UK & EU Supplementary Securities Transaction Policy

Approved October 21, 2026

SS&C Technologies Holdings, Inc.

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Introduction

If you are an employee of SS&C (or any of its world-wide subsidiaries and affiliates, collectively, "SS&C") ***and*** you are involved in the provision of services to any SS&C client with a presence in the United Kingdom (UK) or the European Union (EU), you are subject to securities transaction restrictions additional to those set forth in SS&C Securities Transaction Policy (the "Master Trading Policy"). *These restrictions are generally more stringent than those imposed by the laws of the United States and the Master Trading Policy.* They cover you because of the nature of the services SS&C provides in the UK and the EU and arise under one or more EU Directives and/or Regulations and the UK equivalent legislation applicable to our clients, such as the Market Abuse Regulation, the recast Markets in Financial Instruments Directive II ("MiFID II"), the Alternative Investment Fund Managers Directive (the "AIFMD") or the UCITS[1] Directive and, in each case, the applicable UK equivalent legislation (together, the "Applicable UK & EU Laws"). The purpose of this UK & EU Supplementary Securities Transaction Policy (the "UK & EU Trading Policy") is to establish policies and procedures sufficient to ensure compliance by SS&C with the Applicable UK & EU Laws and other legal and regulatory requirements, such as prohibitions on insider dealing, market abuse and the unlawful disclosure of inside information, applicable to SS&C and its employees, and to educate SS&C employees on their specific duties and obligations.

Background – The Applicable UK & EU Laws

Under one or more of the Applicable UK & EU Laws, some of SS&C's clients, particularly asset managers and broker/dealers established and licensed in the UK and EU, are required to confirm that their service providers – companies like SS&C – have adequate arrangements in place to prevent misuse of client information and other forms of market abuse. Client information is information that relates to the business of a client, is owned by that client and/or is information in respect of which SS&C owes the client a duty of confidentiality or is obligated under the Applicable UK & EU Laws to maintain confidentiality, such as inside information ("Client Information"). For the purposes of the Applicable UK & EU Laws, "inside information" means information that is precise, has not been made public, which relates, directly or indirectly, to an entity with securities listed and/or traded on a UK or EU trading venue which would be likely to have a significant effect on the price of the entity's securities if it was made public. Misuse of Client Information means disclosing that information in breach of a duty of confidentiality, prohibition imposed by the Applicable UK & EU Laws, or using that information (for example, by trading on the information) in a way that conflicts with the interests of the client or otherwise constitutes a breach of SS&C's obligations to its client or under applicable law ("Misuse").

Who is covered by the UK & EU Policy?

This UK & EU Trading Policy applies to:

- ***all employees of SS&C, wherever you are employed,*** and your spouse and minor children, any person who lives in your household or is financially

[1] The Undertakings for The Collective Investment Of Transferable Securities.

dependent on you, and any corporation, partnership, trust or other entity controlled by you or any of the foregoing persons or entities; ***and***

- ***where your day-to-day duties and responsibilities*** include direct or indirect access to Client Information in any of the following applications ("Relevant Applications") for a client with a European Client Service Office location:

    - GoTrade, GoTrade Capture, GoPricing, Geneva, GoCSM, GoCredit, GoConfirm, GoRec GoReporting, GoMatch/TradeExport, GoRisk, GoPayment, ODS, Price Marker, Reports Hub, MOTO, Altimis, Genesis, Moxy, Fidessa, IRESS, RSP Gateway, WBS, Hubwise and such other analogous applications you may have access to that contain client financial instrument trading activity.

SS&C employees and others who meet all of the criteria set forth above are defined for purposes of this UK & EU Trading Policy as "UK & EU Covered Employees." If you are uncertain as to whether you are a UK & EU Covered Employee, please contact a member of SS&C's Legal Department or the General Counsel of the Company.

What are the UK & EU Policy Requirements?

Under this UK & EU Trading Policy, UK & EU Covered Employees shall:

- ***not Misuse Client Information in any way or assist or encourage any other person in Misusing Client Information in any way; and***

- ***complete the attached "Securities Transaction Pre-Approval Request Form" and submit it for pre-approval of any planned transaction involving securities or financial instruments. Only if you are cleared to trade may you complete the planned transaction. Transactions involving mutual funds, index funds or exchange traded funds or the purchase or sale of securities of a listed company with a market capitalization greater than or equal to US$5.0 billion need <u>not be pre-approved</u>.***

Additionally, under this UK & EU Trading Policy, UK & EU Covered Employees are required to:

- maintain records of all personal trading transactions for three years from the date of execution of each such transaction;

- comply promptly (and, in any event, within 72 hours) with any request from SS&C to provide to SS&C your personal trading records; and

- attend the training on matters covered by this UK & EU Trading Policy as may be offered by SS&C.

Questions Concerning This UK & EU Policy

If you have questions concerning the applicability or interpretation of this UK & EU Trading Policy, please contact the General Counsel of the Company.

SS&C Technologies, Inc.
SECURITIES TRANSACTION PRE-APPROVAL REQUEST FORM

Instructions to User: Please complete this Securities Transaction Pre-Approval Request Form and submit it to the Office of the General Counsel of SS&C Technologies, Inc. (email address is "TradeRequest@sscinc.com") prior to undertaking any securities transaction (for example, the purchase or sale of any shares of stock.)[1] As soon as practicable after receiving your completed Pre-Approval Request Form, a representative from the Legal Department will respond to your request. You may not trade in the securities that are the subject of your request unless and until you have received written pre-approval from the Legal Department. If you have questions regarding this Pre-Approval Request Form, please contact the legal department CorpLegal@sscinc.com.

EMPLOYEE INFORMATION		
Name:		Date:
Title:	Phone:	Email:
Address:		
City:	State:	ZIP Code:
Business Unit and Location:		
Manager:		

DESCRIBE SECURITIES TRANSACTION FOR WHICH YOU ARE SEEKING APPROVAL: (for example, purchase 100 shares of IBM Corporation):

TYPE OF TRANSACTION	**NAME OF SECURITY/TYPE** (For example: IBM stock)	**QUANTITY/NUMBER OF SHARES**
BUY:…….☐ SELL:…….☐ OTHER:……..☐ (Describe, for example, is this a hedging or a pledging transaction? or a gift of securities?) _____ _____ _____	**TICKER SYMBOL** (if available)	

INVOLVEMENT IN CLIENT ACCOUNTS (Describe/list client accounts in which you have been involved or to which you have had access in the last 10 days):

OTHER: Provide other relevant information necessary or helpful in assessing whether your proposed securities transaction should be approved:

By signing below, I certify that the information contained in this Pre-Approval Request Form is complete and accurate and further that I have read and understand SS&C's Securities Transaction Policy and this EU Supplement and I hereby confirm that the requested trade is in conformity with such policies. **Signature of Employee**	**Date**

FOR LEGAL DEPARTMENT USE ONLY

Approval Granted: Yes/No By:_____ Name:	Date

[1] ***Transactions involving mutual funds, index funds or exchange traded funds or the purchase or sale of securities of a listed company with a market capitalization ≥ US $5.0 billion are not required to be pre-approved.***