

## ABOUT THE RAYMOND JAMES ALERTLINE

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View answers to frequently asked questions about how to confidentially report actual or suspected violations of our values, our code, our policies, or the law via the AlertLine.

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### About the AlertLine

#### What is the AlertLine?

The AlertLine is a confidential, 24-hour, toll-free hotline and website available to Raymond James associates, independent financial advisors, suppliers, clients, contractors, subcontractors and agents for reporting actual or suspected violations of our values, our code, our policies, or the law. All information shared via the AlertLine is taken seriously. Telephone and web reporters may remain anonymous.

#### Why does Raymond James have the AlertLine?

Federal regulations for compliance programs encourage the creation of a communication line that allows confidential and anonymous reporting of suspected unethical or unlawful conduct. The AlertLine is a critical tool for Raymond James to continue to conduct business according to our values and the [Raymond James Code of Business Conduct \(code\)](#). Associates in Canada should also reference the [RJL Business Ethics and Corporate Policy](#).

### When and Why to Report

#### What types of situations should I report?

You should use the AlertLine to share information of any kind that you believe is related to potential violations of our code. Examples may include:

- Accounting or auditing irregularities or misrepresentations
- Fraud, theft, bribery and other corrupt business practices
- Antitrust or insider trading violations
- Discrimination or harassment
- Actual or potential conflicts of interest

#### I am not sure that what I saw or heard is really a violation of our code, or involves unethical conduct, but it just doesn't seem right. What should I do?

You should file a report. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked just because you weren't sure.

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, our policies and the law?
- 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?

## Does management really want me to report things to the AlertLine?

Yes. 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 must report any known or suspected illegal conduct, as well as any conduct that violates the underlying principles of our values, code or policies. Just as you will be held responsible for your own actions, you can also be held responsible for not reporting the actions of others.

## How to Report

### Can I report using either the website or the telephone?

Yes. Both methods are available 24 hours a day, 365 days a year. By giving you choices, the AlertLine helps ensure that you can file a report confidentially and anonymously and in the manner most comfortable or convenient to you.

### How do I submit a report on the AlertLine website?

To report via the website, visit <https://raymondjames.alertline.com>.

The AlertLine website contains a Data Protection and Privacy Notice, a few drop-down selections, and a handful of freeform fields. Information is entered directly on the AlertLine secure server.

### What's the process for making a report through the AlertLine hotline?

To report using the toll-free telephone hotline:

- From the **United States**, dial 888.686.8351
- From **Canada**, dial 844.345.1941
- From the **United Kingdom**, dial 0808.234.2959
- For all other locations, please see our [code](#).

AlertLine calls are answered by an independent third party who will ask you some predetermined questions and enter your answers directly on the AlertLine secure server.

## Protecting Your Privacy

### Is the AlertLine website anonymous?

Whether you report from the office, home, or any computer, your report will remain secure, confidential and anonymous. None of the content from browsing the AlertLine website is retained. Additionally, the AlertLine is contractually committed not to pursue a reporter's identity.

### Is the AlertLine telephone hotline anonymous?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report. These reports have the same security and confidentiality measures applied to them as website reports.

### What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

### I have heard that whenever I use my Raymond James computer, a server log is generated showing every website I visit. Won't this log identify me as a report originator?

No. None of the content from browsing the AlertLine website is retained.

### I am concerned that the information I provide the AlertLine will reveal my identity. How can you assure me that will not happen?

The AlertLine is designed to protect your identity, if you choose to report anonymously. You are encouraged to communicate the information you feel comfortable providing. The information will be kept confidential, except as needed to conduct a full, fair investigation.

At the same time, you should take steps to ensure that the content of your report does not reveal your identity by accident. Examples that may reveal your identity, include phrases such as “From my cube next to John Doe...” or “In my 23 years...” may provide enough information to determine who made the report.

#### Where do these reports go, and who can access them?

The AlertLine administrator, an associate of Raymond James, makes phone or web reports available only to appropriate professionals who will investigate concerns, and, if warranted, take appropriate remedial or corrective action.

#### What if my boss or other managers are involved in a violation? Won't they get the report?

Consistent with our code, all reasonable measures are taken to help ensure that any AlertLine investigation is free of conflicts of interest. For example, if a manager is named by a reporter as an alleged wrongdoer, then the manager will not direct the investigation and/or fact gathering process. The manager may, however, be asked to submit to an interview and/or supply information.

#### If I make a report, could I be subjected to some form of retaliation?

No. You will not be retaliated against for raising concerns. We are committed to protecting the rights of those individuals who report issues, and our company will not retaliate or permit retaliation against a person who in good faith:

- Reports what they believe 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
- Files a report or participates in an investigation by any governmental agency or entity regarding a potential violation of law, rule, or regulation

Retaliation is prohibited under law and by our code. If you know or suspect that retaliation has occurred or is occurring, you must report it.

## AlertLine Data Protection & Privacy Notice

### What is the AlertLine Data Protection & Privacy Notice?

The AlertLine Data Protection & Privacy Notice outlines how personal data and information is collected, processed and accessed in AlertLine. If you wish to identify yourself and disclose personal data and information in your report, Raymond James will use, disclose and retain this information pursuant to the AlertLine Data Protection & Privacy Notice below.

*The data privacy regulations of some countries require that a person making a report containing personal data be notified of certain collection and retention practices regarding the information submitted.*

### **What personal data and information is collected and processed?**

*This service captures the following personal data and information that you may provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by the firm; (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); and (iii) a description of the alleged misconduct as well as circumstances of the incident.*

### **How will the personal data and information be processed after you submit your report and who may access personal data and information?**

*The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX in the United States. NAVEX is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.*

*For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of your firm, including Human Resources, Finance, Internal Audit, Legal, Compliance, management, external advisors (e.g., legal advisors), or, in limited circumstances, by technical staff at NAVEX.*

*The personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in the country in which you reside.*

*The personal data and information you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet legal, financial or other regulatory requirements, including record retention requirements.*

### **Accessing information concerning the report**

*Your firm may be required to notify any person who is the subject of a report to this service except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.*

*With some exceptions, the subject of the report may request access to information concerning the report (with the exception of the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. To make any such corrections, please contact your firm.*