

2021 ESG Report

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Letter from our CEO

For more than 25 years AssetMark's mission has been to make a difference in the lives of our advisors and their clients. Our unwavering dedication to that mission resulted in the best year in the company's history in 2021. We intend to build on that momentum in 2022, as we continue to redefine the independent advisor experience.

At AssetMark, we are inspired to do our part in making the world a better place. We know that building social value and creating economic value are not competing goals. We firmly believe that our future success is also linked to our ability to make a difference within our organization, in the communities in which we operate, and in the world.



Making a difference in our organization

Our people are by far our greatest asset. AssetMark is deeply committed to fostering a strong and inclusive culture built upon shared success. We believe that diversity, equity and inclusion (DEI) at all levels within AssetMark is foundational to our mission, and our ability to innovate gives us a strong competitive advantage. We are committed to ensuring that team members of all backgrounds have the opportunity to thrive. Over the past year, we established three new Employee Resource Groups (ERGs), which are focused on the interests and advancement of women, people of color, and Lesbian, Gay, Bisexual, Transgender, Questioning/Queer (LGBTQ+) in our organization, our industry, and our communities. Each team member-led ERG nominates charities and community programs that they determine are aligned with their work. Our Diversity & Inclusion Committee then selects two charities per ERG to donate to on behalf of AssetMark.

Making a difference in our communities

At AssetMark, we're dedicated to doing our part every day to lift up our communities. We have supported charitable giving for more than 25 years, and each year we aim to donate about one percent of our reported profits to support causes that positively impact our industry and our communities. Through activities like our Community Inspiration Award, Summer of Service, paid volunteer days, corporate partnerships, and team member matching program, we strive to empower our team members and clients to do the same. In 2021, we proudly donated over \$530,000 in support of various charities and causes through our Charitable Giving Programs. Despite the pandemic, in 2021, we had 218 team members safely volunteer 727 hours to support 14 charities. We believe giving back is the right thing to do, and we will continue to identify ways to contribute to the communities in which we operate.

Making a difference in our world

We are committed to making meaningful progress in protecting our planet's natural resources. We strive to minimize the environmental impact of our operational footprint through energy-efficient and eco-friendly sustainable business practices. We lease all of our office space, including our LEED-CS Silver certified corporate headquarters (HQ) in Concord, California. To divert our operational waste footprint, we have arranged regular e-waste, recycling, and composting collections. Our overall energy conservation and eco-friendly initiatives have been reviewed and certified by the Green Business Bureau.

While we recognize that we have more to do, we have made — and continue to make — significant progress, benefitting our shareholders, team members, advisors and their clients.

Going forward, as we continue to work to generate long-term sustainable growth for our investors, we are committed to an ongoing focus on strong ESG practices. We are pleased to present our inaugural ESG report, which reflects the ways we are working to achieve transparency and make a difference.

Thank you for your continued support. Together, we make a difference and together, we can achieve more.

Natalie Wolfsen
Chief Executive Officer

About Us

AssetMark Financial Holdings, Inc. (NYSE: AMK), is a leading provider of comprehensive wealth management solutions aimed at redefining what it means to be a modern Turnkey Asset Management Program (TAMP). Just as we did when we were founded 25 years ago, we are pushing boundaries to reimagine how we can do MORE to empower financial advisors.

Redefining the Independent Advisor Experience

Advisors deserve an outsource partner who understands the complex challenges and opportunities they face. As a modern TAMP, AssetMark is redefining the independent advisor experience through an ecosystem of solutions that offer choice, flexibility and autonomy.

We pair our deep expertise and hands-on service with innovative, portable technology to drive transformational value for advisors across all aspects of their business.

Purpose-Built Solutions

Our fully integrated tech stack is open-architecture and tailored to support each advisor's unique goals – whether that's to grow their practice, build closer relationships with their clients, or drive efficiency.

Our dedicated service teams offer highly personalized support at every stage to maximize the value advisors bring to their clients, and to support the growth and performance of the advisor's practice.

Our investment professionals carefully select and monitor strategies through a rigorous due diligence process. The result is an expertly curated menu of flexible investment solutions that advisors and investors can choose from with confidence.



About Us



A Community of Independence

When advisors choose to work with AssetMark, their independence is paramount, but they are never alone. We are an extension of their team, equally committed to serving their clients' interests, and they are part of a community of thousands of like-minded advisors.

AssetMark had **\$93.5 billion** in platform assets as of December 31, 2021 serving over **8,600 advisors** and **209,000 households**.

Our ESG Strategy

Behind our wealth management technology platform (Platform) is our commitment to **Making a Difference**—having a positive impact on the lives of our advisors and their clients, as well as our team members and the communities in which we live and work. Our dedication to *Making a Difference* is not just words — we put this commitment into action every day by living our values in all that we do — Heart, Integrity, Excellence, and Respect.

It is with that same dedication that we embrace our Environmental, Social and Governance (ESG) Strategy as pivotal to how we operate. It's about how we treat each other and how we achieve excellence for those who rely on our financial stewardship, investment expertise, and client-focused approach for their financial advice and decision-making. We are pleased to share our inaugural ESG Report that outlines our current sustainability initiatives, practices, and objectives in the areas that are fundamental to our business. We view our ESG Strategy as critical to our long-term financial value creation, environment impact and social responsibility.





Our ESG Strategy

Our Governance

We are committed to sound governance and compliance, responsible business practices, and the highest standards of ethics to achieve business success and enhance long-term shareholder value.

ESG in Our Investment Management

We integrate ESG considerations and responsible business practices into our investment analysis and proprietary solutions to support the financial decision-making of advisors and their clients.

Our Team

We are committed to fostering a mission-driven, diverse and inclusive culture, where we support our people with comprehensive benefits, health and wellness, and career development opportunities.

Our Communities

For over 25 years, we have made “Making a Difference” in our communities a priority by giving back through our volunteering and charitable donations.

Our Environment

We strive to minimize the environmental impact of our operational footprint through energy efficient and eco-friendly sustainable business practices.

ESG Oversight

We are committed to sustainable business practices and have implemented processes throughout our operations to effectively execute solid governance, environmental stewardship, and social responsibility. Our Board of Directors (Board) and Executive Team recognize the importance of solid oversight of the ESG issues that impact our business to our long-term strategy, financial sustainability, and shareholder value creation. While our Board as a whole works closely with the Executive Team to govern and manage ESG business functions, the Audit and Risk Committee exercises primary oversight of our ESG strategy, initiatives, and policies.



About This Report

Our ESG Report has been prepared in accordance with the accounting standards published by the Sustainability Accounting Standards Board (SASB). We have also identified the United Nations Sustainable Development Goals (SDGs) that we believe best align with our business activities and key priority areas. Both are included in the Frameworks and Standards at the end of this report. Please note that our fiscal year ends on December 31st. Unless otherwise noted, data provided throughout this report covers our fiscal year 2021 (FY21), reflecting data for the period from January 1, 2021 through December 31, 2021. This report contains forward-looking statements, which may include our current expectations and assumptions regarding our future activities, plans, and objectives and other future conditions. Please see our Forward-Looking Statements at the end of this report for more information.

1. Our Governance

We are committed to sound governance and compliance, responsible business practices, and the highest standards of ethics to achieve business success and enhance long-term shareholder value.



1.1 Business Ethics and Compliance

AssetMark is committed to sound governance and high standards of ethical and responsible business conduct and compliance with applicable laws rules and regulations.

Board Governance and Oversight of Ethics

The Board is committed to the achievement of business success and the enhancement of long-term shareholder value with the highest standards of ethics. The Board maintains our [Corporate Governance Guidelines](#) to provide an effective corporate governance framework that reflects a set of core values that are foundational to our governance and management systems and our interactions with others.

In addition, the Board has adopted a set of [Corporate Standards](#) that applies to all of our team members, officers, and directors, including our Chief Executive Officer (CEO), Chief Financial Officer (CFO), and other executive and senior financial officers. The Standards provide an ethical business framework and promote honest and ethical conduct in connection with our business operations, while also holding team members accountable for nonadherence. The Standards address relevant topics such as:

- Conflicts of interest
- Corporate opportunities and fair dealing
- Compliance with laws, rules and regulations, including insider trading laws
- Confidentiality and protection and proper use of company assets
- Proactive reporting of any illegal or unethical behavior (with protections against retaliation)
- Equal opportunity, non-discrimination and fair employment

While the Board is ultimately responsible for corporate compliance with the highest standards of responsibility, ethics and integrity, the Board committees and management assist the full Board in fulfilling its oversight responsibilities, as follows:



Compliance Program and Team Member Training

As a public company, we are subject to the reporting requirements of the Sarbanes-Oxley Act (SOX). SOX requires that we maintain effective disclosure controls and procedures and internal controls over financial reporting. As discussed above, our Standards, required by the New York Stock Exchange (NYSE) and the Securities and Exchange Commission (SEC), drive our ethical framework, and support our corporate compliance efforts. Further, our Internal Audit team tests required SOX controls across the company. Internal Audit reports all control test results to the Audit and Risk Committee, and ultimately the Board. Our Audit and Risk Committee provides oversight of our corporate compliance with laws and regulations, including major legal and regulatory initiatives. We also engage with external auditors who conduct independent reviews of our SOX controls, which are reported to our Audit and Risk Committee and the Board.

Compliance Programs

In addition to our corporate compliance framework, we have dedicated Compliance Teams, by business line, who test and review the effectiveness of their respective compliance programs. Compliance Teams remediate control gaps and update policies and procedures as needed. The testing results are summarized by the CCOs of each Compliance Team through annual reports, which are provided to the General Counsel and the Board.

Our dedicated compliance programs are as follows:

- **Advisor Compliance**
Pursuant to the Investment Advisers Act of 1940 (IAA), this team oversees the compliance of our investment adviser. The Advisor CCO and Advisor Compliance Team are responsible for the implementation of the compliance program that adheres to the standards and requirements of the IAA.
- **Fund Compliance**
Pursuant to the Investment Company Act of 1940 (ICA), this team oversees

compliance of AssetMark's proprietary mutual fund families (Funds). The Fund CCO and Fund Compliance Team are responsible for the implementation of the compliance program that adheres to the standards and requirements of the ICA.

- **Brokerage Compliance**
Pursuant to various SEC laws and rules, and rules of the self-regulatory organization, Financial Industry Regulatory Authority (FINRA), this team oversees compliance of AssetMark's broker-dealer. The Brokerage CCO and Brokerage Compliance Team are responsible for the implementation of the compliance program that adheres to the standards and requirements of SEC and FINRA rules.

Compliance Training

Ensuring a strong culture of compliance and tone from the top is critical to our success. Extensive and on-going compliance training is required for all team members, including our executive and senior officers, and is a key component of our ethical framework and culture of compliance.

Our compliance training is as follows:

- **Corporate Compliance**
All team members are trained on the Standards upon hire and then annually thereafter. Upon each training requirement, all team members certify their understand and adherence to the requirements of the Standards.
- **Supervised Persons**
Team members who work for our adviser business are trained upon hire and then annually under IAA rules. Upon each training requirement, all team members certify to their understand and adherence to the requirements under IAA rules.
- **Brokerage Compliance**
Team members registered with our broker-dealer have considerable continuing education and training requirements, required by FINRA and the Company.

We internally audit all team members' compliance training rates and escalate any necessary remediation efforts to the Audit and Risk Committee and General Counsel. During 2021, 100% of our team members completed their required compliance trainings.

Whistleblower Policy

The Audit and Risk Committee has adopted a Whistleblower Policy to establish procedures for the reporting and handling of complaints and concerns related to accounting or auditing matters and violations of our Standards. Neither AssetMark nor its team members or directors will retaliate or discriminate against any team members with respect to the good faith reporting of concerns. We treat concerns raised under this policy on an anonymous and confidential basis, unless otherwise required by law, consented to by the team member, or as may be necessary to conduct a thorough investigation. For more information, please see our [Whistleblower Policy](#) on our website.

Insider Trading

The U.S. securities laws regulate the sale and purchase of securities in the interest of protecting the investing public. U.S. securities laws give the company, its officers and directors, and other team members the responsibility to ensure that information about the company is not used unlawfully in the purchase and sale of securities. As such, our Insider Trading Policy outlines applicable controls that support insider trading laws when our team members transact in company stock.

As part of the Standards, all team members are subject to our Insider Trading Policy; however certain team members, deemed "insiders" of the company, have additional requirements, such as shorter trading windows and preclearance requirements. Officers and directors also frequently use trading plans, called 10b5-1 plans, that permit them to sell a predetermined number of shares at predetermined times. We continually test controls and review all team member transactions in our company stock, and we hold team members accountable for nonadherence.

Government Relations and Political Contributions

Any political contributions made by or on behalf of AssetMark and any solicitations for political contributions of any kind must be lawful and in compliance with corporate policies, including our Political Contribution Policy within our Standards. This policy applies solely to the use of corporate assets and is not intended to discourage or prevent individual team members, officers, or directors from making personal political contributions or engaging in political activities on their own behalf. No one may be reimbursed directly or indirectly by the Company for personal political contributions. We did not make any corporate contributions in 2021. We do not use corporate funds for independent political expenditures to support or oppose any candidate for office.

Fair Marketing and Communications

AssetMark, Inc. ("AMI") is the Company's registered investment adviser, and oversees AssetMark's investment "platform." AMI creates various marketing materials to support the independent third-party financial advisors and their clients who utilize the platform. Under SEC and IAA rules, AMI is required to ensure that their advertisements and marketing materials are truthful, accurate, and consistent with applicable rules and regulations. All communications with the public must be based on principles of honesty and fairness and provide a sound basis for evaluating the facts regarding any product or service. Exaggerated, unwarranted, deceptive, or misleading statements or claims are prohibited.

Additionally, all advertising and marketing materials must be reviewed and approved by Advisor Compliance prior to being circulated to ensure conformity to AssetMark standards and adherence to applicable rules and regulations of the SEC and IAA. We additionally review to ensure materials are appropriate for the intended audience prior to circulation.

1.2 Data Security and Customer Privacy

AssetMark is dedicated to the security and integrity of the data we manage. Our privacy and security measures are designed to safeguard the sensitive data of our financial advisors and investors. We have strict oversight, policies, and controls to protect against anticipated threats to client information and business operations.

Our security framework is guided by the core tenants of our Information Security Program which incorporates the following key features:

- Governance and risk
- Training and awareness
- Vendor management
- Security architecture

Governance and Risk

Information Security Policy

We have adopted and implemented an Information Security Policy (InfoSec Policy) that outlines our security and data protection policies and procedures. The InfoSec Policy is designed to provide for the confidentiality, integrity, and availability of information used within our business practices and operations. This policy is approved by the Chief Information Security Officer (CISO) and is reviewed and amended as necessary at least annually. The InfoSec Policy is part of the broader information security program, which includes its Business Continuity Plan, and its Incident Management and Response Plan. We do not share our clients' nonpublic personal information with any affiliated party for their marketing purposes. For more information, please see our [Client Privacy Policy](#) and our [Online Privacy and Security Policy](#).

Our controlling stockholder, Huatai Securities Co., Ltd. (HTSC), does not have access to AssetMark's employee or customer data in accordance with the National Security Agreement established between AssetMark and the Committee on Foreign Investment in the United States (CFIUS).

Governance and Oversight

Our Board has oversight responsibility of our data security and privacy through its Audit and Risk Committee. This committee oversees the executive accountability of corporate information technology (IT) risks, controls, and procedures of the Information Security Council and Regulatory Cybersecurity Committee, as outlined below:

Audit and Risk Committee of the Board: Receives updates on our company's Information Security Programs at least annually.

Governance Committee: Receives updates on our corporate Information Security at least monthly.

Chief Information Security Officer (CISO), Chief Information Officer (CIO) and General Counsel: Designs establishes and executes Information Security Policies and their operations.

Information Security Council: Consists of the Information Security Team. Enables collaboration for ongoing security incidents and emerging threats, reviews IT security roadmap, and continually evaluates the current state of the information security program.

Regulatory Cybersecurity Committee: Reviews new and changing regulatory requirements and recommendations and assesses these impacts on our business.

Training and Awareness

All team members are required to complete information and data security training to ensure awareness of the most common security threats and how to detect them. This training includes tips such as social engineering tactics, how to identify email phishing attacks, and how to safely handle sensitive data. Additionally, certain team members, based upon their job functions or roles within the firm, are required to take client Security and Fraud Awareness Training. This training is required upon hire and annually thereafter, including phishing exercises. We exercise internal audits, confirm compliance and review training programs to update at least annually. During 2021, 100% of active team members completed the required data security training.

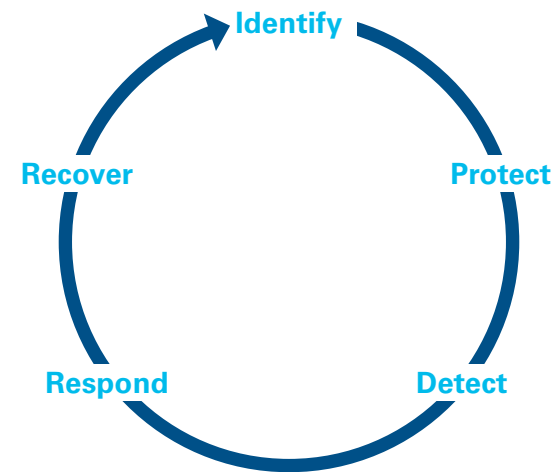
Vendor Management

Vendor risk assessments are conducted in coordination with our Legal and IT departments. Vendors who will have access to our proprietary data or personal identifiable information (PII) are further vetted by the Information Security Department. Additionally, risk assessments are completed on an annual basis for those vendors that the company has identified as “high risk” and “critical.” Vendors that require network access to provide services are subject to our rigorous internal controls. Only pre-identified individuals are granted access rights to the necessary systems and programs using the least privileged model. Access rights are discontinued immediately upon termination and are audited quarterly.

Security Architecture

Protection of assets and services depends upon understanding and defining appropriate information practices including the maintenance of efficient cybersecurity policies, procedures, and awareness of current threats and

vulnerabilities. We outsource our data center needs to third-party providers, utilizing cloud-based platforms and leveraging their physical and data security infrastructure. Our cybersecurity controls are informed by industry best practices, including those set forth by the National Institute for Technology (NIST) Framework, which defines the primary cybersecurity functions as follows:



Our eWealthManager platform is hosted in a Tier 3 data center that complies with the SOC 1 and SOC 2 Type 2 standards. They are audited annually to ensure they remain in compliance with pre-defined control criteria relating to security, availability, processing integrity, confidentiality, and privacy of a system and its information. A 3-tier architecture is used for eWealthManager for added security by separating the presentation layer, functional process logic and back-end databases using next-generation firewalls. Security controls are in place to limit access to production systems to authorized users only. Multifactor authentication (MFA) is enabled for advisor logins.

1.3 Risk Management and Business Continuity

The Board oversees our governance and compliance processes and procedures to promote the conduct of our business in accordance with applicable laws and regulations and with the highest standards of responsibility, ethics, and integrity. The Board is responsible for overseeing the management and mitigation of our key risks, including our enterprise risk program. Our Audit and Risk Committee provides oversight and review at least annually and discusses with management and our independent auditor the major financial and regulatory risk exposures and the steps management has taken to monitor and control those exposures, as well as the corporate guidelines and policies with respect to risk assessment and risk management.

Business Continuity Planning and Disaster Recovery

To ensure our continuity of critical services, we have established a Business Continuity Plan (BCP) that utilizes a holistic approach to our preparedness efforts. Our BCP integrates all aspects of traditional IT system recovery processes (Disaster Recovery Plan), team member safety and disaster preparedness, crisis management planning and business continuity planning. The BCP provides the framework for management escalation and communication processes utilizing mass notification tool.

Our Incident Response Team maintains an Incident Response Plan to respond to any security incident. This plan is updated at least annually. All security incidents and threats are reported to IT and documented and tracked in our internal tracking system. All security and fraud incidents are reported to our Compliance Team.

1.4 Supply Chain Management

Our vendor relationships are integral to our business success whether for technology, financial, accounting, legal, or custodian services. As vendors play a critical role in the day-to-day operation of our business, vendor management is crucial to helping protect our company from undue risk. Our internal Vendor Management Policy (Vendor Policy) governs the establishment and monitoring of relationships with vendors with whom we contract for goods and services. It provides a framework to mitigate exposure to potential credit, conversion, strategic, reputation and/or operational risk arising from relationships with vendors.

Our Legal and Information Security Departments (as appropriate) conduct due diligence on our new vendors. We require all vendors with access to AssetMark's systems, non-public company and/or customer information to undergo a risk assessment, including answering questions contained in our Vendor Risk Assessment Form, Office of Foreign Assets Control (OFAC) screening, and, as necessary, Information Security approval.

Our Legal Department maintains a master list of all active approved vendors. The master list is reviewed and updated quarterly to reflect current approved vendors, completed due diligence, and risk classification related to our day-to-day business operations. Annual evaluation of vendors with a risk classification of "critical" or "high risk" is required, or when performance levels have declined below acceptable standards.

2. ESG in Our Investment Management

Our investment offering is backed by rigorous due diligence that is designed to help advisors best serve their clients by narrowing the universe of potential investment solutions to a select group of investment choices. We aim to support our advisors in serving client interest in ESG investment options through our Values-Driven Investing Strategies offerings. These strategies are designed to extend advisors' capabilities to construct and align clients' portfolios to reflect their personal preferences and values.

Our teams integrate ESG and Values-Driven Investing Strategies within our investment solutions primarily in two ways – selection of ESG strategies from independent investment management firms and through proprietary portfolio construction for values-based solutions. For more information on our ESG and Values-Driven investment approaches offered through our Platform, please [visit our website](#).



2.1 Investment Manager Selection and Due Diligence

In selecting the independent investment management firms that are made available on our Platform, our Due Diligence team evaluates investment firms based upon investment style, consistency, and relative performance. Key elements in this evaluation process include an analysis of investment philosophy, process rigor, competitive advantage, organizational stability, and historical results. We enhanced our process to include evaluation of ESG characteristics at both the corporate level and the investment management level.

Our core beliefs have been enriched with ESG considerations and are the foundation of our comprehensive due diligence process:

Our Due Diligence Process

People	Experienced, tenured teams in stable organizations
Philosophy	Clearly defined, tried and tested
Process	Consistent, disciplined and applied in multiple market environments
Portfolio Construction	Risk management is a key component
Performance	Proof statement of philosophy, process and portfolio construction

ESG in Due Diligence Process - Ensuring Investment Managers are Walking the Walk, Not Just Talking the Talk

The Due Diligence team conduct a deep and thorough annual due diligence review of all investment managers and strategies to gauge suitability for inclusion in our investment lineup. We collect data on investment managers that includes several ESG factors, such as diversity data, governance structures, responsible business practices related to the environment, social and sustainability factors. We use this data to help inform our insights about a manager's commitment to ESG. Through meetings with the managers, we assess their investment capabilities for an ESG-focused solution by digging deep into the manager's investment strategy, portfolio characteristics, and performance data to assess the merits of the fund's ESG mandate, sustainability research, and investment experience to determine if the firm's ESG approach is differentiated and well-resourced.



2.2 Proprietary Portfolio Construction

Our proprietary portfolio construction takes two approaches to building values-based solutions:

- 1. Globally diversified portfolio implemented with actively managed values-based and impact-oriented funds or strategies:** Our relationships with values-based managers from years of due diligence of asset managers establishes a strong foundation for our proprietary portfolio solutions. We combine these funds and strategies to create broadly diversified portfolios that are reflective of the global capital markets.
- 2. Equity portfolios implemented through systematic security selection:** We also construct individual equity portfolios that emphasize companies with characteristics that align with values-based characteristics. The investable universe of securities is first 'curated' by values-based metrics, then by fundamental metrics within the asset class. Lastly, each security is filtered via business activity screens to ensure a material part of their business is not derived from targeted sources (i.e. alcohol, tobacco, gambling, etc.). Securities identified as having severe values-based risks, either through controversy or broad-based values-based rating scores, are removed from the investable universe. From there a portfolio of individual equities is constructed based upon expected alpha and optimized around asset class benchmark(s), where the expected alpha is predicated upon value, profitability and momentum factor scorings.



3. Our Team

Our people are by far our biggest asset. We work hard to foster a diverse, inclusive culture that is driven by our mission and connected by our values with a focus on our clients.



Heart

Make a difference in the lives of others



Integrity

Do what is right all the time



Excellence

Do the best in all that we do



Respect

Encourage and value different ideas, experiences, perspectives, and backgrounds

3.1 Benefits and Wellness

We offer competitive salaries, full benefits, and excellent opportunities for growth. We remain committed to providing comprehensive medical coverage and a robust wellness program to empower our team members and their families with meaningful tools and resources to achieve great health outcomes.

Some highlights of our benefits include the following:

- Equity incentive plans through granting of stock-based compensation awards
- Comprehensive insurance benefits program, including for part-time team members
- Paid time off, sick time and holidays
- One paid "Volunteer Day" per year to volunteer at a charitable organization
- 401(k) Retirement Savings Plan with a 6% match on contributions
- Retirement Program with lump sum payment and 18-month medical coverage
- Flexible Spending Accounts for qualifying healthcare and dependent care expenses
- Tuition and professional certification reimbursements
- Family leave, including bonding time and adoption assistance
- Work-life balance through flexible schedule and part-time options
- Military leave and jury duty

We support our team members in their diverse personal wellness journeys. Some unique features of our program include:

- **Go365 Wellness Platform:** Healthy activity reward system with tools, support, and resources to help team members and families live happier, healthier lives and reduce overall healthcare expenses.
- **Omada:** Digital lifestyle program that combines technology with support, whether around eating, activity, sleep, or stress.
- **Fitness Reimbursement:** Financial support for team member fitness membership dues, home fitness equipment, mental health apps, on-demand workout classes, and virtual resource expenses.
- **Team Member Assistance Program:** Confidential coaching, counseling, and webinars on topics such as anxiety, chemical dependency, legal, financial, and dependent/elder care.
- **Emotional Well-Being Resources:** Online therapy and confidential mental healthcare.

2021 Wellness Program Recognition



3.2 Team Member Engagement, Training and Development

We strive to foster community among our team members and build a strong, inclusive culture that encourages our team members to succeed, grow and contribute to our long-term business success.

Team Member Engagement and Retention

We measure our team member engagement through a companywide annual survey. Our 2021 Overall Engagement Score was 77%. Top scoring categories reflected that 90% of respondents felt committed to producing top quality work and 89% felt they treat each other with respect. We use the information from these surveys to guide management engagement, decision-making, and strategy. Over the past year, input from these surveys was important in driving improvements in our performance management framework and creation of diversity initiatives.



Talent Development

We continually evaluate and improve our performance management framework to increase the likelihood of team member achievements and desired outcomes. Over the past year, we integrated enhancements to drive meaningful conversations about performance, provided a strong linkage between pay and performance, and cultivated a better team member – manager experience. During 2021, we had 322 internal promotions and job transfers.

We are committed to providing our team members with professional development opportunities for personal and career growth in a fast-paced and challenging business environment. The foundational elements of our Learning & Development approach include the following:

- **Team Member Development** – New Team Member Onboarding designed to welcome our newest team members with a blended approach to learn about our company, industry, mission, and culture.
- **Leadership Development** – Leadership skills and coaching support across all career stages, from emerging leaders to those newly promoted to advanced leaders running cross-functional project teams.
- **Organizational Learning Support** – Career architecture, team dynamics, compliance training and corporate learning projects.
- **Diversity & Inclusion** – Outreach aligned to support Respect@AssetMark and Employee Resource Group (ERG) strategic diversity initiatives.
- **Internal Communications** – Companywide engagement for building organizational culture, facilitating all-team meetings, and team members engagement.

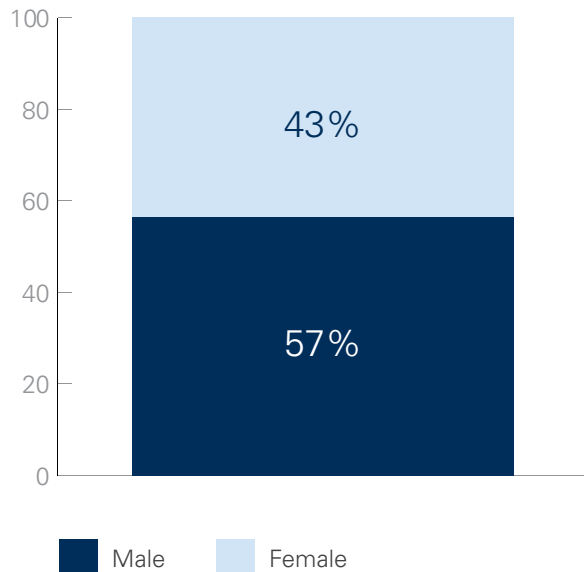
We also provide tuition and professional certification reimbursements to support learning opportunities outside AssetMark. During 2021, **12 team members** participated in this program for total reimbursements of **\$46,615**.

3.3 Diversity, Equity and Inclusion

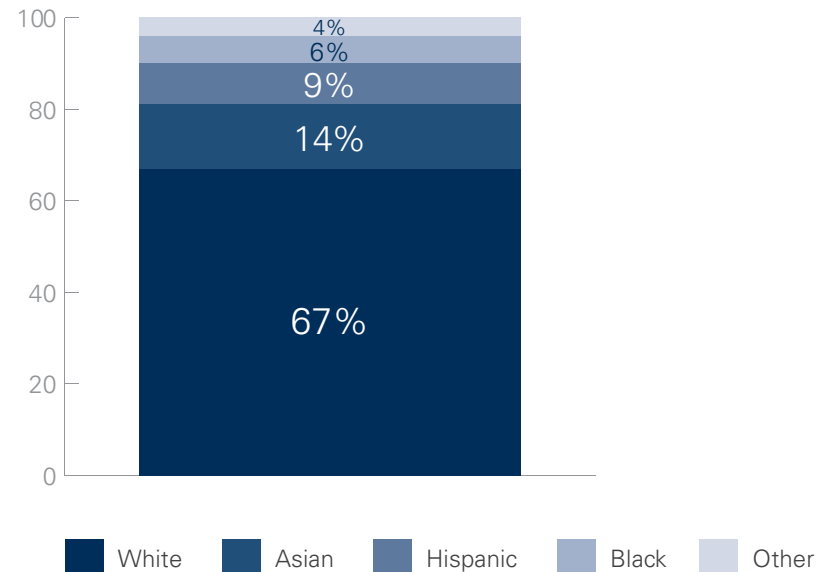
We believe that a diverse team at all levels within AssetMark is foundational to our execution and innovation and gives us a strong competitive advantage. While we are early on our journey, we aim to create a work environment that fosters diversity, equity, and inclusion (DEI) across the company. Our EVP of Human Resources and Program Management oversees our DEI strategy and practices, including our initiatives around hiring, promotion, retention, and attrition, and provides periodic updates to the CEO and Board on our progress in connecting DEI to our broader, business-driven, results-oriented strategy.

As of December 31, 2021, our workforce diversity by gender was 57% male and 43% female. Our workforce diversity by race/ethnicity was 67% white and 33% underrepresented minorities (Asian, Hispanic, Black, and Other).

Gender Diversity



Ethnic Diversity





Our DEI Strategic Pillars

In 2020, we launched our formal diversity and inclusion program, Respect@AssetMark, specifically designed to align with our core value of respect. The goal of this program is to bring new diverse talent into the financial services industry by growing our internship and diversity recruiting programs. We also provide opportunities supporting our existing diverse talent to gain industry knowledge, advance career paths, and achieve their fullest potential.

We have developed a strategic DEI framework that incorporates our cultural values and defines four key pillars of our DEI commitment to help focus our efforts, as follows:



Education



Representation



Development



Community

Over the past year, we have launched several initiatives across these focus areas to advance our DEI strategy and reinforce our commitment across our company, as highlighted below.



Education

Objectives:

- Resources to educate and engage our team members
- Diversity and inclusion as an active component of people management and leadership training
- Research and implementation of best practices

HIGHLIGHT

We partnered with ExecOnline to provide a Diversity & Inclusion course library. Featuring relevant subject matter, these 1-3 week certification programs are from the world's top business schools. Course topics include "Communicating Inclusively," "Practicing Inclusive Innovation" and "Fostering Inclusion & Diversity."



Representation

Objectives:

- Building a more diverse workforce
- Expanding recruiting channels and processes
- Data driven analysis and action planning

HIGHLIGHT

Based upon team member feedback from our engagement surveys, we launched three main Employee Resource Groups (ERGs) over the past year. We support ERGs as a vital part of our culture, helping us to build an environment of diversity and inclusion. These ERGs provide opportunities to listen, learn, and grow as a team, and to provide our leadership with cultural insights as we grow and expand our company. As part of our DEI mission, each ERG was allotted \$20,000 in 2021 to support a community cause important to that group, as highlighted here:



Women of AssetMark

Mission: To empower and unite the Women of AssetMark by providing a safe space to learn, inspire, and advance a culture that fosters female leaders.

Charity Partner: Financial Women of San Francisco (FWSF) Scholarship Fund

The FWSF Scholarship Fund provides graduate and undergraduate scholarships to San Francisco Bay Area women pursuing careers in finance and financial services. Beyond financial support, FWSF scholarship recipients have the opportunity to be mentored by FWSF members and attend career development and networking events.

People of Color

Mission: To foster an inclusive and diverse environment for all people of color and their allies at AssetMark through educational opportunities, earnest dialogue, networking, cultural events, and social gatherings.

Charity Partner: Impact 6

Impact 6 is a nonprofit organization designed to empower youth from underprivileged and under-resourced communities. They connect kids at an early age with mentors who can help foster their growth and development in an impactful way. Their diverse set of successful mentors brings different skills and stories to the table, with the common factor being a driving passion to pay it forward to our next set of leaders.

LGBTQ+

Mission: To provide a safe space, sense of community, support, education, and networking opportunities to our LGBTQ+ team members and allies.

Charity Partner: One-n-ten

One-n-ten's mission is to serve LGBTQ+ youth and young adults ages 11-24. One-n-ten aims to enhance their clients' lives by providing empowering social and service programs that promote self-expression, self-acceptance, leadership development, and healthy life choices.



Development

Objectives:

- Talent assessment, and career pathing and planning
- Training to enhance skills and competencies
- Opportunities for growth and development

HIGHLIGHT

In 2021, we launched an Advanced Leadership Program as part of our Respect@AssetMark strategy to help leaders develop the skills needed to be successful in this fast-paced and challenging business environment, with particular aim to expand diverse participation and support. This six-month program focused on developing experienced leaders who direct cross-functional project teams that have a positive impact on the organization. Overall, the leadership class received rave reviews, and the gender diversity mix was 50%.



Community

Objectives:

- Charitable giving and opportunities
- Engagement with diverse groups and educational programs in our community
- Team member support communities

HIGHLIGHT:

We support the Center for Financial Planning (CFP) Board, which shares our commitment to increasing diversity in the financial industry. In 2018, we committed to donate \$250,000, spread across five years, to help create a more diverse and sustainable financial planning profession, and give every American access to competent and ethical financial planning. Our CEO also serves on its Board of Directors.

3.4 Workforce Health and Safety

AssetMark is committed to conducting business in compliance with all applicable environmental and workplace health and safety laws and regulations. Our Executive Team strives to provide a safe and healthy work environment for our team members and to avoid adverse impact and injury to the environment and communities in which we conduct our business.



COVID-19

During this unprecedented time, we have instituted various protocols to keep our work environment safe for our team members during the COVID-19 pandemic. We have sanitizers and personal protective equipment (PPE) available, such as KN95, and N95 masks, accessible for all team members and visitors. All offices also utilize portable air filtration systems in conference rooms and gathering areas.

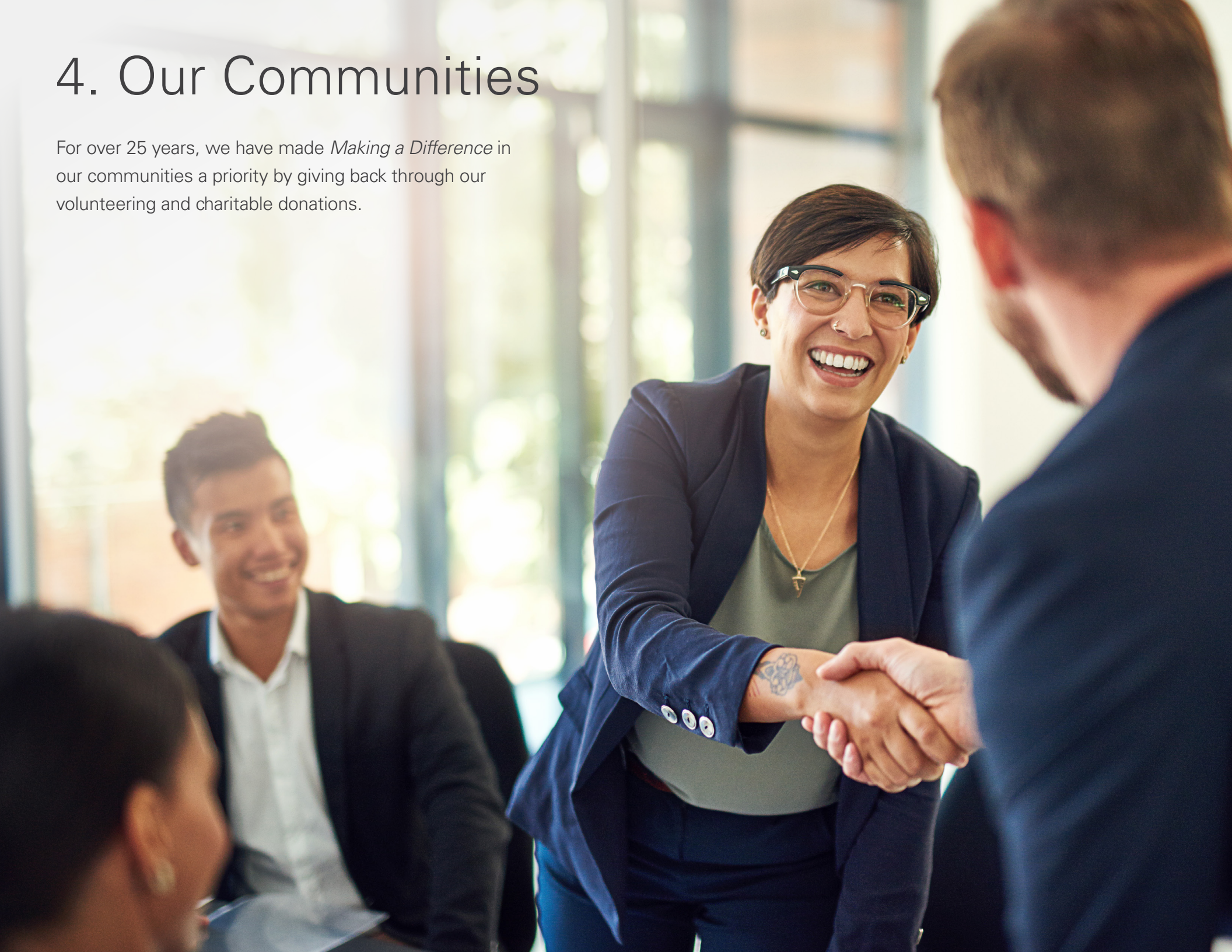
Team Member Safety Program

We conduct a quarterly security risk assessment to ensure an active review and constant improvement of our security posture. We have annual testing and ongoing updates to plans to ensure an accurate representation of business recoverability needs, including:

- Team Member Safety Program covering all office locations with designated Safety Leaders and Safety Captains at each location.
- Testing conducted under the Team Member Safety Program, which includes an annual fire drill, annual earthquake drill for California locations, and tests of the mass notification tool.
- Safety Leaders and Floor Wardens responsible for assisting in emergency evacuations and communication structure during a crisis event. They attend periodic training on the Team Members Safety Program and can attend cardiopulmonary resuscitation (CPR) and automated external defibrillator (AED) training every two years.

4. Our Communities

For over 25 years, we have made *Making a Difference* in our communities a priority by giving back through our volunteering and charitable donations.



4.1 Our Culture of Giving Back

Our mission of ***Making a Difference*** is at the heart of all we do. Our dedication to this mission extends beyond AssetMark to also include the communities in which our team members, advisors and their clients live and work. We give back and support our communities through team member volunteering and charitable donations that collectively make a difference for hundreds of organizations and causes each year.

~900
employees

Supporting
175+
charitable organizations

\$530,263
donated in 2021

4.2 Governance and Oversight

We have a Charitable and Giving Oversight Committee (CGOC) in place to ensure that our charitable giving aligns with our values of Heart, Integrity, Respect, and Excellence, while making a difference in our communities. Our CFO serves as the Chair of the CGOC, and our CEO and President are both committee members. The Director of Charitable Giving and a corporate legal team member are also part of the CGOC. In accordance with its charter, the CGOC meets semi-annually to review the charitable budgets, approve and monitor charitable initiatives, and publish our Annual Charitable & Giving Report. For more information, please see our [Philanthropy and Community](#) page of our website.

“AssetMark is honored to support those charitable organizations that are also supported by our advisors. We are so proud to partner with our advisors, who make a difference in their communities each and every day.”

Michael Kim
President and Chief Client Officer

4.3 Charitable Giving Programs

We believe that giving back to our communities is the right thing to do. This is why we have supported charitable giving for more than 25 years. We were proud to donate \$530,263 in 2021 to support various charities and causes through our Charitable Giving Programs, as highlighted below:



CORPORATE PARTNERS
\$145,000



EMPLOYEE FOCUS GROUPS
\$82,500



SUPPORTING TEAM MEMBER GIVING
\$131,763



SUPPORTING OUR ADVISORS' CHARITIES
\$91,000



SUPPORTING OUR COMMUNITIES IN NEED
\$80,000



\$530,263

donated in 2021 through charitable giving programs

Corporate Partners

To empower our core values and embody our DEI strategy, we support both local and national strategic corporate partners who align with our mission of **Making a Difference**. Locally, our offices select charities that resonate with our team members:

- **Concord, California** supports the Monument Crisis Center (MCC), which focuses on helping families in need, supporting seniors, and providing education assistance.
- **Chicago, Illinois** supports the Catholic Charities of the Archdiocese of Chicago Mother and Child Nutrition Program, which provides food, clothing, shelter, and counseling to bring hope to the hopeless.
- **Atlanta, Georgia** supports the Atlanta Community Food Bank, which is fighting to end hunger in Atlanta and inspiring change through education and outreach.
- **Encino, California** supports The Dream Center Los Angeles, which addresses immediate and long-term needs in the areas of homelessness, hunger, poverty, addiction, abuse, education, and human trafficking.

Team Member Focus Groups

We support the causes and interests that support and demonstrate our focus on diversity and inclusion in our company, industry, and community. In 2021, with most team members working remotely, we made a point to focus on their physical and mental well-being during charitable activities, such as:

- Team members sent 847 “Kudo Grams” thanking other team members and raising \$4,000 for the **American Heart Association**.
- **Our Annual Step Challenge** included 12 teams, who collectively logged 29,038,056 steps during the month of September 2021 (nearly 200,000 miles!) to raise \$5,000 for four charities.
- 100 team members virtually cycled for **Habitat for Humanity** to donate \$5,500.
- 50 team members joined the **Walk to End Alzheimer’s** with donations totaling \$5,000.

Supporting Team Member Giving

AssetMark also hosts multiple volunteer events for team members in their local communities and matches our team member donations.

• Our Volunteers

We grant each of our team members eight hours of paid Volunteer Time Off (VTO) per year to volunteer with the charities of their choice. Even during the pandemic, team members were able to find volunteer opportunities. Additionally, several team members are chosen each year from a peer nominations process as “Volunteer of the Year.” Winners are granted an additional eight hours of annual VTO; however, due to the pandemic in 2021, this recognition was tabled until 2022.

We also host a Summer of Service (SOS) Program to give team members the opportunity to volunteer together to support various charities selected by team members from each office. In 2021, despite the pandemic, we remained committed to our mission and core values to support 15 charities through our SOS Program.

• Matching Team Member Donations

Each year, AssetMark matches team members’ charitable donations to a maximum of \$500 per person for a total of \$50,000 for the company. During 2021, the Team Member Donation Program donated a total of \$113,000 to 137 charities between \$61,000 from team members and \$52,000 from AssetMark.

Supporting Our Advisors

Our annual Community Inspiration Award honors advisors who are making a significant impact in their communities through dedicated service. Every year, we select advisors to be recognized at Gold Forum, our annual industry event, where we award \$10,000 to each advisor’s charitable organization of choice to shine a light on their volunteering and inspire others to give back. The following organizations were honored in 2021:

- **Angels of America’s Fallen** helps children of our fallen military and first responders develop into strong and successful adults by providing them positive mentoring and developmental activities when they are at their most crucial development phase of life.

- **Cars 4 Kids Foundation** is dedicated to providing comfort, happiness, and monetary support to critically ill or injured children through events focused on the shared passion for the automotive community.
- **The Community Foundation of Greater Huntsville Racial Equity Fund** is a trusted leader in mobilizing generosity to improve the quality of life and addressing issues that impact our community.
- **Helping a Hero** provides adapted homes and emergency financial aid to severely wounded heroes. They give marriage and caregiver support, provide recreational activities, and facilitate community support for the grant recipients.
- **Kids in Focus** is dedicated to empowering at-risk youth to reach their potential using photography to ignite their imagination and build their sense of confidence.
- **Phillip's Love Bears, Inc.** provides new, high quality Teddy Bears, and other plush animals, to those in need, including but not limited to individuals with special needs, child trafficking survivors, law enforcement, hospitals, missionaries, nursing homes, and orphanages around the world.
- **Salem Rotary Foundation DBA Gerry Fran Salem Rotary Amphitheater** is making an impact for years to come, in a joint project with the City of Salem, to foster, develop, promote, and encourage the health, education, and general welfare of young people with the development of a \$4.0 million outdoor amphitheater and associated \$3.7 million of improvements in the surrounding section of Riverfront Park.

Supporting Our Communities in Need

We identify organizations whose work impacts issues that are currently and directly affecting our team members and their communities. To support victims of violence against Asians, we donated \$20,000 to the **Asian American Advancing Justice**, who seek to advance civil and human rights for Asian Americans and to build and promote a fair and equitable society for all.

We are also committed to support our communities outside our local areas. To demonstrate support of our large, outsourced team member base in India, we donated \$5,000 each to three charities:

- **MAP International USA** – A global health organization that reached 89 countries with free medicine and health supplies in 2021.
- **Pratham International USA** - Established in 1995 to provide education to children in Mumbai slums, Pratham is now one of the largest and most successful non-governmental education organizations in India.
- **Sewa International USA** - A Hindu faith-based, humanitarian, nonprofit service organization specializing in disaster relief and rehabilitation in Colombia, Guyana, India, Kenya, Pakistan and Sri Lanka.



5. Our Environment

We strive to minimize the environmental impact of our operational footprint through a variety of sustainable business practices. We have reduced travel by integrating video and audio conferencing and virtual meetings into our business practices. We outsource our data center, thus decreasing our overall carbon footprint by leveraging the economies-of-scale and environmental efficiencies of our third-party, cloud-based data center provider.

We lease all of our office space, including our LEED-CS Silver certified corporate headquarters in Concord, California. One of our four other smaller satellite U.S. office locations is also LEED-CS Gold certified. While the majority of the building decisions are controlled by property management, we integrate eco-friendly features into our occupied office spaces as permitted, such as evaporative cooling devices, motion-sensor LED lighting, Energy Star™ appliances, and low-water plumbing fixtures.

To divert our operational waste footprint, we have arranged regular e-waste, recycling, and composting collections. We have also reduced paper waste through a combination of lowering our print requirements, using composable kitchen paper products and 100% recycled paper, and utilizing secure shredding/recycling services for document destruction. Our overall energy conservation and eco-friendly initiatives have been reviewed and certified by the [Green Business Bureau](#).





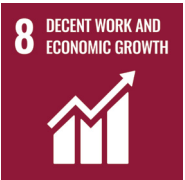

6. Frameworks and Standards

Our ESG Report has been prepared in accordance with the accounting standards published by the Sustainability Accounting Standards Board (SASB). We have also identified the United Nations Sustainable Development Goals (SDGs) that we believe best align with our business activities and key priority areas.



6.1 United Nations Sustainable Development Goals (SDGs)

The United Nations Sustainable Development Goals (SDGs) are a collaborative, global effort to achieve a better and more sustainable future for all. Represented by 17 Global Goals and 169 targets, the SDGs address challenges of poverty, inequality, climate change, environmental degradation, peace, and justice. We identified the key areas where we have the greatest influence and impact through our business strategy, products, and services.

SDG	Description	Comments	Section in the Report
 <p>3 GOOD HEALTH AND WELL-BEING</p>	Ensure healthy lives and promote well-being for all at all ages	We offer competitive salaries, full benefits, and excellent opportunities for growth. We remain committed to providing comprehensive medical coverage and a robust wellness program to empower our team members and their families with meaningful tools and resources to achieve great health outcomes. We support our team members in their diverse personal wellness journeys through a robust wellness program.	Our Team
 <p>5 GENDER EQUALITY</p>	Achieve gender equality and empower all women and girls	As of December 31, 2021, our diversity by gender was 57% male and 43% female. Fostering gender equality is paramount not only for AssetMark team members but also for our industry. The mission of our “Women of AssetMark” ERG is to empower and unite the women of AssetMark by providing a safe space to learn and advance a culture that fosters female leaders. Additionally, we host a Women’s Advisory Forum for our women leaders at various stages of their career journeys.	Diversity, Equity and Inclusion
 <p>8 DECENT WORK AND ECONOMIC GROWTH</p>	Promote inclusive and sustainable economic growth, employment and decent work for all	We strive to foster community amongst our team members and build a strong, inclusive culture that encourages our team members to succeed, grow, and contribute to our long-term business success. This initiative includes not only ensuring fair compensation but also providing a work environment that fosters talent development. During 2021, we had 322 internal promotions and job transfers.	Our Team
 <p>10 REDUCED INEQUALITIES</p>	Reduce inequality within and among countries	As of December 31, 2021, our diversity by race/ethnicity was 67% white and 33% underrepresented minorities (Asian, Hispanic, Black, and Other). Over the past year, we established three new ERGs, which are focused on the interests and advancement of racial and ethnic minorities within our organization, our industry, and our communities.	Diversity, Equity and Inclusion

6.2 Sustainability Accounting Standards Board (SASB)

The below table incorporates accounting standards from the Sustainability Accounting Standards Board (SASB) related to Asset Management & Custody Activities. It includes references to sections within this report where specific topics are discussed.

Topic	Accounting Metric	SASB Code	Section in the Report
Transparent Information & Fair Advice for Customers	(1) Number and (2) percentage of covered team members with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	FN-AC-270a.1	Business Ethics and Compliance
	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product related information to new and returning customers	FN-AC-270a.2	
	Description of approach to informing customers about products and services	FN-AC-270a.3	
Employee Diversity & Inclusion	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other team members	FN-AC-330a.1	Diversity, Equity and Inclusion
Incorporation of Environmental, Social, and Governance Factors in Investment Management & Advisory	Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening	FN-AC-410a.1	ESG in Our Investment Management
	Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies	FN-AC-410a.2	
	Description of proxy voting and investee engagement policies and procedures	FN-AC-410a.3	
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	FN-AC-510a.1	Business Ethics and Compliance
	Description of whistleblower policies and procedures	FN-AC-510a.2	

Forward-Looking Statements

Forward-looking statements include all statements that are not historical facts and can be identified by terms such as “will,” “intend,” “believe,” “expect,” or “continue,” the negative of these terms and other comparable terminology that conveys uncertainty of future events or outcomes. These forward-looking statements involve known and unknown risks, uncertainties, assumptions and other factors that may cause actual results to differ materially from statements made in this report, including our ability to maximize value, growth and performance for our advisors, our ability to enhance long-term shareholder value, our ability to safeguard sensitive data, and our ability to minimize the environmental impact of our operational footprint. Other potential risks and uncertainties that could cause actual results to differ from the results predicted include, among others, those risks and uncertainties included under the captions “Risk Factors” and “Management’s Discussion and Analysis of Financial Condition and Results of Operations” in our Annual Report on Form 10-K for the year ended December 31, 2021. All information provided in this report is based on information available to us as of the date of this report and any forward-looking statements contained herein are based on assumptions that we believe are reasonable as of this date. Undue reliance should not be placed on the forward-looking statements in this report, which are inherently uncertain. We undertake no duty to update this information unless required by law.

AssetMark Financial Holdings, Inc.

1655 Grant Street
10th Floor
Concord, CA 94520-2445
800-664-5345

About AssetMark Financial Holdings, Inc.

AssetMark is a leading provider of extensive wealth management and technology solutions that power independent financial advisors and their clients. Through AssetMark, Inc., its investment advisor subsidiary registered with the Securities and Exchange Commission, AssetMark operates a platform that comprises fully integrated technology, personalized and scalable service and curated investment platform solutions designed to make a difference in the lives of advisors and their clients. AssetMark had \$93.5 billion in platform assets as of December 31 2021, and has a history of innovation spanning more than 25 years.

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