

Avantax®

AVANTAX, INC.

CODE OF ETHICS AND CONDUCT

(Adopted August 14, 2014 and Amended through January 26, 2023)

General Policy Statement

AVANTAX GUIDING PRINCIPLES AND BEHAVIORS



Bold Innovation

Disrupt the Competition
Be Fast, Agile and Efficient
Continuously Improve

Accelerate & Iterate

Use Data Insights to Deliver Value
Use Products & Tech to Address Customer Pain Points
Simplify and Automate to Delight!

Strength & Openness

Collaborate and Build Strong Teams
Welcome new Perspectives &
Engage in Constructive Conflict
Be Consistently Ethical & Transparent

Intense Customer Focus

Be Customer Obsessed!
Serve with Passion
Deliver on Promises to Build Trust

Clear Strategic Alignment

Align Actions & Decisions to Priorities
Agree on Goals, Metrics, & Milestones
Track Progress and Refine as Needed

Smart, Scalable Execution

Test & Iterate to Achieve Outcomes
Identify the Roadblocks & Address Them
Get Behind the Ideas that Work,
Stop Those that Don't

As part of our guiding principles and behaviors (the “*Guiding Principles*”), Avantax Inc., including its subsidiaries (collectively, the “*Company*” and also referred to as “we,” “us” or “our”), believes ethics, integrity, honesty and respect are part of our core values and expect all employees, officers and directors, including the Company’s chief executive officer, chief financial officer, principal accounting officer or controller, treasurer, or persons performing similar functions (collectively, “*Company Personnel*”), to act in a professional manner that reflects these values, and applies whether Company Personnel are working at the Company’s premises or at any other location, including working remotely.

This Code of Ethics and Conduct (the “*Code of Conduct*”) sets forth the Company’s expectations regarding how Company Personnel should embody the Guiding Principles when conducting business on behalf of the Company. This policy contains broad principles, and it is not intended to address every situation where ethical and professional judgment should be used by Company Personnel. More detailed information is set forth in the Company’s handbook and the policies and procedures applicable to individual business units. You are responsible for complying with this Code of Conduct and all other Company policies that apply to you and your business unit. For example, employees serving the Avantax Wealth Management business unit are also expected to

comply with the Avantax Wealth Management Code of Ethics and any other policies and procedures applicable to Avantax Wealth Management.

Company Personnel are expected to be accountable for adherence to the Code of Conduct. If you violate this Code of Conduct or fail to report violations that come to your attention, it will be grounds for corrective action, up to and including termination of your employment.

Ethics, Integrity, Honesty and Respect

Company Personnel are expected to act in the best interests of the Company and shall at all times do so in a manner that reflects the Company's values of ethics, integrity, honesty and respect. By maintaining these ethical and professional standards, Company Personnel are expected to adhere to the following:

- ❖ ***Professionalism.*** Company Personnel shall use good judgment and act in a professional manner that is ethical and demonstrates integrity, honesty, and respect when interacting with fellow Company Personnel, customers, partners, suppliers, stockholders, members of the public, and other constituencies, such as advisors. Unprofessional behavior includes conduct that interferes with others' ability to perform their job.
- ❖ ***Discrimination and Harassment.*** The Company values the diversity of Company Personnel and its partners. Discrimination or retaliation by any Company Personnel based on certain characteristics such as race, color, creed, gender, sexual orientation, gender identity, religion, national origin, citizenship, physical and mental disability, age, military or veteran status, familial status, or any other protected status under applicable federal and state law does not reflect the Company's core values and is strictly prohibited. The Company prohibits abusive or harassing conduct by any employee toward others, such as unwelcome sexual advances, comments based on protected characteristics, or other non-business, personal comments or conduct that may make others uncomfortable in their employment with the Company. This applies to recruiting, hiring, compensation, benefits, training, termination, promotions or any other terms and conditions of employment. You must not possess, use or distribute pornographic, racist, sexist or otherwise offensive materials on the Company's property or use the Company's property or networks to obtain or view such information. The Company encourages employees to report harassment or other inappropriate conduct as soon as it occurs in accordance with the manner described below for reporting concerns or in accordance with the Company's policy on harassment in the employee handbook.
- ❖ ***Conflicts of Interest.*** Company Personnel are expected to use their best judgment to act, at all times, and in all ways that promotes the best interests of the Company over the individual, personal interests of Company Personnel. A "conflict of interest" may exist when Company Personnel's personal interests interfere or appear to interfere with the best interests of the Company or an employee's judgment. For example, a conflict of interest may occur when an employee or a family member receives a personal benefit as a result of the employee's position with the Company. A conflict of interest may also arise from an employee's business or personal relationship with a customer, supplier, vendor, competitor, business partner, or other employee, if that relationship impairs the employee's objective business judgment. In general,

employees must avoid, where possible, any interest, investment or association in which a conflict of interest, or the appearance of a conflict, might arise. Employees shall disclose to their supervisor or the Company's Legal department any situations that may involve actual, apparent, or potential inappropriate or improper conflicts of interest affecting them personally or affecting other employees or those with whom the Company does business.

- ❖ ***Corporate Opportunities.*** Employees are expected to advance the Company's interests when the opportunity to do so arises. This means that you must not take for yourself any business opportunities that you discover through the use of Company property or information or through your position with the Company, unless disclosed in advance to and, if appropriate, approved by (a) for officers and directors, the Audit Committee and (b) for other employees, the Legal department.
- ❖ ***Gifts, Gratuities, Entertainment, and Travel.*** Employees should never accept anything from anyone including, but not limited to, any vendor, supplier, or other current or potential business partner of the Company that would appear to create a conflict of interest or that violates any other Company policy, including any policies that limit dollar amounts on gifts, such as the Avantax Code of Ethics. Gifts of goods or services that are of a size that would be likely to influence any business decision and gifts of any amount to any government official are prohibited. This prohibition does not apply to items that are immaterial in value or items that are generally free promotional items, assuming these items are not otherwise prohibited by law. If you are unsure whether a situation could be considered an actual or perceived conflict of interest or have any questions as to whether you may accept a gift, Company Personnel should consult with their supervisor or the Company's Legal department to resolve any situation which may arise.
- ❖ ***Prohibited Competition, Outside Compensation and Activities.*** Company Personnel shall not compete (which includes, but is not limited to, working simultaneously for a competitor, customer, supplier, contractor or other similar party) with the Company during the term of their employment and shall not initiate any steps to compete with the Company while employed by the Company. While employed by the Company, receiving compensation from any third party other than the Company for those skill sets that you employ as an employee of the Company is strictly prohibited. Subject to a written agreement with the Company, Company Personnel may be prohibited from competing with the Company for a limited period of time after employment with the Company terminates. In addition, outside work activities that do not compete with the Company but affect job responsibilities or performance, utilize Company assets or property, and/or occur during the Company Personnel's work hours at our Company are prohibited. Trade secrets and other nonpublic know-how and information learned at or developed at or for the Company must not be used in activities outside our Company or in any other way that could harm our business.
- ❖ ***Confidentiality.*** Company Personnel may have access to confidential information related to the Company's business. Information related to the Company's business includes all forms of information about the Company, including information about the Company's customers, its advisors, counterparties, vendors, business partners, and fellow employees. Confidential information includes all non-public information that might be of use to competitors or harmful

to the Company or other companies with which the Company does business, if disclosed. This includes all information, in any format, that the Company has a legitimate business interest in protecting and may also include information received from or relating to third parties with which the Company has or is contemplating a relationship, such as current or potential customers, operators, suppliers or strategic partners, and, in addition, may consist of the fact of such relationship or contemplation of such relationship. Company Personnel must protect the confidentiality of all confidential information related to Company's business. Company Personnel are strictly prohibited from using or disclosing any confidential information in an unethical or illegal manner. Company Personnel should consult with their supervisors or the Legal department if there is any question about whether certain information may be shared or disclosed within or outside of the Company. In addition, do not disclose to the Company, or use during your employment with the Company, any confidential information, nonpublic, or trade secret of a prior employer. Company Personnel are prohibited from using confidential information, nonpublic, or trade secrets of a prior employer without express written consent from that prior employer. The obligation to treat information as confidential does not end when an individual leaves the Company. Upon separation from the Company, everything that belongs to the Company, including all documents and other materials containing confidential information, must be returned. *In addition, if you have signed a confidentiality agreement with the Company, refer to that agreement for more information regarding your specific obligations in relation to confidential information.*

- ❖ ***Outside Board and Other Service.*** Company Personnel are required to obtain prior authorization from the Legal department for service as a director, general partner, manager, officer trustee, consultant or similar position with any privately held or public business entity or as an appointee to any kind of governmental, quasi-governmental or regulatory agency or body. Service solely as a director or trustee of nonprofit corporations engaged in charitable activities does not require approval unless that activity could involve improper conflicts of interest.
- ❖ ***Prohibited Political Contributions.*** Unless first approved by the Legal department or the Company's Chief Executive Officer, no Company Personnel shall contribute in the Company's name or on the Company's behalf, any cash, services or property of any kind for or in support of any political candidate, committee, initiative, or activity. No lobbying efforts or contracts shall be undertaken in the Company's name or on the Company's behalf without the prior approval of the Legal department or the Company's Chief Executive Officer.
- ❖ ***Fair Dealing.*** Company Personnel must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom they have contact in the course of performing their job. Company Personnel may not take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.
- ❖ ***Protection and Proper Use of Company Assets.*** Company Personnel should protect the Company's assets and ensure their efficient and proper use. Theft, intentional carelessness and waste have a direct impact on the Company's profitability and are prohibited. All Company assets should be used only for legitimate business purposes. Any suspected incident of fraud

or theft should be reported for investigation immediately. The obligation to protect Company assets includes physical and intangible assets, such as confidential information and data and the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any nonpublic financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties. You are responsible for taking proper security precautions when using the Company's networks and information technology systems. Be sure to secure your computers, phones, tablets and other devices properly when unattended. Before sending information considered sensitive or vulnerable, you should password protect or encrypt the information.

- ❖ ***Intellectual Property.*** Patents, copyrights and trademarks are legal terms that define when an invention, product, written work or name is owned by an individual or company and use of these by others is prohibited without express permission. Ownership rights in patents, copyrights and trademarks are granted on a country-by-country basis. You may sometimes develop ideas, processes and technology on the Company's behalf or in the scope of your work for the Company that will be protected by patents, copyrights, trademarks or trade secret laws. This "intellectual property" usually belongs to the Company, depending on the situation. As required by law and the terms of your employment, each of you agrees to assign the rights to any such intellectual property to the Company.
- ❖ ***Data Privacy and Protecting Employee Data.*** The Company protects personal data through organizational and technical measures including IT security tools, restrictions on access to the data and physical security measures to help prevent unauthorized or unlawful access, disclosure, loss, destruction or damage. The Company accesses and uses personal data only for legitimate business purposes and maintains appropriate access controls and use limitations. Only those individuals who need the data to accomplish a business objective should have access to personal data and only for as long as they need it to accomplish the objective. You are required to follow all applicable privacy, information security and data protection laws that govern the handling, use and retention of personal data, which means any information that, standing alone or in connection with other data, could be used to identify the individual to whom the information relates. Some information is particularly sensitive personal data, such as health information, government identification numbers and compensation data, and is subject to even further protections. Any collection, storage, processing, transfer, sharing or use of personal data must be done in a manner that protects such data from inadvertent or unauthorized access, use, disclosure, loss, destruction or damage, and any authorized disclosure or use must be in compliance with local laws.
- ❖ ***Electronic Communications.*** The Company provides resources such as computers and other physical assets to enable you to conduct business. While you are permitted limited personal use of these assets, such personal use should not detract from the performance of your duties or violate any Company policy or applicable law. You must not use these resources to improperly disclose or misuse the Company's confidential information, conduct illegal activities, access or download obscene or sexually explicit material, or communicate discriminatory, harassing or threatening messages. You have no expectation of personal

privacy in connection with the use of Company resources unless otherwise permitted by law. The Company reserves all rights, to the fullest extent permitted by applicable law, to monitor and review any messages, internet browsing history and other information sent, received or viewed using Company resources.

Adherence to Applicable Laws and Regulations

Company Personnel must follow all applicable laws and regulations. In the event of any uncertainty regarding the applicability or requirements of a law or regulation to the Company and Company Personnel in carrying out the business of the Company, Company Personnel must discuss this issue with the Legal department. As a publicly traded Company, the Company is required to abide by the rules and regulations of the Securities and Exchange Commission (the “*SEC*”), Nasdaq, the U.S. government, any applicable regulatory or self-regulatory organizations, and other local, state and national laws, rules or regulations that may be applicable to the Company from time-to-time. The Company maintains certain policies, and Company Personnel are expected to adhere to those policies as well as the following:

- ❖ ***General Compliance with Laws.*** The Company’s business is subject to various laws, rules and regulations. Although you are not expected to know the details of the many laws governing our business, you are expected to be familiar with and comply with the policies and procedures that apply to your business unit and review any policies and complete any required training that applies to you. When in doubt about applicable laws, seek advice from supervisors, the Legal department, the Compliance department or other appropriate personnel.
- ❖ ***Accuracy of Records and Reporting.*** Company Personnel are responsible for maintaining accurate records. All business transactions must be accurately recorded in a timely manner. The Company’s books, records, accounts and financial statements must be maintained in appropriate detail, must properly reflect the Company’s transactions and must conform both to applicable law and to the Company’s system of internal controls and accounting requirements, and no one shall enter any false or artificial information in the Company’s records or reporting systems. Further, the Company’s public reports, including its financial reports, must contain full, fair, accurate, timely, and understandable disclosure as required by law. The Company’s financial, accounting, and legal groups are responsible for procedures designed to assure proper internal and disclosure controls, and all employees must cooperate with these procedures.
- ❖ ***Insider Trading Policy.*** The Company’s Insider Trading Policy prohibits any Company employee who is aware of material nonpublic information concerning the Company, or concerning third parties with whom the Company does business, from buying or selling securities of the Company or of those third parties until after the material information has been fully disclosed to the public. In addition, Company Personnel are also prohibited from disclosing material nonpublic information to others who then trade based on that information or making recommendations or expressing opinions as to transactions in securities while aware of material nonpublic information (which is sometimes referred to as “tipping”). All trading of Company securities should be done in accordance with the Company’s Insider Trading

Policy, and Company Personnel are expected to adhere to any blackout restrictions and pre-approval requirements for trading in the Company's Insider Trading Policy.

- ❖ ***No Selective Disclosure.*** In addition, SEC rules also prohibit selective disclosure of material nonpublic information to certain people outside the Company. Therefore, all Company Personnel are expected to assist the Company in keeping all material nonpublic information about the Company strictly confidential unless and until the Company makes an authorized press release or other authorized public communication or filing. Requests from the media, analysts or stockholders about our Company's performance or financial situation must be directed to the Chief Executive Officer, the Chief Financial Officer, or the Sr. Director of Investor Relations, who have been designated the Company spokespersons. Any disclosure of material nonpublic Company information must be made in accordance with the Company's Communications and Disclosure Policy.
- ❖ ***Information to the Public.*** Our policy is to provide timely public dissemination of material information about our business only through Company Personnel authorized for this purpose. Company Personnel are not, under any circumstance, to discuss the Company's financial, business, legal or other information with the press (except for those employees expressly authorized for this purpose) or on any internet site, intranet site, or other "discussion board," "chat room," "social media" site or similar forum. In addition, any electronic communications or online activities by Company Personnel are subject to and must comply with the Company's electronic and social media communications guidelines included in the employee handbook.
- ❖ ***Bribery and Corruption.*** Offering or paying bribes to win business or obtain an unfair advantage is unacceptable no matter where the Company is doing business, even if business is lost or difficulties are encountered as a result (for example, delays in obtaining permits or licenses). Offering, paying, accepting or soliciting bribes, kickbacks, payoffs, inducements and other corrupt payments may expose individuals and the Company to civil and/or criminal liability. A "bribe" is anything of value offered, promised or given directly or indirectly to improperly influence the actions of a third party in order to obtain or retain business or gain a business advantage. Bribes may include money in any form (including cash equivalents), gifts, travel or other expenses, entertainment or other hospitality, below-market loans, discounts, favors, business or employment opportunities, political or charitable contributions, or any direct or indirect benefit. The Company does not permit "facilitating payments" to expedite the routine performance of legitimate duties, except in extraordinary circumstances as approved by the Legal department. You must not engage in corruption, extortion or embezzlement in any form with any third party, public or private, whether offered, paid, accepted or solicited directly by the Company's employees or indirectly through third parties. You must not use agents, consultants, independent contractors or other third parties to do indirectly what you cannot do directly under this Code of Conduct or applicable laws, rules and regulations.

Reporting Concerns and Enforcement

- ❖ ***Questions.*** Company Personnel who have questions about any issues related to the subject matter of this Code of Conduct should speak with their supervisor, Human Resources

personnel, or the Legal department. If there are concerns related to issues involving this Code of Conduct, or if there is any doubt about how to properly act in a particular situation, Company Personnel shall discuss any issues with the appropriate Company Personnel identified in this Code of Conduct or with the Legal department; the Company encourages such discussions.

- ❖ **Reporting Violations.** Company Personnel who become aware of a violation of this Code of Conduct, or otherwise believe that any other misconduct related to the Company is occurring or has occurred must promptly report such violation. All reports received will remain confidential to the extent possible. Company Personnel may report such violation to their supervisor, to the Human Resources Department, to the Legal department, the Compliance department, by calling the Company's third-party operated anonymous whistleblower hotline at (844) 987-0398, or by submitting a confidential report through the online whistleblower portal at www.avantax.ethicspoint.com. If you submit a concern anonymously, please ensure that you provide sufficiently detailed information to enable the concern to be properly investigated (including, for example, details relating to the facts underlying the concern and the person(s) involved). Any employee who receives a report of an alleged violation shall immediately report these matters to the Legal department. All reports the Company receives relating to this Code of Conduct or other potential violations of law or ethics will be investigated in accordance with applicable Company policies, and concerns regarding accounting, auditing and financial disclosure will also be communicated to the chairperson of the Audit Committee. *While the Company encourages internal reporting to the Company of concerns, nothing in this Code of Conduct restricts or limits your ability to report concerns directly to a regulatory agency.*
- ❖ **Enforcement.** The Company must ensure prompt and consistent action against violations of this Code of Conduct. Upon receipt of a determination that there has been a violation of this Code of Conduct, Human Resources Department, the Legal department, and/or the Compliance department will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.
- ❖ **Cooperation with Investigations.** Company Personnel are expected to participate in and cooperate with any investigation related to suspected violations, violations or general misconduct related to this Code of Conduct. Company Personnel shall provide relevant, truthful information or otherwise assist with the investigation in any reasonable manner requested by the investigator. Failure to participate in and cooperate with any investigation related to this Code of Conduct will be considered a violation of this Code of Conduct.
- ❖ **Waivers.** Waivers of this Code of Conduct may only be made only as follows: (a) in the case of any member of the Company's executive leadership team or Director of the Company, by the Board of Directors, and (b) in the case of any other person, by the Chief Executive Officer, Chief Financial Officer, or Chief Legal Officer of the Company. If required by stock exchange rules or applicable laws or regulations, any waiver shall be promptly disclosed in the manner required by such stock exchange rules or applicable laws or regulations.

THE COMPANY HAS A NO-TOLERANCE NON-RETALIATION POLICY. COMPANY POLICY PROHIBITS RETALIATION OR DISCRIMINATION AGAINST EMPLOYEES FOR PARTICIPATING IN AN INVESTIGATION AND/OR PROVIDING INFORMATION IN GOOD FAITH ABOUT VIOLATIONS (OR SUSPECTED VIOLATIONS) OF COMPANY POLICIES OR FEDERAL OR STATE LAWS, RULES OR REGULATIONS. MAKING A REPORT IN “GOOD FAITH” MEANS THAT YOU HAVE PROVIDED ALL THE INFORMATION YOU HAVE AND THAT YOU REASONABLY BELIEVE THERE HAS BEEN A POSSIBLE VIOLATION OF APPLICABLE LAW, REGULATION, RULE OR STANDARD, THIS CODE OR ANY OTHER COMPANY POLICY, EVEN IF YOUR REPORT TURNS OUT TO BE UNSUBSTANTIATED. HOWEVER, IT IS A VIOLATION OF OUR STANDARDS TO INTENTIONALLY REPORT INFORMATION TO COMPANY PERSONNEL THAT IS FALSE AND/OR MISLEADING.

VIOLATIONS OF THIS CODE OF CONDUCT MAY SUBJECT COMPANY PERSONNEL TO DISCIPLINARY ACTION, UP TO AND INCLUDING TERMINATION OF EMPLOYMENT. IN APPROPRIATE CASES, THE COMPANY MAY ALSO REFER MISCONDUCT TO THE PROPER AUTHORITIES FOR PROSECUTION. THIS MAY SUBJECT THE INDIVIDUALS INVOLVED TO CIVIL AND/OR CRIMINAL PENALTIES.

This Code of Conduct may only be amended by the Company’s Board of Directors, except that the Chief Legal Officer may make non-material changes to ensure that this Code of Conduct remains correct and accurate. If required by stock exchange rules or applicable laws or regulations, any amendment to this Code of Conduct shall be promptly disclosed in the manner required by such stock exchange rules or applicable laws or regulations.