



Harassment Prevention Policy

Artisan Partners is committed to providing a professional and civil work environment for its employees. All employees, regardless of title or seniority, are responsible for treating all individuals with respect, courtesy and fairness. Verbal and physical bullying and other disrespectful conduct, while not illegal, is not condoned by the firm. If you believe your job performance is being adversely affected by any such conduct, you are encouraged to either address the situation informally or report the matter as described below.

In accordance with applicable law, the firm strictly prohibits harassment and/or discrimination by any employee, client or vendor representative, whether directed at an applicant, employee, client, vendor representative or person providing services pursuant to contract because of that person's age, ancestry, citizenship, color, physical or mental disability, gender or sex, gender identity or expression, genetic information, marital or partnership status, race, medical condition (including cancer or genetic condition), military and/or veteran status, national or familial origin, pregnancy, childbirth or related condition such as lactation, religion or creed, sexual orientation, caregiver status, credit history, status as a victim of sexual assault, domestic violence, or stalking, unemployment status, certain arrest or conviction records, or other characteristic protected by federal, state or local law. The firm further prohibits harassment or discrimination based on the perception that a person has or is associated with a person who has any of these characteristics. The firm is committed to taking all reasonable steps to prevent harassment and discrimination from occurring, including by providing training on the prevention of workplace harassment and bullying.

Sexual Harassment

Sexual harassment means any harassment based on someone's sex or gender (including sexual orientation and gender identity and expression). It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when any of the following is true:

- Submission to such conduct is explicitly or implicitly made a term or condition of employment.
- Submission to or rejection of such conduct is used as a basis for employment decisions.
- Such conduct has the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile or offensive work environment, even if the complaining individual is not the intended target of the harassment.

Sexual harassment can occur between any individuals, regardless of their sex or gender and does not need to be motivated by sexual desire. This definition includes many forms of offensive behavior.

Artisan Partners will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal (for example, epithets, derogatory statements, slurs, sexually-related comments or jokes, suggestive or obscene letters or emails, unwelcome sexual advances or requests for sexual favors)
- Physical (for example, assault, inappropriate physical contact, or impeding or blocking movements)
- Visual (for example, displaying sexually suggestive objects or pictures, leering, or making sexual gestures)

The above list is illustrative only. No form of sexual harassment will be tolerated.

The firm recognizes that intimate relationships may develop between employees. Although such consensual relationships are a personal choice and should remain private between the employees involved, the firm requires that the parties must promptly disclose a relationship to Human Capital if (i) a reporting or supervisory relationship between the employees exists, or (ii) a relationship presents an actual, potential or perceived conflict of interest. The firm, at its discretion, will determine what action is appropriate under the circumstances.

Other Kinds of Harassment

This policy applies equally to other unlawful harassment based on age, ancestry, citizenship, color, physical or mental disability, genetic information, marital status, race, medical condition (including cancer or genetic condition), military and/or veteran status, national origin, pregnancy or related condition such as lactation,



ARTISAN PARTNERS

religion or creed, and any other characteristic protected by federal, state, or local law. Similar to sexual harassment, harassment may be:

- Verbal and written statements, including jokes, threats, derogatory comments or slurs
- Physical conduct, including assault or other inappropriate contact
- Visual conduct, including derogatory posters, photos, cartoons, drawings or gestures

Reporting Procedures

If you experience or witness behavior that violates this policy, you are encouraged to tell the individual involved that his or her conduct is unwanted and unacceptable. The firm encourages employees to attempt informal resolutions to conflicts when possible and to find mutually satisfying and respectful solutions. However, if an informal approach is unsuccessful or if you are uncomfortable engaging with the individual in an informal manner, you should promptly report the conduct by making a formal complaint.

Formal complaints should be as detailed as possible and include specific information about the incident or incidents, the names of the individuals involved and the names of any witnesses. Reports can be made orally or in writing (see attached complaint form) and should be directed to your direct manager or to a Human Capital Manager. You may also report your concerns using the firm's secure reporting system hosted by EthicsPoint, through which you may choose to remain anonymous. The EthicsPoint reporting system is available 24-hours a day and can be accessed online.

Manager Responsibilities

Managers are obligated to bring immediately to the attention of an appropriate Human Capital Manager any allegations that become known, either directly or indirectly, involving conduct that violates this policy. Any management personnel who observed, witnessed, or otherwise knew about such conduct and took no action to stop it or failed to report it may be subject to discipline, up to and including termination.

Investigation and Determination

The firm takes all complaints of harassment seriously. Upon receipt of a complaint the firm will promptly undertake a fair, thorough and objective investigation in a manner that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. The firm expects all employees to fully cooperate with any investigation conducted by the firm into a complaint under this policy. The investigation will be managed as confidentially as possible, consistent with conducting a fair and thorough investigation.

While the process varies from case to case, investigations may include:

- Interviews of parties involved, including any relevant witnesses
- Reviews of documents, emails, instant messages and phone records relevant to the complaint
- Documentation of the investigation process and the final determination

Once an investigation is completed and a determination is made, the complaining party will be advised that the investigation has concluded. If the firm determines that prohibited activity has occurred, it will take appropriate remedial action commensurate with the severity of the offense.

Any employee found to have engaged in behavior in violation of this policy will be subject to disciplinary action up to and including termination of employment. The disciplinary action taken in a particular case will be at the discretion of the firm and will depend on the facts and circumstances of the specific incident or incidents. A client, visitor, vendor or other non-employee who subjects an employee to inappropriate conduct or harassment in the workplace will be informed of the firm's policy and appropriate action will be taken. In cases of harassment or discrimination by customers, vendors or other persons not employed by the firm, the firm will take corrective action within its reasonable control after consultation with the appropriate managerial personnel and appropriate action will also be taken to deter any future harassment.

The firm does not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of an employee's duties. Accordingly, to the extent permitted by law, the firm reserves the right not to provide a defense or pay damages assessed against an employee for conduct in violation of this policy.



ARTISAN PARTNERS

No Retaliation

It is a violation of this policy and applicable law for any employee or the firm to retaliate against a person in response to the person reporting or filing a complaint of harassment. Further, this policy prohibits retaliation against any employee for testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the firm or by a federal or state enforcement agency relating to the kind of discrimination or harassment covered by this policy. Employees should report any retaliation pursuant to this policy's complaint procedure. Any complaint will be immediately and thoroughly investigated in accordance with the investigation proceeding outlined above. If a report of retaliation is substantiated, appropriate disciplinary action up to and including termination will be taken.

Additional Enforcement

The firm encourages employees to report incidents of harassment internally. However, employees who believe they are the subject of illegal harassment or discrimination may also file a charge of discrimination with the federal Equal Employment Opportunity Commission (EEOC) for violation of federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964. The EEOC can be contacted by visiting www.eeoc.gov, emailing info@eeoc.gov or by telephone at 1.800.669.4000 (TTY 1.800.669.6820).

Employees may also file a complaint with certain state or local agencies that accept and investigate charges of harassment and discrimination.

New York employees may be able to file a complaint alleging a violation of the New York State Human Rights Law either with the Division of Human Rights (DHR) or in New York State Supreme Court. New York employees may also file sexual harassment complaints with the New York City Commission on Human Rights. The DHR may be contacted by visiting www.dhr.ny.gov, by telephone at 718.741.8400, or by mail to One Fordham Plaza, Fourth Floor, Bronx, New York 10458. The New York City Commission on Human Rights may be contacted by visiting www.NYC.gov/Human Rights or by telephone at 718.722.7131.

California employees may file a complaint of discrimination with the Department of Fair Employment and Housing (DFEH). If the DFEH finds sufficient evidence to establish that discrimination occurred and settlement efforts fail, the Department may file a lawsuit on behalf of the complaining party. If a court finds that discrimination has occurred, it can order remedies including: (i) fines or damages for emotional distress from each employer or person found to have violated the law; (ii) hiring or reinstatement; (iii) back pay or promotion; (iv) changes in employer policies or practices. Employees can also pursue the matter through a private lawsuit in civil court after a complaint has been filed with the DFEH and a right-to-sue notice has been issued. DFEH can be contacted toll free at (800) 884-1684 or at <http://www.dfeh.ca.gov/>.

Filing deadlines for these and other relevant state and local agencies may vary.