

# Modern 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 principle 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 Enterprise-wide Risk Management Framework by:

- developing a Modern Slavery Policy (approved by the firm's Executive Committee on an annual basis);
- identifying standards (set out below) against which to assess our progress on slavery and human trafficking issues; and
- integrating consideration of modern slavery and human trafficking in our Third-Party Onboarding and Oversight Framework.

Our Modern 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, to our suppliers, and to our investment activities.

Our Modern 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. These requirements are embedded in our Procurement Policy.

### *Due diligence in our investment activities*

Our consideration of modern slavery extends far beyond our direct operations or our supply chains – the companies in which we invest can have a profound impact on society and we take our responsibilities as investors seriously.

Engagement with companies is an integral part of our investment approach and is one of the means by which we develop our understanding of companies, raise issues with management and monitor subsequent developments. Our engagements will cover a wide range of topics including operational performance, governance issues, transparency and disclosure, industry-specific considerations and environmental and social factors such as modern slavery or human rights abuses.

Our Stewardship team has a key role in advising and supporting our investment managers in their engagement activities. In addition, Artemis' investment managers are also encouraged to use the Modern Slavery Toolkit for Investor Due Diligence published by the Investor Forum. Artemis was a member of the Investor Forum working group that provided input to the development of this toolkit.

### *Training*

All members of staff (including new joiners) have access to our Modern Slavery Policy. In addition, online training on modern slavery and human trafficking is provided to all Artemis staff on a biennial 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 access to our Modern 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
- staff successfully completing online training.

In addition, our approach to modern slavery will be subject to assurance activity in accordance with Artemis' risk-based Risk & Compliance monitoring and Internal Audit plans.

## *Future steps*

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. Over the course of the next year, we intend to take the following actions to build on the steps taken so far:

- continue to keep our Procurement Policy and Third-Party Oversight Onboarding and Oversight Framework under review;
- further embedding consideration of modern slavery and human trafficking in the ongoing oversight of our suppliers;
- assessing the impact of modern slavery and human trafficking as our business expands outside the UK; and
- participating in relevant modern slavery industry initiatives, for example, the Find it, Fix it, Prevent it ("FIFIPI") initiative, which is an investor led, multi stakeholder project involving investors, academics and non-governmental organisations aimed at making the corporate response to modern slavery more effective.

This statement is made pursuant to section 54(1) of MSA 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2023. The firm's Management Committee is responsible for implementing this Statement. This Statement is reviewed annually and made available on our website. It is also available on the website [modernslaveryregistry.com](https://modernslaveryregistry.com).

## *Approval*

This statement is approved on 19 June 2024.



Mark Murray  
Senior Partner