



ARTISAN PARTNERS

Anti-Corruption and Bribery Policy

The Anti-Corruption and Bribery Policy applies to all employees and contractors (collectively, associates) of Artisan Partners Limited Partnership and its affiliates (collectively, Artisan Partners or the Firm)

It is the policy of Artisan Partners to conduct business in an honest and ethical manner. The Firm is committed to acting professionally, fairly and with integrity in business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

Artisan Partners will uphold laws relevant to countering bribery and corruption in the jurisdictions in which the Firm conducts business, including without limitation the United Kingdom's Bribery Act (UKBA) and the United States' Foreign Corrupt Practices Act (FCPA).

This Policy should be read in conjunction with the Artisan Partners Gifts and Business Entertainment Policy, the Charitable Donations and Sponsorship Procedures and the Travel and Expenses Policy.

What is Bribery and Corruption?

Corruption is the act of improperly influencing or conducting an existing business, legal or governmental process in a manner that is dishonest, fraudulent or illegal with an intent to gain an advantage or procure some benefit either personally or for someone else. It is typically enabled via a bribe and often involves the use of a public or fiduciary position for private gain.

Bribery is the offering, giving or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. Bribery includes kickbacks - giving a payment to someone who helps facilitate a transaction. It's important to understand that a corrupt act has occurred even if:

- A bribe does not succeed.
- A person authorizes or provides direction for a bribe, but no bribe is ultimately offered or paid.

"Anything of value" includes, but is not limited to:

- Cash, cash equivalents (such as gift certificates/cards), stock, personal property, and assumption or forgiveness of a debt.
- Gifts, meals, entertainment, and travel
- Political contributions whether made directly or indirectly
- Charitable contributions or sponsorships — if made to a charity at the direct request of a government official or private business partner, a contribution could be considered an indirect bribe made in order to obtain or retain business or to secure other improper business advantage.
- Job offers or internship awards—offers to government officials (or their relatives) can present a risk of violating anti-bribery or anti-corruption laws and regulations. Compliance must be consulted prior to making such offers.

Artisan Partners prohibits the giving or receiving of bribes. If you suspect bribery or corruption or an attempt to make or receive a bribe, you must report it to the Global Chief Compliance officer immediately.

Third Parties

The Firm may be liable for failing to detect and prevent bribery by a third party acting on its behalf. A third party includes, but is not limited to distributors, consultants, agents, representatives, subcontractors, and subadvisors, that perform a service on behalf of Artisan Partners.

Third parties representing the Firm are expected to comply with relevant anti-corruption laws. In some jurisdictions, the Firm can be convicted of a criminal offense if it fails to prevent bribery carried out on its behalf by a third party even if Artisan Partners had no actual knowledge of the bribe.

When Artisan Partners seeks to engage a third party, for the purposes of introducing or gaining business, it should, where necessary, undertake due diligence to establish that the third party is bona fide and a legitimate

entity; is qualified to perform services for which it will be retained; and maintains standards consistent with the legal, regulatory, ethical, and reputational standards of the Firm.

Public Officials

A public official is any person who is employed, potentially employed by or is acting in an official capacity for a government, government agency, or a public international organization. A public official includes elected or appointed persons who hold legislative, administrative or judicial positions, such as executive and legislative branch politicians, agency bureaucrats, civil servants, and judges.

Laws and regulations are strict when dealing with public officials because they are in an ideal position to request or receive a bribe and therefore engage in corruption. For example,reasonable corporate hospitality that is acceptable with other business associates might not be allowable when government officials are involved. Please see the Artisan Partners Gifts and Business Entertainment Policy for details.

Gifts and Business Entertainment

This policy does not prohibit normal and appropriate gifts and business entertainment (given and received) to or from third parties, so long as the provision or receipt of such gifts and business entertainment otherwise meets the requirements of the Firm’s Gifts and Business Entertainment Policy.

Facilitation Payments and Kickbacks

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Whilst they may be acceptable in some jurisdictions, the Firm does not make, and will not accept, facilitation payments or "kickbacks" of any kind.

Kickbacks are typically payments made in return for a contract, business favour or advantage. All Associates must avoid activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Firm.

Donations

Artisan Partners only makes charitable donations that are legal and ethical under local laws and practices. All donations must be offered in accordance with the Firm’s Charitable Donations and Sponsorship Procedures and the Travel and Expenses Policy.

Responsible Business Group:	Compliance
Date of Last Revision:	18 December 2024
Applicable to:	APLP and Affiliates