

Code of Ethics - Public Summary

Golden State Tech Inc. (FinX / FinX Stocks) | Last updated: September 28, 2026

Golden State Tech Inc., doing business as FinX or FinX Stocks ("FinX"), has adopted a Code of Ethics designed to promote integrity, fair dealing, protection of client information, and compliance with applicable securities laws. Our Code reflects our fiduciary obligation to place client interests ahead of our own interests and the personal interests of our personnel.

Our standards of conduct

FinX expects its directors, officers, employees, contractors, and other supervised persons to:

- Act honestly, fairly, professionally, and in clients' best interests.
- Comply with applicable securities laws and FinX compliance policies.
- Identify, disclose, and appropriately address actual or potential conflicts of interest.
- Protect confidential client, platform, and business information.
- Avoid misleading statements, deceptive practices, misuse of client information, and improper personal benefit.
- Promptly report actual or suspected violations of the Code or applicable law.

Personal securities transactions

FinX personnel may invest for their personal accounts only when doing so does not conflict with client interests or FinX's duties. The Code prohibits personnel from:

- Trading while in possession of material nonpublic information.
- Sharing material nonpublic information with others who may trade on it.
- Front-running or attempting to benefit personally from nonpublic FinX recommendations, model changes, or client information.
- Using personal holdings or outside interests to influence FinX model portfolios, recommendations, technology decisions, or other advisory activities.
- Trading securities subject to applicable FinX restrictions.

FinX requires applicable personnel to disclose reportable securities accounts and holdings, submit periodic reports, and obtain approval before certain transactions, including initial public offerings and private or limited offerings.

Automated advice and model governance

FinX provides automated digital investment recommendations through the FinX platform. The current service is a free simulated-account or paper-trading environment; it does not involve actual client assets, execution of trades, custody of assets, or ongoing management of clients' actual brokerage accounts. FinX's Code requires personnel to protect the integrity of the platform's model portfolios, algorithms, risk-scoring methodology, and client information. Personnel may not improperly alter client information, risk constraints, model logic, or client-specific recommendations to favor personal interests, commercial relationships, or other conflicts.

Confidentiality and information protection

FinX requires personnel to safeguard nonpublic personal information, client questionnaire responses, recommendations, platform information, software, and confidential business information. Personnel may

access and use confidential information only for authorized business purposes and must follow applicable privacy, information-security, and incident-reporting procedures.

Gifts, entertainment, and outside activities

FinX personnel may not accept or provide gifts, entertainment, payments, or other benefits that could improperly influence business judgment or create an actual or apparent conflict of interest. Cash and cash-equivalent gifts are prohibited. Personnel must disclose and, where required, obtain approval for outside business activities, financial-industry roles, issuer affiliations, consulting arrangements, and other outside interests that could create conflicts or provide access to confidential information.

Enforcement and availability

FinX reviews potential Code violations and may impose appropriate corrective or disciplinary action, including restrictions on personal trading, enhanced supervision, suspension of access, termination of employment or engagement, and referral to regulators or other authorities where appropriate.

A copy of FinX's complete Code of Ethics is available to current and prospective clients upon request.

To request a copy or ask a compliance question, contact:

Armand Batocabe, Chief Compliance Officer

Golden State Tech Inc. / FinX

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