

# Modern Slavery Statement

This Modern Slavery Statement is made on behalf of Investnet, Inc. and its subsidiaries to address the requirements of the *Modern Slavery Act 2015* (UK), the *Modern Slavery Act 2018* (Australia), and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), and covers the reporting period of January 1, 2024, to December 31, 2024.

## Our Structure, Operations and Supply Chain

Investnet refers to the family of operating subsidiaries of Investnet, Inc., a privately held company.

Investnet, is transforming the way financial advice and insight are delivered. Our mission is to drive the growth and productivity of advisors and wealth managers through our ecosystem of connected technology, advanced insights, and comprehensive solutions – backed by industry-leading service and support. Investnet’s vision is to empower advisors to deliver better financial outcomes through a connected, intelligent approach to holistic wealth management.

As of December 31, 2024, Investnet’s clients include more than one-third of U.S. advisors, 17 of the 20 largest U.S. banks, 48 of the 50 largest wealth management and brokerage firms, and over 500 of the largest RIAs, all of which leverage Investnet technology and services that help drive better outcomes for enterprises, advisors and their clients.

Through a combination of platform enhancements, partnerships and acquisitions, Investnet uniquely provides a financial network connecting technology, solutions and data, delivering better intelligence and enabling its customers to drive better outcomes.

Investnet, a Delaware corporation originally founded in 1999, serves clients from its headquarters in Berwyn, Pennsylvania, as well as other locations throughout the United States, India and other international locations.

As of December 31, 2024, Investnet had a total global workforce of approximately 3,000 employees, of which 99% are full-time employees, with 52% located in the United States and 48% located outside of the United States, primarily in India.

Investnet is organized around two business segments based on clients served and products provided to meet those needs.

- Investnet Wealth Solutions – a leading provider of comprehensive and unified wealth management software, services and solutions to empower financial advisors and institutions to enable them to deliver holistic advice to their clients.
- Investnet Data & Analytics – a leading provider of financial data aggregation, analytics and digital experiences to meet the needs of financial institutions, enterprise FinTech firms and market investment research firms worldwide.

Investnet’s supply chain is concentrated in the markets where we have our largest operational footprints, the United States and India, with correspondingly smaller supply chain activity supporting our businesses in Canada, Australia and the United Kingdom.

Investnet’s Strategic Sourcing and Procurement team works to centralize the management of supplier relationships and standardize third-party risk management (TPRM) across Investnet and its subsidiaries.

## Risks of Modern Slavery in our Operations and Supply Chain

Investnet's businesses provide technology, solutions and intelligence to our clients. As a corporation, we believe that the risk of Investnet to cause, contribute to, or be directly linked to modern slavery through our own hiring decisions, operations, and that of our immediate suppliers is low. However, those risks could increase the further we go into our supply chains, our ecosystem partners, and their supply chains. Investnet's businesses include acting as an asset manager, offering investment strategies and sub-advisory services to other financial advisors and institutions, and there is the potential for the companies we invest in to themselves be linked to modern slavery, and therefore connect Investnet to modern slavery through those portfolio holdings.

## Our Policies Related to Modern Slavery and Human Trafficking

### Due Diligence

Investnet's employee handbook has sections addressing human rights and human trafficking. The Prohibition of Human Trafficking section states Investnet expects all employees to report any circumstances that may involve human trafficking to Investnet's Legal or Human Resources departments.

The Investnet Human Rights Policy Statement, available on our website at <https://investnetonestg.prod.acquia-sites.com/sites/default/files/2023-07/investnet-human-rights-policy-2023.pdf> states that "Investnet firmly opposes human trafficking in all its forms, including child labor and forced labor, and is committed to preventing human trafficking in its corporate activities."

The Investnet Supplier Code of Conduct, available on our website at [https://www.investnet.com/sites/default/files/2023-09/Investnet\\_Supplier\\_Code\\_of\\_Conduct.pdf](https://www.investnet.com/sites/default/files/2023-09/Investnet_Supplier_Code_of_Conduct.pdf) lays out our expectations for suppliers, including specifically addressing human trafficking and many of the aspects of modern slavery. The Supplier Code of Conduct indicates Investnet may seek specific reassurances or seek to carry out due diligence or audits of suppliers to satisfy itself that modern slavery and human trafficking violations are not occurring. Investnet does not yet have a process that audits compliance by our suppliers with the Investnet Supplier Code of Conduct but relies on their responses to questionnaires used in our third-party risk management (TPRM) process and self-reporting by suppliers or the public disclosure of issues.

### Training

All employees are required to acknowledge annually they have read, understood and will comply with the policies and procedures in the employee handbook, including the sections on human rights and human trafficking.

Investnet does not currently provide employee training that specifically addresses modern slavery or human trafficking.

### Remediation

During the 2024 reporting period, Investnet was not involved in any remediation efforts for forced labor, child labor, or the loss of income to the most vulnerable families resulting from any measures we have taken to eliminate the use of forced labor or child labor in our supply chains. Investnet was not aware of any modern slavery issues in our operations or supply chains during the reporting period.

## Assessing the Effectiveness of our Actions

Envestnet continues to monitor and review our policies and actions with regard to modern slavery.

There were no reports by Envestnet's employees or suppliers of modern slavery incidents in our operations or supply chains during the 2024 reporting period.

## Review and Attestation

This statement was reviewed and approved by Envestnet's Board of Directors in their capacity as principal governing body of Envestnet, Inc. on May 28, 2025, and has been signed on this date on its behalf by Chris Todd, Director and Chief Executive Officer of Envestnet.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



**Chris Todd**  
Director and Chief Executive  
Officer May 28, 2025