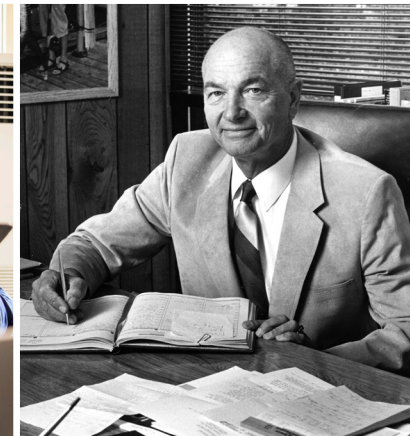


RAYMOND JAMES

More than a code, a culture

The Raymond James Code
of Business Conduct and Ethics





A MESSAGE FROM OUR CHAIRMAN AND CHIEF EXECUTIVE OFFICER

PAUL REILLY

Our business is people and their financial well-being. It's the mission Raymond James was founded on, and that still guides us today.

Keeping people – not only clients, but you, the advisors and associates who are Raymond James – at the heart of everything we do is what has made us successful, helped us weather economic downturns, and steered us as we have continually adapted to a shifting regulatory environment and an evolving world.

Our Code of Business Conduct and Ethics serves as a guide for living out our mission. It reflects our commitment to clients and keeps us accountable to those we work alongside every day.

I encourage you to read this document, and to use it to guide your decision-making and actions.

Because whether you're meeting with clients, building technology solutions or leading change in one of our business units, you are Raymond James. The work you do every day matters. And how you do that work matters even more, especially if we are to realize the promise of our vision: to be a financial services firm as unique as the people we serve, transforming lives, businesses and communities through the power of personal relationships and professional advice.


PAUL C. REILLY

Chairman and Chief Executive Officer
Raymond James Financial



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1 We Are All Raymond James

Our culture is people-driven, values-built and future-focused – **and it starts with you.**

At Raymond James, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business.

And our Code of Business Conduct and Ethics (the code) serves as a road map for doing the right thing, outlining how we treat people, how we make decisions and how we work.

Each of us is expected to embrace the principles of our code and:

- Show respect in the workplace
- Act with integrity in the marketplace
- Operate ethically in our business relationships
- Work responsibly for our clients, firm and shareholders



A guide to culture at Raymond James

Our code is an extension of the people-driven, values-built, future-focused culture that defines our firm. To learn more about that culture, read the Blueprint.

Our Mission

Our business is people and their financial well-being.

We are committed to helping individuals, corporations and institutions achieve their unique goals, while also developing and supporting successful professionals and helping our communities prosper.

Our Values



We put clients first. If we do what's right for clients, the firm will do well and we'll all benefit.



We act with integrity. We put others above self, and what's right above what's easy. We believe doing well and doing good are not mutually exclusive.



We think long term. We act responsibly, taking a conservative approach that translates into a strong stable firm for clients, advisors, associates and shareholders.



We value independence. We respect autonomy, celebrate individuality and welcome diverse perspectives, while encouraging collaboration and innovation.

Doing business the right way

Simply put, you do business the right way when you act ethically and consistently with our values, our code, our policies and the law.

All associates of Raymond James and its independent financial advisors and their registered and non-registered associates, including foreign subsidiaries, and third-party suppliers that are obligated to follow Raymond James Policies and policy-related documents, are expected to comply with the principles of our code. Third parties, including suppliers, are expected to act in a way that is consistent with the principles and values of our code as well as the [Supplier Code of Conduct](#) when conducting business with Raymond James.

Our code is at the center of everything we do, reinforced by our values, vision and guiding behaviors, and inspired by our mission to serve people. It is also an extension of our pledge to commit our energies, intellect and knowledge to attaining the financial objectives of our clients by providing the highest possible level of service and delivering superior investment solutions.

Policies, policy-related documents and supplements to our code

Our core values and the principles set forth in our code are described further in company policies and policy-related documents. Together these documents serve as a framework to guide our actions, protect the firm's reputation and preserve our culture.

When we use the term “code,” we are referring to this code and any codes or handbooks of any Raymond James subsidiary, including our foreign subsidiaries. In addition to our code, you should consult your business subsidiary or foreign subsidiary-level or legal entity policies and policy-related documents. Contingent workers must follow the applicable Supplier Code of Conduct for their location.

You are responsible for reading, understanding and following our code and those policies and policy-related documents that apply to you. If adherence with any provision of the code, policy or policy-related documents violates local laws, rules or regulations, you should comply with the more stringent policies, policy-related documents, laws, rules or regulations. For questions regarding our code or a particular policy or policy-related documents, consult your Compliance officer, Legal or Human Resources representative.

Where can I find company policies and policy-related documents?



Policies and policy-related documents referenced in our code are available in the [Additional Resources](#) section. In addition, many business, foreign subsidiary and legal entity policies and policy-related documents are available on company intranet sites. You can also ask your manager, supervisor or Human Resources for copies of applicable policies and policy-related documents.

Associate responsibilities

No matter what job you do or where you do it, you are the heart of Raymond James. We put others above self, and what's right above what's easy. We believe doing well and doing good aren't mutually exclusive. We hold ourselves and each other to the highest standards. Think about that as you engage over our business relationships, client and company transactions and products we offer, and make sure your actions always reflect our core values.

Responsibilities for leaders, managers and supervisors

If you manage or supervise people, you have an even greater responsibility. Lead by example and set the tone from the top by making sure your team members know our code is a resource for them and that there is no difference between what you do and what you expect from them.

Create the kind of workplace where individuals feel comfortable coming forward with questions and concerns, and support them when they raise issues. Never retaliate when an individual shares concerns in good faith, and always work to prevent retaliation by others.

In addition to acting with integrity, showing respect and building trust, leaders, managers and supervisors set the tone for their teams and they are often the first point of contact for questions. If you lead or supervise others, we require you to demonstrate ethical leadership and set the right tone by:

1. Fostering a positive and inclusive work environment in which legal, ethical, responsible and appropriate behaviors are exercised
2. Communicating and modeling appropriate behaviors that are consistent with our code and our core values, mission, vision, guiding behaviors and culture
3. Regularly communicating the importance of ethically sound business practices and discussing implications of business decisions
4. Providing education and development resources to enable associates to perform their duties appropriately and grow their careers
5. Using feedback mechanisms to document, communicate and evaluate associates on what business objectives they achieve and how they achieve them
6. Identifying and mitigating ethics and compliance risks, as well as other business risks
7. Responding appropriately and in a timely manner to colleagues who seek advice or raise concerns while helping them to feel secure and at ease in doing so
8. Following escalation processes and seeking additional guidance as needed when concerns are raised
9. Managing and where possible eliminating conflict of interest situations to achieve fair and appropriate outcomes





2

We Uphold
The Code

Seeking guidance and speaking up

We believe that great cultures once built can be sustained, but that requires having the right people and plans in place while providing the right guidance for a strong, resilient structure.

If you have a concern about a business situation and are not able to find the answer you are looking for in our code or policies and policy-related documents, there are a number of resources available.

Our code, by its very nature, cannot describe every possible situation you might encounter in your daily work. If you cannot find an answer in our code, or have questions on how to interpret our code, seek guidance. Likewise, if you are aware of something that may be a violation of our values, our code, our policies or the law, it is not acceptable to look the other way or let someone else worry about it – misconduct affects all of us. You should report any known or suspected illegal conduct, as well as any conduct that violates the underlying principles of our code. Just as you will be held responsible for your own actions, you can also be held responsible for not reporting the actions of others if you knew or should have known that they were in violation of our values, our code, our policies or the law. Be aware that anyone who violates our code may face corrective action, up to and including termination of employment or affiliation with Raymond James.

You have several channels to seek guidance or make a report:

- **Your immediate manager or supervisor.** Your manager or supervisor is an excellent resource for guidance or concerns related to company and role-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to your work environment
- **Compliance, Human Resources or Legal.** For issues involving actual or potential violations of our values, our code, our policies or the law, you should contact the Compliance, Human Resources or Legal departments. Examples of these issues include:
 - Accounting or auditing irregularities or misrepresentations
 - Fraud, theft, bribery and other corrupt business practices
 - Antitrust or insider trading violations
 - Illegal discrimination or harassment
 - Actual or potential conflicts of interest
 - Guidance on national, regional, state or municipal legal requirements that apply to our company or to your role

The Raymond James AlertLine:

The AlertLine is a 24-hour, toll-free ethics hotline available to Raymond James associates, independent financial advisors,

suppliers, clients, contractors, subcontractors and agents to report suspected violations of our values, our code, our policies or the law.

The AlertLine is available anywhere in the world:

- By phone, using a special toll-free telephone number based on the country from which you are calling. In the United States, call 1.866.686.8351. For a list of international country phone numbers, see the [Reporting Potential Violations or Concerns](#) section
- Online, through a confidential and anonymous report at: [Raymond James AlertLine](#)

To assist us in investigating a report, you are encouraged to communicate all of the information you feel comfortable providing. The information will be kept confidential, except as needed to conduct a full, fair investigation. You may remain anonymous if you so choose, except where required by local law. Your identity, phone number or IP address will not be recorded or included in any report that is provided to Raymond James, unless you voluntarily provide such information.

Note: Due to local privacy laws in certain countries, the AlertLine may permit only specific types of calls, such as accounting, financial, auditing and bribery matters. For questions regarding what is permitted, contact your Compliance officer or Human Resources.



How do I know when I should seek guidance?

If something does not feel right, then it might not be the right thing to do. Ask yourself:

- Am I sure this course of action is legal? Is it consistent with our core values, our code and policies?
- Could it be considered unethical or dishonest?
- Could it hurt Raymond James' reputation or put our company at risk?
- Could it cause our company to lose credibility?
- Will this hurt other people? Clients? Associates? Investors?
- Will it reflect poorly on me or Raymond James? How would it look on the front page of the newspaper?

If you are unsure about the answers to any of these questions, you should seek additional guidance to make the right decision.

I suspect – but I am not certain – that someone is violating our code. Should I keep my concern to myself?

No. If you suspect a violation, say something. It's better to raise a potential problem than to wait and risk harm to others or to the company.

I can tell my colleague is upset by members of our team who tell jokes of a sexual nature. I'm not bothered by them. Should I just wait for him/her to say something?

Sexual harassment can be directed toward a person of the same or opposite sex. If it's clear to you that these jokes are offensive to your co-worker, step up and encourage him/her to speak with the individual to let them know their humor isn't welcome. If he's/she's reluctant, inform a manager, or supervisor about the situation. You may also consult with Human Resources or Legal. At Raymond James, we personally commit to the success and well-being of teammates.

My manager/supervisor often loses his/her temper and yells at the team when we miss a deadline. Is that harassment?

It depends, but regardless, the situation creates a negative work environment. This behavior is something that Raymond James will look to address because it violates the commitment we've made to a respectful workplace. Share your concerns with Human Resources, Compliance or the AlertLine.

What happens when I contact the AlertLine?

AlertLine calls are answered by an independent third party with expertise in handling hotline calls. An interview specialist will

ask you questions and send a report to Raymond James' General Counsel and Chief Compliance Officer for a confidential review. Appropriate professionals designated by the General Counsel and/or Chief Compliance Officer will investigate concerns, and, if warranted, remedial actions will be taken.

What should I do if my manager asks me to perform a task that I believe might violate our code or the law?

If you feel comfortable, raise your concerns openly and honestly with your manager/supervisor. If you are uncomfortable, or not satisfied with the response, raise the issue through any other resource listed under [Seeking Guidance and Speaking Up](#). You should never knowingly violate our code, a policy or policy-related documents, or a law simply because a manager or supervisor directs you to do so or because you failed to ask for guidance.

I applied for a position with another team but learned it was offered to a less-qualified person. I believe the reason was attributed to the hiring manager/supervisor knowing that I am disabled. What should I do?

We require that employment decisions be based on objective criteria, regardless of an individual's status. If you suspect you were discriminated against, speak up and contact Human Resources or Legal.

Decision Tool



Making decisions the Raymond James Way

How we make a decision says as much about who we are as a company as the decision itself. It is important that you make decisions that we can be proud of – decisions that support behaviors that are legal, ethical and responsible.

The Decision Tool can help us navigate the gray areas of business and make certain you make the best choices.

Non-retaliation

You will not be retaliated against for raising concerns. We are committed to protecting the rights of those individuals who report issues in good faith either through one of the reporting means described in the [Seeking Guidance and Speaking Up](#) section or to government authorities. Our company will not retaliate or permit retaliation against a person who in good faith:

- Reports what he or she believes is a violation of our values, our code, our policies and policy-related documents, or the law
- Raises a compliance question or seeks advice about a particular business practice, decision or action
- Cooperates in an investigation of a potential violation

Retaliation for reporting an issue in good faith is itself a violation of our code. If you know or suspect that retaliation has occurred or is occurring, you should report it.

Investigations

We investigate reports of actual or suspected violations of our code promptly, fairly and in accordance with our legal obligations. All associates and, to the extent applicable, financial advisors affiliated with Raymond James, independent contractors, agents or contingent workers are required to cooperate fully in any Raymond James investigation, and are asked to keep their knowledge of and participation in such investigation confidential. This helps safeguard the integrity of the investigation, protect witnesses and secure relevant evidence. We will appropriately protect the confidentiality of the reporting source.

When conducting investigations, we seek fair, well-reasoned outcomes that balance our interests in identifying and addressing misconduct while preserving the dignity of those involved, consistent with our values and our code.

Disciplinary action

All associates of Raymond James and to the extent applicable independent financial advisors and their registered and non-registered associates, including foreign subsidiaries, and third-party suppliers that are obligated to follow Raymond James policies and policy-related documents are required to comply with our code. Failure to comply with our code, company policies and policy-related documents, and applicable laws can result in disciplinary action, up to and including termination of employment or affiliation, as well as potential civil and criminal liability.



3

We Care
About Others



Professional respect

We're one team representing many ideas, experiences and backgrounds. We value each other's contributions and believe that everyone should have an equal chance to succeed – this is essential to advancing our goals and initiatives. Everyone should be treated with dignity, honesty and fairness. Respect people for who they are and what they bring. We want to foster working environments that are fair and safe, where rights are respected and everyone can achieve their full potential.

Diversity and inclusion

We intentionally nurture an inclusive and diverse culture where everyone feels welcomed, respected, valued and free to bring their whole selves to work – unleashing the power of perspectives and unique talents to drive growth, improvement and exceptional results.

We encourage all associates to participate in the company's many diversity and inclusion programs, including our Associate Inclusion Networks and Advisor Inclusion Networks. Do your part to keep our workplace diverse, inclusive and respectful by driving a positive environment, and recognizing the many strengths and talents of your colleagues.

Anti-harassment

We seek to foster a work environment that is free from harassment or any other offensive or disrespectful conduct. We believe that every individual should be treated with respect, regardless of their race, color, ethnicity, ancestry, national origin, religion, age, physical or mental ability, medical condition (including pregnancy, childbirth,

breastfeeding and related medical conditions), veteran status, marital status, sex, sexual orientation, gender identity or gender expression, and/or other protected characteristic as established by applicable law. A work environment free from harassment and discrimination enables us to grow and thrive together. Our company complies with all country and local laws prohibiting harassment, and our code prohibits harassment in the workplace.

Harassment includes unwelcome verbal, visual, written, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, we consider the following non-exhaustive list to be unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility toward others because of individual characteristics

You should never act in a harassing manner or otherwise cause your co-workers to feel uncomfortable in their work environment. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

If you or someone else is the subject of discrimination or harassment, speak up and report it to Human Resources or Legal.

Anti-discrimination

We work better together because of our differences, not despite them. We believe that we best serve our communities and enrich our own culture through the diverse skills, experiences and backgrounds each of us brings to the company. We provide equal employment opportunities to all qualified candidates and associates. Each of us should have the opportunity to reach our full potential and contribute to the firm's success. To accomplish this, you should never discriminate or treat associates or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment.

Your employment decisions regarding associates and applicants must always be based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as:

- Race, color, ethnicity, ancestry or national origin
- Gender or gender identity
- Sex
- Sexual orientation
- Medical condition (including pregnancy, childbirth, breastfeeding or related medical conditions)
- Age
- Religion
- Disability
- Veteran status
- Genetic information
- Any other legally protected status

Making employment decisions based on any of these characteristics is against our policies and is illegal under the laws of many countries. We make all employment decisions on the basis of merit and business needs. You must always act fairly and give qualified individuals the chance to develop their abilities and advance within our company.

Campus safety

People are our greatest asset, so we've developed procedures to help ensure the safety of all our associates. Every individual is empowered to take immediate action for the safety of our colleagues regardless of role, title or responsibility. If you see a situation that could put others at risk, take action, and at all times and in all places, work to keep yourself and your co-workers safe.

We have a strict policy when it comes to acts or threats of violence. Be alert to what is going on around you, observe good security practices and speak up about any threats of potential violence.

We prohibit weapons on all of the company's properties consistent with local law. If you have concerns that someone may have a weapon on our property, report it immediately to your manager, a member of our Corporate Security team or the AlertLine.

Having, using or distributing alcohol or illegal drugs on the premises is also prohibited as they can impair your judgment, your performance and the safety of those who work with you. Moderate and responsible consumption of alcoholic beverages is permitted in appropriate social situations where alcohol is served during a company-sanctioned event with the appropriate executive committee member approval.



Stay Alert

Raymond James campuses and offices are safe, and we take preventive measures to ensure they remain that way. It is important to stay alert and observant. If you hear or see something that looks out of the ordinary or just feels a little strange, say something. Depending on the severity of the concern, you should report it to anyone on your leadership team or Corporate Security and Investigations. The Corporate Security and Investigations team is trained to identify and mitigate potentially high-risk situations.

Human rights

As a company, we recognize the important responsibility we have to respect the rights of every individual and abide by the employment laws in the markets where we operate and in the products and services we offer. We support fundamental principles of human rights in each region of the world in which we operate and acknowledge the [United Nations Guiding Principles on Business and Human Rights](#) as the recognized framework for corporations to respect human rights in their own operations and through their business relationships.

We do not knowingly employ, conduct business or otherwise engage with any individual, supplier or company that does not abide by labor laws and regulations in the regions where they reside or conduct business, including those that address child labor, forced labor, slavery, human trafficking, equal pay and non-discrimination in their workforce. This includes the elimination of the “worst forms of child labor,” as defined by [International Labour Organization \(ILO\) Convention 138 & 182](#), from its supply chain.

We are committed to standing against modern day slavery including abuse and exploitation resulting from the various forms of human trafficking through our code, policies and policy-related documents, and practices.

Charitable contributions

While we encourage you to become involved with charitable organizations, please make sure that your participation does not interfere with your responsibilities at Raymond James. Remember that soliciting clients, suppliers and other associates for contributions or other participation is generally prohibited

or restricted, and many of our locations have specific policies governing these activities. You must comply with any restrictions and policies that apply to you. Sometimes, clients or suppliers ask that we make a contribution to a charity or nonprofit organization. Charitable contributions may not be given as a condition of or in order to influence a business decision. To determine whether you can make a charitable contribution at the request of a client or supplier, you must 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 Compliance.

Corporate responsibility

We give back to the communities in which we live and work. It's a phrase that has been a part of our mission from the beginning. It's a commitment to putting others first – from our clients to our neighbors – that was established at our founding in 1962, and has shaped who we are today. We recognize that our business decisions have the potential to impact surrounding communities and that our firm and associates can and should make a difference through volunteerism.

Environmental sustainability

Building a workplace that uses its resources wisely and sustainably is a logical approach 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 associates to also take similar steps and apply them in their day-to-day lives.



4

We Do
What's Right



Antitrust and tying

Competition laws, known in the U.S. as antitrust laws, promote and maintain the benefits of free markets. These laws vary from place to place, but they share core principles that protect competitive market participants, including our company and our clients. We are committed to complying with the letter and spirit of applicable competition laws wherever we do business. These laws and our company policies prohibit us from entering into formal or informal agreements with competitors, such as to (i) fix prices; (ii) allocate markets; (iii) allocate customers; or (iv) refuse to deal with particular customers or suppliers.

Additionally, the Federal [Bank Holding Company Act](#) and anti-tying laws prohibit associates from participating in certain “tying arrangements.” A tying arrangement is one in which the seller or provider of services conditions the sale of a product or service on the customer’s purchase of a separate product or service unrelated to the original. For example, although credit may be extended to a borrower on the condition that they maintain a deposit relationship, credit may not be extended on the condition that the borrower purchases securities from an affiliate.

Anti-money laundering and counter-terrorist financing

“Money laundering” is generally described as financial transactions in which criminals attempt to disguise the proceeds, sources and nature of their illicit activities.

“Terrorist financing” involves the raising and processing of funds to supply terrorists with resources to carry out their activities, including attacks.

Money laundering and terrorist financing are financial crimes with the potential for severe criminal and monetary penalties to the company. Criminal and civil liability for aiding and abetting money laundering has been found when individuals have been “willfully blind” to the criminal conduct. Willful blindness is the deliberate or grossly negligent avoidance of knowledge of the facts, and a failure to follow up in the face of information that suggests probable money laundering or terrorist financing.

It is our responsibility to understand and comply with the RJF Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) Policy or policy-related documents. In addition, we are responsible for:

- Being alert to and reporting suspicious activity and possible violations of the AML/CTF Policy or policy-related documents
- Refraining from providing advice or other assistance to persons who seek to violate or attempt to violate any AML/CTF law or regulation, AML/CTF Policy, or policy-related documents
- Identifying and reporting, as appropriate, red flag indications that an individual or entity may be seeking to engage in a relationship or transaction for an unlawful purpose or with the proceeds of alleged illegal activity
- Completing required AML/CTF training, as directed

Anti-bribery and anti-corruption

Bribery and corruption

Bribery, in broad terms, is the receiving or offering of undue reward or “anything of value,” and includes payments to secure a business advantage, either directly or indirectly, financial or otherwise, to which you or the firm is not entitled. Corruption is a broader category of improper business practices, which includes bribery, graft, “facilitation payments,” or other misuse of entrusted power or office, whether in the public or private sector, for private gain.

Zero tolerance

Consistent with our culture, the firm has a zero tolerance policy towards bribery and corruption, as detailed in our Anti-Bribery and Anti-Corruption Policy (ABAC Policy). Every associate must comply with our ABAC Policy.

What is “anything of value”?

The term “anything of value,” has been interpreted very broadly. It can include a gift in kind or other favor, such as an offer of employment to a person or their relative from whom a benefit is sought. It also can include goods, services or merchandise, such as cash, cash equivalents, gift cards, vouchers, hospitality, meals, event tickets, entertainment, travel perks, donations to designated charities, unsolicited discounts, personal services, and loans.

What are examples of activities prohibited under anti-bribery and anti-corruption laws?

- Attempting to win a contract or other business by promising money, or something else of value
- Employing a third party to indirectly offer or promise a bribe
- Gaining access to non-public bid tender information
- Evading taxes or penalties through side agreements or kickback payments
- Improperly influencing the adjudication of lawsuits or enforcement actions
- Improperly obtaining exceptions to regulations
- Attempting to avoid the termination of a contract through inappropriate means

What are “facilitation payments”?

Facilitation payments are payments made to government officials with the intention of expediting an administrative process or securing services. Examples of facilitation payments may include, but are not limited to, payments to process government papers and secure government services. Associates are strictly prohibited from making facilitation payments even if such payments are a local practice or custom

Who are “government officials”?

Government officials include:

- A person holding a legislative, administrative, or judicial office, whether appointed or elected
- A person exercising a public function for a country, including for a public agency or public enterprise
- An official or agent of a public international organization
- An employee of a government-owned or –controlled commercial enterprise, international organization, political party, or political candidate



Your responsibilities

Bribery and corruption activities are not only a violation of the code, they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws in various countries. Additionally, associates and other representatives of the firm who violate the ABAC Policy could be subject to disciplinary action up to and including termination. It is your responsibility to prevent bribery and corruption. Your responsibilities include:

- Knowing and complying with the firm's ABAC Policy and other ABAC policy-related documents
- Obtaining needed approvals for gifts, entertainment, and other expenses
- Communicating and implementing anti-bribery provisions in contracts
- Obtaining senior management approvals for partnerships, solicitation arrangements, and third-party payments
- Conducting due diligence of third parties with an emphasis on third parties operating in countries with reputations for high corruption
- Escalating concerns about bribery and corruption

Higher risk factors

Some activities pose a higher risk of bribery and corruption. Examples include:

- Carrying out activities in countries or regions considered high-risk, such as Africa, China, India, Latin America, and Russia

- Engaging a third-party foreign finder or agent to gain access to otherwise inaccessible markets
- Engaging a third-party from a high-risk industry
- Conducting business with a politically exposed person or government official

If you know or suspect any potential or actual corrupt arrangement or agreement, you shall immediately report it through your Compliance officer, the AlertLine, or other channels identified in the ABAC Policy.

Inside information

We maintain trust with our clients, investors and the public by respecting financial laws, which means – among other things – that we do not trade based on material non-public information. In our work, we may become aware of material non-public information about Raymond James or other publicly traded companies we do business with. Information is “material” if a reasonable investor would consider it important in deciding whether to buy or sell that company’s securities. Information is “non-public” if it has not been broadly communicated to the investing public and/or sufficient time has not yet passed to allow the markets to absorb the information.

If you have access to inside information, never trade on it or share it with others until it has been released to the public and sufficient time has elapsed to allow the markets to absorb the news. Passing inside information along to anyone who may use

it in a decision to invest, including family, friends or third parties, is also an illegal form of insider trading known as “tipping.” To preserve our reputation for adhering to the highest standards of conduct, you should always exercise caution and avoid even the appearance of anything improper.

Inside information can include information about Raymond James’ or another company’s:

- Financial earnings or losses
- Anticipated mergers, acquisitions or divestitures
- Offerings of securities or changes in dividend policy
- Changes in executive leadership
- Pending or threatened significant litigation
- Gain or loss of a significant new customer or vendor
- New products or projects

To meet these challenges and assist associates in complying with the law, our Board of Directors has adopted the Material Non-Public Information and Insider Trading Policy that applies to your transactions in Raymond James securities, as well as a separate Pre-Clearance Group Trading Policy that applies to trading in the securities of all other companies.

If you have any questions regarding inside information or how it should be handled, contact your Compliance officer or Legal.

Insider trading

We have ethical and legal obligations to maintain the confidentiality of information about Raymond James and to not engage in transactions in Raymond James securities while aware of material non-public information. Each individual is responsible for making sure that he or she, and any family member, household member or entity whose transactions are subject to the Material Non-Public Information and Insider Trading Policy, complies. In all cases, the responsibility for determining whether an individual is in possession of material non-public information rests with that individual. Under all circumstances, the appearance of an improper transaction must be avoided to preserve our reputation for adhering to the highest standards of conduct.

Associate conflicts of interest

Conflicts of interest can arise when our personal relationships or financial interests overlap with our job responsibilities. It is important to make business decisions based on sound judgment, the merit, our core values and the best interests of Raymond James.

This section provides guidance on some of the more common conflicts of interest, but it cannot cover every situation you may face. As a first step, ask yourself the questions in the quick test on the next page to determine whether there might be a conflict of interest.

Conflicts of interest can be avoided or addressed if promptly disclosed and properly managed. If you're in a situation in which there might be a real or perceived conflict of interest, you must:

- Disclose your situation to your manager, supervisor or Compliance officer
- Remove yourself from the decision-making process on how to resolve the situation
- Support the subsequent decision

Outside business activities

Don't let your activities outside of Raymond James reflect adversely on the company or suggest a possible conflict of interest. You must request approval through the Disclosure System prior to participating in an outside business activity. Outside business activities that must be submitted vary based on compensation, control of funds and responsibilities. Some of the activities that require disclosure and pre-approval include:

- Engaging in an activity or providing a service for which compensation or benefits are expected
- Acting as, or being named as, a control person for an individual or maintaining a beneficiary relationship with a client of Raymond James
- Being an employee or independent contractor of a non-Raymond James entity
- Owning, operating or engaging in a business venture independent of Raymond James
- Founding or serving in a leadership capacity of a non-Raymond James entity



I have learned that Raymond James is considering the acquisition of a small, publicly traded advising company. May I acquire stock of this company in anticipation of the acquisition?

No. Non-public information about an unannounced acquisition is almost always material. Trading on material non-public information is illegal and a violation of our code, whether you are trading in the stock of Raymond James or the stock of another company.

While some exceptions exist, the following are activity types generally prohibited to associates and affiliates of Raymond James:

- Board or advisory board membership for publicly traded companies
- Political or government office
- Raising capital and/or seeking financing including private securities
- Private securities transactions
- Serving unaffiliated banks or their affiliates, including their holding companies and affiliated broker/dealers, in a management capacity while simultaneously serving as a management official (director, senior executive officer, etc.) of Raymond James and its affiliates; some exceptions exist

You may not be employed by, affiliated with, otherwise provide services for, or receive payment from any client, supplier or competitor of Raymond James without prior written approval of your manager, supervisor, Compliance officer or Supervision. You are required to renew this approval annually or as prompted by the firm's disclosure system.

Service on the boards of public companies is generally not permitted and is subject to enhanced review and approval requirements. If you have questions, ask your

manager, supervisor, Compliance officer or Supervision for guidance.

Gifts and entertainment

The exchange of gifts and offers of entertainment are common business practices, but too often can be misinterpreted or suggest the appearance of something improper, even when there is no improper intent. You should never accept or provide anything of value (a "gift") that may create a conflict of interest or suggest something improper. Inappropriate gifts include those that create an obligation, are in the form of cash, or appear to be lavish or extravagant.

You are generally prohibited from directly or indirectly offering, giving, soliciting or accepting a gift or gifts over U.S. \$100 (or other amount listed in a foreign subsidiary policy) per calendar year per person or entity (the gift limit threshold), or entertainment over U.S. \$500 (or other amount listed in a foreign subsidiary policy) per person, per event (the entertainment limit threshold). If you are offered or receive a gift beyond the amounts specified herein, you must disclose this to your Compliance officer or Supervision.

Make sure you follow the policy, and be aware of any special restrictions. If you have questions, ask your Compliance officer or Supervision for guidance.



What is a conflict of interest?

Conflicts of interest can arise when activities outside of work, ownership interests in other companies or personal relationships interfere – or appear to interfere – with our ability to do our jobs or to make unbiased decisions on behalf of the company.

Even the appearance of a conflict of interest can make others think we are acting improperly and should be avoided.

Conflict of Interest Quick Test

If I take this course of action:

1. Will I feel obligated to someone else?
2. Am I dishonoring our core values?
3. Is there a chance – however small – of my independent judgment being compromised?
4. Could it give the appearance of impropriety or divided loyalty?

If you answered "yes" to any of these questions, there is a high probability that your decision will result in a real or perceived conflict of interest. If you are unsure about how to proceed, seek guidance from your manager, supervisor, Compliance officer or Supervision.

Outside investments

You have a duty to disclose outside investment accounts upon your initial hiring or affiliation with Raymond James, prior to transferring and closing those accounts as required by our policy. An outside investment account is an account held away from Raymond James in which securities or commodities transactions can be conducted. Your due diligence will help Raymond James in our efforts to protect the firm and clients.

General policy requirements require closure or transfer of accounts when you:

- Have a beneficial interest as indicated in the policy
- Have the ability to exercise discretion or control
- Are a participant in an investment club that trades in an outside investment account

It is important to also be aware that outside investment accounts may be the result of certain life events such as being named trustee of a family trust, becoming a power of attorney for an immediate family member, or marriage.

There may be certain situations in which an outside investment account is approved for an exception. This would require the firm that holds the account to provide physical or electronic duplicate statements and trade confirmations to Raymond James. Also, you may be subject to an annual fee by Raymond James for each approved outside investment account. However, if not approved

to hold outside investment accounts with another firm, you must close or transfer your outside investment accounts within 90 calendar days of your hiring or affiliation with Raymond James.

At times it can be hard to determine beneficial interest or control of an outside investment account. If you have questions, ask your manager, supervisor, Compliance officer and Supervision for guidance.

Political activities

We encourage our associates to participate in their communities, which may include political activities. If you are eligible to contribute to U.S. political parties or U.S. candidates, you must obtain written preapproval from a designated principal performing a supervisory function. This must be done prior to making, soliciting others to make, or coordinating the making of monetary or non-monetary contributions to candidates and other specified persons in the policy. If you have questions, ask your manager, supervisor, Compliance officer or Supervision for guidance.

Mandatory absence

“Mandatory absence” is a requirement for associates in certain “sensitive” positions to take an absence from their duties for a prescribed number of consecutive working days each calendar year. Positions that may be deemed sensitive vary based on the associate’s department, responsibilities and/or system access,

and are reviewed at least annually. This practice is considered an important internal safeguard largely because the perpetration of an embezzlement, fraud, or illegal activity usually requires the constant presence of the wrongdoer to prevent detection. If you have questions, ask your manager, supervisor, Compliance officer or Supervision for guidance.

Nepotism and associate relationships

The company’s goal is to always hire the most qualified applicants to open positions. To promote a productive environment, free from conflicts of interest as well as favoritism and unfair advantage, whether perceived or real, the company has adopted rules and guidelines related to employment of family members. The company has implemented a Nepotism Policy that can be found in the Associate Handbook.

Given its size, the company recognizes that personal relationships among associates within the workplace may occasionally develop. Personal relationships within lines of management and supervisory chains may result in conflicts of interest that the company needs to know about in order to protect both the associates and the company from legal and other risks. The company has implemented an Associate Relationships Policy, which can be found in the Associate Handbook.



5 We Protect Clients

Speeches, presentations and publications

When communicating online or during public speaking engagements, be aware of situations in which you may be perceived as representing or speaking on behalf of Raymond James. Do not make any statements on the company's behalf unless you are authorized to do so. Please keep in mind, some speaking engagements may require preapproval based on regulatory requirements. Please refer to the Media Relations Policy.

At times, it is best for our company to speak with one coordinated voice, especially when speaking with the media. All media inquiries, including those regarding sensitive or important Raymond James matters, should be referred to the Media Relations group in Corporate Communications. Such instances may include significant changes to corporate policy, positions or performance of Raymond James or a particular business, lawsuits, terminated associates or significant corporate decisions. Refer all media inquiries and interview requests to Media Relations (mediarelations@raymondjames.com).

Things to consider:

- Does this subject potentially impact or reflect on Raymond James?
- Am I qualified to discuss the subject, product or market conditions?
- How will the audience – clients, prospects and nonclients alike – perceive Raymond James based on my appearance and content?
- Are there regulatory or reputational considerations I need to discuss with a Risk, Legal or Compliance officer?



I post on blogs related to my professional expertise at Raymond James. Should I be upfront about my connection to Raymond James?

Yes. In the online world, being transparent about company connections is good etiquette and consistent with our code. Depending on where you are, it may also be required by law. We value, promote and fiercely protect our reputation. You must tell people you work for Raymond James, and add this line to your blog, chat or other online entries: “The opinions expressed are my own and do not represent the views of Raymond James.” Do not include in your experience, or discuss in a post, any regulatory or legal initiatives in which you have participated. Regulatory information is sensitive and, in many cases, must be treated confidentially.

A news agency called me to discuss an acquisition that Raymond James is considering. May I share my views about the acquisition with the media outlet?

No. Even if news of the acquisition is publicly available, there are many sensitive considerations that must be taken into account, and having a coordinated message is essential to protect the firm and its reputation. This inquiry must be directed to Media Relations (mediarelations@raymondjames.com).

The market is having a particularly strong day, and I've been asked by my local TV station to appear and comment. May I do so?

To ensure that Raymond James, its affiliate firms and any industry issues affecting Raymond James' clients are portrayed accurately by the media, it is vital we communicate with one voice. Therefore, under no circumstances should you respond to any media inquiry. All media inquiries must be directed to Media Relations.

Social media usage

What we say, email, blog, post or tweet can reach millions of people in seconds. And because our communications can reach millions of people, they also can affect millions of people, for better or for worse. Everything we say and do affects our reputation. Therefore, the use of social media brings additional responsibility. When communicating on social media, be aware of situations in which you may be perceived as representing or speaking on behalf of Raymond James. Do not make any statements on the company's behalf unless you are authorized to do so.

As we find new ways to communicate with others, we recognize the growing importance of social media and believe it can be a powerful vehicle for communicating our passion and knowledge to our clients.

Outside of work, many of us blog, post on social networks and contribute to wikis. During these personal pursuits, we all have a responsibility not to disclose company confidential and proprietary information without authorization.

Some examples of social media

- Social networking sites (e.g., Facebook, LinkedIn)
- Video and photo sharing sites (e.g., Instagram, Flickr, YouTube)
- Microblogging sites (e.g., Twitter, Weibo)
- Blogs (e.g., corporate blogs, personal blogs, media-hosted blogs)
- Forums and discussion boards (e.g., Google Groups)
- Collaborative publishing (e.g., Wikipedia, Google Docs)



Data and privacy protection

People trust us to protect their personal information. We respect the privacy of our clients, suppliers, co-workers and others with whom we conduct business, and we handle their personal information with care. Personal information is any information that could be used to identify someone, either directly or indirectly, such as a name, government ID, personal email address or phone number. There are data privacy laws that prescribe how to responsibly collect, store, use, share, transfer and dispose of personal information, and we strive to comply with those laws everywhere we operate.

Follow our policies and policy-related documents to protect any personal information that is entrusted to you. Use it only in the way it's meant to be used and don't share it with anyone inside or outside of the company in an unauthorized manner.

For more information on Raymond James' data collection and use practices, please see the [privacy notices for clients and associates](#).

Make sure you follow the policies and policy-related documents, processes and practices we have in place to protect personal information on our networks, computers, programs and data from attack, damage or unauthorized access. If you have any reason to believe that our network security or your computer has been compromised, you should promptly report it. For example, if you:

- Notice unauthorized changes on your computer
- Lose your laptop (Raymond James or personal equipment)
- Lose your personal device with access to Raymond James data
- Believe you may have visited a malicious website

Promptly report concerns to the Technology Service Center at 1.877.847.5435 for United States associates, 1.866.333.8858 for Canadian associates, or RJEUPrivacy@raymondjames.com for European associates. If you receive a suspicious email, do not click on links or open attachments; forward the email to cyberthreat@raymondjames.com.

For more information and cyber security resources, consult our information security resources and support page.

Key points

- Know the kinds of information considered “personal information”
- Follow the privacy laws and regulations of the country or countries in which you work
- Safeguard personal and personnel information from unauthorized disclosure. Report any breaches immediately to the Technology Service Center (TSC) at 1.877.847.5435 for United States associates, 1.866.333.8858 for Canadian associates, or RJEUPrivacy@raymondjames.com for European associates

Privacy laws are evolving to provide consumers with additional rights regarding the collection and processing activities of their personal information. Our clients may approach us requesting access, portability or deletion of their personal information. Please contact the Global Data Privacy & Protection Office immediately should you receive any such requests.



One of our suppliers wants to say “hello” by sending everyone on my team a coupon and a free sample of their product that is of nominal value. The supplier has asked me for a list of my co-workers’ names and addresses. Is it okay to provide them?

Before doing anything, contact the Global Data Privacy & Protection Office in Compliance. Even if the intent behind the request is well-meaning, and even if your co-workers might like receiving the samples, supplying this information would violate our commitment to keeping personal information private.

Voice and video recording

The company's technology and applications with voice, video and meeting recording capabilities are only to be used for legitimate business purposes. We are responsible for ensuring that the legitimate business purpose for a recording complies with federal and state notice and consent requirements. If a legitimate purpose for recording does not exist, if consent is not obtained from all participants or retention and distribution standards cannot be met, do not use voice and video recording technology.

Email, internet and information systems

Our information technology systems constitute a critical component of our business operation and are provided for authorized business purposes. Your use of these systems must comply with all Information Technology policies including our Enterprise Information Technology Acceptable Use Policy.

We reserve the right to monitor, record, disclose, audit and delete, without prior notice, the nature and content of an associate's activity using our company's email, phone, voicemail, internet and other systems, to the extent permitted by local law.

Intellectual property

Our intellectual property is an invaluable asset that must be protected at all times. Intellectual property includes our trademarks, brands, logos, copyrights, inventions, patents and trade secrets. You should never allow a third party to use

our trademarks or other intellectual property without proper authorization and a license agreement that has been approved by the Legal and Marketing departments (legal.copyright@raymondjames.com). Furthermore, our trademarks should never be used in a degrading, defamatory or otherwise offensive manner.

Our intellectual property also includes associates' work product. As a company associate, any work you create, in whole or in part, in connection with your duties or Raymond James' business, using company time, resources or information, belongs to Raymond James. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software or any other materials you may help to create or author in connection with your work for our company belongs to Raymond James. You should promptly disclose any invention related to our business, so that it may receive the same protection as other intellectual property of our company. In the event the laws for your jurisdiction require any additional agreements, you agree that you will cooperate with Raymond James to execute such documentation.

You must not infringe on a third party's intellectual property rights, including but not limited to sharing articles without a publisher's permission, or accessing a subscription using another person's username and password. If you receive a notice alleging Raymond James' infringement of a third party's rights, contact Legal (legal.copyright@raymondjames.com).

For more information, see answers to common questions regarding intellectual property on the Legal department's FAQ page.



An associate creates a PowerPoint presentation for an internal company meeting regarding a service offered by the company. To enhance the presentation, the associate copies a news wire photograph of the New York City skyline from Google Images and pastes it into one of the slides. Is this okay?

Probably not. For any presentation or product in the scope of your work that you create and contains a work created by someone other than you or Raymond James, you should acquire rights to use such media prior to your use. In this example, the image found on Google Images is copyrighted by the photo's creator. You can contact the photo's creator to receive written permission to use the photo. Or, you can reach out to Marketing, which has license agreements with companies that provide access to media libraries from which you or Raymond James can purchase rights to the media you would like to use. If you need help procuring rights to use media or are unclear as to whether the media you would like to use exposes the firm to a copyright risk, contact the Legal department. Raymond James encourages its associates to use photos that have been approved for company use.

Accurate recordkeeping

Integrity in our recordkeeping inspires trust in clients, investors and business partners. Our long-term success depends, to a large extent, on how well we manage our business. Our records – and our recordkeeping – help us to manage client and company assets, support operational processes and fulfill our financial commitments. But they also provide a picture of our financial health and regulatory compliance. They keep us accountable to our shareholders, our customers and each other and are the basis on which we make important strategic decisions. That's why records that are clear, complete and accurately reflect our business transactions are critical company assets.

Each of us has an obligation to follow all internal controls in recording and maintaining our company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement or simply completing a time sheet, be honest, accurate and complete.

You also have a responsibility to know, understand and follow our information management and books and records

policies. Take care to safeguard sensitive information, limit retention of convenience or duplicate copies of records, and dispose of information that has met its retention period unless you receive instructions from Legal that the records may be relevant to current or threatened litigation.

Company assets

We are responsible stewards of Raymond James' resources. We use company resources and money to do our jobs every day. These resources belong to Raymond James; we owe it to our investors to use them responsibly and in ways that preserve trust and add value.

The use of company assets outside of your company responsibilities – such as using your company work product in an outside venture, or using company materials or equipment to support personal interests – requires prior written approval from your manager. You must have this approval renewed annually if you continue to use the asset outside of work.



I don't work in Compliance or Information Technology. How is "recordkeeping" my responsibility?

Recordkeeping isn't the job of one team or one department. It's a responsibility we all share. Our everyday processes create records that need to be appropriately managed to protect our customers and our firm. From daily work to training content, from customer statements to financial reports – our daily transactions must be accurate, complete and properly recorded.

I observed a colleague in our supply area filling up a box full of pens, paper and other items. I asked her what she was doing, and she told me that her son's school was short on supplies, so she was trying to help out. She said Raymond James can afford the supplies more than her son's school and that it was the right thing to do. I am friendly with my colleague and I don't want to get her in trouble. What should I do?

The supplies purchased by our company are to be used for business needs only. Your colleague does not have the right to take these supplies for any purpose, even if it seems like a good cause. Speak to him/her and if he/she refuses, you should inform your manager/supervisor.

THANK YOU

Thank you for taking the time to read through our code and for committing to help preserve our reputation and honor our values. We expect anyone affiliated with Raymond James to be honest, to be forthright and to use good judgment. Maintain your personal integrity at all times and in all places.

If you have a question about our code, are in an ethical dilemma or aren't sure what to do in a situation, you can contact your manager, supervisor, Human Resources, Legal or Compliance. Remember, if you seek advice, raise a concern or report suspected acts of misconduct, you are complying with our code and helping Raymond James be a company known for its ethical leadership by upholding our values and preserving our culture for many more years to come.



REPORTING POTENTIAL VIOLATIONS OR CONCERNS

For matters involving any violation of our code or company policy or laws or regulations relating to Raymond James' business

Contact: The AlertLine

Phone:

Country	AlertLine Number
United States	1.888.686.8351
Australia	0011.1.888.686.8351
Belgium	0800.7.9274
British Virgin Islands	1.888.686.8351
Canada	1.844.345.1941
France	0800.90.1908
Germany	0800.182.3615
Hong Kong	001.1.888.686.8351
Liechtenstein	00.41.800.151.0186
Poland	00.800.151.0186
Switzerland	0800.89.0268
United Kingdom	0808.234.2959

Web: [Raymond James AlertLine](#)

Misconduct by a high-level official in the company

- **Contact:** Chief Audit Executive, General Counsel or Chief Compliance Officer

Harassment, discrimination, or any criminal charge or arrest that involves you personally, whether related to the business of the company or not

- **Contact:** The AlertLine, Human Resources, General Counsel or Chief Compliance Officer
- **Phone:** See AlertLine numbers or call Human Resources at: 1.727.567.4703

Safety issues

- **Contact:** Corporate Security, Corporate Real Estate or Facilities Plant Operations
- For facilities-related issues, contact:
 - **Corporate Security:** 1.727.567.7770
 - **Corporate Real Estate:** 1.727.567.8002
 - **Facilities Plant Operations:** 1.727.567.4040
- For emergencies where associates are in immediate danger, such as workplace violence
 - **Contact:** Local emergency services, then contact Corporate Security

Accounting, internal controls, auditing matters or financial reporting practices

- **Contact:** The AlertLine, General Counsel or Chief Compliance Officer
- **Phone:** See AlertLine numbers
- **Web:** [Raymond James AlertLine](#)



ADDITIONAL RESOURCES

Raymond James maintains policies and policy-related documents on the RJnet policies and policy-related documents page. Additional policy-related documents and supplements can be located outside of this page. You can ask your manager, supervisor or Human Resources for copies of applicable policy-related documents and supplements. Below is a list of some policy-related documents that have been referenced in our code.

- Associate Handbook*
- Corporate Donations Policy
- Corporate Social Media Overview
- Enterprise Information Technology Acceptable Use Policy*
- Gifts and Entertainment Policy*
- Insider Trading Policy with Respect to Company Securities*
- Mandatory Absence Policy*
- Material Non-Public Information (MNPI) and Insider Trading Policy*
- Media Relations Policy
- RJ Social, social media tool
- Outside Business Activity Policy*
- Outside Investment Accounts Policy*
- Political Contributions and Activities Policy*
- Books and Records Policy*
- RJA Charitable Contribution Guidelines
- RJF Anti-Bribery and Anti-Corruption (ABAC) Policy*
- RJF Anti-Money Laundering and Counter-Terrorist Financing Policy*
- RJF Enterprise Privacy Policy*
- Social Media at Raymond James: Advisors
- Pre-Clearance Group Trading Policy

*Enterprise policy-related documents

RAYMOND JAMES®

INTERNATIONAL HEADQUARTERS: THE RAYMOND JAMES FINANCIAL CENTER
880 CARILLON PARKWAY // ST. PETERSBURG, FL 33716 // 1.800.248.8863
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