

Raymond James' Modern Slavery Statement – Financial Year 2021

Introduction

Raymond James Financial, Inc. (“**RJF**”) and its subsidiaries¹ and affiliates (together the “**Enterprise**” or “**Raymond James**”), are committed to practices which combat Modern Slavery and Human Trafficking (as defined under the U.S. Criminal Code Title 18, Chapter 77) and are committed to acting in an ethical manner, with integrity and transparency in all business dealings. As a result, RJF is publishing this Modern Slavery (“**MS**”) Statement which is applicable to Raymond James’s global operations and supply chains.

This MS Statement outlines the proactive steps taken by Raymond James and the RJF Anti-Money Laundering (“**AML**”) and Financial Crimes Management (“**FCM**”) Group, during fiscal years 2020 and 2021 in an effort to prevent Modern Slavery-related transactions or associated activities from taking place in any part of its operations, subsidiaries, affiliates, or supply chains.

Raymond James is committed to protecting and advancing human rights in its business, including through its supply chain, employment practices and supplier risk management process. Raymond James is committed to continuing its efforts to combat Modern Slavery, including commercial sexual exploitation and forced labor, and mitigating the associated public safety, economic, and health risks to its community. Raymond James commitment to these issues, through its business, client relations, supply chain management, and as an employer are set forth below.

Raymond James business Overview

RJF is a leading diversified financial services company providing private client, capital markets, asset management, banking and other services to individuals, corporations and other legally organized entities, not for profit organizations and municipalities. RJF (the parent company), along with its subsidiaries is engaged in various financial services activities, including providing investment management services for retail and institutional clients, the underwriting, distribution, trading and brokerage of equity and debt securities and the sale of mutual funds and other investment products. Raymond James also provides corporate and retail banking services, and trust services.

Established in 1962 and public since 1983, RJF is listed on the New York Stock Exchange (the “NYSE”) under the symbol “RJF.” As a bank holding company and financial holding company, RJF is subject to supervision, examination and regulation by the Board of Governors of the Federal Reserve System.

RJF currently operates through five segments: Private Client Group (“**PCG**”), Capital Markets, Asset Management, Raymond James Bank, N.A. and other.

¹Refer to complete list: <https://www.raymondjames.com/about-us/subsidiaries> of RJF subsidiaries and affiliates which may change from time to time.

Total assets under administration in the PCG segment are approximately \$1.18 trillion as of September, 2021 with over 8,482 advisors located in the U.S., Canada, and the UK and elsewhere overseas. RJF's associates procure goods and services from RJF's supply chain, which is made up of over 4,500 suppliers with the majority located in the U.S.

More information can be found in the RJF [Annual Report](#).

Framework

Raymond James believes there is a low risk of Modern Slavery occurring within its business and supply chain; largely because its supply chains are not complex and various steps have been implemented to mitigate Modern Slavery and Human Trafficking.

Raymond James's activities and operations are integrated globally, with core risk management policies and standards established at the Enterprise-wide level. Each subsidiary and affiliate may establish its own policies, procedures and controls to comply with all applicable local laws whilst maintaining the spirit of the Enterprise-wide policies and standards. Raymond James' Board has established an Enterprise Risk Management framework that ensures that Raymond James' risks are managed in a sound manner and escalated as appropriate.

Enterprise Policies and Principles

Raymond James is guided by employment laws in the markets where it operates and in the products and services offered. Raymond James further supports fundamental principles of human rights in each region of the world in which it operates, and expects that its subsidiaries, associates, affiliated representatives, contingent workers, consultants and suppliers (collectively Raymond James' personnel) do the same.

The Compliance Risk and Ethic Committee ("**CREC**") is responsible for overseeing the execution of a framework for the development, review, approval, and communication of policies, standards, procedures, and related policy documents across Raymond James. At the Enterprise level, each policy is assigned to an appropriate governance committee that is responsible for approving policies and standards (e.g., the Compliance Risk and Ethics Committee approves the *Compliance Risk Policy*) with certain Enterprise policies also being approved by the Raymond James' Board of Directors or a board-level committee thereof.

RJF's subsidiaries, whilst maintaining the spirit of the Enterprise wide policies and standards, may implement their own policies procedures and approval processes to comply with all applicable local laws.

RJF Policies include:

1. Enterprise Information Technology Acceptable Use Policy

The RJF *Enterprise Information Technology Acceptable Use Policy* is applicable to associates, independent financial advisors and their registered and non-registered associates, and third-party suppliers that are obligated to follow Raymond James policies and standards. This policy outlines prohibited actions pertaining to the use of Raymond James provided equipment, including its network, laptops, email and cell phones, for purposes of purchasing sex or displaying materials that may adversely or negatively reflect upon Raymond James.

2. Travel and Expense Policy

The RJF *Travel and Expense Policy* is applicable to associates and other personnel who travel on behalf of Raymond James, and contains measures to restrict various types of expenses and methods of payment typically associated with Modern Slavery including the various forms of Human Trafficking, and clarifies that violations of the code or other related policies are prohibited.

- a. states that all material out of pocket expenses require a detailed receipt;
- b. caps spending on laundry service, tips, parking and other services known to be associated to human/sex trafficking;
- c. contains an extensive list of non-reimbursable expenses (including adult entertainment); and
- d. encourages associates to obtain and use a corporate card for all business-related travel/expenses.

The policy is tested annually by Internal Audit to ensure compliance with the extensive IRS regulations.

3. Gifts and Entertainment Policy

The RJF *Gifts and Entertainment Policy* is applicable to associates, independent financial advisors and their registered and non-registered associates, and third-party suppliers that are obligated to follow Raymond James policies and standards. The Policy specifies that those subject to the Policy are prohibited from offering, giving, soliciting, or accepting gifts and entertainment, regardless of value, if the gift or entertainment:

- a. violates laws or regulations, or could harm Raymond James's reputation;
- b. is so frequent or extensive that it may raise the appearance of impropriety;
- c. could be viewed as a bribe, pay-off, improper influence, or having the expectation of a return favor;
- d. includes sexually explicit content and activities, regardless of local or prevailing laws, or is inconsistent with ethical business practices; and
- e. is in the form of cash or cash equivalents, and from a product sponsor in the U.S.

4. Anti-Money Laundering and Counter-Terrorist Financing Policy

Raymond James takes a risk-based approach in its commitment to combatting money laundering, corruption, terrorist financing and other financial crimes, and have implemented policies and standards applicable to all subsidiaries and affiliates, with each subsidiary and affiliate implementing their own procedures and internal controls designed to comply with the Enterprise policies and standards, as well as applicable local laws and regulations. Since proceeds stemming from the heinous acts of the various forms of Modern Slavery are criminally derived, these would be included in the scope of regulatory reporting under RJF's *AML and Counter-Terrorist Financing ("CTF") Policy* and related procedures.

RJF's *AML and CTF Policy* points to the *Enterprise AML/FCM Prohibited Clients Standard* which specifies that Raymond James will not conduct business with any client who has "pled guilty to, or have been convicted of, any of the following crimes or of a crime that constitutes knowingly facilitating any of the following criminal acts: slavery; forced or coerced labor or servitude; forced or coerced sexual exploitation; any other criminal act that is comparable to those stated in this list; and/or Human Trafficking for the purpose of any of the preceding criminal acts."

5. Code of Business Conduct & Ethics

The [Code of Business Conduct & Ethics](#) (the "**Code**") defines the way Raymond James conducts business. The principles and standards outlined in the code apply to all aspects of its business and the way it engages its stakeholders. The code is designed to support a culture where ethical and responsible behavior is expected and ingrained into its business dealings. It includes an ongoing commitment to doing business in a sound and ethical manner, while outlining a strong stance against all forms of Modern Slavery, including abuse and exploitation resulting from various forms of Human Trafficking or human rights violations.

The Code states that Raymond James does not knowingly employ, conduct business or otherwise knowingly engage with any individual, supplier or company that does not abide by labor laws and regulations in the regions where they conduct business, including those that address child labor, forced labor, slavery, Human Trafficking, equal pay and non-discrimination in their workforce.

Risk Management

RJF implements the following risk management controls:

1. Supplier Risk Management

Suppliers undergo a formal evaluation of potential risks. Suppliers are asked to certify that they comply with all applicable regulations, including that of Modern

Slavery. Additionally, once a supplier is on-boarded, they will be screened for adverse media (amongst other things) including human rights violations and Human Trafficking.

2. Code of Business Conduct & Ethics

All associates must read and acknowledge the Code annually, which underscores Raymond James values and its commitment to ensuring a workplace that includes equal opportunity, dignity and respect, including with respect to its suppliers, affiliates and partners.

3. Enterprise AML and FCM Group

The Enterprise AML and FCM Group has developed extensive policies, procedures and controls designed to detect and report money laundering, corruption, terrorist financing and other financial crimes. These policies, procedures and controls seek to protect Raymond James and its reputation from bad actors who may attempt to utilize Raymond James in the furtherance of crime and legitimizing illicit proceeds. Some subsidiaries rely upon the control-related services conducted by the Enterprise AML and FCM Group to fulfill their AML program requirements, including adverse media screening and suspicious activity investigations and subsequent reporting.

The Enterprise AML and FCM Group screens all clients for adverse media including Human Trafficking, human rights violations, and prostitution via automated screening and open source search text strings.

The Enterprise AML and FCM Group will continue to evaluate red flags and industry trends to ensure appropriate adequate transaction monitoring and effective training.

Under applicable laws, the RJF AML and FCM Group will file a Suspicious Activity Report (“**SAR**”) or a Suspicious Transaction Report (“**STR**”) as applicable, where it has a suspicion that a client’s source of funds is derived from criminal activity to include Modern Slavery or Human Trafficking, or if any transactions or activities are suspected to involve Modern Slavery or Human Trafficking.

4. Red Flags List

The RJF Master Red Flags list includes comprehensive red flags lists to include those associated with Modern Slavery and Human Trafficking, including: payments for online services; advertising; classifieds ads; web hosting; excessive ATM activity; payments for hotels; airlines; bus passes; ride sharing; medical clinics; student recruitment; employment agencies; telephone service providers; frequent deposits of cash or monetary equivalents below reporting thresholds.

Raymond James’s subsidiaries may not implement/rely on Enterprise level risk management procedures and controls but, whilst maintaining the spirit of the Enterprise wide risk management procedures and controls, may implement their own to comply with all applicable local laws.

Training

Raymond James has incorporated Human Trafficking educational topics and red flags training into Raymond James's firm element continuing education which all associates/affiliates receive annually, beginning in calendar year 2020.

The RJF AML and FCM Group facilitates peer discussions and engages law enforcement to keep abreast of ever changing and developing typologies and to keep the flow of information fluid.

Various members of the Enterprise AML and FCM Group are active participants in local Anti-Human Trafficking non-profits seeking to assist survivors of human trafficking and provide valuable education to the public.

RJF subsidiaries may deliver training in accordance with all applicable local laws.

Reporting

Raymond James has established protocols and procedures to ensure unethical behavior and/or activities are properly escalated and reported, either by upwards reporting or confidential and anonymous reporting. Raymond James has established an internal confidential and anonymous reporting hotline so that associates may report potentially unlawful, improper or questionable conduct, including with regard to suppliers or other third parties, ethics violations, and accounting, internal controls or auditing matter concerns.

Ongoing Plans

Raymond James intends to continue work on reducing the risk of there being Modern Slavery or Human Trafficking in its operations or supply chain by taking the following steps:

- providing ongoing training to associates; and
- As part of its emerging risks process, continuing to develop applicable transactional typologies and evaluate if additional monitoring scenarios are necessary.

This Modern Slavery Statement has been approved by the Raymond James' Executive Committee and Board of Directors.