Envestnet | Yodlee

Summary BCP Disclosure

2025

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Business Description

Envestnet is helping to lead the growth of wealth managers and transforming the way financial advice is delivered through its ecosystem of connected technology, advanced insights, and comprehensive solutions—backed by industry-leading service and support. Serving the wealth management industry for 25 years with approximately $6.5 trillion in platform assets, Envestnet technology and services are trusted by more than one-third of all financial advisors. Many of the largest U.S. banks, wealth management and brokerage firms, and Registered Investment Advisors (RIAs) depend on Envestnet to help drive business growth and productivity—and deliver better outcomes for their clients.

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

Our business segments are as follows:

- ***Envestnet 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.
- ***Envestnet Data and 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.

Envestnet Wealth Solutions
Envestnet Wealth Solutions empowers financial advisors at broker-dealers, banks, and RIAs with all the tools they require to deliver holistic wealth management to their end clients. In addition, the firm provides advisors with practice management support so that they can grow their practices and operate more efficiently.

Services provided to advisors include: financial planning, risk assessment tools, investment strategies and solutions, asset allocation models, research, portfolio construction, proposal generation and paperwork preparation, model management and account rebalancing, account monitoring, customized fee billing, overlay services covering asset allocation, tax management and socially responsible investing, aggregated multi-custodian performance reporting and communication tools and data analytics. We also have access to a wide range of leading third-party asset managers.

Wealth Solutions platforms include: Envestnet Workplace Solutions (401kplans.com / Envestnet Retirement Marketplace, ERS); FolioDynamix; MoneyGuide; Envestnet Billing Solutions / Redi2 (BillFin, Payments, Revenue Manager, Wealth Manager); Tamarac (Tamarac CRM; Tamarac Reporting & Trading; Truelytics; UMP (Unified Managed Platform); Wealth Analytics (WDP / Wealth Analytics, Wheelhouse).

Envestnet Data & Analytics
Yodlee is a leading data aggregation, analytics, and digital experiences platform. Yodlee provides clients and their account holders with data connectivity via open APIs, data enrichment, AI-based analytics, and digital experiences.

Over 1,400 clients, including financial institutions, financial technology innovators and financial advisory firms, including 17 of the 20 largest U.S. banks, subscribe to the Yodlee platform to underpin personalized financial apps and services for approximately 38 million paid end-users.

Yodlee serves two primary markets:

- ***Open Banking*** provides personal financial management, wealth management, payments, credit/lending, business financial management and enterprise business intelligence solutions for retail and commercial banks, credit unions, credit card providers, wealth management firms, FinTech firms, E-commerce, and payment solution providers.
- ***Alternative Data*** provides de-identified consumer spending insights for investment research and corporate and marketing research clients.

Data & Analytics platforms include: Abe.ai and Yodlee.

Firm Policy

Our firm's policy is to respond to a significant business disruption by safeguarding employees' health and safety, as well as company property; making financial and operational assessments; quickly recovering and resuming operations; protecting intellectual property, books and records; and allowing our clients to conduct business.

Our strategy is to manage an approved enterprise-wide Business Continuity Program to maintain the policy and standards while providing a comprehensive education and implementation process. The objective is to create, document, test, and maintain departmental business resumption plans in order to recover critical systems and functions. At least annually, Operations & Service departments with critical business processes test plans to ensure that they are workable, in compliance, and that staff are aware of their roles in the event of a business interruption. A corporate communication and management process exists to ensure critical business processes resume quickly, thereby reducing financial risk.

Significant Business Disruptions

Our plan anticipates two kinds of significant business disruption, internal and external. Internal disruptions affect only our firm's ability to communicate and do business, such as a fire in our building. External disruptions disrupt the operations of the securities markets for a number of firms, such as a natural disaster; acts of terrorism; cyber-attacks; equipment or system failures; unexpected loss of a critical service provider / facilities / key personnel; or a wide-scale, regional disruption. Our response to an external disruption relies more heavily on other organizations and systems, especially on the capabilities of firms that provide financial accounts and transaction information for many of our data aggregation clients.

As cybersecurity incidents have the potential to contribute to a significant business disruption, Envestnet's Business Continuity and Disaster Recovery planning controls complement the firm's Information Security program that leverages elements from NIST CSF, NIST Standards, ISO 27001:2013 and other relevant industry best practices. Under the direction of the firm's Information Security Officer, the program includes a threat-driven risk-based information security policy and risk management framework, a dedicated security function, while performing independent attestations and internal assurance activities to ensure program alignment.

Business Continuity Program & Plans

Envestnet has an enterprise-wide Business Continuity program which is aligned and certified to ISO 22301:2019. Envestnet's overall Business Continuity and Disaster Recovery strategies have been designed to complement each other and address not only worst-case scenario in the event of a significant business disruption, but also disruptions of a lesser magnitude.

Envestnet's program and plans encompass several levels of planning which cover all locations, employees, services, and products used in servicing our clients. Envestnet's Program is linked to regulatory controls, good corporate governance, effective risk management and it establishes sound management practice for this important area within the business. This document provides an overview of Envestnet's Business Continuity Program including all Business Continuity Plans maintained by our organization.

- ***Enterprise Business Continuity Plan*** - Enterprise-level document detailing the Business Continuity Program and policy for achievement of regulatory, contractual compliance, and industry best practice. The Enterprise Business Continuity Plan addresses the framework in which a business disruption would be managed to minimize the loss of vital resources throughout the company.
- ***Location Business Resumption Plans*** - Location-level recovery plans and procedures to achieve recovery of critical business in line with compliance and within the Recovery time Objective. In addition, these plans contain building-specific emergency response plans for use in an incident causing building evacuation or an employee health and safety issue, damage assessment forms, and site-specific vendor contacts.
- ***Department Business Resumption Plans*** - Department-level procedures providing all critical resources, skills, tasks, and Service Level Agreements identified through the Business Impact Analysis and updated at least annually; includes employee level procedures to achieve recovery in line with compliance and within the Recovery Time Objective. Also

identifies alternative employees within the department or in another geographic location that are able to supplement resumption efforts.

- ***Disaster Recovery Plans*** - Technology-specific plans and procedures to protect critical business from extended outages and to ensure resumption and recovery of defined critical technology within the Recovery Time Objective and Recovery Point Objective.
- ***Summary Business Continuity Plan Disclosure*** - Public summary of Envestnet's Business Continuity Plan and program details how Envestnet maintains compliance with regulatory requirements. The public summary is provided to all customers upon request and published on our website.
- ***Building Emergency Response Plans*** - building-specific emergency response plans for use in an incident causing building evacuation or an employee health and safety issue. The plan includes Damage Assessment Forms and Vendor Contacts.
- ***Employee Unavailability Plan / Pandemic Plan*** - Provides instruction for planning, response, and resumption of the business due to a pandemic, communicable illness or other events impacting availability of Envestnet employees.

Plan Location and Access

Our firm will maintain copies of its Business Continuity Plans), including the annual reviews and approvals in accordance with our Records Management policy, along with any changes that have been made to it for inspection. Copies of plans are available to plan owners and plan approvers via the 'Envestnet Community' within the Fusion Risk Management platform. Optionally, plan owners and plan approvers may maintain copies of plans in either hardcopy or electronic form using a secure medium of their choosing - Network Shared Drive; Microsoft Office 365; etc. These secondary copies shall be maintained and securely destroyed in accordance with the Global Information Security Policy – Information Classification and Handling Policy and Compliance Manual – Records Retention Schedule.

Office Locations

Our parent company headquarters is located in Berwyn, PA, and our firm, including all subsidiaries, has US offices in Boston, MA; Denver, CO; Powhatan, VA; and Raleigh, NC. In addition, international locations exist in London, United Kingdom; Sydney, Australia; and Trivandrum, India. Some of the referenced locations are dedicated to specific service offerings provided by other Envestnet entities and thus have separate Business Continuity Summaries to cover individual operations.

Yodlee US-based operations exist in Berwyn, PA; Denver, CO; and Raleigh, NC. In addition, international locations exist in London, United Kingdom and Sydney, Australia.

#	US Office Locations	Address	Envestnet Platform Support
1	Berwyn, PA PARENT COMPANY HEADQUARTERS	1000 Chesterbrook Blvd, Suite 250 Berwyn, PA 19312	ERS Redi2 Tamarac UMP WDP Yodlee
2	Boston, MA	205 Portland St, Suite 202 Boston, MA 02114	Redi2
3	Denver, CO	1801 California Street, 23rd Floor Denver, CO 80202	UMP Yodlee
4	Powhatan, VA	1588 Oakbridge Terrace Powhatan, VA 23139	MoneyGuide
5	Raleigh, NC YODLEE HEADQUARTERS	621 Hillsborough St, 10th Floor Raleigh, NC 27603	Redi2 Tamarac UMP Yodlee

#	International Office Locations	Address	Envestnet Platform Support
6	London, United Kingdom	Level39, One Canada Square Canary Wharf London, United Kingdom E14	Yodlee
7	Sydney, Australia	Level 4/11 York Street Sydney NSW 2000 AU	Yodlee
8	Trivandrum, India (Techno Park)	First Floor, Bhavani Building Technopark Campus, Karyavattom Trivandrum 695 581, Kerala, India	ERS FolioDynamix Tamarac UMP

Alternative Physical Location(s) of Employees

Envestnet |Yodlee does not maintain specific 'hot site' recovery facilities for operational failover. In the event of a significant business disruption, Envestnet will move our staff from affected locations to the relevant predetermined workspace failover site assigned to each employee record within their Department Resumption Plan and maintained in our Business Continuity Planning system.
Envestnet's overall Business Continuity and Disaster Recovery strategies have been designed to complement each other to address not only worst-case scenario in the event of a significant business disruption, but also disruptions of a lesser magnitude.

Envestnet maintains stop-gap measures for business continuity, some of which are outlined below:

- ***To address loss of platform technology***, Envestnet and its affiliates have an established presence in geographically dispersed primary and disaster recovery data center facilities for their platform technologies, resulting in the ability to support business out of either facility, should one of these locations be compromised by a natural disaster. Both data centers are hardened with redundant HVAC systems, electrical systems with battery backup and diesel generators, and temperature and environmental monitors. Access to the data centers is secured by cameras and card key access with biometric scanners. Data centers are staffed 24x7x365;
- ***To address contingency arrangements for loss of key personnel due to a pandemic or other limited event***, Envestnet maintains an Employee Unavailability Plan as a supplemental document to the Firm's Enterprise, Location-Specific and Departmental Business Resumption Plans. Long-term or permanent arrangements would be made in conjunction with Human Resources Succession Plans.
- ***To reduce key man risk***, most critical Operations & Service departments work in a distributed fashion, meaning that they have multiple locations that perform the same production work. In instances of weather issues or regional disasters, these distributed locations can continue processing, and unaffected Envestnet locations can serve as a relocation point for critical employees should the significant business disruptions timeframe be extended;
- ***All employees are assigned a workplace strategy to be employed in the event of a significant business disruption*** – work from home; relocate to an alternate Envestnet facility; on hold; etc. In order to support these strategies:
    - Yodlee employees have been issued Envestnet laptops to support working in a remote fashion and utilizing secure VPN capabilities and our web-enabled systems to access our custom platforms to support critical business processes in a remote fashion.
    - Periodic testing of these strategies is required for critical Operations & Service departments.

Data Backup and Recovery (Hard Copy and Electronic)

Our firm maintains its primary copy of books and records at its Berwyn, PA and Denver, CO offices and its backup hard copy books and records through various third-party storage vendors. Hard copy records are sent to offsite storage semi-annually or more frequently as needed.

Our firm maintains its backup electronic books and records through strategic partnerships with various parties for our platform technology and backup vendors. The data vaulting / managed backup service and data center providers, which house our production and disaster recovery sites, are hosted in the United States, and do not have direct access to Envestnet | Yodlee data or client Personally Identifiable Information (PII). Data center providers only provide physical space, security, and

environmental controls; Envestnet manages the equipment. Backup vendors only store data on behalf of Envestnet; Envestnet encrypts data before transmission, vendors do not have access to encryption keys. We have a defined data protection strategy to cyclically back up our electronic records to meet the Recovery Time Objectives and Recovery Point Objectives of our various mission critical systems.

In the event of an internal or external significant business disruption that causes the loss of our paper records, we will access electronic versions of these records in our various systems and platforms. If our primary site is inoperable, we will continue operations from our backup site or an alternate location. For the loss of electronic records, we will recover the electronic data from our backup records stored in the disaster recovery site, or, if our primary site is inoperable, continue operations from our backup site.

Financial and Operational Risk Assessments

Envestnet has an established enterprise-wide Risk Management program with which we manage our proprietary risk inventory, related controls, mitigation plans, and risk treatment consistent with industry best practices and regulatory guidance. Envestnet risks are reviewed and assessed on an ongoing basis within the organization to support various initiatives and compliance programs including but not limited to ISO 22301; Sarbanes-Oxley Act (SOX); SEC Rule 206(4)-7; Internal Audit; Business Continuity; and Risk Management. In addition, Envestnet's Information Security Risk Management Process includes asset-based risk treatment plans and is certified with accreditation to ANSI National Accreditation Board (ANAB) and United Kingdom Accreditation Service (UKAS).

Envestnet's Risk Management program is facilitated by a cross-functional Risk Management Committee (RMC) responsible for supervising the Enterprise Risk Framework of the Company. The RMC, chaired by the Chief Compliance Officer and co-chaired by the Head, Business Continuity & Risk, is comprised of senior-level management representatives from various disciplines within the firm that meet formally to review, assess, and discuss any significant risks or exposure and to review the steps taken to minimize identified risks or exposures. The Risk Management program is managed using a corporate risk management tool and facilitated through established policies, procedures, and training that raise awareness and provide a means of reporting and addressing potential problem and risk areas within the organization.

Envestnet's risk assessments, risk inventory, meeting minutes, and other Committee materials are considered confidential and may not be shared externally.

Envestnet's Risk Management Program includes the following:

- The RMC meets formally on a scheduled basis throughout the calendar year to review, assess and discuss any significant risks or exposure and steps taken to minimize identified risks or exposures.
- The RMC is responsible for ensuring that sound policies, procedures, and practices are in place for the enterprise-wide management of the Company's material risks and to report the results of the Committee's activities to Senior Management and Board of Directors.
- The RMC is responsible for designing and implementing a risk management framework to:
    - Provide ongoing guidance and support for the overall risk management framework ensuring that best practices are incorporated.
    - Ensuring that risk assessments are performed periodically and that results are communicated to relevant stakeholders, Senior Management, and the Board of Directors.
    - Ensuring that management understands and accepts its responsibility for Identifying Hazards; Assessing and Categorizing the Risk; Evaluating Existing Controls; Recommending Additional Risk Controls; Establishing Risk Acceptance Criteria; and for ongoing Monitoring and Reviewing of Risk.
    - Sets the tone for Envestnet's business units and functional areas regarding the importance and value of risk management.
- The RMC is responsible for executing and monitoring risk management practices and may engage with independent firms as needed.

Operational Risk

Our firm recognizes that operational risk includes the firm's ability to maintain communications with clients and to retrieve key activity records through its mission critical systems. In the event of a significant business disruptions, we will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of a significant business disruptions will determine the means of alternative communication, the communication options we will employ will include our web site, telephone, voicemail, and secure email. In addition, we will retrieve our key activity records as described in the section above, Data Backup and Recovery (hard copy and electronic).

Financial and Credit Risk

In the event of a significant business disruptions, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. To the extent that we have financing requirements at the time of a significant business disruptions above and beyond considerations that are already contemplated through insurance coverage, we will request additional financing from our bank or other credit sources in order to remain in compliance with any applicable capital requirements. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

Mission Critical Systems

Our firm's mission critical systems are those that ensure prompt and accurate reporting of securities holdings and the processing of securities transactions, including order implementation, reconciliation, comparison, allocation, clearance and settlement of securities transactions, the maintenance of client accounts and the delivery of funds and securities. More specifically, these systems include the custom platforms that support our core business offerings. In addition, our mission critical systems include any corporate applications that support our communication needs surrounding remote working, internet, phone, and email.

Recovery Time Objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure— particularly telecommunications—can affect actual recovery times.

Business Impact Analysis

Envestnet defines critical business processes as those that support market and customer agreements and include the people and technology that support these processes, ensure compliance with requirements, and maintain customer relationships.

As a part of Envestnet's annual review and update of our Business Continuity Program and Plans, Envestnet performs a Business Impact Analysis to account for any changes in our operations, structure, business, and/or locations to ensure that our planning effort encompasses the entire organization. The Business Impact Analysis to reflects on the potential impact from a Financial; Legal / Compliance; Operational; Market Share; Reputational; and Strategic perspective that a disruption would have on Envestnet.

Through the Business Impact Analysis, Envestnet has identified critical departments, critical business processes, inter-department dependencies and recovery priorities for both technology and resources. The Business Impact Analysis process is supported through our Business Continuity Management Tool, Fusion Risk Management and assists the firm in analyzing the following criteria for each critical business process:

- Building a criticality profile, outlining personnel resource requirements, as well as mitigation strategies.
- Assessing the potential financial, operational, legal/compliance, reputational, market share, and strategic impacts over several points in time ranging from 1 day to 30 days or more during a significant business disruption.
- Identifying and prioritizing critical business processes and associated Recovery Time Objectives.
- Providing visibility for upstream and downstream dependencies between critical business processes across the firm.
- Providing visibility for system and technology resources for both internal systems and external service providers.

- Identifying key personnel that support processes in either a primary or secondary role.
- Naming alternate processing facilities where work is processed in a distributed fashion.
- Outlining dependencies on key documents and vital records.
- Identifying critical strategic partners / third-party vendors required to support our business.

In addition to the Business Impact Analysis performed at the critical business process level, Envestnet performs an annual Location Threat Assessment for each brick-and-mortar location to assess location-specific risks and subsequent risk treatment plans under the categories - Health Disasters, Man-Made Disasters, Facility Disasters, and Natural Disasters.

Incident / Crisis Management

Given our reach in financial services, Envestnet's senior management understands the importance of the services we provide to our clients and that any interruption in service has the potential of severe repercussions to our business partners. As a result of the environment we live and work in, management teams' face increasing regulation and liability surrounding resiliency to any event that can disrupt the business. On an enterprise-level we aim to identify potential impacts that threaten our organization and provide a continuity framework to our employees. This framework has the purpose of building resilience and capability for an effective response that safeguards the interests of our key stakeholders, reputation, brand, and value creating activities.

Envestnet has enterprise-wide Business Continuity, Disaster Recovery, and Information Security programs. Envestnet incorporates Incident / Crisis Management into three different planning streams – Business Continuity, Disaster Recovery, and Information Security Management. Envestnet's Business Continuity Team will manage incidents during a significant disruption or disaster event requiring activation of our Business Continuity Plan.

Business disruptions can range from temporary power outages or severe weather outages to earthquakes, cyber threats, or internal attacks. Whatever the potential disruption, we must be prepared to safeguard our employees and our business, by achieving a state of readiness and resilience to face any adversity or challenge with minimum impacts.

Envestnet approaches incidents and business recovery with an 8-phase, repeatable approach:

- **Phase 1:** Emergency & Disruption Response
- **Phase 2:** Assessment
- **Phase 3:** Declaration of an Office Disruption or Disaster
- **Phase 4:** Communication
- **Phase 5:** Resumption of Critical Business Processes
- **Phase 6:** Recovery of the Business
- **Phase 7:** Normalization
- **Phase 8:** Lessons Learned / After Action Plan Step

After an incident is detected or reported, it is addressed through a triage process by the lead, where it is categorized as 1) an enterprise-wide disaster; 2) a location-specific disruption; or 3) an incident with no declaration required. Regardless of declaration, documented disruption and communication procedures are followed.

Alternate Communications between the Firm and Clients, Employees, and Regulators

Clients

We communicate with our clients using our platform technology, telephone, email, our web site, fax, U.S. mail, and in person visits at our firm or at the other locations. In the event of a significant business disruptions, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email, but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail. In addition, we may also utilize our automated marketing capabilities as a means to reaching select contacts at our

client home office locations quickly during a significant business disruption to provide disruption notification, procedures, and contingency arrangements.

Employees

We communicate with our employees using the telephone, email, and in person. In the event of a significant business disruptions, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree and/or our automated Emergency Notification System, AlertMedia, so that senior management can reach all employees quickly during a significant business disruption to provide disruption notification, procedures, and contingency arrangements.

Key Service Providers / Strategic Partners

We communicate with our key service providers / strategic partners using the telephone, email, fax, U.S. mail. In the event of a significant business disruption, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Regulators

We communicate with our regulators using the telephone, email, fax, and U.S. mail. In the event of a significant business disruption, we will assess which means of communication are still available to us and use the communication closest to those we have used before the disruption.

Regulatory Reporting

Our firm's Data & Analytics business is subject to regulation by the Office of the Comptroller of the Currency (OCC); the Federal Reserve System (FRS); the Consumer Financial Protection Bureau (CFPB); and the Federal Deposit Insurance Corporation "FDIC). We file reports with our regulators using paper copies through the U.S. mail and electronically using fax, email, and the Internet. For our United Kingdom (UK) branch we file reports with the Financial Conduct Authority (FCA) using their online service RegData. In the event of a significant business disruption, we will check with the OCC, FRS, FDIC, and other regulators to determine which means of filing are still available to us and will use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

Envestnet Data & Analytics

Office of the Comptroller of the Currency (OCC) 101 South Tryon Street, Suite 400 Charlotte, NC 28280 Phone: +1 (704) 350-4800	**Financial Regulatory Services (FRS)530 East Trade Street** Charlotte, NC 28202 Phone: +1 (704) 358-2100
Federal Deposit Insurance Corporation (FDIC) Raleigh, NC Phone: +1 (919) 787-8727	**Financial Conduct Authority (FCA)** 12 Endeavour Square London, UK E20 1JN Phone: +44 207 066 1000
Australian Competition and Consumer Commission (ACCC) Level 27 | 135 King Street Sydney NSW 2000 Phone: +61 2 9230 9133	**Office of the Australian Information Commissioner (OAIC)** GPO Box 5218 Sydney NSW 2001 Phone: +61 2 9942 4272
US Department of Labor 200 Constitution Ave NW Washington, DC 20210 Phone: +1 866 487 2365	**Consumer Financial Protection Bureau (CFPB)** 1700 G St. NW Washington, DC 20552 Phone: +1 855 411 2372

Communications with Law Enforcement / Federal Bureau of Investigation (FBI)

In the event of a security-related incident which requires assistance from external agencies, Envestnet will communicate with local FBI authorities regarding the nature and extent of the incident.

Below is our contact information for the FBI Chicago and North Carolina Field Offices. Envestnet's Information Security Department will coordinate all communications.

Federal Bureau of Investigation (FBI) **Chicago Field Office** 2111 W. Roosevelt Rd Chicago, IL 60608 Phone: +1 (312) 421-6700 Fax: +1 (312) 8295732/38 Email: Chicago@ic.fbi.gov	**Federal Bureau of Investigation (FBI)** **North Carolina Field Office** 7915 Microsoft Way Charlotte, NC 28273 Phone: +1 (704) 672-6100

Critical Business Constituents and Counterparties

Envestnet has an enterprise-wide vendor management program through which Envestnet has identified dependencies on several key service providers. As a result, Envestnet | Yodlee follows a formalized a risk-based strategy for performing vendor due diligence and oversight. Envestnet works with the business to identify vendors that support their critical business processes and performs due diligence on the vendor and their service offerings at the onset of the relationship. The due diligence review is tailored to the specific service provided by the vendor, and typically includes information and physical security, regulatory compliance, business continuity and disaster recovery, and enterprise risk management.

For vendor onboarding, Envestnet's Legal department, along with Envestnet's Information Security Officer, requires that all vendors are subject to strict confidentiality, non-use and non-disclosure restrictions, and that all contracts contain appropriate language to specifically address issues related to Information Security, Data Security, Confidentiality, and Service Level Agreements (as applicable to the specific vendor engagement) , as specified within Envestnet's Information Security in Supplier Relationships Policy and further supported within Envestnet's Compliance Manual. Both policies are reviewed during annual, external ISO and Compliance Audits.

The vendor due diligence process is tracked and monitored throughout the lifecycle of the vendor relationship and includes the following: Business Impact Analysis; Risk Rating; Information Gathering Questionnaire; Risk Remediation; Development of Relevant Contract Terms for Information Security and Privacy; and Final Review and Approval. Based on specified risk criteria Envestnet may also conduct periodic due diligence reviews and/or site visits for critical service providers.

Envestnet | Yodlee engages in strategic partnerships with several third-party vendors to leverage certain capabilities.

The following are examples of our strategic partners; a comprehensive list can be made available upon request:

- **Data Center Providers** only provide physical space, security, and environmental controls; Envestnet . manages the equipment.
- **Backup Vendors** encrypted copies of web, application code and database data are backed up; The data does not leave Envestnet owned infrastructure at any given point in time.
- **Shredding Vendors** are supervised onsite and throughout the shredding process.
- **Data Feeds** are one-way to Envestnet.
- **Operations Support** provides contracted personnel, working within Envestnet's systems, security protocols, and controls, to support client and professional services; data operations; and engineering, enabling Envestnet to scale operations based on demand.

Business Constituents

We have contacted our critical business constituents defined as those businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services and have determined the extent to which we can continue our business relationship with them in light of the internal or external significant business disruption. We will quickly establish alternate arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a significant business disruption to them or our firm.

Counterparties

We have contacted our critical counterparties, such as our disaster recovery providers to determine if we will be able to carry out our transactions with them in light of the internal or external significant business disruption. Where the transactions cannot be completed, we will contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Testing

Business Continuity tests are completed with critical business resources and Business Continuity Teams at least annually to provide Envestnet Management and our stakeholders with the assurance that the business will successfully recover following a business disruption.

Below is an overview of Envestnet Business Continuity Testing:

- Testing is a major component of Envestnet's Business Continuity Program, tests ensure that plans are repeatable, consistent and that staff are able to fulfill roles and responsibilities.
- The test schedule is created annually in Q4 by Business Continuity Teams. Considerations are made for employee participation and preparedness levels along with the current risks and impacts to the business.
- Success is measured ultimately by achievement in meeting business requirements such as communication and the Recovery Time Objective.
- As needed, Business Continuity Plans are updated to account for findings and/or feedback received from test participants.
- Any corrective actions resulting from testing are recorded and tracked through a mitigation process to completion. This is accomplished through a combination of recording test results within our planning system, where we detail testing artifacts and within Envestnet's Corrective Action Plan Log.
- Quarterly program and test summary reports are provided to management for review and action, as well as to clients if requested.

Maintenance

Envestnet reviews plans on an annual basis with all owners to ensure plans are accurately maintained and fit for purpose. At the time of review, business changes and best practices are reviewed and reflected within plans.

Location-specific Business Resumption Plans are reviewed by location level owners and Department Business Resumption Plans are reviewed by department level owners. All Business Continuity Plans are reviewed by the Business Continuity Manager. It is the responsibility of the plan owners to ensure the plans have been reviewed, are accurate and complete.

The Business Continuity Program is approved by the Chief Financial Officer, or their designee.

Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business, or location.

In addition to the annual Business Continuity Plan review process, key areas that trigger review and potential revisions include:

- Business Continuity Plan test results
- Significant business / location / department changes or incidents
- Laws & Regulations
- Best Practice Guidelines

Senior Manager Approval

The approval for the Enterprise Business Continuity Plan and Program is managed and tracked through an automated approval workflow process within our Business Continuity Planning system, Fusion Risk Management's 'Envestnet Community'. ,.

I have reviewed and determined that this plan is reasonably designed to enable our firm to meet its obligations to customers in the event of a significant business disruption.

By: Joshua Warren
Title: Chief Financial Officer
Date: January 4, 2025