

Modern Slavery Act Statement

Introduction

This statement is made by William Blair International, Ltd (“William Blair” or “we”) pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “Act”) in respect of the financial year ending 31 December 2018.

Our Business

William Blair is the premier global boutique with expertise in investment banking, investment management, and private wealth management. We provide advisory services, strategies, and solutions to meet our clients’ evolving needs. An independent and employee-owned firm, the William Blair group is headquartered in Chicago, and, together with its strategic partners, operates in more than 20 offices and approximately 1,600 employees worldwide.

William Blair & Company, L.L.C.: provides investment banking, asset management for private wealth and institutional clients, institutional sales & trading, equity research and corporate & executive services. William Blair & Company, L.L.C. is registered with the U.S. Securities & Exchange Commission (SEC) and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Registration with the SEC does not imply a certain level of skill or training. As of June 30, 2019, William Blair & Company, L.L.C. had approximately \$41 billion in client assets, of which approximately \$32 billion constitutes regulatory assets under management (including almost \$8 billion of non-discretionary assets).

William Blair Investment Management, LLC: provides asset management services to institutional clients including the William Blair Funds. William Blair Investment Management, LLC is registered with the SEC and the U.S. Commodity Futures Trading Commission (CFTC) and is a member of the National Futures Association (NFA). Registration with the SEC and CFTC does not imply a certain level of skill or training. As of June 30, 2019, William Blair Investment Management, LLC had regulatory assets under management of approximately \$56 billion.

William Blair International, Ltd: primarily provides investment banking, asset management and institutional sales & trading services to professional clients. William Blair International, Ltd is a BIPRU permitted firm authorised and regulated by the Financial Conduct Authority (FCA).

For more information about our business, please see our [website](#).

The William Blair group is committed to acting according to the highest standards of ethical behaviour in our business activities and to ensuring that there are no instances of modern slavery or human trafficking in any part of our operations or supply chain. We seek to work with suppliers who meet the same strict standards and who share our values.

Risk Assessment and Policies

William Blair is committed to upholding and promoting human rights in the conduct of our business. We operate a Code of Business Conduct which outlines the rules to which we hold ourselves accountable; namely, the highest standards of honesty, integrity and professionalism. Our employees are required to adhere to the code in every transaction and in every business relationship. Employees have access to the whistle-blowing procedures to report or raise any concerns, warnings, or suspected unethical behaviour including in respect of slavery or human trafficking. We are committed to respecting the human rights of our employees through a number of related policies and procedures, such as our dedication to build an inclusive workplace through a diversity of skills, capabilities and experiences. We aim to provide a rewarding work environment in which people are valued and respected.

We recognise our responsibility to ensure that our suppliers have fair and ethical labour practices. William Blair has a limited supply chain, given the nature of our business. The vast majority of William Blair's suppliers are UK-based professional service firms, office space providers, office supplies providers, financial and related data suppliers, recruitment agents and telecommunications hardware and software providers. We therefore consider that the risk of modern slavery and human trafficking within our supply chain is low but nevertheless shall keep this under review on a periodic basis.

Awareness

William Blair's employee handbook and Compliance Manual specifically informs employees of William Blair International, Ltd of the Modern Slavery Act and our zero tolerance approach to any instance of modern slavery and human trafficking. Our staff periodically attest to compliance with the Manuals.

Ongoing Commitment

We will continue to review the steps we are taking to combat modern slavery and human trafficking in our business and supply chains including training for areas where procurement or supply chains exist. We will make improvements to our policies and practices necessary to eradicate modern slavery and human trafficking from our business and our supply chains.

This statement is made voluntarily in accordance with Section 54(1) of the Modern Slavery Act 2015 and has been signed by Arthur Simon on behalf of the Board of Directors.



Arthur Simon, Director

General Counsel