

SEI Investments (Europe) Limited ('SIEL')
Modern Slavery Act Transparency Statement
May 2026

1. Introduction

This is SIEL's tenth Modern Slavery Act Transparency Statement (the "**Statement**"), following the introduction of the Modern Slavery Act 2015 ("**the Act**" or "**MSA**"). SIEL fully supports the aims of the Act, and is committed to tackling the contents thereof, namely slavery and human trafficking, where practical and possible.

2. Our Business

SIEL provides technology, operations and asset management services to the financial services industry. SIEL is incorporated in the UK and regulated by the Financial Conduct Authority ("**FCA**"). SIEL's financial year end is 31 December.

SIEL is a wholly owned subsidiary of SEI Global Investments Corporation ("**SGIC**"), a company incorporated in the United States of America, which in turn is wholly owned by SEI Investments Company ("**SEIC**"). SEIC, the ultimate parent of SIEL: (i) is regulated by the Board of Governors of the US Federal Reserve as a savings and loan holding company; (ii) has its common stock traded on the NASDAQ Stock Market; and (iii) is registered with the Securities and Exchange Commission. SIEL has over 300 employees and through its role within the wider SEI group it supports and services clients across Europe.

3. Our Approach

SIEL's approach is designed to reflect its zero tolerance of slavery and/or human trafficking, in all its different forms, in any parts of its business or supply chain. SIEL's approach also reflects a commitment to act ethically and responsibly in all its business relationships. As such, SIEL will not, knowingly support, or do business with, any organisation involved in slavery and/or human trafficking. SIEL is committed to upholding the following:

- UN Guiding Principles on Business and Human Rights;
- International Labour Organisation (the "**ILO**") Declaration on Fundamental Principles and Rights at Work;
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- Organisation for Economic Co-operation and Development ("**OECD**") Guidelines for Multinational Enterprises;
- OECD Due Diligence Guidance for Responsible Business Conduct; and
- 2018 Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains.

SIEL's approach is underpinned by its Modern Slavery Act Policy and a corporate policy on procurement and outsourcing which requires our business to assess the social, ethical and equality impact of existing, as well as new business relationships. Our approach is also supported by other relevant corporate policies including Human Resources and whistleblowing policies.

To tackle slavery and human trafficking, SIEL:

- (a) Identifies, monitors and assesses categories of third-party vendors most at risk from slavery and/or human trafficking;
- (b) Incorporates anti-slavery and human trafficking obligations into procurement agreements and sub-contracting arrangements, as appropriate and on a risk assessed basis;
- (c) Includes appropriate measures in its due diligence processes for all its vendors and outsourced relationships (irrespective of whether they meet the requirements under s. 54 of the Act);

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- (d) Provides a programme of training for relevant employees to ensure that there is a high-level understanding of the risks of slavery and human trafficking; and
- (e) Maintains whistleblowing arrangements.

SIEL also adheres to the responsible business practices prescribed in the corporate Code of Conduct.

From an operational perspective SIEL has enhanced its due diligence as follows:

- For all critical vendors, SIEL requires supplier attestation in relation to compliance with the MSA and, as of 2025 enhanced our periodic due diligence to include questions around visa status checks, slavery and human trafficking, and employee grievance procedures.
- SIEL has endeavoured to identify those suppliers whose service profiles could present a comparatively higher risk and then considered and implemented measures to mitigate such risks.
- SIEL suppliers are subject to adverse media screening therefore any reports of suspicious activity would be flagged to SIEL for review.

4. Due Diligence & Risk Assessment

SIEL have comprehensive procedures regarding the oversight of its third-party relationships. The SIEL due diligence process includes an assessment of each third-party's adherence to the MSA principles and their ongoing assessment of other parties further along the supply chain. Due diligence exercises are completed on a 1-3 year cycle depending on the criticality of each third-party's services to SIEL.

5. Risk and Compliance

SIEL has embedded risk and compliance procedures which require the ongoing assessment of the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain. As an asset management and wealth processing services firm our supply chains predominantly comprise business and professional services organisations, and consequently we do not consider that we operate in high-risk sectors for modern slavery based upon our business areas: however, SIEL will continue to assess each supplier on a case-by-case basis.

SIEL recognises that training our staff is fundamental to raising awareness of the issues around modern slavery and identifying and managing risks, including how staff should report concerns. SIEL has implemented a training programme on modern slavery risks (in our business and/or supply chains) which will be provided at regular intervals (no less than every three years) and this is co-ordinated by SIEL's HR function.

6. Further Action and Sign Off

This Statement was approved by the SIEL Board of Directors, on behalf of SIEL, on 28 April 2026. A reviewed and updated Statement will be published each year on the corporate website:

Signed by



Name: James London

Title: CEO, and Director for and on behalf of the SIEL Board