



**KNOWLEDGE.
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Vendor Code of Conduct Policy

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Vendor Code of Conduct Policy

Janus Henderson Group plc (the “Group”) and its companies operate in many markets and countries throughout the world. In all instances, we respect national laws and any other laws with an international reach, such as the UK Bribery Act and the US Foreign Corrupt Practices Act, where relevant, and industry codes of conduct. We are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity.

We, the officers and staff of all companies in the Group, recognise our obligations to all who have a stake in our success including share owners, clients, staff and suppliers;	You confirm that you recognise our obligations and will not act detrimentally to these obligations.
Information about our business shall be communicated clearly and accurately in a non-discriminatory manner and in accordance with local regulations;	You confirm that you will treat information about the Group as described.
We select and promote our people 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;	You confirm that you have equivalent policies in your organisation.
We believe that a workplace should be safe and civilised; we 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 Group or client premises;	You confirm that you have equivalent policies in your organisation and that you will respect our workplace and people as described.
We will not tolerate the use, possession or distribution of illegal drugs, or our people reporting for work under the influence of drugs or alcohol;	You confirm that you have equivalent policies in your organisation and that you will respect our workplace and people as described.
We will treat all information relating to the Group’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;	You confirm that you agree to our policy in respect of our information.
We are committed to protecting consumer, client and employee data in accordance with national laws and industry codes;	You confirm that you have equivalent commitments in your organisation that cover all information from and relating to our business and that of our partners in that business.
We 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;	Wherever relevant, you confirm that you have equivalent standards for your work.
We will not undertake work which is intended or designed to mislead, including in relation to social, environmental and human rights issues;	Wherever relevant, you confirm that you have equivalent standards for your work.
We will consider the potential for clients or work to damage the Group’s reputation prior to taking them on. This includes reputational damage from association with clients that participate in activities that contribute to the abuse of human rights;	This relates only to members of the Group.
We will not for personal or family gain directly or indirectly engage in any activity which competes with companies within the Group or with our obligations to any such company;	This relates only to members of the Group.
We will not give, 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. We will collectively ensure that all staff understand this policy through training, communication and by example;	This applies directly to you.
We 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;	This applies directly to you.

Global Procurement Policy

We will not accept for our personal benefit goods or services of more than nominal value from suppliers, potential suppliers or other third parties;	This applies directly to you.
We will not have any personal or family conflicts of interest within our businesses or with our suppliers or other third parties with whom we do business;	You should have equivalent policies in your organisation.
No 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, without the prior written approval of the Group board; and	You should have your own policy regarding such contributions, together with appropriate authorisation procedures.
We will continue to strive 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 our supply chain. Our Corporate Responsibility Policy provides more detail about our commitments in these areas.	You should have equivalent policies in your organisation.

Document Control

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Author	
Committee Approval	
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