



## Policy on Reporting of Concerns (“Whistleblower Policy”)

The Audit Committee of the Board of Directors of Artisan Partners Asset Management Inc. has adopted this policy on the reporting of concerns to provide the means for employees, officers, directors, and other interested parties (e.g. independent contractors) to report good faith concerns they may have regarding inappropriate conduct. Artisan Partners encourages employees and others to raise concerns, no matter whom such concerns involve, without fear of retaliation. We fully support ethical conduct, compliance with applicable laws, and transparency and accountability in business practices.

### **I. Scope of Matters Covered**

You should report good faith concerns regarding any of the following matters:

- Suspected violations of law or fraudulent activities
- Questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information
- Suspected violations of our policies, including our Code of Business Conduct and Code of Ethics and Insider Trading Policy

### **II. Reporting of Concerns**

You may report good faith concerns in one of the following ways:

- To the Chief Legal Officer
- Via the Company’s secure reporting system hosted by EthicsPoint, an independent third-party service provider, through which you may choose to remain anonymous. The EthicsPoint reporting system is available 24-hours a day and can be accessed online.

We provide for the above reporting mechanisms so that we can be made aware of any suspected wrongdoings and address them as quickly as possible. However, nothing in this policy is intended to prevent you from reporting concerns in any other manner, including, for example, to federal or state law enforcement agencies.

### **III. Handling of Reported Concerns**

The Chief Legal Officer will promptly review all reported concerns to determine the appropriate course of action. The specific action taken in a particular case depends on the nature of the concern.

Reported concerns relating to accounting, internal accounting controls and other auditing or financial matters will be communicated to the Audit Committee at the next meeting of the committee (or more promptly, as appropriate), who shall direct and oversee an investigation as it determines to be appropriate. The Audit Committee may also delegate the oversight and investigation of such reports to management or outside advisors, as appropriate.

Reports regarding all other matters will be reviewed under the direction of the Chief Legal Officer, who will forward them to the appropriate person or department for investigation, unless the Chief Legal Officer determines that other treatment is necessary. The Chief Legal Officer may refer any report to the Audit Committee or the Board for consultation or oversight.

On a quarterly basis, the Chief Legal Officer will provide the Audit Committee with an update on the status of any reports previously brought to the attention of the committee. Upon the conclusion of the investigation of any report, prompt and appropriate action will be taken as warranted.

Any reporting person who knowingly and intentionally files a false report or provides false or misleading information in connection with an investigation of a report may face disciplinary action or other legal action.

#### **IV. Confidentiality**

Information regarding all concerns reported pursuant to this policy will be treated confidentially to the maximum extent possible consistent with applicable law and Artisan Partners' obligation to conduct thorough investigations. To the extent practical and appropriate, we will advise reporting persons on the status of their report. However, due to confidentiality and other obligations, there will be times when we cannot provide details regarding corrective or disciplinary action taken.

#### **V. Anti-Retaliation**

Artisan Partners strictly prohibits and does not tolerate any retaliation against a reporting person for reporting a good faith concern pursuant to this policy or for otherwise cooperating in an investigation of a reported concern. Artisan Partners considers retaliation to be a violation of our policy, which will result in disciplinary action, up to and including termination of employment.