HENDERSON ASSET MANAGEMENT, LLC

2025 Code of Ethics

HENDERSON ASSET MANAGEMENT, LLC, AND DIANA HENDERSON consider ethical behavior to be of the utmost importance and follows the standards set by the Financial Planning Association.

We are committed to the following behavior and will always:

- 1. Act with honesty, integrity, competence, and diligence.
- 2. Act in the client's best interest.
- 3. Exercise due care.
- 4. Avoid or disclose and manage conflicts of interest.
- 5. Maintain the confidentiality and protect the privacy of client information.
- 6. Act in a manner that reflects positively on the financial planning profession.