

Ethics for EveryONE

# Our Code of Ethical Conduct





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About our code



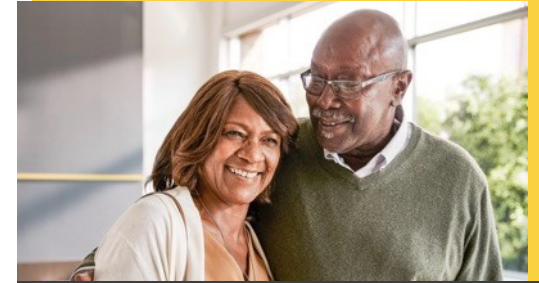
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Our commitment



# Message from Penny

With approximately 55,000 colleagues serving in North America, we think of Edward Jones as a town square that brings people together across differences to thrive.

Each day, we are guided by our purpose — to partner for positive impact to improve the lives of our clients and colleagues, and together, better our communities and society. It's what our clients expect from us, and what our communities need from us. But most importantly, it is what we demand of ourselves.

Our purpose is rooted in relationships, with trust at the center. For more than 100 years, we've been continuously evolving to be more and do more for more people. Serving our clients more completely through comprehensive planning and advice requires a steadfast commitment to doing what's right for those we partner with every day.

Our Code of Ethical Conduct outlines those standards and serves as our guide for how we show up in our relationships with our clients and their families, our colleagues, our regulators and our communities. It is up to each of us to understand this Code and apply it in everything we do — and it is up to each of us to speak up if we see something that goes against this Code.

No single document, however, can address every unique circumstance. That's why more broadly, we ask our colleagues to stay true to our purpose and core values and to ensure their daily decisions pass all three of these tests:

**Does this benefit our clients?**

**Does this meet the standards of our firm and our industry?**

**Does this add value and use resources responsibly?**

It's our responsibility — and our privilege — to serve with the highest ethical standards, and our firm's purpose and values unite us as we aspire to make a difference in the world that matters, that is positive, and that builds families and futures.



**Penny Pennington**

Managing Partner, Edward Jones




# About our code

Our Edward Jones Code of Ethical Conduct affirms our values and beliefs and sets the direction for how we engage with each other and those we serve. It outlines ethical standards and principles that guide our behaviors and decision-making.


This code applies to all associates and principals, which includes firm general partners, financial advisors, client service team members and home office associates. All associates are expected to comply with and apply this information in their daily work.

The information in this code references and summarizes multiple firm policies. For complete information, refer to the policy document itself. If there are any discrepancies between the information in this code and the firm policies referenced, the terms of the policies will govern in all cases.



## Links

to firm policies and resources that support and enable ethical conduct and decisions — some links may not be accessible based on your role/location



## Key definitions

to provide clarity and context



## Ethics for EveryONE

examples to aid in applying our ethical standards



## Resources

for reporting ethical concerns

Nothing in this code diminishes or eliminates the responsibility of associates and principals to comply with all other firm codes, policies and procedures. Violations of this code, our policies or the law can result in disciplinary action, up to and including termination of employment.

This code is administered by the Compliance division. The Compliance division can provide interpretative guidance on the principles in the code in consultation with Home Office Compliance, Field Supervision, Legal, the chief compliance officer or the general counsel as appropriate.

# Who we are

We work in partnership as ONE Edward Jones. Fueled by our purpose, we live our core values and are energized by our culture.

## Our purpose

We partner for positive impact to improve the lives of our clients and colleagues, and together, better our communities and society. Our approach as a firm is to address some of the most pressing challenges of our time in three Purpose Impact Areas:

- Partnering for lasting financial strength
- Promoting healthier futures
- Advancing inclusive growth

These serve as an extension of our firm's purpose. They guide our strategic business decisions, investments and activities and enable us to measure our progress in making a positive impact on clients, colleagues and in our communities. You can find more information about our strategy in our annual Purpose, Inclusion and Citizenship Report which is available at [edwardjones.com](https://www.edwardjones.com).

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# Our core values

These are our shared beliefs and rarely change regardless of firm strategy, yet the way they manifest will evolve. Our core values come to life through our mindsets and behaviors, such as our culture of compliance.

- Our clients' interests come first
- We believe in a quality-oriented, long-term investment philosophy
- We value working in partnership
- Individuals and their contributions are valued and respected

# Our culture mindsets

If our purpose is our why, our culture is our how: providing us a blueprint for the mindsets and behaviors needed to bring our purpose to life. By channeling these mindsets into our daily actions, we enhance our ability to live our purpose and broaden our impact to our clients, communities and one another.



## Leadership

How are we holding ourselves accountable to helping others thrive?



## Place of Belonging

How are we creating a place of belonging — a welcoming environment where we’re all achieving our potential?



## Continuous Learning

What new experiences and perspectives are we embracing and learning from?



## Effective Decision-making

Are we making effective decisions and using our time wisely?

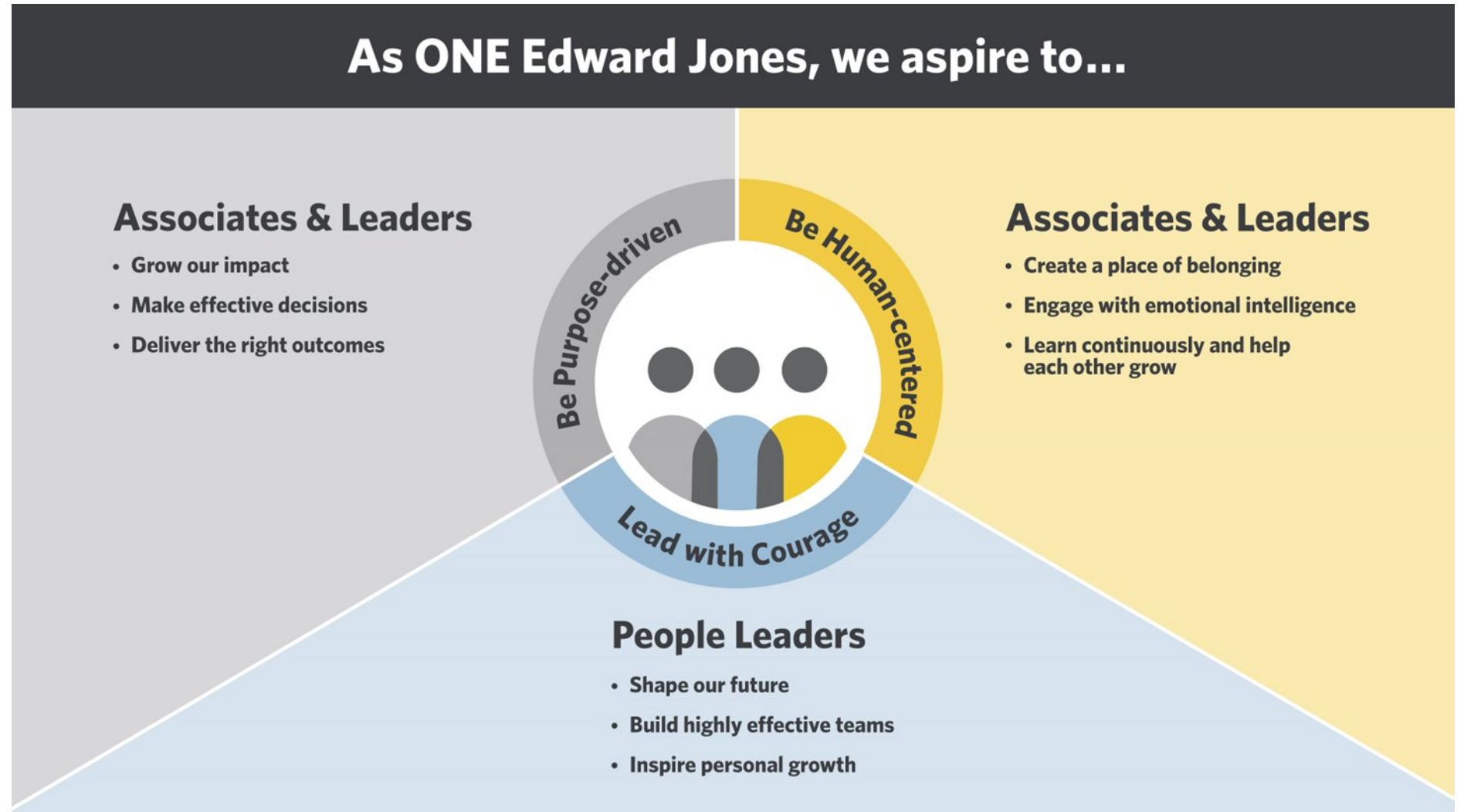


## Growing Our Impact

How are we adding value to our clients and communities?

# Our associate and leader behaviors

As we continue to align our work to our firm's purpose and culture, it's important that all leaders and associates can describe in practical terms the specific behaviors that bring these to life. We continue to remind ourselves that how we do our work is equally important to what we do.





# Our responsibilities

Trust is the bedrock of Edward Jones' business. Clients entrust our financial advisors and client support team members with their savings — their hopes, dreams and challenges. This is something no one takes for granted at Edward Jones. We hold ourselves to the highest ethical standards when dealing with our clients, our colleagues and the communities in which we live and serve.

## Each of us has a responsibility to:

- Put our clients' interests first
- Live our purpose, uphold our core values and embody the culture mindsets and associate and leader behaviors
- Treat all clients, colleagues and business contacts with respect, fairness and dignity
- Comply with firm policies and all applicable laws and regulations
- Be good stewards of firm resources
- Report any unethical, illegal or questionable behavior and fully cooperate with any inquiry. See **Our Reporting Resources** for more information.

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## Our leaders

The actions and behaviors of leaders influence the teams and colleagues around them. Our people leaders have the additional responsibility to build highly effective teams, shape our future and inspire personal growth. We encourage our leaders to foster a psychologically safe environment where all associates feel inspired to reach their full potential.

**Psychological safety** describes an environment where people feel free to express relevant thoughts and feelings. When people feel safe, they're willing to participate in moderate risk-taking, expressing differing opinions, and creativity without fear of any repercussions.



Our people leaders have the following additional responsibilities:

- Regularly reinforce the importance of ethical behavior and decision-making
- Encourage associates to speak up about issues and foster an environment where they feel safe doing so

Ensure associates are aware of our reporting resources and properly resolve or escalate all concerns. See **Our Reporting Resources** for more information.

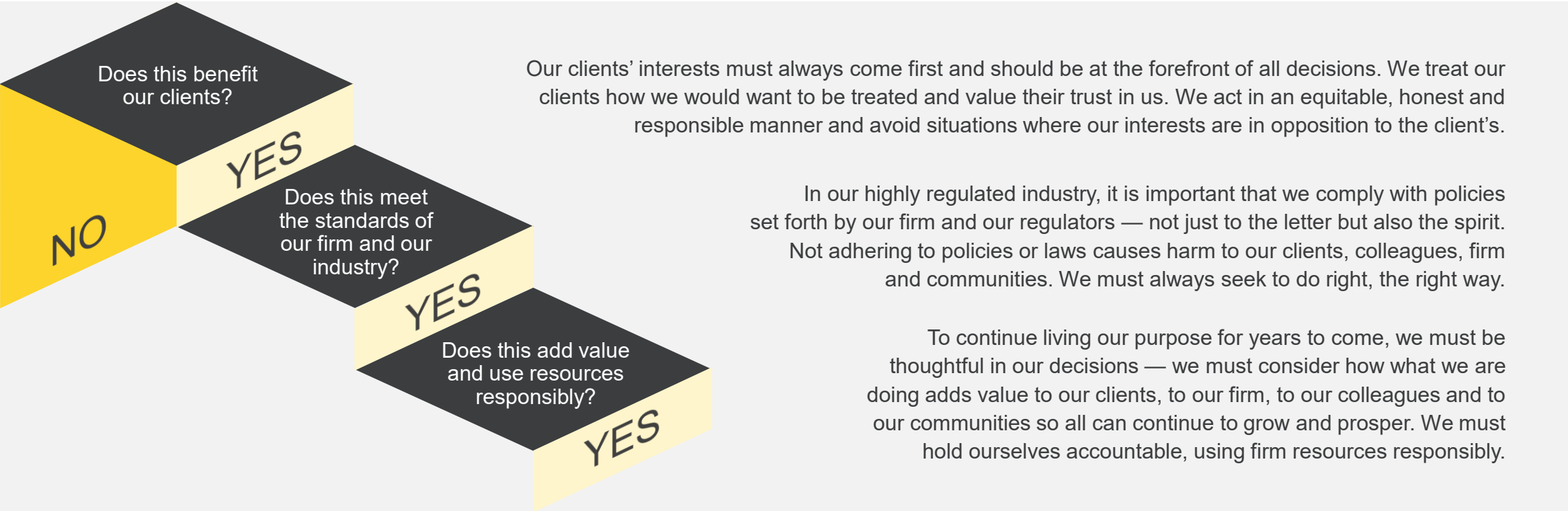
**People leaders** include leaders with associates responsible to them, all general partners (home office and field leaders), matrix project leaders in the home office and all financial advisors.



# Our decisions

Delivering the right outcomes in the right way starts with a commitment to making ethical decisions. Ethical decisions are the foundation of good business practices. Every day you will be faced with decisions — some of them may be complex and not every decision will have a clear answer.

In addition to aligning with our purpose, values and culture, our decisions must always pass three tests.



**If you have asked yourself these questions and are still unsure about what to do, reach out to your leader for help. Open and honest communication is integral to creating a place of belonging and cultivating effective, ethical decision-making.**



# Our reporting resources

If at any time you witness behaviors that undermine trust, are unethical, do not appear to be in accordance with laws, rules or regulations, or are not aligned with our policies and core values, promptly report these matters using our reporting resources detailed on the following pages.

All associates should feel safe to report their concerns, understanding that our firm does not, and will not, tolerate retaliation against anyone who comes forward with a concern in good faith.

**Retaliation** is defined as taking a materially adverse action which would dissuade a reasonable principal or associate from engaging in one of the Protected Activities.



“Protected Activities” for the purposes of the anti-retaliation policy include legally protected activities such as alleging discrimination, objecting to a potential securities law violation or asserting a concern with respect to compliance with a firm policy.

See the **Anti-retaliation** section in this document for more information.

You are encouraged to start with your leader for questions about what to do or if you see something that should be escalated. If you are not comfortable escalating to your leader, reach out to another reporting resource.

If another associate shares concerns about misconduct with you, encourage them to make a report or make one yourself. Regardless of the reporting resource you use, your concern will be handled promptly and professionally.



# Ethics/Whistleblower Hotline

Use this resource to report potential violations or information to an independent third party. Reports can be made anonymously or not. All reports are forwarded to the home office for investigation.

- Potential violations of our core values, our policies or the law
- Non-emergency safety or security concerns
- Potential securities fraud
- Financial crimes
- Illegal conduct
- Securities law violations
- Corporate fraud



# Associate Relations

Use this resource to report Human Capital policy issues or concerns, to ask questions or receive clarification.

- Harassment
- Discrimination
- Hostile work environment
- Retaliation
- Inappropriate or unprofessional conduct



# Compliance and Field Supervision

Use this resource to report concerns of non-adherence to Compliance policies, to ask questions or receive clarification related to client service or branch teams.

- Best interest recommendations
- Fair and reasonable commissions
- Annual account reviews
- Electronic communications and social media for business use
- Client account activity and transactions
- Outside accounts/activities
- Suspected senior client exploitation or diminished capacity



# Global Security Services

Use this resource to report safety and security concerns.

- Report injuries on Edward Jones property
- Report crimes and security incidents affecting your branch or branch associates
- Receive support and advice after a crime has been committed
- Consult with a Global Security Services professional about security and safety issues such as:
  - Managing threatening or violent behavior
  - Protecting property
  - Making safe face-to-face contacts
  - Receiving crime prevention information and developing a branch security plan
  - Understanding the criteria for installing a security intrusion system, selecting a security system installer and assistance during installation
  - Assistance from Global Security Services in dealing with federal, state and local law enforcement





# Client Relations

Clients can use this resource if their branch team is unavailable to them, and they have an urgent need. It is designed to complement the service provided by their branch, not replace it. This resource may also be used for:

- Account-related inquiries, including placing trades, if the branch is unavailable
- Escalating concerns, serving as a compliance liaison for clients who wish to voice issues related to their branch or the firm

# Client Complaints

Use this resource to submit client complaints immediately upon receipt. Complaints can involve a variety of matters, including, but not limited to:

- Dissatisfaction with products, costs or service
- Alleged misconduct relating to client accounts or transactions, such as misappropriation or unauthorized trades

## United States

**Call (clients only):** 800-441-2357  
**Hours:** 8 a.m.–5 p.m. CT (Mon.–Fri.)

## Canada

**Call (clients only):** 877-370-2627  
**Hours:** 8 a.m.–5 p.m. ET (Mon.–Fri.)



## United States

**Online:** Contact Us  
**Mail:** Complaint Investigations, 12555 Manchester Road,  
St. Louis, MO 63131

## Canada

**Online:** Contact Us  
**Mail:** Legal Department, Sussex Centre, Suite 902  
90 Burnhamthorpe Road West, Mississauga, Ontario L5B 3C3



# Financial Crimes

Use this resource to report potentially fraudulent activity or unusual activity as soon as possible.

- Scams (romance, grandparent, inheritance, lottery, investment or other suspicious activity)
- Suspicions of elder financial exploitation
- Clients investing in or directly involved in CBD, hemp or marijuana (U.S. only)
- Clients charged with financial crimes
- Potential money laundering concerns
- Suspicious or unusual account activity



# Trading and Market Surveillance

Use this resource to report potential material nonpublic information (MNPI), sometimes known as “inside information,” and certain nonpublic rumors. MNPI is information that could be reasonably expected to impact a security’s price once it is made known to the investing public. Examples of MNPI include but are not limited to:

- Mergers or acquisitions
- Changes in executive leadership
- New products and services
- Projected financial earnings or losses
- Strategic business plans
- Pending lawsuits



# Our clients

Our competitive advantage comes from the deep, personal relationships we build with our clients. By helping clients establish, grow, pass on, and give away their wealth, we will leave people and places better than we found them.

In all interactions, the interests of our clients always come first. This is one of our core values and a belief we all share.

- We strive to deliver the experience clients desire and deserve, from needs that may be more straightforward, to some of the more complex.
- We act with integrity and consider the impact of each decision on our clients.
- We are purpose-driven — this ensures that we will plan and execute our business well to serve our clients and associates and attract the households we know we can serve.



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# Privacy, information security and recordkeeping

We are entrusted with access to all kinds of data and information — with varying levels of sensitivity and confidentiality — of our clients, the firm, vendor partners and our colleagues. We have a responsibility to protect this information, not only because of our legal and regulatory obligations but because it is integral to our business.

We have developed enterprise-wide programs and policies related to privacy, information security and recordkeeping. These programs apply to all associates and encompass the following high-level principles:

- Associates may only use approved software and systems and must use extreme care when accessing external websites, opening email from non-Edward Jones entities and clicking on attachments or links.
- Firm data and information may only be shared with others for a specific, legal business purpose and may not be used for personal gain.
- The firm’s data and information must be protected at all times, and all associates are required to be familiar with the ways to secure data and information.
- Recordkeeping is an essential aspect of our business, and we are committed to preserving required books and records in conformity with all applicable laws, rules and regulations.
- All records must be accurate, and any material changes must be made promptly.
- Associates must adhere to the recordkeeping policies, controls and procedures relative to their business area, which includes accurately documenting or reporting any business-related communications received outside of Edward Jones systems.

## Ethics for EveryONE:

### The importance of using the “right channel”



Regulations require financial firms to perform a supervisory review and retain copies of all electronic communications pertaining to the business. When communicating with a client or colleague about a business-related matter, make sure you are using a firm-approved communication channel. If you receive a communication outside of an approved channel, follow the firm’s off-channel reporting processes and “change the channel” to bring the communication into an approved channel. This will help avoid risk to the client, yourself and the firm.



# Conflicts of interest

Conflicts of interest are inherent in the financial services industry. We strive to identify and properly manage conflicts of interest. This includes working to avoid, mitigate and/or disclose conflicts as they arise.

We follow these guiding principles:

- Avoid conflicts that impact our clients, colleagues and firm.
- Mitigate conflicts that cannot be avoided.
- Thoroughly disclose applicable conflicts to clients so they can make well-informed decisions.

Our conflicts of interest policies apply to all associates. If you become aware of a conflict of interest you believe is not adequately addressed through firm policies and procedures, or is not adequately disclosed, you must contact your direct leader or the **Ethics Hotline**.

A **conflict of interest** is anything that might affect your (or the firm's) ability to act impartially. This includes anything that might (consciously or unconsciously) cause you to make decisions or take actions that are more advantageous to the firm or to you personally.



## Ethics for EveryONE: Spot the potential conflict



**Example 1:** A financial advisor is close to qualifying for a Travel Awards Program trip. One of their best clients holds nontransferable assets at another firm, which the financial advisor understands are aligned with the client's current needs.

The financial advisor could qualify for the Travel Awards Program if the client liquidates the assets held at the other firm and uses the proceeds to purchase investments in their Edward Jones account. Qualifying for the trip presents a conflict that the financial advisor must manage by putting the client's interest first and avoiding a recommendation that is not suitable.

**Example 2:** A project leader in Information Security recently completed a large-scale effort to upgrade a vendor system for the branches. The multimillion-dollar project has taken more than a year and a half to roll out successfully. To celebrate, the vendor has invited the associate and their spouse to dinner at a local five-star restaurant and passes to the vendor's corporate suite for an evening professional sporting event. The associate knows the relationship with the vendor will be damaged if they do not accept.



# Political contributions

Federal, state and industry regulations place limits on political contributions, including bond ballot initiatives, to avoid large donations inappropriately influencing government officials and entities.

For U.S. associates, our firm policy limits state and local contributions for all associates and requires certain colleagues receive pre-approval for contributions to political parties, political action committees (PACs), ballot initiatives and individual candidates.

You must take the necessary measures to ensure your contributions strictly adhere to all federal, state and local laws, and it is your responsibility to familiarize yourself with firm policy.





## Gifts and entertainment

Giving or accepting gifts or entertainment is an accepted business practice that helps build strong relationships with our clients and business partners. However, certain conditions must be met to mitigate real or perceived conflicts of interest when giving or receiving gifts.

In general, you are prohibited from providing or accepting gifts or entertainment under circumstances that would compromise or appear to compromise or influence a business decision, unduly influence a client decision or that could cause the client's interests not to come first.

We have developed specific policies that include limits on the value of what is being given or received, certain exemptions in terms of individuals involved, and pre-approval and reporting requirements.

## Charitable contributions

You may not request or solicit charitable contributions from clients. Charitable contributions offered by a client should be made directly to the charity and any recognition should reflect only the client.

# Outside activities

We all have a responsibility to put our clients' interests first and prioritize our role at Edward Jones over other outside activities. This helps to ensure we can control risks and the potential for conflicts that may arise.

**All associates are required to:**

- Obtain approval before engaging in any outside business, volunteer, political or employment activities, regardless of compensation.
- Annually and/or when changes have taken place disclose the status of outside activities to confirm necessary updates have been added to the system and for approval to continue in the activity.



# Personal dealings

## Outside accounts

Outside investment and trading accounts are generally prohibited because of regulatory supervision and monitoring requirements. Upon hire, you are obligated to disclose outside accounts in which you hold a beneficial interest (such as accounts held by your spouse and your children if they live in your home), and you must receive prior approval for any additional accounts opened after becoming employed with our firm. This applies to accounts in which you are a single or joint owner, trustee, guardian, executor, power of attorney, or have discretionary authority, trading authorization or other legal interests. To comply with our firm policies, you (and your spouse and dependent children) must generally transfer these accounts to our firm. Exceptions may be approved on a limited basis for non-transferrable products or if a spouse/dependent is employed by a member-firm.

## Trading activities

We review accounts held by our associates and certain family members for improper trading activities, including trading that may conflict with the best interests of a client. In addition, we prohibit financial advisors from placing trades for their personal accounts before trades for our clients in the same security. In the event a financial advisor's personal order fills at a better price than a client's order placed close in time, we will adjust the order so the client receives the better price.

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## Lending arrangements with clients

Associates are generally prohibited from entering into a lending arrangement with a client. Certain exceptions may exist for clients who are immediate family members. You must obtain pre-approval from Compliance for these situations.







# Insider trading

Through our relationships with one another, our clients and our vendor partners, we may learn material nonpublic information (MNPI). Knowing this information is not bad in itself, but you must be careful what you do with that information. Just like with our clients' private information, we must treat all MNPI carefully and conscientiously. No associate may trade on, repeat, pass on, or knowingly facilitate a trade based on MNPI.

Passing along this information so that someone may gain from it is called "tipping." Both insider trading and "tipping" are criminal activities.

All associates must report potential material nonpublic information (MNPI), sometimes known as "inside information," and certain nonpublic rumors to Trading and Market Surveillance. See **Our Reporting Resources** for contact information.

**MNPI**, often referred to as "inside information," is information that could be reasonably expected to impact a security's price once it is made known to the investing public. Examples of MNPI include but are not limited to:



- Mergers or acquisitions
- Changes in executive leadership
- New products and services
- Projected financial earnings or losses
- Strategic business plans
- Pending lawsuits

# Fraud

At Edward Jones, we care deeply about protecting our clients and their families from fraud. Fighting financial fraud starts with education as well as communication between family members and their financial professionals. You should report any potentially fraudulent activity you encounter to Financial Crimes as soon as possible and stay aware for potential red flags or unusual behaviors. See **Our Reporting Resources** for contact information.

## Ethics for EveryONE: Did you know?



The following are some examples of red flags that may indicate fraud or financial exploitation:

- Sudden changes in account activity, such as requesting frequent disbursements or disbursements to unfamiliar third parties
- Client seems anxious and refuses to provide a reasonable answer for a disbursement
- Persons other than an authorized party attempt to act on the account
- False sense of urgency with client saying they need to buy / send funds immediately
- Unexplained changes in beneficiary designations







# Anti-money laundering

We are required to know where our clients' money comes from and where it is going to ensure we are not assisting in the commission of a crime. Branch teams represent the firm's first line of defense against money laundering risks. If you are a branch associate, you must verify the identity of your clients, record accurate and detailed notes on all client interactions, and constantly have money laundering concerns at the forefront of your daily work. Both branch and home office associates must report any suspicious activity encountered or suspected to Financial Crimes. See **Our Reporting Resources** for contact information.

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## Ethics for EveryONE: Did you know?



The following are some examples of red flags that may indicate involvement with money laundering:

- Refusal to provide evidence of source of funds, or wealth was accumulated recently in an unusual way (lottery, legal settlement)
- Business dealings involving multiple players or unknown third parties, particularly in complex transactions like real estate or international business
- Intention to use Edward Jones as a "pass-through" account with promises of future investments rather than immediate financial planning activity
- Unsolicited or remote engagement with profile inconsistencies: distant residential addresses, unrealistic wealth claims, or income that does not match occupation

**Money laundering** is the process of taking the proceeds of criminal activity and making them appear legitimate or "clean."





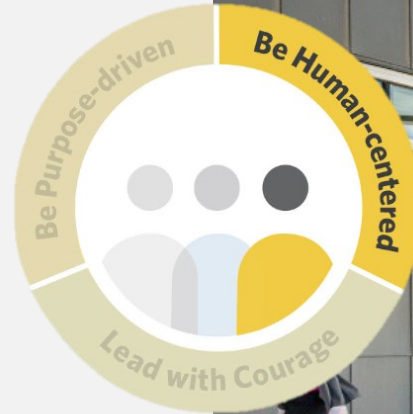
# Our colleagues

Our colleagues are our greatest asset in serving our clients. Our overarching goal is to be a place where every colleague feels valued, respected, seen and heard. We seek to enable all to bring their authentic selves to work every day and thrive in careers that are meaningful and tied to their individual purpose. How do we do this? By being human-centered. We help people flourish, move towards their potential and create a place of belonging that includes actively supporting the mental and physical well-being of others.

## Professional conduct

We are committed to providing a professional environment as we conduct business. To ensure safety and security, and to provide a positive and productive environment, Edward Jones prohibits associates from engaging in unprofessional conduct during working hours, while engaged in Edward Jones business or on Edward Jones' premises, or at an Edward Jones function or event. This includes conduct towards other associates, clients, the communities Edward Jones serves, guests at Edward Jones functions, and contractors and other parties we work with.

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# Nondiscrimination

We believe in valuing the dignity of individuals and the contributions that varying perspectives bring. We prohibit discrimination based on race, color, sex (including sexual orientation, gender identity, gender expression and pregnancy), religion, age, disability, veteran status, genetic information, citizenship status or national origin (except where applicable law or regulation require otherwise), or any other basis prohibited by applicable law.

Our firm does not view discrimination only from a legal perspective but as an issue of treating people with dignity and respect.

# Anti-harassment

At Edward Jones, we respect one another. We do not tolerate any form of harassment in our work environment. Harassing conduct includes, but is not limited to:

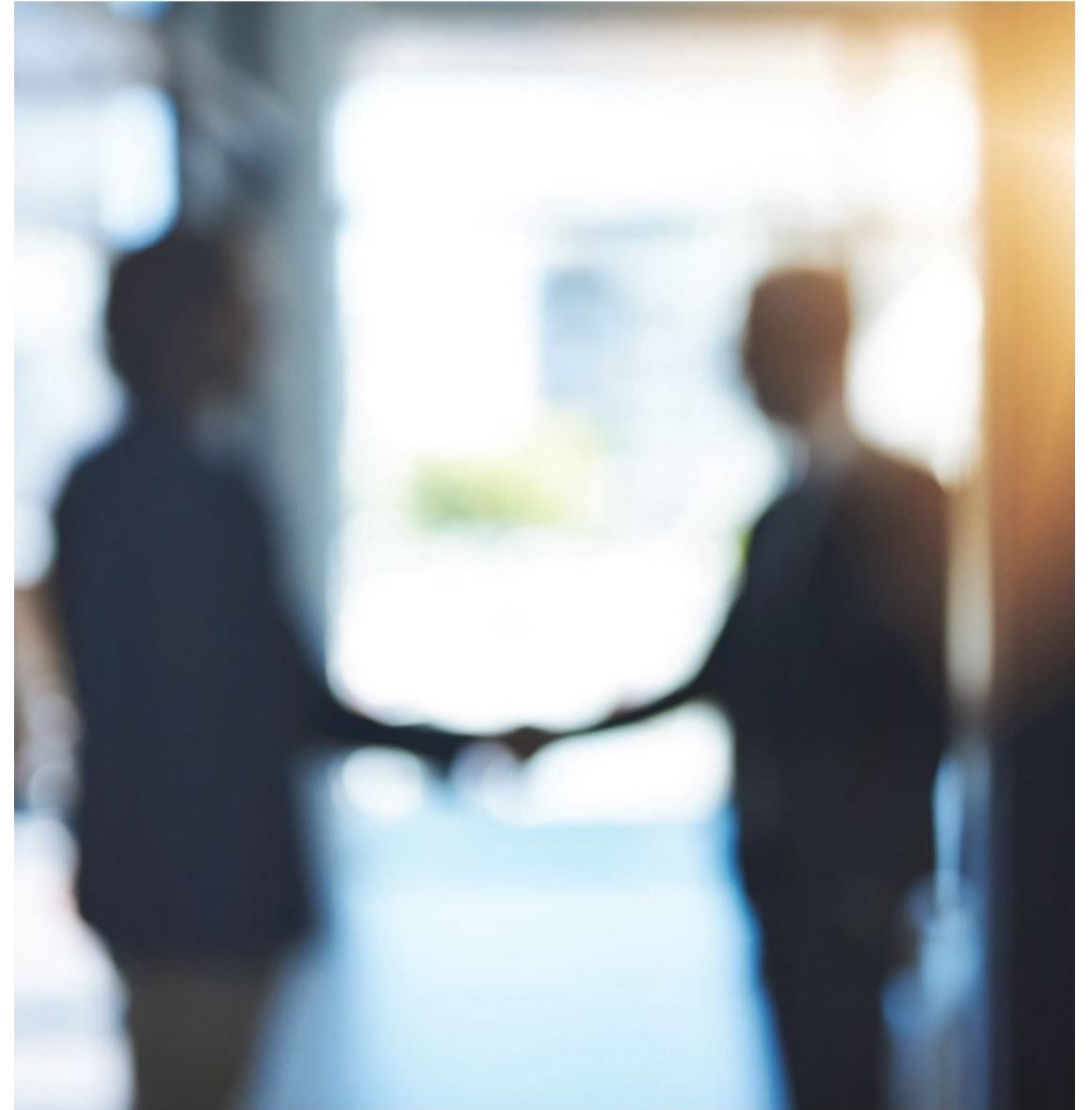
- Verbal (including epithets, slurs, derogatory statements and denigrating jokes)
- Physical (including inappropriate physical contact and pursuit of an associate in a persistent, harassing or obsessive way)
- Visual (including the display of derogatory posters, cartoons, imagery, video conference backgrounds or making derogatory gestures)
- Electronic (including derogatory statements or postings in any electronic media platform, including emails, Teams messages, Facebook, X (formerly Twitter), etc.)

A safe, positive, open and respectful workplace where all associates are treated with dignity and respect offers everyone the opportunity to do their best work. Each of us has a duty to acknowledge and stop harassment.

## Ethics for EveryONE: Do the right thing

**Question:** I went to a colleague's office and saw a meme about religion on the wall. I thought it was pretty offensive. Should I just let it go? Am I being too sensitive?

**Answer:** No, you are not being too sensitive. If you thought it was offensive, you probably are not the only one. You would be doing the right thing (for you, your other colleagues and the firm) to call HR Help for guidance.







# Anti-retaliation

We do not tolerate any form of retaliation against any associate who, in good faith, reports violations of, provides information about, or otherwise assists or participates in an investigation regarding our firm’s policies.

Examples of retaliation might include, but are not limited to, termination of employment, discipline, demotion, reduction in pay (including bonus), changes in work schedule, denial of a development opportunity or a threat to do so based on a Protected Activity. Even though inconsistent with firm culture, minor annoyances, petty slights, simple lack of good manners and other trivial matters, would not normally be considered retaliation because they would not be considered materially adverse.

When you report a concern or incident, no matter how you choose to report it, it will be reviewed and, if necessary, investigated promptly by people with the appropriate subject matter expertise. See **Our Reporting Resources** for more information.

**Retaliation** is defined as taking a materially adverse action that would dissuade a reasonable principal or associate from engaging in one of the Protected Activities.



“Protected Activities” for the purposes of the anti-retaliation policy include legally protected activities such as alleging discrimination, objecting to a potential securities law violation or asserting a concern with respect to compliance with a firm policy.



# Workplace violence and weapons

We are committed to providing a safe workplace for our colleagues, clients and visitors. Our firm prohibits violence (threatened or actual) and the presence of weapons in the workplace. Prohibited conduct or behavior includes, but is not limited to:

- Threatening, attempting or actually physically injuring another person
- Possessing, brandishing, storing or using a weapon on Edward Jones premises, at an Edward Jones function or while engaged in Edward Jones business
- Using a weapon to intimidate, attack or injure another person or to damage property
- Threatening to or intentionally damaging property

# Our communities

As a business that seeks to make a positive difference in the world through the work we do, we are focused on addressing key challenges in three Purpose Impact Areas. These are areas where the skills and passions of our talented associates intersect with our ability to make the greatest impact to improve the lives of our clients and colleagues, for the betterment of our communities. You can find more information about our strategy in our annual Purpose, Inclusion and Citizenship Report which is available at [edwardjones.com](https://www.edwardjones.com).

## Partnering for lasting financial strength



**We believe in the power of financial knowledge and confidence and a personal, needs-based approach to build long-lasting financial strength.**

## Promoting healthier futures



**We work to promote the mental, emotional, physical, financial and social well-being of those impacted by health issues, so each person can live an enriching life.**

## Advancing inclusive growth



**We invest to lift all people and communities, including the underserved, by equipping more people to fully participate in the economy and build the future they want.**



# Our firm

We are committed to serving more clients more completely to make a greater impact for generations of families and communities. Our spirit of working in partnership energizes our culture as ONE Edward Jones team. As a firm, we lead with courage, building highly effective teams, inspiring personal growth and shaping our future.



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# Compliance Manual

All associates must be familiar with the Edward Jones Compliance Manual content and must review the manual at least annually. While the manual addresses policies of a compliance nature, associates are expected to conform to the laws, rules and regulations of the industry and applicable jurisdiction regardless of whether those authorities are covered in the manual.

Violations of laws, rules, regulations and firm policies can result in disciplinary or regulatory sanctions against an associate, as well as fines or responsibility for consequential losses resulting from the violation.



# Product Partner Code of Conduct

To ensure product partners share our commitment to make appropriate investment recommendations, we have developed a Product Partner Code of Conduct that is shared with all buy-eligible product partners in the U.S. and in Canada. Product partners in the U.S. are asked to sign the Code of Conduct.

It requires each product partner to act in a manner consistent with a financial advisor's obligation to provide appropriate investment recommendations based on the needs of each client and not on the basis of any compensation that the financial advisor may receive from a particular recommendation.





# Business resilience

We have a business continuity plan in place that includes procedures for response and recovery in the event of a significant business disruption. We will respond to a significant business disruption by first working to safeguard associates’ lives, clients’ confidential information and firm property, then by directing our focus to enable timely recovery and resumption of critical operations. If a significant disruption were to extend long-term, we also have procedures in place to ensure clients continue to have prompt access to their funds and securities.

Business continuity plans are reviewed annually, and revisions are made as needed to support evolving business needs.

# Third party management

The Third Party Management Policy is in place to establish requirements and practices Edward Jones uses to engage, assess, manage and mitigate risk associated with Third Parties, ensuring alignment with the Firm objectives and compliance with applicable laws, regulations and legal agreements.



Third party risk is a top concern for the firm, and has several impacts across the enterprise, especially with our critical third parties and their significance within our business lines.

If not adequately managed, third parties can expose the firm to regulatory action, financial loss, litigation, reputational damage and potential harm to our clients.



# Our commitment

Our commitment is to leave people and places better than we found them, and together, make a difference. We live our purpose and work toward our goals as ONE Edward Jones. All associates are expected to:

- Act in accordance with the standards contained in the Edward Jones Code of Ethical Conduct and Compliance Manual, including any amendments made by our firm.
- Adhere to policies and procedures established by our firm that may not be explicitly stated or published in full format within the Edward Jones Code of Ethical Conduct and related manuals. This includes but is not limited to: requirements imposed by Compliance and Field Supervision and policies and procedures published on JonesLink.
- Report any deviation from applicable laws, regulations or firm standards through the Edward Jones reporting resources as outlined in this code. See **Our Reporting Resources** for more information.

Failure to comply with the firm's policies and procedures, consistent with the terms therein, may result in disciplinary action by Edward Jones at its sole discretion, including but not limited to heightened supervision, fines, termination of employment and reporting to regulatory authorities.

**Edward Jones**<sup>®</sup>



We work together as ONE Edward Jones to do what is right for the clients we serve, the communities in which we live and for one another. Ethics at Edward Jones is EveryONE's responsibility.