



SEI Investments (Europe) Ltd.

Section 172(1) Statement

Statement by the directors in performance of their statutory duties in accordance with s172(1) Companies Act 2006

The directors consider, both individually and collectively, that they acted in a way they consider, in good faith, would be most likely to promote the success of the Company for the benefit of its members as a whole (having regard to the stakeholders and matters set out in 172(1)(a-f) of the Companies Act 2006). In the decisions taken during the year ended 31 December 2021. In particular, by reference to the approval of its business plan for the period 2022 to 2024, which was designed to have a long-term beneficial impact on the Company, taking account of:

- the interests of its employees;
- the need to foster relationships with its customers and suppliers;
- the impact of its operations on the community and the environment; and
- the desirability of maintaining a reputation for high standards of business conduct, both in its interactions with regulators and participants in the markets in which it operates.

There are seven non-executive directors on the Company's board, three of whom are independent, and the directors consider this helps to ensure that there is robust oversight of the executive function so that strategic decisions are made under proper independent scrutiny and challenge, in each case having due regard to the likely impacts on all relevant stakeholders, to promote a sustainable, profitable and well governed business model.

Employees

The Company's employees are critical to its success and the Company aims to be a responsible employer, operating on the principles of integrity, innovation, inclusion, development and collaboration.

The Company engages with its employees through a number of different forums and channels, including a bi-annual employee engagement survey (the results of which are reported to the directors), regular town halls and executive breakfasts. Management at all levels is encouraged to engage with and seek feedback from employees in order that the Company can better support and develop employees.

Wellbeing initiatives

The Company understands the importance of promoting health and creating a workplace culture to help reduce the severity and duration of any mental or physical ill health. To support employees, the Company created the wellbeing initiative which is an employee resource group that works with teams across the Company and external specialists to introduce initiatives that enhance wellbeing for employees. During the COVID-19 pandemic, a particular focus has been given to mental wellness as employees have had to adapt to changes in work and home life.

Diversity and inclusion initiatives

The Company takes pride in significant contributions made from individuals with diverse backgrounds and is dedicated to the promotion of practices and policies that endorse diversity and inclusion in the workplace.

The Company created the Diversity Network which is an employee-led affinity group whose mission is to support the Company in attracting, developing and retaining employees from diverse backgrounds including race, gender and religion. The network is led by an executive leadership council to ensure that the network is aligned to strategic and business operations.

The Company created the Women's Network which is an employee-led global initiative with a mission to inspire and support the professional growth of women by providing educational forums, hosting networking opportunities and encouraging success.

The Company invests in its global diversity initiative through the Women's Development Series which is a senior management led initiative aimed at retaining women in the workplace and developing them to senior management roles.

The Company is committed to creating and maintaining a diverse and inclusive workforce and culture. People with disabilities are given full and fair consideration for employment and subsequent training, career development and promotion. Where existing employees become disabled, it is the Company's policy to support them in continued employment wherever practicable. The Company currently offers income protection insurance for those colleagues who are not able to return to work.

Customers

The directors place the delivery of high quality services to customers at the very heart of the decision making process, at all levels of the Company, from Board level and through the committees they oversee, to the day to day management processes in place across the business. The Company recognises the need to listen to customers and engage with them in order to adapt and develop new and innovative solutions to meet their evolving needs.

The Company engages with customers through a variety of channels, including client peer group meetings, speaking at external industry events and hosting Company sponsored seminars and workshops, but principally through daily interactions across the breadth of the business. Many of its customer relationships are multi-year outsourcing arrangements where the Company seeks to work as long-term business partners with its customers. These arrangements are supported with dedicated relationship managers whose role is to ensure that customers' needs are understood and new solutions can be devised to meet customer and market demands. Meeting those needs requires ongoing and significant investment in systems and people to improve services and resilience to build for the future alongside its customers.

All strategically important new customer relationships are approved by the board of directors.

Suppliers

The directors recognise that suppliers are critical and integral in ensuring the Company can successfully meet its long-term strategic goals. We engage directly with suppliers to ensure that they are meeting the standards necessary in order to comply (and provide solutions that assist the Company's regulated clients in complying) with its legal and regulatory obligations and other corporate responsibility requirements.

The Company's Vendor Management Office ("VMO") serves as a centre of competency and best practices to facilitate risk management, communication, organisation, and leveragability around supplier relationships and relationship improvement. Additionally, each supplier providing products or services to the Company has a designated vendor owner. The vendor owner is the person primarily responsible for engaging with and managing the supplier relationship on a routine, day-to-day basis, and acts as a point-of-escalation for problem resolution.

The VMO routinely assesses its suppliers against industry "best practices" on information security and operational resilience and compliance with corporate codes, such as UK Modern Slavery legislation, and other corporate social responsibility issues. This is done through proactive communication, on-site visits, and supplier summit events.

The VMO produces a quarterly report for review and challenge and all strategically important new supplier relationships are approved by the board of directors.

Communities and Environment

The directors recognise that the Company has a responsibility to operate safely and in an environmentally friendly way within the communities it shares and to support these communities.

Communities

SEI Cares is a corporate sponsored employee-led programme which promotes philanthropy within the Company's community and beyond. The programme allows employees to participate in charitable activities and organised events to raise money for various charities, as well as hosting fundraising events. SEI Cares and the Diversity Network also maintain an ongoing commitment to partner with and support students at local schools based in socio-economically restricted areas, for example, through CV workshops and interview sessions.

Environment

The Company endeavours to advance sustainability by considering environmental matters throughout its business and operations. The Company believes that environmental improvements foster a sustainable future and lead to social and economic advances, with long-term benefits both for the community and the Company as a constituent of that community. The Company's environmental policy recognises that as a major services provider, the physical commerce that it operates from and the processes adopted by its suppliers could have a sizeable impact on the environment. The Company works with its suppliers to measure environmental data and seek to reduce that environmental impact.

The Green Team initiative aims to share information with employees to raise awareness of environmental impacts on the community and in the workplace, to develop solutions to minimise the Company's global footprint and promote the purchase and consumption of environmentally sound products. The Company has successfully

completed its lighting project to replace fluorescent lighting throughout the office and now over 98 percent of lighting is LED. The Company has also successfully set up and attained an ISO 50001 standard which is the international standard for energy management systems.

Regulators

The Company is regulated by the FCA in the UK and is in regular and close communication with the Company's FCA supervisor at management level and there is also a certain level of engagement directly between the FCA and the directors themselves. The directors view the relationship with the FCA as a constructive engagement and recognise that cooperating with regulators in an open manner, including in terms of significant strategic decisions, will help to ensure the long-term success of the Company, in the interests of its customers and the wider market.

Members

The Company is a wholly owned subsidiary of SEI Investments Company, which is represented at the board of directors level, to ensure decisions of the Company are made in a manner which is consistent with overall Group strategy. The Company has adopted a dividend policy to facilitate the making of distributions to its parent.