

Violations or noncompliance may be reported anonymously. The toll-free number is managed by an outside, independent service provider and allows anyone to make a report without divulging his or her name. Individuals may also make such reports in writing to:

**The Whistleblower and Integrity Hotline**  
Attention: Integrity Ombudsperson  
LPL Financial LLC  
75 State Street, 22nd Floor  
Boston, MA 02109