



ARTISAN PARTNERS

Artisan Partners Modern Slavery Statement

Artisan Partners is a global investment management firm, focused on providing value-added, active investment strategies to sophisticated clients. Artisan Partners is committed to conducting business according to the highest standards of honesty and fairness. The commitment to observing such ethical standards is designed, not only to ensure compliance with applicable laws and regulations in the various jurisdictions where Artisan Partners operates, but also to earn and keep the continued trust of its clients, shareholders, associates and business partners.

Structure and Business

Artisan Partners maintains offices in a number of locations globally. 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.

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.

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 Conduct and Ethics

The Artisan Partners Code of Business Conduct, 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.

Harassment Policy

The Artisan Partners Harassment Policy outlines our commitment to prohibiting harassment in the workplace. The expectation is that all associates show respect for their colleagues, clients and business partners. In addition, any harassment of associates by a third party will not be tolerated.

Equal Opportunities Policy

It is the policy of Artisan Partners to provide equal employment and career development opportunities, including, but not limited to, recruitment, selection, training programs, promotion and compensation. All Artisan Partners associates are expected to comply fully with our policy and are prohibited from engaging

in unlawful discrimination. Artisan Partners is committed to enforcing this policy against all forms of discrimination.

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, that undertakes an assessment and due diligence on service providers that perform or provide services that are integral to the investment management services provided by Artisan Partners. As part of this assessment, Artisan Partners may consider, among other things, modern slavery and human trafficking requirements that applies to third parties
- 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, which may include 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 as needed of third parties with which we enter into agreements for goods and services, including those monitored by the Service Provider Oversight Committee. We believe this due diligence provides us with the necessary operational understanding of such third parties.

Training and Awareness

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, awareness training is provided to those associates that are instrumental in the oversight of service providers and procurement to ensure that Artisan Partners engages with responsible suppliers.