

# Janus Henderson Group plc Vendor Code of Conduct

Last Review Date: September 2021

## Contents

1.1	Policy Statement.....	1
1.2	Expectations .....	1
1.3	Breaches of Code of Conduct .....	2
1.4	Document Control.....	2

## Janus Henderson Vendor Code of Conduct

### 1.1 Policy Statement

The Janus Henderson Group plc (“Janus Henderson”) and its subsidiary entities Vendor Code of Conduct outlines Janus Henderson’s expectations on how its vendors execute business operations. Janus Henderson is committed to acting ethically in all aspects of its business and to maintaining the highest standards of honesty and integrity and expects that all vendors providing services act with the same standards. Janus Henderson expects its suppliers, and their subsidiaries, affiliates, employees, agents and subcontractors, to operate in accordance with this Vendor Code of Conduct and establish and implement appropriate policies and procedures to ensure they do so.

The Vendor Code of Conduct applies globally to all vendors providing services to Janus Henderson. For the purpose of this statement a vendor is defined as any external business entity or organization that provides services or products to Janus Henderson for the benefit of the company.

The Global Procurement team can answer any vendor questions or concerns related to this document.

### 1.2 Expectations

Listed below are the Vendor Code of Conduct expectations of all Janus Henderson vendors.

- All vendors must take responsibility for ensuring they are aware of the requirements of this Vendor Code of Conduct.
- Vendors recognise Janus Henderson obligations to all who have a stake in our success including share owners, clients, staff and suppliers.
- Information about Janus Henderson business shall be communicated clearly and accurately in a non-discriminatory manner and in accordance with local regulations.
- Vendor will treat all information relating to Janus Henderson’s business, or to its clients, as confidential. In particular, “insider trading” is expressly prohibited and confidential information must not be used for personal gain.
- Vendor select and promote employees on the basis of their qualifications and merit, without discrimination or concern for race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age or disability;
- Vendor has policies or processes in place that create a safe and civilised workplace; Vendor will not tolerate sexual harassment, discrimination, or offensive behaviour of any kind, which includes the persistent demeaning of individuals through words or actions, the display or distribution of offensive material, or the use or possession of weapons on the vendor premises.
- Vendors has policies or procedures that prohibit the use, possession or distribution of illegal drugs, or employees reporting for work under the influence of drugs or alcohol.
- Vendors are committed to protecting JHG and other consumer, client and employee data in accordance with national laws and industry codes.
- Vendors will not knowingly create work which contains statements, suggestions or images offensive to general public decency and will give appropriate consideration to the impact of our work on minority segments of the population, whether that minority be by race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age or disability.

## Janus Henderson Vendor Code of Conduct

- Vendor does not undertake work, which is intended or designed to mislead, including in relation to social, environmental, and human rights issues.
- Vendor has policies or procedures in place that prohibit offer or accept bribes, whether in cash or otherwise, to or from any third party, including but not restricted to government officials, clients and brokers or their representatives.
- Vendor will not offer any items of personal inducement to secure business. This is not intended to prohibit appropriate entertainment or the making of occasional gifts of minor value unless the client has a policy which restricts this.
- Vendor will have policies or procedures in place that prohibit personal or family conflicts of interest within your businesses or with your suppliers or other third parties with whom you do business.
- Vendor has policies or procedures in place that prohibit the following without the prior written approval of an oversight body: corporate contributions of any kind, including the provision of services or materials for less than the market value, may be made to politicians, political parties or action committees.
- Vendor has policies or procedures that outline desire to make a positive contribution to society and the environment by maintaining high standards of marketing ethics; respecting human rights; respecting the environment; supporting community organisations; supporting employee development; and managing significant corporate responsibility risks in your supply chain.

### 1.3 Breaches of Code of Conduct

Janus Henderson takes violations of this Policy seriously and expects its vendors to act quickly to implement appropriate corrective actions. Janus Henderson may choose to discontinue its relationship with vendors not complying with expectations outlined in this document.

### 1.4 Document Control

Policy Owner	Chris Desiato
Author	
Committee Approval	
Date Last Reviewed	September 2021
Due Date for Next Review	September 2022