RAYMOND JAMES®

## 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.

### Our business

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.

### Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we ensure that we have in place a rigorous supply chain compliance programme.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

## Our effectiveness in combating slavery and human trafficking

In order to reduce risk and to assist in combating slavery and human trafficking we have implemented the following steps:

• 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 30th September 2024.

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Peter Moores, Raymond James UK CEO