

ANNUAL BEST EXECUTION DISCLOSURE 2020

Henderson Global Investors Limited (HGIL)

April 2021



On an annual basis HGIL is required to provide additional disclosures around the execution venues and counterparties utilised for each asset class and certain information on the quality of execution in line with the requirements of Regulatory Technical Standard 28 (RTS 28) and Article 65(6) of the MiFID II regulation. RTS 28 requires HGIL to disclose the top 5 venues HGIL has executed on per asset class whilst Article 65 requires HGIL to disclose the top 5 counterparties it has placed trades with for those counterparties to execute on our behalf per asset class.

General Disclosures

Orders raised by Janus Henderson Portfolio Managers will be processed by the Janus Henderson Investors (JHI) trading desk that has the most relevant information about the market and/or instrument of each particular transaction. In practice this means that trading desks in different geographical locations could be utilised to execute orders. The best execution disclosure rules mean that we have disclosed Janus Henderson entities within our top five venues, for example Henderson Global Investors Singapore Ltd and Janus Capital Management LLC. These entities will in turn utilise different trading venues to complete the execution of orders they receive. There is no commercial incentive for Janus Henderson to route orders to different Janus Henderson entities and the prime objective is to assist the firm in achieving the best possible outcome for clients. The oversight and controls of each trading entity is consistent and reported to the global Best Execution Committee.

When determining the strategy for placing orders for execution in the market, HGIL will take into consideration a number of execution factors dependent upon the characteristics of the order and the prevailing market conditions. In determining the relative importance of the Execution Factors, JHI will take into account the investment objectives and client restrictions, the specific financial instruments to which the order relates, the trading tools and channels utilized the execution venues or counterparties available for such orders and the prevailing market conditions. Whilst they may differ dependent on the characteristics of each order, for each asset class we have set out below the typical relative importance of the execution factors.

Janus Henderson places orders to be executed with approved counterparties. The list of approved counterparties is reviewed regularly and changes over time. A list of our liquidity providers, in which we place significant reliance, is included in the Best Execution Policy. This list has not materially changed during the period. Janus Henderson utilizes preferred counterparties who have the skills, resources and capabilities to provide favourable access to suitable liquidity and a greater potential for an advantageous outcome in the execution process. JHI conducts a commensurate level of independent due diligence, including an assessment of potential conflicts of interest prior to any counterparty being approved and added to the approved counterparty list. Amendments to the approved counterparties list will be made taking into account a number of factors including; the credit worthiness of the counterparty and the execution performance of the counterparty.

HGIL does not receive payments, discounts, rebates or non-monetary benefits in its trading arrangements unless they meet the definition of minor non-monetary benefits under MiFID. HGIL does not trade with any affiliates or have close links with any trading counterparties or venues. All JHG employees are subject to the JHG Gifts and Entertainment Policy and any receipt of such activities from brokers or other third parties must be within this policy.

All HGIL clients are treated the same except for instances whereby execution venues are dictated by the client. Whilst retail investors may invest in Janus Henderson Funds, HGIL does not execute retail client orders directly and its clients are professional clients.

HGIL may on behalf of clients invest in entities who are or whose sub entities include trading counterparties. However, a centralised dealing desk is in place and Portfolio Managers are not able to influence which trading venue is used in a transaction. An investment in a financial services company with a trading counterparty is not a factor in choosing execution venues.

RTS 27 reports are published by our counterparties in relation to various data points on their execution quality. Janus Henderson has access to such reports but considers that to date their usefulness is limited so Janus Henderson has placed reliance on other measures of execution quality internally. Janus Henderson will continue to review the framework and the usefulness of RTS27 reporting in our oversight process. For the year ending 2020 Janus Henderson can confirm that it considers it has met its obligation to achieve the best possible result for its clients on a consistent basis.

There is currently no consolidated tape provider and therefore we have not used consolidated tape data in our execution arrangements.

A governance oversight meeting (The Best Execution Committee) is held on a quarterly basis in order to review adherence to the best execution policy. It is attended by senior investment, compliance and risk employees who review the management information available for all traded instrument types and discuss any concerns or issues.

Data Table Notes

1. Counterparty data includes:
 - a. Trades placed with a counterparties that were ultimately executed on or off an execution venue
 - b. Trades placed with broker algorithms for execution (these are represented under the broker name and are not recognised separately)
2. The regulation requires splits of aggressive and passive orders to be provided but HGIL consider that this split reflects our trading approach and have thus recorded as N/A on each occasion. 'Passive order' means an order entered into the order book that provided liquidity, 'Aggressive order' means an order entered into the order book that took liquidity.
3. Liquidity banding for the tick size splits within the equity tables have been created utilising the European Securities and Markets Authority (ESMA) Financial Instruments Transparency System (FITRS) tick size banding of the security using the latest available data, up to and including the end of the reporting period.
4. Directed orders - 'directed orders' are orders where a specific execution venue was specified by a HGIL client. Directed orders are immaterial and do not have an impact on the tables disclosed below.
5. Venue data has been included for Bonds on the basis that we consider this to be the only asset class where we are able to provide venue data with confidence on its accuracy or consider that it provides a useful split between venue and counterparty information.
6. The Currencies for all instruments are converted into a common currency (GBP) using the FX rate at the date of trade

7. All executed amounts are calculated using a notional basis, except for Options, which are calculated using the Premium (Cost) values. Any prices used are that registered against the price of the transaction at the time of trade.

Equities – Shares & Depositary Receipts

Tick size liquidity bands 5 and 6 (from 2000 trades per day)

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
UBS Ag	BFM8T61CT2L1QCEMIK50	10.74	14.19	N/A	N/A	N/A
Goldman Sachs International	W22LROWP2IHZNBB6K528	10.48	9.67	N/A	N/A	N/A
J.P. Morgan Securities PLC	K6Q0W1PS1L1O4IQL9C32	8.43	11.63	N/A	N/A	N/A
Merrill Lynch International	GGDZP1UYGU9STUHRDP48	7.34	4.71	N/A	N/A	N/A
Citigroup Global Markets Limited	XKZZ2JZF41MRHTR1V493	7.29	5.81	N/A	N/A	N/A

Tick size liquidity bands 3 and 4 (from 80 to 1999 trades per day)

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Janus Capital Management LLC	G7D5LKZKIBRMES6B0437	57.65	32.47	N/A	N/A	N/A
Janus Henderson Investors (Singapore) Limited	213800HSS4L3FSMQJX36	10.61	3.51	N/A	N/A	N/A

Credit Suisse Securities (Europe) Ltd	DL6FFRRLF74S01HE2M14	3.16	3.44	N/A	N/A	N/A
Credit Suisse Securities (USA) LLC	1V8Y6QCX6YMJ2OELI46	3.00	3.44	N/A	N/A	N/A
UBS Ag	BFM8T61CT2L1QCCEMIK50	2.45	8.71	N/A	N/A	N/A

Tick size liquidity bands 1 and 2 (from 0 to 79 trades per day)

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	61.23	40.46	N/A	N/A	N/A
Janus Henderson Investors (Singapore) Limited	213800HSS4L3FSMQJX36	30.74	26.86	N/A	N/A	N/A
Peel Hunt LLP	5493007DWN0R4YBM4C84	0.69	4.42	N/A	N/A	N/A
J.P. Morgan Securities PLC	K6Q0W1PS1L1O4IQL9C32	0.69	1.78	N/A	N/A	N/A
Numis Securities Limited	213800P3F4RT97WDSX47	0.61	2.27	N/A	N/A	N/A

Contracts for difference

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
UBS Ag	BFM8T61CT2L1QCCEMIK50	22.00	24.87	N/A	N/A	N/A
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	15.53	11.17	N/A	N/A	N/A

Credit Suisse Securities (Europe) Ltd	DL6FFRRLF74S01HE2M14	8.66	15.21	N/A	N/A	N/A
Merrill Lynch International	GGDZP1UYGU9STUHRDP48	6.44	5.04	N/A	N/A	N/A
Goldman Sachs International	W22LROWP2IHZNBB6K528	6.07	5.69	N/A	N/A	N/A

Exchange traded product (Exchange traded funds, exchange traded notes and exchange traded commodities)

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Flow Traders B.V.	549300CLJI9XDH12XV51	40.06	37.04	N/A	N/A	N/A
Jane Street Financial Limited	549300ZHEHX8M31RP142	39.12	18.15	N/A	N/A	N/A
Virtu ITG Europe Limited	213800EEC95PRUCEUP63	9.89	2.22	N/A	N/A	N/A
Susquehanna International Securities Limited	635400IAV22ZOU1NFS89	2.81	2.96	N/A	N/A	N/A
Barclays Bank PLC	G5GSEF7VJP5I7OUK5573	2.12	2.59	N/A	N/A	N/A

Equities & Exchange Traded Products Execution Factors:

- Liquid Equities – (80-2000+ trades per day)
Price and cost will normally be the determining factors, but other reasons may mean for example that certainty of completion takes priority
- Illiquid Equities – (0-79 trades per day)
Price, size of order and cost will normally be the determining factors, but other reasons may mean for example that certainty of completion takes priority

Contracts for Difference Execution Factors:

- Price and cost will normally be the determining factors, but other reasons may mean for example that certainty of completion takes priority

A transaction cost analysis (“TCA”) is regularly carried out for Equities and enables JHG to measure implicit costs, such as market impact, timing and opportunity cost, and highlights how efficient the transaction process is at capturing the implicit value identified by the fund manager. TCA reports are produced on a regular basis and discussed with the Equities Fund Managers and Head of Investment Desks; any concerns are addressed by the Global Head of Equities trading. Independent testing is also undertaken by JHG’s compliance team. Such TCA data is also monitored by the Best Execution Committee.

Debt instruments - Bonds

Notification if <1 average trade per business day in the previous year: No

Top five execution venues ranked in terms of trading volumes (descending order)	Venue ID	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
BLOOMBERG TRADING FACILITY LIMITED	BMTF	56.55	19.02	N/A	N/A	N/A
MARKETAXESS EUROPE LIMITED	MAEL	29.37	64.64	N/A	N/A	N/A
TRADEWEB EUROPE LIMITED	TREU	6.82	5.08	N/A	N/A	N/A
MARKETAXESS CORPORATION	MTXX	5.39	10.86	N/A	N/A	N/A
TRADITION OTF	TCDS	1.05	0.01	N/A	N/A	N/A

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	27.90	16.68	N/A	N/A	N/A
J.P. Morgan Securities PLC	K6Q0W1PS1L1O4IQL9C32	6.32	5.72	N/A	N/A	N/A
Goldman Sachs International	W22LROWP2IHZNBB6K528	5.97	6.68	N/A	N/A	N/A
Citigroup Global Markets Limited	XKZZ2JZF41MRHTR1V493	5.42	6.42	N/A	N/A	N/A
Deutsche Bank AG	7LTFWZYICNSX8D621K86	5.05	4.37	N/A	N/A	N/A

Execution Factors:

Government and Corporate Bonds

- **Size of order, price and cost** will normally be the most significant factors; however, execution speed or the lack of venues or counterparties offering the relevant instrument may mean that our investigation into price is not as varied as it might be in other circumstances

Fixed Income Transaction Cost Analysis (“TCA”) is undertaken and used in conjunction with further management information to analyse the Fixed Income transaction process, ensuring that competing quotes have been obtained where relevant and that exceptions are reviewed where applicable, for example where the best quotes have not been selected. Counterparty concentration reports are produced on a regular basis and discussed with the Fund Managers and Head of Investment Desks; any concerns are addressed by the Global Head of Fixed Income trading. Transaction Cost analysis outliers are reviewed by the trading desk and reviewed independently by the Compliance team. TCA MI is provided to the Best Execution Committee.

Debt instruments – Money Market Instruments

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
ICAP Securities Limited	213800NMEZS3MD2IUP33	44.25	48.75	N/A	N/A	N/A
Tradition London Clearing Ltd	549300035Z3DHK2T4A54	38.88	35.94	N/A	N/A	N/A
BGC Brokers L.P.	ZWNFQ48RUL8VJZ2AIC12	9.35	7.83	N/A	N/A	N/A
Tullett Prebon (Securities) Limited	549300BMVW85YF9FGN67	3.23	3.56	N/A	N/A	N/A
Credit Agricole CIB S.A.	1VUV7VQFKUOQSJ21A208	2.52	2.14	N/A	N/A	N/A

Debt Instruments – Money Market Instruments Execution Factors:

- **Price and cost** will normally be the most significant factors; however, risk diversification may mean that our investigation into price is not as varied as it might be in other circumstances

JHG maintains firm-wide counterparty exposure limits. For both pure investment strategies and other cash transactions, the relevant trade is chosen based on the best market rate available that also ensures adherence with exposure and diversification requirements. This can result in directing trades away from certain counterparties if our overall, or fund-specific, exposure to that counterparty is too high, even if the price or other terms offered by that counterparty might be the best available.

We instruct investments in Fixed Term Deposits (FTDs), call accounts and Certificates of Deposit (CDs) to diversify our risk away from our funds' operational custodial counterparties, and alongside Floating Rate Notes (FRNs) as an investment in their own right. FTDs are typically dealt directly with our pre-approved deposit counterparty banks, whereas a selection of money market brokers provides access to CD market liquidity.

Management information is in place to analyse the Fixed Income transaction process, ensuring that competing quotes have been obtained where relevant and that exceptions are reviewed where applicable, for example where the best quotes have not been selected. Counterparty concentration reports are produced on a regular basis and discussed with the Fund Managers and Head of Investment Desks; any concerns are addressed by the Global Head of Fixed Income trading.

Interest rates derivatives – Futures and options admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
UBS Ag	BFM8T61CT2L1QCCEMIK50	29.67	48.51	N/A	N/A	N/A
Barclays Bank PLC	G5GSEF7VJP5I7OUK5573	23.64	9.15	N/A	N/A	N/A
Merrill Lynch International	GGDZP1UYGU9STUHRDP48	21.22	12.84	N/A	N/A	N/A
Deutsche Bank AG	7LTFWZYICNSX8D621K86	12.15	10.83	N/A	N/A	N/A
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	11.86	14.67	N/A	N/A	N/A

Interest rates derivatives – Swaps, forwards, and other interest rates derivatives

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Goldman Sachs International	W22LROWP2IHZNBB6K528	40.36	27.92	N/A	N/A	N/A
UBS Ag	BFM8T61CT2L1QCCEMIK50	25.84	11.84	N/A	N/A	N/A
J.P. Morgan Securities PLC	K6Q0W1PS1L1O4IQL9C32	11.56	13.07	N/A	N/A	N/A
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	9.87	1.24	N/A	N/A	N/A
Morgan Stanley & Co. International plc	4PQUHN3JPF GFNF3BB653	4.32	10.42	N/A	N/A	N/A

Credit derivatives – Other credit derivatives

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
J.P. Morgan Securities PLC	K6Q0W1PS1L1O4IQL9C32	65.63	18.93	N/A	N/A	N/A
Barclays Bank PLC	G5GSEF7VJP5I7OUK5573	12.15	8.54	N/A	N/A	N/A
JPMorgan Chase Bank, National Association	7H6GLXDRUGQFU57RNE97	7.56	3.35	N/A	N/A	N/A
Goldman Sachs International	W22LROWP2IHZNBB6K528	5.56	10.55	N/A	N/A	N/A
Citigroup Global Markets Limited	XKZZ2JZF41MRHTR1V493	3.19	19.43	N/A	N/A	N/A

Exchange-Traded Derivatives (ETD) – Options and Futures Execution Factors:

- **Price, cost and size of order** will generally be the most important factors when we trade ETDs. However other execution factors may be taken into account or, in exceptional circumstances, be considered the principal factor (e.g. if speed is essential, price and market impact may mean that the trade is carried out in circumstances where the price of a trade is impacted).

For example, when we build structured trades in instruments such as exchange traded options, whilst absolute and relative prices will normally be the most significant factors, execution speed, volume, market positioning, fund positioning, execution costs, risks, and liquidity will also be considered.

Transaction cost analysis is performed on ETDs with a variety of metrics applied to the daily trading range. Transaction Cost analysis outliers are reviewed by the trading desk and also reviewed independently by the Compliance team. TCA MI is provided to and analysed by the Best Execution Committee.

Over-The-Counter Derivatives (OTC) – SWAPs, Forwards, Options, Warrants and Other Derivatives Execution Factors:

Credit and Interest Rates SWAPS, Forwards and other OTC Derivatives

- **Size of order, price and cost** will generally be the most important factors by which we consider how we trade in these instruments. However, other execution factors may be taken into account or, in exceptional circumstances, be considered the principal factor (i.e. if speed is essential, price and market impact may mean that the trade is carried out in circumstances where the price of a trade is impacted).

Management information is in place to analyse the Fixed Income transaction process, ensuring that competing quotes have been obtained where relevant and that exceptions are reviewed where applicable, for example where the best quotes have not been selected. Counterparty concentration reports are produced on a regular basis and discussed with the Fund Managers and Head of Investment Desks; any concerns are addressed by the Global Head of Fixed Income trading.

Currency derivatives – Swaps, forwards, and other currency derivatives

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
BNP Paribas Securities Services	549300WCGB70D06XZS54	51.99	46.68	N/A	N/A	N/A
JPMorgan Chase Bank, National Association	7H6GLXDRUGQFU57RNE97	46.12	46.20	N/A	N/A	N/A

Goldman Sachs International	W22LROWP2IHZNBB6K528	0.43	1.13	N/A	N/A	N/A
J.P. Morgan Securities PLC	K6Q0W1PS1L1O4IQL9C32	0.35	0.53	N/A	N/A	N/A
Barclays Bank PLC	G5GSEF7VJP5I7OUK5573	0.26	0.32	N/A	N/A	N/A

Currency derivatives - Futures and options admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year: Yes

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Goldman Sachs International	W22LROWP2IHZNBB6K528	62.32	40.57	N/A	N/A	N/A
UBS Ag	BFM8T61CT2L1QCCEMIK50	21.74	39.45	N/A	N/A	N/A
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	13.04	15.19	N/A	N/A	N/A
Barclays Bank PLC	G5GSEF7VJP5I7OUK5573	2.90	4.80	N/A	N/A	N/A

Currency Forwards, Spots, SWAPS, other OTC Derivatives Execution Factors:

- **Price, size of the order and cost** will generally be the most important factors by which we consider how we trade in these instruments. However, other execution factors may be taken into account or, in exceptional circumstances, be considered the principal factor (i.e. if speed is essential, price and market impact may mean that the trade is carried out in circumstances where the price of a trade is impacted).

TCA is carried out for FX and enables us to measure implicit costs, such as market impact, timing opportunity cost, performance against agreed benchmarks and highlight how efficient the transaction process is at capturing the implicit value identified by the fund managers. TCA MI is presented to and analysed by the Best Execution Committee.

All possible trades are electronically dealt through an e-trading platform where up to 10 counterparties are selected to compete for each trade. We will always try and select the maximum possible number of banks to competitively quote for each trade. Where the execution process results in fewer than 3 competitive quotes, available prices are checked against current market levels before executing. If there are liquidity constraints due to the size or market conditions where we believe putting trades in competition may negatively affect the outcome, we may use a single counterparty who we believe is best placed to execute the trade. Non-deliverable forwards (NDF) are traded over the phone, obtaining 3 competitive quotes from an approved list of banks where possible, and referencing against current market rates. Certain

FX transactions, such as share class hedging for certain funds or portfolios, will be outsourced to the third-party administrators for the relevant fund or portfolio. In these circumstances, the service provided by the third-party administrator will be overseen by JHG.

Equity Derivatives – Options and Futures admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
BNP Paribas	R0MUWSFPU8MPRO8K5P83	27.76	1.80	N/A	N/A	N/A
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	17.97	31.28	N/A	N/A	N/A
Merrill Lynch International	GGDZP1UYGU9STUHRDP48	13.21	31.78	N/A	N/A	N/A
UBS Ag	BFM8T61CT2L1QCCEMIK50	11.31	15.66	N/A	N/A	N/A
Goldman Sachs International	W22LROWP2IHZNBB6K528	5.54	0.97	N/A	N/A	N/A

Equity Derivatives – Swaps, forwards, and other equity derivatives

Notification if <1 average trade per business day in the previous year: Yes

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Societe Generale SA	O2RNE8IBXP4R0TD8PU41	83.17	44.44	N/A	N/A	N/A
UBS Ag	BFM8T61CT2L1QCCEMIK50	12.25	33.33	N/A	N/A	N/A
Goldman Sachs International	W22LROWP2IHZNBB6K528	4.58	22.22	N/A	N/A	N/A

Exchange-Traded Derivatives (ETD) – Equity Options and Futures admitted to trading on a trading venue Execution Factors:

- **Price, cost and size of order** will generally be the most important factors when we trade ETDs. However other execution factors may be taken into account or, in exceptional circumstances, be considered the principal factor (e.g. if speed is essential, price and market impact may mean that the trade is carried out in circumstances where the price of a trade is impacted).

Transaction cost analysis is performed on ETDs with a variety of metrics applied to the daily trading range. Transaction Cost analysis outliers are reviewed by the trading desk and also reviewed independently by the Compliance team. TCA MI is provided to and analysed by the Best Execution Committee.

Equity SWAPS, Forwards and other OTC Derivatives

- **Size of order, price and cost** will generally be the most important factors by which we consider how we trade in these instruments. However, other execution factors may be taken into account or, in exceptional circumstances, be considered the principal factor (i.e. if speed is essential, price and market impact may mean that the trade is carried out in circumstances where the price of a trade is impacted).

When we build structured trades in instruments such as exchange traded options, whilst absolute and relative prices will normally be the most significant factors, execution speed, volume, market positioning, fund positioning, execution costs, risks, and liquidity will also be considered.

Securitized Derivatives – Warrants and Certificate Derivatives

Notification if <1 average trade per business day in the previous year: Yes

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Merrill Lynch International	GGDZP1UYGU9STUHRDP48	98.54	15.38	N/A	N/A	N/A
Janus Henderson Investors (Singapore) Limited	213800HSS4L3FSMQJX36	1.15	7.69	N/A	N/A	N/A

Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	0.28	7.69	N/A	N/A	N/A
Morgan Stanley & Co. International plc	4PQUHN3JPF GFNF3BB653	0.04	69.23	N/A	N/A	N/A

Securitised Derivatives:

- **Size of order, price and cost** will generally be the most important factors by which we consider how we trade in these instruments. However, other execution factors may be taken into account or, in exceptional circumstances, be considered the principal factor (i.e. if speed is essential, price and market impact may mean that the trade is carried out in circumstances where the price of a trade is impacted).

An analysis of competing quotes is undertaken for securitised derivatives traded; any concerns are addressed by the Global Head of Equities trading. Independent testing is also undertaken by JHG's compliance team.

Commodities derivatives and emission allowances Derivatives – Options and Futures admitted to trading on a trading venue

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
UBS Ag	BFM8T61CT2L1QCCEMIK50	99.06	90.43	N/A	N/A	N/A
Goldman Sachs & Co. LLC	FOR8UP27PHTHYVLBNG30	0.58	6.05	N/A	N/A	N/A
Goldman Sachs International	W22LROWP2IHZNBB6K528	0.26	1.64	N/A	N/A	N/A
Societe Generale SA	O2RNE8IBXP4R0TD8PU41	0.10	1.89	N/A	N/A	N/A

Commodity Derivatives

Price and cost will be generally the most important factors by which we consider how we trade in these instruments. However, other execution factors may be taken into account or, in exceptional circumstances, be considered the principal factor (i.e. if speed is essential, price and market impact may mean that the trade is carried out in circumstances where the price of a trade is impacted).

Whilst absolute and relative prices will normally be the most significant factors when we build structured trades in these instruments, execution speed, volume, market positioning, fund positioning, execution costs, risks, and liquidity will also be considered.

Transaction cost analysis is performed on ETDs with a variety of metrics applied to the daily trading range. Transaction Cost analysis outliers are reviewed by the trading desk and also reviewed independently by the Compliance team. TCA MI is provided to and analysed by the Best Execution Committee.

Securities Financing Transactions (SFTs)

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
BNP Paribas Securities Services	549300WCGB70D06XZS54	100	100	N/A	N/A	N/A

Approach

- A number of funds undertake securities lending activity which is managed by a lending agent. HGIL may however be involved in specifying which securities are available for stock lending and may utilise the discretion of the portfolio manager to opt out of securities lending activity. The agency lending programme entitles the lending agent (BNP Paribas) to act as agent on behalf of its lending clients in order to generate revenues for those clients by lending their securities upon agreed terms with approved counterparties. The lending agent is selected based on a comprehensive due diligence process and reviewed periodically.

The lending agent primarily takes into account the reliability of the counterparty, likelihood of execution and settlement and price as execution factors

Other

Other Instruments include Equities that are not captured by the Tick Size regime and Collective Investment Schemes.

Notification if <1 average trade per business day in the previous year: No

Top five execution counterparties ranked in terms of trading volumes (descending order)	Counterparty LEI	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of aggressive orders	Percentage of passive orders	Percentage of directed orders
Deutsche Bank AG	7LTWFZYICNSX8D621K86	52.47	58.91	N/A	N/A	N/A
International Financial Data Services (Luxembourg) S.A.	5493008FVMXP7JI2CT87	15.75	8.24	N/A	N/A	N/A
Janus Henderson Investors (Singapore) Limited	213800HSS4L3FSMQJX36	12.51	13.32	N/A	N/A	N/A
Janus Capital Management LLC	G7D5LKZKIBRMES6BO437	3.53	3.46	N/A	N/A	N/A
Henderson Management SA	213800QSJA8LL34M8L90	2.51	2.21	N/A	N/A	N/A

The majority of the transactions within this category are in collective investment schemes. Dealing terms in collective investment schemes will be dictated by the price available at the time at which we trade. This is normally obtained from the scheme issuer and is not normally comparable (i.e. there is only one price available at the time of trading).

Timing of execution, price and cost will normally be the determining factors

Equity instruments not within the Tick Size regime follow the equity execution factors and oversight model.

Summary of Execution Strategies utilised

The execution strategy utilised for any particular order is dependent on the nature of the order and the execution options available for the particular asset class. We have summarised the approaches adopted by asset class as below:

Asset Class	On Venue	Execution via Brokers	Utilisation of Broker Algorithm	Off Venue Execution
Equities	Yes	Yes	Yes	Yes
Contracts For Difference	Yes	Yes	Yes	Yes
Exchange Traded Products	Yes	Yes	Yes	Yes
Bonds	Yes	Yes	No	Yes
Money Market Instruments	Yes	Yes	No	Yes
Interest Rate Derivatives – Futures and Options admitted to trading on a trading venue	Yes	Yes	Yes	Yes
Interest Rate Derivatives – Swaps, Forwards and other interest rate derivatives	Yes	Yes	No	Yes
Credit Derivatives – Futures and Options admitted to trading on a trading venue	Yes	Yes	No	Yes
Credit Derivatives – Swaps, Forwards and other credit derivatives	Yes	Yes	No	Yes
Currency Derivatives- Futures and Options admitted to trading on a trading venue	Yes	Yes	No	Yes
Currency Derivatives- Swaps, Forwards and other currency derivatives	Yes	Yes	No	Yes
Equity Derivatives – Futures and Options admitted to trading on a trading venue	Yes	Yes	Yes	Yes
Equity Derivatives – Swaps, Forwards and other equity derivatives	Yes	Yes	Yes	Yes
Securitised Derivatives	No	Yes	No	Yes
Commodities Derivatives – Options and Futures admitted to trading on a trading venue	Yes	Yes	Yes	Yes
Commodities Derivatives – Swaps, Forwards and other commodity derivatives	Yes	Yes	Yes	Yes

Janus Henderson Investors

201 Bishopsgate, London EC2M 3AE

Tel: 020 7818 1818 Fax: 020 7818 1819

This document is intended solely for the use of professionals, defined as Eligible Counterparties or Professional Clients, and is not for general public distribution.

Past performance is not a guide to future performance. The value of an investment and the income from it can fall as well as rise and you may not get back the amount originally invested. Tax assumptions and reliefs depend upon an investor's particular circumstances and may change if those circumstances or the law change.

If you invest through a third-party provider you are advised to consult them directly as charges, performance and terms and conditions may differ materially.

Nothing in this document is intended to or should be construed as advice. This document is not a recommendation to sell or purchase any investment. It does not form part of any contract for the sale or purchase of any investment.

Any investment application will be made solely on the basis of the information contained in the Prospectus (including all relevant covering documents), which will contain investment restrictions. This document is intended as a summary only and potential investors must read the prospectus, and where relevant, the key investor information document before investing. We may record telephone calls for our mutual protection, to improve customer service and for regulatory record keeping purposes.

Important information

Issued in the UK by Janus Henderson Investors. Janus Henderson Investors is the name under which Janus Capital International Limited (reg. no. 3594615), Henderson Global Investors Limited (reg. no. 906355), Henderson Investment Funds Limited (reg. no. 2678531), AlphaGen Capital Limited (reg. no. 962757), Henderson Equity Partners Limited (reg. no. 2606646), (each incorporated and registered in England and Wales with registered office at 201 Bishopsgate, London EC2M 3AE) are authorised and regulated by the Financial Conduct Authority to provide investment products and services.

© 2018, Janus Henderson Investors. The name Janus Henderson Investors includes HGI Group Limited, Henderson Global Investors (Brand Management) Sarl and Janus International Holding LLC.