



Supplier Code of Conduct

Raymond James has built its reputation through providing the highest level of service and integrity since its inception. The firm has grown and evolved in numerous ways over the years, but our integrity has remained constant. It is the cornerstone on which the firm was built, and it is as important to us today as the day the firm was founded. Conducting ourselves lawfully, professionally, and with the highest ethical standards remains our guiding principle and explains why Raymond James remains one of the most admired and emulated financial companies in the world.

This Supplier Code of Conduct sets forth Raymond James' standards and expectations for legal regulatory compliance, labor and human rights, and environmental standards throughout our supply chain. As the firm aspires to maintain the highest standards of ethical conduct, we value companies that do the same.

Raymond James is committed to providing safe working conditions and treating employees with respect. Suppliers, their contractors and subcontractors must comply with our requirements, and employ fair and ethical business practices for their products and services.

The Supplier Code of Conduct does not constitute an employment contract, and nothing contained or implied herein is intended to convey any rights, actions or remedies to suppliers, or to create an employment relationship between supplier or supplier's employees and the firm.

SCOPE

A Supplier shall mean a vendor, supplier or other third-party company or individual (and their suppliers) that provides a product or service to Raymond James. The persons, entities and organizations (collectively referred to as suppliers) are covered by the Supplier Code of Conduct and thereby subject to its provisions.

LEGAL COMPLIANCE AND BUSINESS INTEGRITY

Raymond James expects suppliers to comply with both the letter and the spirit of applicable laws, rules and regulations at all levels of government in the United States and in any other jurisdiction in which the firm conducts business.

ANTI-BRIBERY AND ANTI-CORRUPTION

Raymond James has adopted a zero-tolerance policy with respect to all forms of bribery and corruption. We expect our suppliers, their contractors and subcontractors to abide by the same zero tolerance policy, and abide by all applicable laws, rules and regulations related to Anti-Bribery and Anti-Corruption. We expect our suppliers to prohibit offering, accepting, promising or paying, directly or indirectly, anything of value intended to influence or attempt to influence a business decision. Under no circumstance may a supplier offer or make facilitation payments of any kind on behalf of Raymond James, even if such payments are a local practice or custom. Suppliers may not offer or receive a gift or entertainment on behalf of Raymond James. We expect our suppliers to conduct due diligence and oversight over their employees, intermediaries and joint venture partners, and to identify and manage conflicts of interest.

CHARITABLE CONTRIBUTIONS

Raymond James is committed to giving back to the communities in which we live and work. From time to time, representatives from Raymond James may contact suppliers with opportunities to make charitable contributions to nonprofit organizations supported by the firm. Suppliers are permitted to make charitable contributions directly to these nonprofit organizations; however, charitable contributions may not be requested or given as a condition of, or to influence, a business decision. Many of our locations also have specific policies governing charitable contributions. Suppliers must comply with any applicable local restrictions and policies.

To determine whether Raymond James can make a charitable contribution at the request of a client or supplier, the Raymond James associate who received the client or supplier request must receive pre-approval and should refer to the approval guidelines specific to that region. Note that any contribution requested by or that would benefit a government official must be escalated to ABAC Compliance.

LABOR, HUMAN RIGHTS AND SOCIAL RESPONSIBILITY

Raymond James supports the protection and preservation of human rights around the world. The firm is guided by fundamental principles of human rights, such as those in the United Nations Universal Declaration of Human Rights and the International Labour Organization Core Conventions. This includes the elimination of the “worst forms of child labor,” as defined by International Labour Organization Core Conventions 138 and 182, from the firm’s supply chain.

We expect our suppliers, their contractors and their subcontractors to abide by labor laws and regulations in the locations where they conduct business, including those that address child labor, forced labor, slavery, human trafficking, equal pay and nondiscrimination in their workforce. The firm also expects that workweeks will not exceed the maximum set by local law.

ENVIRONMENTAL SUSTAINABILITY

Building a workplace that uses its resources wisely and sustainably is a logical effort for a firm dedicated to helping people manage and maintain their financial resources. Raymond James has undertaken initiatives to reduce our environmental impact, and we encourage our employees to also take similar steps and apply them in their day-to-day lives.

We encourage all suppliers to partner with us to integrate sustainability factors in their business decision-making, consistent with maximizing efficiency, decreasing costs and doing what is right for our clients, our associates and the environment we share. We also encourage all suppliers to have an effective environmental policy and to disclose their policy, if requested by the firm.

Raymond James expects our suppliers to actively monitor and audit their day-to-day processes and their contractors and subcontractors to ensure alignment with the Supplier Code of Conduct. Suppliers must promptly report to Raymond James any concerns or suspected violations of any law or regulations related to business with the firm or a violation of the Supplier Code of Conduct or any other firm policy, including fraud, dishonesty or unfair or unethical conduct related to financial services.

To report questionable behavior or a possible violation of the Supplier Code of Conduct, please contact the Raymond James confidential hotline at 888.686.8351.

If you have any questions about this Supplier Code of Conduct, please contact a Raymond James Corporate Procurement team member at CorporateProcurement@Raymondjames.com.

RAYMOND JAMES®

INTERNATIONAL HEADQUARTERS: THE RAYMOND JAMES FINANCIAL CENTER
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