



## **Code of Business Conduct and Ethics**

### **Introduction**

Evercore Inc. and its subsidiaries (the “Company”) are committed to conducting the Company’s business with honesty and integrity. The policies outlined in this Code of Business Conduct and Ethics (the “Code”) are designed to ensure that the Company’s employees and directors, including anyone authorized to act for the Company, act in accordance with not only the letter but also the spirit of the laws and regulations that apply to our business. Employees and directors who violate this Code will be subject to disciplinary action.

Employees and directors are expected to read the policies discussed in this Code and ensure that they understand and comply with them. Any questions about the Code or the appropriate course of conduct in a particular situation should be directed to the Company’s General Counsel. Any violations of laws, rules, regulations or this Code should be reported immediately. The Company maintains an Ethics Hotline, which is a 24-hour telephone service and web portal available to all employees for reporting potentially illegal or unethical matters observed, discovered or experienced in the workplace. This resource is operated by a third party to ensure confidentiality, and additional contact information is available on the intranet. The Company will not allow retaliation against an employee or director for such a report made in good faith.

### **Responsibilities**

#### **1. Compliance with laws, rules and regulations**

It is the policy of the Company to comply with all applicable laws, rules and regulations that apply to our business, including anti-money laundering, anti-bribery and anti-corruption laws, rules and regulations. It is the personal responsibility of each employee and director to adhere to the standards and restrictions imposed by those laws, rules and regulations. Any questions should be directed to the Company’s General Counsel. If a law conflicts with a policy in this Code, employees and directors must comply with the law. If a local custom or policy conflicts with a policy in the Code, employees and directors must comply with the Code.

#### **2. Securities trading**

It is the Company’s policy that employees and directors may not buy or sell shares of the Company when they are in possession of material, non-public information. They also are prohibited from passing on such information to others who might make an investment decision based on it. Short-term investment activity in the Company’s securities, such as trading in or writing options, arbitrage trading or “day trading,” and short-selling of the Company’s securities are not appropriate under any circumstances and accordingly are prohibited.

Employees and directors also may not trade in securities of other companies about which they learn material, non-public information through the course of their employment or service. They also are prohibited from passing on such information to others who might make an investment decision based on it. Any questions as to whether information is material or has been adequately disclosed should be directed to the Company’s General Counsel.

### 3. Conflicts of interest

A conflict of interest occurs when an individual's private interest improperly interferes with the interests of the Company. A conflict situation can arise when an employee or director takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively. Conflicts of interest are prohibited as a matter of Company policy, unless they have been approved by the Company. In particular, an employee or director must never use or attempt to use his or her position at the Company to obtain any improper personal benefit for himself or herself, for his or her family members, or for any other person, including loans or guarantees of obligations, from any person or entity.

Service to the Company should never be subordinated to personal gain and advantage. Conflicts of interest should, to the extent possible, be avoided.

Any employee or director who is aware of a material transaction or relationship that reasonably could be expected to give rise to a conflict of interest should discuss the matter promptly with the General Counsel or the CEO or, if applicable, a Co-CEO or the CFO of the Company.

### 4. Corporate opportunities

Employees and directors are prohibited from taking for themselves personally (or directing a third party) any opportunities that arise through the use of corporate property, information or position and from using corporate property, information or position for personal gain. Employees and directors are further prohibited from competing with the Company directly or indirectly. Employees and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

### 5. Confidentiality

Employees and directors may learn information about the Company or its clients that is not known to the general public or to competitors. Confidential information includes, among other things, all non-public information concerning the firm, including its businesses, financial performance, results or prospects, or information that associates, or clients of the Company have entrusted to it. Confidential information also includes all non-public information that might be of use to competitors of the Company, or harmful to the Company or its clients, if disclosed.

Employees and directors must maintain the confidentiality of information entrusted to them by the Company or its associates or clients, except when disclosure is authorized or legally mandated. Any questions about whether information is confidential should be directed to the Company's General Counsel.

### 6. Fair dealing

Each employee and director shall endeavor to deal fairly with the Company's stockholders, competitors, suppliers and employees. No employee or director shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

No bribes, kickbacks or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. The Company and the employee, officer or director involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this policy.

Occasional business gifts to and entertainment of non-government employees in connection with business discussions or the development of business relationships are generally deemed appropriate in the conduct of Company business. However, these gifts should be given infrequently and their value should be modest. Gifts or entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted. In addition, certain businesses are subject to rules which contain strict limits on the giving of business gifts or gratuities. Questions regarding business gifts and entertainment should be directed to the Legal and Compliance Department.

#### 7. Protection and proper use of Company assets

Theft, carelessness and waste have a direct impact on the Company's profitability. Employees and directors have a duty to safeguard Company assets and ensure their efficient use. Company assets should be used only for legitimate business purposes and employees and directors should take measures to ensure against their theft, damage, or misuse.

Company assets include intellectual property such as trademarks, business and marketing plans, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Company policy.

#### 8. Cyber security and privacy

The Company recognizes the importance of cyber security and seeks to protect its network, systems and data in its possession. The Company conducts regular security testing to its systems and monitors for cyber security threats and vulnerabilities. It is the personal responsibility of each of our employees and directors to comply with the cybersecurity policies, practices and procedures promulgated by the Company from time to time, as well as comply with any requests in connection with testing and monitoring the efficacy of such policies, practices and procedures.

In addition, the Company is subject to various privacy laws in the jurisdictions in which it operates. Although the definition of "personal data" can vary widely, it typically includes information that relates to an identified or identifiable individual. The Company has promulgated policies and procedures designed to (i) comply with applicable data protection laws and the privacy policies of the associated businesses, (ii) keep personal data secure, and (iii) escalate incidents involving the potential misuse of personal data. Any questions about these policies should be directed to the Company's General Counsel.

#### 9. Recordkeeping

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the matters to which they relate and must conform both to applicable legal requirements and to the Company's system of internal controls. All assets of the Company must be carefully and properly accounted for. The making of false or

misleading records or documentation is strictly prohibited. Unrecorded funds or assets should not be maintained.

The Company complies with all laws and regulations regarding the preservation of records. Records should be retained or destroyed only in accordance with the Company's document retention policies. Any questions about these policies should be directed to the Company's General Counsel.

#### 10. Interaction with public officials

When dealing with public officials, employees, directors, and agents must avoid any activity that is or appears illegal or unethical, and employees, directors, and agents also must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, both of which apply to companies and individuals beyond their countries' borders. These laws prohibit offering, paying or promising to pay or authorizing the payment of anything of value, directly or indirectly, to the employee or officials of any government in order to obtain or retain business. An "employee or official" of a foreign government includes any civil servant, governmental representative, public sector employee (including an employee of government-owned or government-controlled corporation or instrumentality or public international organization), a political party, official of a political party, or candidate for public office, or any family member or close associate of such persons, or any intermediary for payment or provision to any of the foregoing. A "thing of value" may include money, goods, or services, such as gifts, entertainment, transportation, lodging, a job or internship, or other benefits. Our policies also prohibit payments to government officials to speed up the processing of a license, application or permit, often called a facilitating payment. In addition, the giving of gifts, including meals, entertainment, transportation, and lodging, to government officials is often limited by law, and illegal payments to government officials of any country are strictly prohibited. In some cases, particularly for members and employees of the judiciary, gift-giving is strictly prohibited. Questions regarding this policy should be directed to the Legal Department.

#### 11. Quality of Public Disclosures

The Company has a responsibility to provide full and accurate information in our public disclosures, in all material respects, about the Company's financial condition and operating results. Our reports and documents filed with or submitted to the Securities and Exchange Commission and our other public communications shall include full, fair, accurate, timely and understandable disclosure.

#### 12. Equal Opportunity, Non-Discrimination, and Fair Employment

The Company's policies for recruitment, advancement and retention of employees forbid discrimination on the basis of any criteria prohibited by law, including but not limited to race, sex and age. Our policies are designed to ensure that employees are treated, and treat each other, fairly and with respect and dignity. In keeping with this objective, conduct involving discrimination or harassment of others will not be tolerated.

Violence and threatening behavior are not permitted. Employees should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of

illegal drugs in the workplace will not be tolerated.

### 13. Core Values

The Company is committed to upholding its Core Values, which include (a) client focus, by investing in long-term relationships with our clients through independent, trusted, and innovative advice to help them achieve superior results, (b) integrity, by strictly adhering to the principle of doing the right thing at all times and in all circumstances, (c) excellence, by relentlessly striving to achieve the highest standards of quality, (d) respect, by treating all people with the utmost dignity, respect and appreciation, (e) diversity, equity and inclusion, by developing and sustaining a strong culture of inclusion which embraces diversity and creates opportunity for all employees, (f) investment in people, by attracting the most talented people and inspiring them to reach their highest potential through a deep commitment to career development, and (g) partnership, by promoting a culture which encourages honest debate, yet demands collaboration and uncompromising teamwork.

### 14. Compliance with Antitrust Laws

The antitrust laws prohibit agreements among competitors on such matters as prices, terms of sale to customers and allocating markets or customers. Antitrust laws can be very complex, and violations may subject the Company and its employees to criminal sanctions, including fines, jail time and civil liability. If you have any questions, consult the General Counsel.

### 15. Social Responsibility

The Company has an obligation to act as a responsible corporate citizen. The Company also takes steps to review actions in furtherance of corporate social responsibility and considers public issues of significance which affect its employees, investors, and other key stakeholders.

### 16. Political and Charitable Contributions and Activities

Any political or charitable contributions made by or on behalf of the Company and any solicitations for political or charitable contributions of any kind must be lawful and in compliance with Company policies. This policy applies solely to the use of Company assets and is not intended to discourage or prevent individual employees, officers or directors from making political or charitable contributions or engaging in political or charitable activities on their own behalf. No one may be reimbursed directly or indirectly by the Company for personal political or charitable contributions.

## **Compliance Standards and Procedures**

No code of business conduct and ethics can replace the thoughtful behavior of an ethical employee or director or provide definitive answers to all questions. Since we cannot anticipate every potential situation, certain policies and procedures have been put in place to help employees and directors approach questions or problems as they arise.

The Company recognizes the need for this Code to be applied equally to everyone it covers. The General Counsel of the Company, will have primary authority and responsibility for the enforcement of this Code, subject to the oversight of the Audit Committee of the Board of

Directors and, with respect to policy matters relating to the Code, the Nominating and Corporate Governance Committee of the Board of Directors. The Company will devote the necessary resources to establish such procedures as may be reasonably necessary to create a culture of accountability and facilitate compliance with the Code. Questions concerning this Code should be directed to the General Counsel.

### 1. Designated officer

The Company's General Counsel has been designated as the officer with responsibility for overseeing and monitoring compliance with the Code. The General Counsel will make periodic reports to the Audit Committee of the Board of Directors regarding the implementation and effectiveness of this Code as well as the policies and procedures put in place to ensure compliance with the Code.

### 2. Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know if a violation has occurred. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Always ask first, act later: if you are unsure of what to do in any situation, seek guidance before you act.
- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: what specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- Seek help from individuals other than your supervisor. In situations where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, consider discussing the issue with someone from the Human Capital Group. If the issue relates to a specific regulatory matter, consider discussing the issue with the relevant compliance officer. In the case of accounting, internal accounting controls or auditing matters, consider discussing the issue with the relevant finance officer or the Audit Committee of the Board of Directors. Interested parties may also communicate directly with the Company's non-management directors through contact information located in the Company's annual proxy statement and website or via the

Company's confidential reporting systems.

- Remember — always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

### 3. Investigations

Reported violations will be promptly investigated. It is imperative that the person reporting the violation not conduct an investigation on his or her own. However, employees and directors are expected to cooperate fully with any investigation made by the Company into reported violations.

### 4. Waiver

Any waiver of the provisions of this Code for executive officers or directors of the Company may be made only by the board of directors or a committee of the board and must be promptly disclosed to the Company's stockholders.

### 5. Discipline/Penalties

Employees and directors who violate this Code will be subject to disciplinary action, up to and including dismissal. Employees and directors who have knowledge of a violation and fail to move promptly to report or correct it and employees and directors who direct or approve violations may also be subject to disciplinary action, up to and including dismissal. In determining what action is appropriate in a particular case, the Board of Directors or such designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual involved had been advised prior to the violation as to the proper course of action and whether or not the individual involved had committed other violations in the past.

Furthermore, violation of some provisions of this Code is illegal and may subject the employee or director to civil and criminal liability.

If you have any questions about how this Code should be applied in a particular situation, you should contact promptly the Company's General Counsel.