

## **Supplement to the Code of Business Conduct and Ethics Regarding Improper or Questionable Payments**

SS&C Technologies, Inc. and its affiliates (collectively, “SS&C”) expects its employees to comply with the laws of the United States and other locally applicable laws and to maintain the highest ethical standards of business conduct. The Code of Business Conduct and Ethics (“Code”) applies both to employees working in the United States and in all foreign countries. This supplement to the Code (“Supplement”) emphasizes and clarifies aspects of the Code that have particular relevance to issues arising under the U.S. Foreign Corrupt Practices Act (“FCPA”) -- an antibribery and record keeping statute that applies to SS&C and its officers and employees worldwide.

- 1. Payments to Government Officials or Customer and Supplier Employees.** No employee of SS&C shall make (or countenance) any payment to secure, maintain, or direct business, or for any other purpose, to any government official or to any employee of a customer or supplier. For these purposes, “government official” includes the employee of any government owned or controlled entity or any public international organization, any political party or party official, or any candidate for public office. Securing, maintaining, or directing “business” can include securing government licenses and permits. Payments made indirectly through a third party are also prohibited.
- 2. Cash and Third Country Payments.** To avoid even the appearance of impropriety, no payments to any third party shall be made in cash other than documented petty cash disbursements. No corporate checks shall be written to “cash,” “bearer,” or third party designees of the party entitled to payment. No payments shall be made outside the country of residence of the recipient without the prior written approval of the Chief Financial Officer.
- 3. Consultants, Agents, and Representatives.** No employee of SS&C may retain a consultant, agent, or representative until sufficient due diligence has been performed to enable the employee to conclude with reasonable assurance that the consultant, agent, or representative understands and will fully abide by the FCPA and SS&C’s Code. SS&C must have a written agreement with each of its consultants, agents, or representatives, and the agreement must specifically bind the consultant, agent, or representative to comply with SS&C’s Code and to comply with the FCPA as if it directly applied to him.
- 4. Business Entertainment, Gifts, and Travel Expenses.** Employees must exercise good judgment and moderation in entertaining and offering gratuities to customers. When widely accepted, customarily practiced, consistent with customer policies, and permissible under local law, employees may entertain or make gifts of nominal value to employees of non-governmental customers or pay bona fide travel expenses directly related to the promotion or performance of SS&C’s services. Without prior written approval of the

General Counsel, no entertainment or gifts may be offered, or travel expenses paid, to any government official (as defined above).

5. **Books and Records.** Employees must help to ensure that corporate books and records (which include virtually all forms of business documentation) accurately and fairly reflect, in reasonable detail, all transactions and dispositions of assets. No undisclosed or unrecorded fund or asset may be established or maintained for any purpose. No employee shall participate in falsifying any accounting or other business record, and all employees must respond fully and truthfully to any questions from SS&C's internal or independent auditors.
6. **Compliance.** Failure to comply with the Code will be grounds for termination or other disciplinary action. Designated personnel will be asked to certify annually that they have read the Code and this Supplement and have complied with its provisions. Any employee with questions about these policies or information concerning possible violations should contact the Chief Financial Officer or the General Counsel.