



FOCUS[®]
FINANCIAL PARTNERS

FINANCIAL CODE OF ETHICS

What Is a Quick Summary of This Code?

This Code sets forth specific policies to guide Focus's CEO and CFO in the performance of your duties. This Code emphasizes Focus's commitment to ethics, compliance with the law and providing full and accurate financial disclosures. You are required to comply with the laws that govern the conduct of Focus's business and must report any suspected violations.

This Code does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity.

How Does Focus Expect Me to Conduct Business?

You are expected to:

- Comply with laws and regulations;
- Manage conflicts of interest; and
- Abide by and promote compliance with Focus's disclosure policies.

Who Is Covered by This Code?

Focus's CEO and CFO.

How Should I Address Conflicts of Interest?

You are expected always to act in the best interests of Focus. You should avoid conflicts of interest. You have a conflict of interest

when your personal interest interferes or appears to interfere with Focus's or your partner firm's best interests.

Before making any investment, accepting any position or benefits, participating in any transaction or business arrangement that creates or appears to create a conflict of interest you must receive pre-approval from Focus's General Counsel. For more information, see the Code of Business Conduct and Ethics.

What Is My Disclosure Obligation? In filings and public communications, you are expected to make disclosures which are full, fair, accurate, timely and understandable. You are also expected to promote compliance with this Code and Focus's disclosure policies by all Focus personnel.

What Are My Compliance Obligations? You must always follow applicable laws and regulations, as well as Focus's policies. If you suspect or know of a violation of applicable laws and regulations or Focus's policies, you must tell the General Counsel immediately.

If you have a question about a law or regulation or a Focus policy, immediately consult with Focus's legal department. For more information, see the Code of Business Conduct and Ethics.

Are There Exceptions to This Code? Exceptions to this Code may be made only by the Audit and Risk Committee of the Board. Any such waiver may be required to be publicly disclosed.

Who Can Answer My Questions About This Code? Focus's General Counsel.

What Are the Consequences of Violating This Code? If you are involved in a violation of this Code, you may be subject to possible disciplinary action up to and including termination. Violating this Code may also constitute violations of law and may result in civil or even criminal penalties, including fines and imprisonment. There may also be serious consequences for others at Focus and for Focus itself.

*Adopted: July 25, 2018
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Last amended: November 12, 2020*