Modern Slavery and Human Trafficking Statement

Raymond James Investment Services Limited adopts a zero tolerance approach to modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We operate within the financial services sector and, in comparison to other goods and services providers, there is a lower risk of modern slavery occurring within our business and supply chain. This is largely because our supply chains are not complex and our employees are often qualified professionals. In any event, we have implemented the following steps to counter modern slavery risks:

- We conduct eligibility-to-work checks during the recruitment process for all applicants.
- We have in place an Anti-Corruption and Bribery Policy as well as an Anti-Money Laundering Combating Terrorist Financing Policy. These policies enable us to better identify any modern slavery issues both internally and within our supply chain. We provide training to our employees on the above policies.
- We encourage employees to express any concerns they may have regarding actions which they believe are inconsistent with our ethical standards, which includes, for example, suspected instances of modern slavery. In addition to setting out clear internal reporting lines, we also provide the option of reporting concerns to an independent corporate hotline.
- We provide formal training to key staff on how to recognise and report modern slavery risks within our business and supply chain.
- Whilst conducting our Supplier Risk Assessment, we ask suppliers whether they are aware of and can confirm they comply with modern slavery legislation. We then take their response into consideration when determining whether to continue with said relationship.
- We request that, where appropriate, suppliers include a clause contracts confirming both parties’ commitment to complying with all applicable legislation, including anti-bribery and modern slavery legislation.

We will continue to assess the modern slavery risk to our business, evaluate the effectiveness of the steps described above and determine whether further steps should be implemented.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and relates to the financial year ending 30 September 2019.

Peter Moores, Raymond James UK CEO