Form CRS (Client Relationship Summary), June 30, 2020 Raymond James Investment Counsel, Ltd.

Raymond James Investment Counsel, Ltd. ("Raymond James", "we", "us") is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker/dealers, investment advisers, and investing.

What investment services and advice can you provide During periods of lower trading activity, the advisory fee may be me? Metallic transaction charges you would have paid in a

The investment advisory programs we offer include:

- Financial Advisor managed Accounts in this program are discretionary your financial professional makes investment decisions to buy, sell or hold securities in your account.
- Firm managed Another firm, which may or may not be affiliated with us, manages investments in your account. All firm managed programs are discretionary.

We also offer various investment advisory services including Financial Planning – your financial professional helps you develop a goal-based strategy or financial plan intended to achieve your financial objectives.

Monitoring: We and your financial professional conduct ongoing monitoring of your advisory accounts tailored to your advisory relationship and advisory account(s).

Limited Investment Offerings: We provide advice on proprietary and non-proprietary products. Depending on your choice of account type, strategy and model, you may receive advice with respect to a broad range of investments, or you may receive advice regarding a limited range of investments. For example, we do not make all mutual funds available for use in advisory programs and generally limit the offered mutual funds to a single share class.

CONVERSATION STARTER

 Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

In an investment advisory account, you will incur advisory fees which are generally assessed either monthly or quarterly at the rate and schedule you agreed upon with your financial professional (based on our recommended fee schedule). Depending on your choice of custodian for your investments you will also incur additional charges. In addition, it does not include underlying management fees and operating expenses for investment products and other charges described in our advisory brochure. Because we and your financial professional are compensated based on the amount of assets in your account, we and your financial professional are incentivized to grow your assets Because we earn fees for all assets custodied at Raymond James Correspondent Services we are incentivized to recommend you use them.

During periods of lower trading activity, the advisory fee may be higher than the transaction charges you would have paid in a brokerage account. To determine whether an investment advisory account is appropriate for you, you should carefully analyze the projected costs of an investment advisory account versus a brokerage account based on factors such as expected size, volume and frequency of transactions, projected holding period and the advisory services provided by your financial professional. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information about our fees and charges, please refer to the Important Client Information.

CONVERSATION STARTER

 Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- Proprietary products We and our affiliates may serve as the investment manager on investments and earn a management fee.
 Any such fees are in addition to any advisory fees you will incur.
 We therefore have a financial incentive to recommend proprietary products over third-party products.
- Third-Party Payments We receive payments from third-parties when you invest in certain products (e.g. mutual funds). These payments represent additional compensation to us, or provide compensation for ongoing support activities we perform on behalf of third parties, such as product servicing, tax-reporting, statement and trade confirmation mailings or recordkeeping. This results in a financial incentive to recommend products that provide additional compensation to us over those that pay lesser amounts or none at all. Such payments may also affect which products we make available.

- Custodial Services Our parent company offers custodial services for which it receives fees. When you open your account, you have the freedom to custody your assets with our parent company or select another option. We therefore have a financial incentive to recommend our parent company to custody your assets.
- Principal trading Our affiliate may buy a security from you or sell you a security from their own account, predominantly with bonds and other fixed income securities. This may create incentives to act against your best interest to generate trading profits or minimize losses.

This summary does not identify all of our conflicts of interest, or all material facts about the conflicts of interest listed. For additional information about these and other conflicts of interest, please review our Important Client Information.

CONVERSATION STARTER

 How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

- Your financial professional is compensated as a percentage of advisory fees, which are, assessed either monthly or quarterly at the rate you agreed upon with your financial professional (based on our recommended fee schedule). The percentage of revenue that your financial professional receives will generally increase as revenue earned from their client accounts increases. Therefore, financial professionals are incentivized to increase revenues on your and other clients' accounts.
- Financial professionals may receive incentive compensation based on revenues earned from client accounts. Incentive compensation may include paid travel for recognition trips, stock incentives for shares of Raymond James Financial, Inc., and certain expense reimbursements.

• When financial professionals affiliate with us, they may receive compensation in connection with transitioning from their prior firm. This includes an upfront payment and additional potential compensation based on the revenues generated from client accounts in the first few years. This creates incentives for financial professionals to encourage you to move your assets to Raymond James and to produce greater revenues by charging higher fees.

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Do you or your financial professionals have legal or disciplinary history?

Yes. Visit Investor.gov/CRS for a free and simple search tool to research us and the financial advisors.

CONVERSATION STARTER -

As a financial professional, do you have any disciplinary history?
 For what type of conduct?

Additional Information: This Form CRS is an SEC-mandated summary disclosure on certain important topics about Raymond James. The information in this Form CRS is subject to the more complete terms and conditions of our investment advisory agreements and disclosures (including Form ADV Part 2), and does not create or modify any agreement, relationship or obligation you have with us. For additional information about us and our services, please visit raymondjamesinvestmentcounsel.ca or your financial advisors' website. If you would like additional information or a copy of this Client Relationship Summary, please call your financial advisor or visit our website www.raymondjamesinvestmentcounsel.ca.

CONVERSATION STARTER -

• Who is my primary contact person? Is he or she a representative of an investment adviser or a broker/dealer? Who can I talk to if I have concerns about how this person is treating me?

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