Whistleblowing, complaints, and non-retaliation



SEI's Code of Conduct contains the following information related to whistleblowing, complaints, and non-retaliation.

SEI is committed to conducting its business activities with integrity. We believe that personal accountability is the foundation of ethical conduct and encourage Employees to speak up about any potential wrongdoing. Employees who observe, learn of, or in good faith, suspect a violation of the Code should immediately report the matter using a method outlined below. A reportable concern could also relate to a breach of rules, policies and procedures, or harmful behavior. As described below, SEI strictly prohibits retaliation of any kind against Employees who speak up about any suspected or potential violation or wrongdoing. Employees should immediately report any suspected acts of retaliation.

Raising concerns and speaking up

An Employee may escalate concerns to their manager, any member of senior management, a member of the Legal and Compliance teams, or Workforce Development (Human Resources). Other reporting options include:

- The Head of Internal Audit at SEI for accounting, internal accounting controls, or auditing matters
- The General Counsel of SEI Investments Company
- By email to SEIEthicsCommittee@seic.com

SEI has also contracted a third-party vendor to provide confidential reporting available in multiple languages, 24 hours a day, and seven days a week with the option to remain anonymous. Phone calls are not recorded.

Procedure for reporting code violations

Any person who has knowledge of a suspected Code Violation should file a complaint by contacting:

• By telephone

U.S. and Canada: 1-877-705-2579

— Hong Kong: 800-906-553

- India: 022-5097-2653

— Ireland: 1800-443-388

- Luxembourg: 800-24-997

- South Africa: 087-195-1003

- Switzerland: 0800-121-155

United Kingdom and Northern Ireland: 0800-066-8826

• Online at www.SEIC.EthicsPoint.com

• By email to SEIEthicsCommittee@seic.com



1 Freedom Valley Drive P.O. Box 1100 Oaks, PA 19456 610-676-1000

seic.com







