



Sequoia Economic Infrastructure Income Fund Limited **("SEQI" or the "Company")**

Policy on Anti-Bribery and Corruption

The Board of the Company recognises the requirements under the Bribery Act 2010 and is committed to conducting all business affairs in an honest and ethical manner, taking a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

The Company is structured as an investment fund and does not have any direct employees and therefore the application of the Bribery Act is of greater relevance to the companies in SEQI's supply chain and to the Company's Investment Adviser, Sequoia Investment Management Company Limited ("**SIMCo**"). SIMCo operates its business and its investment activities in accordance with the UN Global Compact which includes a commitment to work against corruption in all its forms, including extortion and bribery.

Internal policies are maintained by SIMCo and each of the Company's other key service providers, namely Apex Fund and Corporate Services (Guernsey) Limited, Jefferies International, JPMorgan Cazenove and FundRock Management Company (Guernsey) Limited on the prevention of bribery and corruption and the relevant approach taken by each provider.

In March 2016 the following was minuted and in each subsequent year the Board is asked to consider and reconfirm whether the position remains accurate:

IT WAS RESOLVED to adopt the following policy:

1. Any benefit, other than modest corporate hospitality, offered to any Director should be reported to the other Directors immediately;
2. The Board considered it appropriate to record formally its zero tolerance of bribery; and
3. The Board considered that the Company itself was unlikely to commit any such acts as its activities are conducted on its behalf by its key service providers, each having its own policy in place in relation to the prevention of bribery and corruption.

Last reviewed and readopted: 4 March 2025