

Anti-Slavery Statement

Pursuant to Section 54(1) of the Modern Slavery Act 2015 (“**MSA 2015**”), this statement is published on behalf of the Artemis Group which includes Artemis Investment Management LLP and Artemis Fund Managers Limited. References to "Artemis", "we", "us", "our" or the "firm" are to these named entities.

Slavery and human trafficking statement

At Artemis we conduct our business ethically and with integrity. We behave responsibly and pay fair remuneration for work done. We are committed to:

- the prevention of modern slavery, in all its forms, both in our business and in our supply chains as part of maintaining our reputation and the confidence of our investors and business partners;
- enforcing effective systems and controls designed to address the risk of slavery and human trafficking; and
- acquiring goods and services without causing harm to others.

We will not do business with suppliers involved in any form of slavery. If you have any concerns or suspicions we should know about then please contact our Chief Risk Officer on 0131 225 7300 or report your concern in accordance with our Whistleblowing policy.

Our business and supply chains

Artemis is a dedicated, active UK-based fund manager, offering a range of funds for both retail and institutional investors which invest in the UK, Europe, the US and around the world. Our clients include large, small and medium sized enterprises, and individuals.

We have offices in Edinburgh and London. Further information about our business can be found on our website.

Our principal third party suppliers are professional services firms providing services to enable us to deliver fund management services to our clients. We also engage with businesses that supply services related to the running of our premises (e.g. cleaning and catering services), IT and technology and stationery and supplies. While we consider the risk of slavery or human trafficking occurring within our business or supply chain to be low, we recognise that particular types of supplier (e.g. those employing lower-wage staff) are likely to present a higher risk of slavery and human trafficking.

Compliance

Since the MSA 2015 came into force, we have built on our existing compliance framework by:

- assessing the risk of modern slavery in our business and our supply chains;
- assessing our approach to such risk;
- holding internal discussions on the matter;
- developing an Anti-slavery Policy (to be approved by the firm's Risk and Compliance Committee on an annual basis); and
- identifying standards (set out below) against which to assess our progress on slavery and human trafficking issues.

Our Anti-slavery Policy reflects our commitment to conducting business ethically and with integrity and to enforcing systems and controls designed to ensure slavery and human trafficking is not taking place in our business or in our supply chains. The Policy applies to all staff and to our suppliers.

Our Anti-slavery Policy builds on Artemis' existing policies covering equal opportunity and diversity, conduct of business, grievances and whistleblowing.

Due diligence in our supply chains

Artemis expects its suppliers to adopt the same high standards that we adhere to and to have robust employment practices. We have considered the risk of modern slavery in our supply chains based on a number of relevant factors. We have taken a risk based approach and, in relation to suppliers that we have identified as higher risk, will inform them of our commitment to complying with the requirements of the MSA 2015 and our responsibility to ensure, as far as possible, that slavery and human trafficking is not occurring in any part of our supply chains.

Training

All members of staff (including new joiners) are provided with our staff handbook which contains our Anti-slavery Policy. In addition, online training on modern slavery and human trafficking is provided to all Artemis staff on an annual basis.

Standards

We will use the following standards to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- all staff have been provided with our Anti-slavery Policy;
- any cases of suspected slavery/trafficking breaches should be reported to the Chief Risk Officer or in accordance with our Whistleblowing policy within a reasonable time of occurring;

- any cases of suspected slavery/trafficking are assessed within a reasonable time of being reported and further investigations concluded as soon as possible thereafter; and
- employees successfully completing online training.

Future steps

Over the course of the next year, we intend to take the following further steps to combat slavery and human trafficking:

- ensure that any new high risk suppliers receive a copy of our Anti-slavery Policy; and
- continue to keep our outsourcing processes under review.

We will continue to monitor the effectiveness of our processes and procedures to prevent modern slavery and human trafficking in our business and our supply chains, and take necessary steps to ensure that they remain appropriate.

This statement is made pursuant to section 54(1) of MSA 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018. The firm's Management Committee is responsible for implementing this Statement. This statement will be reviewed annually and made available on our website.

Approval

This statement is approved on 11 June 2019.

A handwritten signature in black ink, appearing to read 'Mark Murray', written in a cursive style.

Mark Murray
Senior Partner