



# **Envestnet, Inc.**

## **Whistleblower Policy**

*(Last Amended by the Board of Directors - April 19, 2023)*

# WHISTLEBLOWER POLICY

## Introduction

This policy governs the procedures of the Audit Committee (the “**Audit Committee**”) of Envestnet, Inc. (“**Envestnet**”) relating to the handling of complaints and concerns received by Envestnet or any of its subsidiaries, from employees or others (including anonymous submissions) (each such complaint or concern being a “**Report**”) regarding accounting, internal accounting control or auditing matters involving Envestnet (“**Accounting Matters**”).

Examples of Accounting Matters which should be reported pursuant to this Whistleblower Policy (this “**Policy**”) include, without limitation:

- fraud, deliberate error or gross negligence in the preparation, evaluation, review or audit of any Envestnet financial statements, tax returns or other financial reports of Envestnet;
- fraud, deliberate error or gross negligence in the recording and maintaining of Envestnet’s financial records;
- deficiencies in or noncompliance with Envestnet’s internal accounting and reporting controls;
- misrepresentation or false statements to or by a senior officer or accountant regarding a matter contained in Envestnet’s financial records, financial statements, tax returns or other financial reports;
- deviation from full and fair reporting of Envestnet’s financial condition, results of operations or cash flows;
- violations of the rules and regulations of the Securities and Exchange Commission that are related to accounting, internal accounting controls and auditing matters;
- Violations of Envestnet’s Insider Trading Policy, U.S. federal securities laws or anti-corruption laws, including suspected or alleged dishonest or illegal conduct by any person, including Envestnet employees and third-party service providers; or
- the taking of any action to coerce, manipulate, mislead, or fraudulently influence Envestnet’s external auditor in any way that would render Envestnet’s financial statements materially misleading.

Any person can submit a Report regarding an Accounting Matter without fear of retaliation of any kind.

## Procedures for Making Reports

Envestnet shall maintain a toll-free hotline and web-based reporting mechanism (“**Call Center**”) that allows any Envestnet employee to make a Report without divulging his or her name. The person maintaining the Call Center shall promptly share the information provided in the Report with the General Counsel or his/her designee. The person maintaining the Call Center shall explain to each Envestnet employee procedures for following up on the Report (including the Envestnet employee’s providing additional information at a later date).

Reports can be made, at any time, confidentially and anonymously:

- to the Envestnet Alert Line by calling toll-free:  
1-866-381-3168
- to the Call Center via the web: [www.envestnet.ethicspoint.com](http://www.envestnet.ethicspoint.com)
- to Envestnet management by writing to:

Board of Directors - Audit Committee  
Envestnet, Inc.  
1000 Chesterbrook Boulevard, Suite 250  
Berwyn, PA 19312

Reporting as specified above is in addition to, and shall not be deemed to replace, any other communications that may be appropriate or required, including but not limited to communications with the Envestnet employee’s co-workers and immediate supervisor(s) in the ordinary course of the Envestnet employee’s duties.

## Responsibilities with Respect to Specified Reports

The Audit Committee is responsible for overseeing the receipt, retention and investigation of and response to all Reports. The General Counsel is responsible for administering these procedures on behalf of Envestnet.

Upon receipt of a Report, the General Counsel will (i) determine whether the complaint actually pertains to Accounting Matters and (ii) when possible, acknowledge receipt of the complaint to the sender. The General Counsel will promptly forward to the Audit Committee, in detail, any Report involving Accounting Matters. Reports relating to Accounting Matters will be reviewed under Audit Committee direction and oversight by the General Counsel, Internal Audit function or such other persons as the Audit Committee determines to be appropriate.

At the next scheduled Audit Committee meeting, the General Counsel will present a summary of all Reports received other than those pertaining to Accounting Matters. The General Counsel will provide such additional information regarding any Report as may be requested by the Audit Committee. The Audit Committee may request special treatment for any Report and may assume the direction and oversight of an investigation of any such Report.

## **Treatment of Reports**

In connection with the investigation of a Report, the Audit Committee and the General Counsel may consult with, and obtain the assistance of, any member of Envestnet management who is not the subject of the Report. In addition, the Audit Committee and the General Counsel may, in its or his/her sole discretion, retain independent legal, accounting or other advisors as may be necessary or appropriate to investigate the Report.

Upon completion of the investigation of a Report, the Audit Committee or the General Counsel, as the case may be, will take such prompt and appropriate corrective action, if any, as in its or his/her judgment is deemed warranted.

## **Follow-Up to Reports**

The Audit Committee or the General Counsel, as determined by the General Counsel, will provide updates to the person maintaining the Call Center, so that each Envestnet employee who files a Report can be informed of the results of the investigation and what, if any, corrective action was taken.

## **Confidentiality**

Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review. Access to Reports may be granted to regulatory agencies and other parties at the discretion of the Audit Committee. Documents that are covered by the attorney-client communication and/or work-product privileges should not be disclosed unless the General Counsel has consented in writing to a waiver of privilege.

## **Retaliation Prohibited**

Neither Envestnet, the Audit Committee nor any director, officer or employee of Envestnet will discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against, directly or indirectly, any Envestnet employee who, in good faith, makes a Report or otherwise assists the Audit Committee, Envestnet management or any other person or group, including any governmental, regulatory or law enforcement body, in investigating a Report.

Neither Envestnet, the Audit Committee nor any director, officer or employee of Envestnet shall (i) reveal the identity of any person who makes a Report and asks that his or her identity remain confidential, unless necessary to conduct an adequate investigation or compelled by judicial or other legal process or obligation, or (ii) make any effort to ascertain the identity of any person who makes a Report anonymously.

## **Records**

The Call Center, under the supervision of the General Counsel, will maintain a log of all Reports, tracking their receipt, any investigation conducted, their resolution and the response given to the person making the Report as required under applicable law or any document retention policy. The General Counsel will provide periodic summary reports thereof to the Audit Committee, and the Audit Committee shall provide summary reports to the Board periodically, and at least annually, regarding any significant Reports and the results of any investigation regarding such

Reports.

Envestnet shall retain all Reports and all records relating to such Reports in accordance with the applicable provisions of its records retention policy.

## **Disclosure**

A copy of this policy shall be made available to all Envestnet employees.

## **Annual Review of Policy**

The Audit Committee shall review this policy and make changes as appropriate on an annual basis.