

CONSUMER PROTECTION

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?

Yes ___ No ___

If no, please briefly explain: To the best of our knowledge, yes, Stifel is in compliance with all applicable consumer financial protection laws.

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?

Yes X No ___

If no, please briefly explain: _____

3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?

Yes X No ___

If no, please briefly explain: _____

4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?

Yes X No ___

5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?

Please see Exhibit 3.

CERTIFICATION UNDER PENALTY OF PERJURY (*)

I certify under penalty of perjury that I have read and understand the questions contained in this form and the responses contained in the form and on all the attachments. I further certify that I have provided full and complete answers to each question, and that all information provided in response to this form is true and accurate to the best of my knowledge and belief.

Jake Campos, Managing Director
Print Name Title


Signature

1/20/2021
Date

(*) Signature must be that of the Head of Public Finance or equivalent corporate executive.

PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO CAO.DEBT@LACITY.ORG.

**Office of the City Administrative Officer
200 North Main St. Room 1500
Los Angeles, CA 90012
Attention: Debt Management Group**

Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

| Name of Charitable Organization | Type | Amount (\$) |
|---|------------------------------|--------------------|
| PUENTE Learning Center | Education | \$5,000 |
| CORO Southern California | Community Development | \$5,000 |
| Inner City Struggle | Children & Youth Development | \$1,000 |
| Thomas & Dorothy Leavey Center for the Study of LA, LMU | Voter Rights | \$10,000 |
| Los Angeles County Women's Leadership Conference | Women Empowerment | \$3,000 |
| USC Price Executive Education Forum | Education | \$10,000 |
| HOPE | Women Empowerment | \$5,000 |
| Variety Boys & Girls Club | Children & Youth Development | \$5,000 |
| LASPA | Community Development | \$500 |
| Cal State LA Pat Brown Institute of Public Affairs | Education | \$5,000 |
| META Scholarships | Education | \$2,500 |
| City of Los Angeles 2020 Regional Investors Conference | Economic Development | \$5,000 |
| UCLA Undergraduate Mathematics Student Association | Education | \$1,000 |
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| Fabric of Society Scholarship Program | Stifel Scholarship Winners | |
| Nava College Prep Academy | 1 Winner | \$2,000 |
| Alliance Cindy & Bill Simon Tech Academy | 2 Winners | \$4,000 |
| Francisco Bravo High School | 2 Winners | \$4,000 |
| Ramon C. Cortinez School of Visual and Performing Arts | 2 Winners | \$4,000 |
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Equal Employment Opportunity

Firm Policy: Stifel, Nicolaus has not adopted an affirmative action policy; however, our firm is strongly committed to equal opportunity. Our equal opportunity policy provides as follows:

Stifel is committed to providing equal employment opportunities (“EEO”) to all Associates, applicants for employment, and individuals providing services in the workplace without regard to actual or perceived race, color, religion, creed, gender, pregnancy (including childbirth, lactation, child-bearing capacity, sterilization, fertility, past pregnancy condition and the potential or intention to become pregnant and related medical conditions), sexual and reproductive health decisions, sexual orientation, gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), national origin, ancestry, age, disability, weight, genetic information, marital status, citizenship status, familial status, homelessness (i.e., lack of a permanent mailing address or a mailing address that is a shelter or social services provider), status as a covered veteran or any other protected criteria in accordance with applicable federal, state, and local laws. Stifel complies with all applicable state and local laws governing non-discrimination in employment applicable to each location in which the Firm operates. Stifel strictly prohibits any form of unlawful discrimination.

Equal opportunity extends to all aspects of the employment relationship, including hiring, transfers, promotions, training, termination, working conditions, compensation, benefits, and all other terms and conditions of employment. All Stifel Associates are responsible for implementing this EEO policy in their daily actions, conduct, and decisions. All Associates are expected to treat each other with respect and professionalism.

Associates are encouraged to contact Human Resources regarding any potential violation of this policy as soon as possible. Stifel strictly prohibits any type of retaliation against an individual who in good faith reports a violation of this policy, raises a complaint or concern regarding discrimination or harassment, or otherwise engages in protected activity under the law.

Stifel also complies with the applicable provisions of the Americans with Disabilities Act, as amended, and similar state and local laws, and it does not discriminate against any qualified Associate or applicant because of a real or perceived disability. Stifel will make reasonable accommodations for qualified Associates or applicants with disabilities or for pregnancy consistent with applicable law. Retaliation for requesting an accommodation for a disability or pregnancy is strictly prohibited.

Exhibit 3
RBO – Corporate Citizenship Statement Form
Stifel, Nicolaus & Company, Incorporated

Answer to Question 5

Stifel, Nicolaus & Company, Incorporated (“Stifel”) is an investment banking and securities firm providing investment services to individuals and institutional clients, investment banking, and related services including the day-to-day purchase and sale of securities. Stifel is a wholly-owned subsidiary of Stifel Financial Corp. (SF). In the normal course of business, at any given time, Stifel is subject to a number of claims and disputes, as well as regulatory matters including examinations, reviews, investigations, or formal actions. All required disclosures of material litigation and regulatory matters are made in Stifel Financial Corp.’s public filings with the SEC and other regulatory authorities, such as its Form 10-K and the most recent Form 10-Q filed with the U.S. Securities and Exchange Commission (the “SEC”), 8-K’s, and in other regulatory filings, such as Form B/D, as amended. You are further referred to the FINRA website, where you can access Broker Check reports for Stifel, Nicolaus & Company, Incorporated which may be located with the following hyperlink: <http://brokercheck.finra.org/Firm/Summary/793>. This contains the regulatory reports on Stifel’s disciplinary disclosures.