

Modern Slavery and Human Trafficking Statement **Financial year ending 31 December 2019**

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps Janus Henderson Investors (the “Group”) has taken during its previous financial year to ensure that slavery or human trafficking is not taking place in its business or supply chains.

About Janus Henderson Investors

The Group was formed in 2017 following the merger between Janus Capital Group Inc. and Henderson Group plc. The Group includes, for the purposes of this statement: Henderson Global Investors Limited, Henderson Investment Funds Limited and Janus Capital International Limited. We are an independent asset manager, specialising in active management.

The Group has investment teams situated around the world and we serve intermediary, institutional and individual investors globally. As at 31 December 2019, we have approximately US\$374.8bn in assets under management, more than 2,000 employees and offices in 27 cities worldwide. Headquartered in London, we are dual listed on the New York Stock Exchange and the Australian Securities Exchange.

The Group is governed by a global management team who strive to ensure that all its offices worldwide work together to achieve the same goals and ethical commitments.

Efforts to combat Modern Slavery and Human Trafficking

The Group is committed to maintaining a strong corporate culture employing high standards of integrity and fair dealing in the conduct of the Group’s activities, compliance with both the letter and the spirit of relevant laws and regulations, and standards of good market practice in all jurisdictions where the Group’s business is carried out.

As a regulated investment management company, primarily operating in major financial centres, we believe the likelihood of modern slavery existing within our own organisation or supply chain to be very low. Policies and processes have been implemented and our approach is designed to be proportionate to the risks identified and will be supported by the existing anti-bribery and corruption due diligence work which is undertaken by our Compliance function.

Our People

Janus Henderson is committed to supporting the wellbeing of our employees and those directly engaged in our operations. There are various measures in place to safeguard against human trafficking or individuals being forced to work against their will.

- Our Core Values set out the manner in which we behave as an organisation and how we expect our employees to act.
- We operate a robust recruitment policy, conducting pre-employment checks including references and the right to work in the respective location.
- To ensure our employees are aware of the safeguarding processes in place we provide a comprehensive induction for new starters, and each employee has access to a dedicated HR Business Partner for their area.
- The Employee Handbook sets out all our core employment practices and escalation channels should employees feel mistreated, and all policies are available on the company intranet.

Janus Henderson Investors

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- Our whistleblowing policy ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain without fear of reprisals.
- An employee engagement survey is also undertaken each year to offer employees the opportunity to provide feedback on an anonymous basis.
- In the UK, we subscribe to The Living Wage Foundation which demonstrates our commitment to paying higher rates of base pay. It provides a benchmark for responsible employers who choose to pay their employees a rate that meets the basic cost of living in the UK and London.

Our Supply Chain

The Group operates relatively simple supply chains, predominantly comprising business and professional services organisations and have minimal contact with the countries and sectors that are generally considered to have a risk of modern slavery. Throughout the last financial year, we have continued to take a risk-based approach to addressing matters of modern slavery and human trafficking within our supply chain. These measures include:

- Providing suppliers with a copy of our Modern Slavery and Human Trafficking Policy which sets out the high ethical standards we expect our suppliers to adhere to.
- Conducting due diligence on our suppliers based on the region of operation and goods or services provided to ensure they operate fair employment practices.
- Requiring our suppliers to comply with all applicable law and regulations and where applicable, including anti-slavery and human trafficking provisions in our contractual arrangements with relevant suppliers.
- Ensuring relevant departments within the Group receive Ethical Sourcing training to raise awareness and learn how to identify and address any incidents of non-compliance.

The Group remains committed to working with its suppliers to provide support and guidance when implementing anti-slavery policies. To demonstrate this, an enhanced Supplier Code of Conduct that includes our Modern Slavery and Human Trafficking Policy was implemented in 2019 to further raise awareness with our suppliers.

Our Investments

The Group is committed to the principles of good stewardship and responsible investment, and to being a positive influence on the companies we invest in. This includes consideration of the risk of human rights violations such as slavery and child labour in company supply chains.

This statement has been approved by the Boards of Henderson Global Investors Limited, Henderson Investment Funds Limited and Janus Capital International Limited. It constitutes the Group's Modern Slavery Statement for the financial year ending 31 December 2019 and will be reviewed and updated annually.



Roger Thompson
Chief Financial Officer

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