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## **Henderson Management S.A. – Complaints Policy**

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## 1. Objective

Henderson Management S.A. (“HMSA”) is a Luxembourg based Management Company authorised under Chapter 15 of the law of 17 December 2010, relating to undertakings for collective investment and as Alternative Investment Fund Manager under the law of 12 July 2013 on Alternative Investment Fund Managers. HMSA is supervised by the *Commission de Surveillance du Secteur Financier* (“CSSF”).

In accordance with the provision of CSSF Regulation 16-07 relating to out-of-court complaint resolution and Circulars 14/589 and 18/698, Management Companies shall implement and maintain effective and transparent procedures for the reasonable and prompt handling of investor complaints and have a policy describing the complaints settlement procedure.

On this regard, HMSA’s complaints handling policy aims to provide a framework for handling complaints. Its purpose is to ensure that HMSA has the ability to resolve issues in a consistent, systematic, transparent and responsive manner. The complaints handling policy will also help HMSA to identify trends with issues and make necessary changes to enhance the control environment.

## 2. Scope

This policy will apply to all complaints as defined in the CSSF Regulation 16-07. A complaint is defined as a claim filed by a shareholder, a prospective shareholder or any other party (hereinafter referred to as “the complainant”) with HMSA to recognise a right or to redress harm in relation to a specific issue or following general dissatisfaction with a service provided.

Requests for information or explanations are not considered as complaints.

## 3. Process description

In order to ensure a consistent and robust approach and, as per the regulatory provisions, HMSA has designated the responsibility of the complaints handling process to a complaints handling officer. The appointed complaints handling officer, Ms Clodhna Duggan, is notified to the CSSF as well as any subsequent changes thereto.

To ensure complaints are resolved in an effective and transparent manner, complaints shall be notified in writing, either by letter or e-mail to:

Henderson Management S.A.  
Attn: Complaints handling officer  
2, rue de Bitbourg  
L-1273 Luxembourg  
Email : HMSAComplaints@janushenderson.com

The information provided by the complainant must clearly describe the facts underlying the complaint as well as the person, service and entity to which it refers. Furthermore, the complaint should describe the steps already taken by the complainant. In case the complainant does not act on its own behalf, sufficient proof should be provided by the complainant that it is legally entitled to do so.

The complaint will be acknowledged in principle within 48 hours and responded to in writing within 15 business days after the receipt of the complaint. In this timeframe HMSA shall seek to gather and to investigate all relevant evidence and information on each complaint.

In case a full response cannot be provided within 15 business days, the complainant will be informed. HMSA shall provide an answer without undue delay and in any case, as prescribed in the CSSF Regulation 16-07, within one month of receipt of the complaint. If HMSA is not in a position to provide an answer within this period, it shall inform the complainant of the reason of the delay and provide an indicative date at which its examination is likely to be achieved.

In the interactions with the complainant, HMSA shall communicate in a plain and easily comprehensible language.

In case the response provided by the complaints handling officer is not satisfactory, the complainant can decide to escalate the complaint to the Conducting Officers of HMSA. Contact details of the conducting officers can be provided by HMSA upon request.

HMSA will ensure that the investment manager, distributor and service providers which are involved in the operations or distribution of the funds are informed of this policy so that complaints addressed to them but relating to HMSA can be brought to the attention of the complaints handling officer. Complaints that are addressed to service providers and specifically relate to the operations of the service provider will also be forwarded to the complaints handling officer together with underlying information on the complaint details of how the complaint will be dealt with and a timeline for resolution.

## 4. Complaint referral

### **Luxembourg-domiciled Funds:**

If the complaint relates to a Luxembourg-domiciled fund (please refer to Appendix 1 for further details) and the complainant is not satisfied with the response, it can be referred to the CSSF under regulation 16-07 on out-of-court resolutions of customer complaints. The request must be filed with the CSSF within one year after the complaint has been filed initially with HMSA. Further information on how to submit a complaint to the CSSF can be found on the CSSF website:

<https://www.cssf.lu/en/customer-complaint/>

### **Irish-domiciled Funds:**

If the complaint relates to an Irish-domiciled fund (please refer to Appendix 1 for further details) and the complainant is not satisfied with the response, it can either be referred to the CSSF under regulation 16-07 on out-of-court resolutions of customer complaints or the Financial Services and Pensions Ombudsman (FSPO) in Ireland. The FSPO is an independent body that helps to resolve disputes and complaints with financial service providers. Further information on how to submit a complaint to the CSSF or the FSPO can be found on:

<https://www.cssf.lu/en/customer-complaint/>

<https://www.fspo.ie/make-a-complaint/>

Please note that while the Central Bank of Ireland does not investigate individual complaints it welcomes information from consumers on financial products. Please refer to the Central Bank of Ireland's website for additional information:

<https://www.centralbank.ie/consumer-hub/explainers/how-do-i-complain-about-a-financial-services-firm>

#### **4. Reporting and review**

All the relevant data relating to each complaint, as well as each measure taken to handle it, will be logged in HMSA's complaints register. On an annual basis, and as per the regulatory provisions, the complaints handling officer will send a report to the CSSF detailing the number of complaints received classified by type of complaints, together with a description of the complaints, the measures taken to handle them and their status.

This policy is subject to a formal review by the Board of HMSA annually and it will be updated when required. It also shall be made available to all relevant staff.

Policy Owner	Complaints Handling Officer
Author	Gerard Theunissen
Reviewed by	Clíodhna Duggan
Date Approval	September 2020
Date Last Reviewed	31 August 2020
Date Due for Next Review	August 2021

## Appendix 1

### Luxembourg-domiciled Funds

<b>Janus Henderson Horizon Fund SICAV</b>
Janus Henderson Horizon Asian Dividend Income Fund
Janus Henderson Horizon Asian Growth Fund
Janus Henderson Horizon Asia-Pacific Property Income Fund
Janus Henderson Horizon Biotechnology Fund
Janus Henderson Horizon China Opportunities Fund
Janus Henderson Horizon Emerging Market Corporate Bond Fund
Janus Henderson Horizon Euro Corporate Bond Fund
Janus Henderson Horizon Euro High Yield Bond Fund
Janus Henderson Horizon Euroland Fund
Janus Henderson Horizon European Growth Fund
Janus Henderson Horizon Global Equity Income Fund
Janus Henderson Horizon Global High Yield Bond Fund
Janus Henderson Horizon Global Multi-Asset Fund
Janus Henderson Horizon Global Natural Resources Fund
Janus Henderson Horizon Global Property Equities Fund
Janus Henderson Horizon Global Technology Leaders Fund
Janus Henderson Horizon Japan Opportunities Fund
Janus Henderson Horizon Japanese Smaller Companies Fund
Janus Henderson Horizon Pan European Absolute Return Fund
Janus Henderson Horizon Pan European Dividend Income Fund
Janus Henderson Horizon Pan European Equity Fund
Janus Henderson Horizon Pan European Property Equities Fund
Janus Henderson Horizon Pan European Smaller Companies Fund
Janus Henderson Horizon Strategic Bond Fund
Janus Henderson Horizon Total Return Bond Fund
Janus Henderson Horizon Global Sustainable Fund
Janus Henderson Horizon Global Smaller Companies Fund

<b>Janus Henderson Fund SICAV</b>
Janus Henderson Continental European Fund
Janus Henderson Emerging Markets Fund
Janus Henderson Global Equity Fund
Janus Henderson Global Equity Market Neutral Fund

Janus Henderson Latin American Fund
Janus Henderson Pan European Fund
Janus Henderson Pan European Smaller Companies Fund
Janus Henderson United Kingdom Absolute Return Fund
Janus Henderson Global Multi-Strategy Fund

## Irish-domiciled Funds

<b>Janus Henderson Capital Funds plc</b>
Janus Henderson Absolute Return Income Fund (EUR)
Janus Henderson Absolute Return Fund
Janus Henderson Absolute Return Income Opportunities Fund
Janus Henderson Balanced Fund
Janus Henderson Flexible Income Fund
Janus Henderson Global Adaptive Capital Appreciation Fund
Janus Henderson Global Adaptive Capital Preservation Fund
Janus Henderson Global Adaptive Multi-Asset Fund
Janus Henderson Global High Yield Fund
Janus Henderson Global Investment Grade Bond Fund
Janus Henderson Global Life Sciences Fund
Janus Henderson Global Real Estate Fund
Janus Henderson Global Research Fund
Janus Henderson Global Technology and Innovation Fund
Janus Henderson High Yield Fund
Janus Henderson Intech All-World Minimum Variance Core Fund
Janus Henderson Intech European Core Fund
Janus Henderson Intech Global Absolute Return Fund
Janus Henderson Intech Global All Country Low Volatility Fund
Janus Henderson Intech US Core Fund
Janus Henderson Multi-Sector Income Fund
Janus Henderson Opportunistic Alpha Fund
Janus Henderson US Balanced 2026 Fund
Janus Henderson US Forty Fund
Janus Henderson US Research Fund
Janus Henderson US Short Term Bond Fund
Janus Henderson US Strategic Value Fund
Janus Henderson US Venture Fund

<b>Janus Selection</b>
Janus Selection Balanced Fund
Janus Selection Flexible Income Fund



Janus Selection Forty Fund
Janus Selection Global Real Estate Fund
Janus Selection High Yield Fund
Janus Selection Strategic Value Fund