



ARTISAN PARTNERS

UK Stewardship Code (2020) Disclosure Statement

Artisan Partners Asset Management (together with its affiliated companies, “Artisan Partners” or the “group”) is a global independent asset manager, focused on providing value-added, active investment strategies to sophisticated clients. Artisan Partners is Milwaukee-based and carries on business in the UK through its UK affiliates including Artisan Partners UK LLP (“Artisan UK”). This statement is published on behalf of Artisan UK, which is authorised and regulated by the Financial Conduct Authority (“FCA”).

Under rule 2.2.3 of the FCA’s Conduct of Business Sourcebook, as an authorised firm, Artisan UK is required to disclose clearly on its website statements detailing the nature of its commitment to the UK Financial Reporting Council’s Stewardship Code (the “Code”) or, where it does not commit to the Code, their alternative strategy.

The Code is a voluntary code and sets out a number of areas of good practice to which the Financial Reporting Council believes assets owners and asset managers should aspire, and in particular to encourage the institutional investment community to engage more actively in stewardship of the assets in which they invest.

Currently, Artisan UK does not provide investment management or advisory services. Thus, whilst Artisan UK generally supports the objectives that underlie the Code, the provisions of the Code are not considered to be relevant to the activities currently undertaken by Artisan UK. If Artisan UK’s activities change in such a manner that the provisions of the Code become relevant, Artisan UK will amend this disclosure accordingly.

In carrying on all investment activities, Artisan Partners, as a global business, takes its fiduciary responsibilities seriously and has implemented initiatives and policies that indicate its commitment to making decisions in the best interests of our clients.

- Artisan Partners maintains a [Responsible Investment Policy](#) that is publicly available.
- The [Artisan Partners Proxy Voting Policy](#) outlines to clients and prospects how Artisan Partners will vote on securities for which it has been delegated voting authority. Artisan Partners’ proxy voting committee oversees the proxy voting process, reviews the proxy voting policy at least annually, develops the guidelines, grants authority to certain associates or services to vote proxies in accordance with the guidelines and otherwise perform administrative services relating to proxy voting and, with respect to each matter with which Artisan Partners may be deemed to have a conflict and/or for which the guidelines do not specify a particular vote or for which an investment team recommends a vote that is not consistent with the guidelines, makes determinations as to the votes to be cast.
- Artisan Partners has a written [Code of Ethics and Insider Trading Policy](#) that governs the personal securities transactions of Artisan Partners’ associates. The Code generally provides that such persons may not take personal advantage of any information they may have concerning Artisan Partners’ current investment program. The Code requires pre-approval of most personal transactions in securities, restricts the ability of Artisan Partners associates to invest in IPOs or private placements, and prohibits profiting from most short-term trading.

Further information on Artisan Partners policies and guidelines are available on its websites:

[Artisan Partners | United Kingdom: https://www.artisanpartners.com/global/gbr.html](https://www.artisanpartners.com/global/gbr.html)

[Artisan Partners: https://www.artisanpartners.com/sustainability-esg/home.html](https://www.artisanpartners.com/sustainability-esg/home.html)