



# ARTISAN PARTNERS

## Artisan Partners Modern Slavery Statement

### Structure and Business

Founded in 1994, Artisan Partners is a global investment management firm headquartered in Milwaukee, Wisconsin, focused on providing value added, active investment strategies to sophisticated clients globally. Our autonomous investment teams manage a broad range of U.S., non-U.S. and global investment strategies that are diversified by asset class, market cap and investment style.

In this statement, references to 'Artisan Partners', 'we' or 'us' mean Artisan Partners Asset Management and any of its subsidiaries.

Artisan Partners' primary offices are in Atlanta, Chicago, Denver, Dublin, London, Milwaukee, New York, San Francisco, Singapore, Stockholm, Sydney and Wilmington. Legal and regulatory requirements around the prevention of modern slavery and human trafficking are present in many of the jurisdictions in which Artisan Partners operates, and as an organization, Artisan Partners acknowledges its responsibility to prevent modern slavery and human trafficking.

As an organization operating globally, Artisan Partners seeks transparency within its own organization and from suppliers of goods and services it contracts with in relation to the prevention of modern slavery and human trafficking. For the purposes of this statement, Artisan Partners considers 'supply chains' to be the independent contractors, agents, vendors and service providers with whom we contract and interact.

Generally, Artisan Partners deals with persons that are: (i) regulated (either within the financial sector or other sectors); (ii) reputable and well established; (iii) based in jurisdictions which have a low risk of modern slavery; or (iv) are often themselves subject to anti-slavery legislation or commercial standards. Therefore, given the nature of the services we offer, we believe the risk of modern slavery or human trafficking in our business and its supply chain is low.

### Related Policies and Processes

We do not tolerate modern slavery, forced labor or human trafficking in any form. We are committed to acting ethically and with integrity, and our commitment to our fiduciary responsibility means we expect all employees' actions, client interactions, business relationships and other activities of the firm to be conducted with the highest levels of ethical standards. Relevant policies and procedures include:

#### **Code of Ethics**

The Artisan Partners Code of Ethics and other internal policies reflect the organization's commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls, which among other things, should help prevent modern slavery.

Where it occurs in the world, modern slavery can also involve financial crime offences. Artisan Partners has several policies and procedures in place designed to identify and prevent financial crime generally and specifically for the purpose of preventing and detecting money laundering, terrorist financing, breach of sanctions, fraud, bribery and corruption.

#### **Whistleblower Hotline**

This service allows our employees to report to a member of senior management a violation of the Code of Ethics or other wrongdoing or breach of law or regulation. The whistleblower hotline provides a confidential phone number and online submission form to report concerns in a confidential manner.

### Due Diligence Processes for Modern Slavery and Human Trafficking

Our approach to preventing modern slavery is designed to be proportionate to the modern slavery risks we face, recognizing risks can vary according to the businesses, jurisdictions, sectors, suppliers and other factors involved.

As part of Artisan Partners' initiative to identify and reduce the risk of modern slavery and human trafficking occurring within its supply chain, we have adopted the following due diligence procedures:

- Artisan Partners maintains a Service Provider Oversight Committee which includes representation from senior management and which considers the due diligence process in light of, among other things, modern slavery and human trafficking requirements.
- Artisan Partners has built and maintains long standing relationships with its third-party service providers and suppliers and requires such providers and suppliers to comply with all applicable laws, including applicable modern slavery and human trafficking regulations and laws.
- Artisan Partners is regulated by various regulatory agencies across the world and is therefore required to have appropriate systems and controls in place to operate a well-managed business.
- Artisan Partners carries out initial and ongoing due diligence of the third parties with which we enter into agreements for goods and services. We believe this due diligence provides us with the necessary operational understanding of such third parties.

### Training

Artisan Partners maintains a broad compliance training program that includes annual training for every associate at the firm addressing the legal and regulatory requirements under which the firm operates. Where relevant, training includes the concepts and commitments outlined in this Modern Slavery Statement.