

JANUS HENDERSON INVESTORS
EUROPE S.A.
Complaints Handling Policy

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Objective

Janus Henderson Investors Europe S.A. ("JHIESA") 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. JHIESA 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 17/671, 18/698 and 19/718, 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.

In this context, JHIESA's Complaints Handling Policy (the "Policy") establishes a framework for the effective handling of complaints. Its objective is to ensure that complaints are handled in a consistent, systematic, transparent and timely manner. The Policy also supports JHIESA in identifying issues and trends, enabling the implementation of appropriate remedial actions to strengthen the overall control environment.

Scope

This Policy applies to all complaints, as defined under CSSF Regulation 16-07, received by JHIESA in connection with the services it provides in its capacity as Management Company and Alternative Investment Fund Manager. It applies to complaints relating to a specific issue or to general dissatisfaction with a service provided by JHIESA. Complaints are handled free of charge. This Policy applies to JHIESA and its Branches established within the European Union.

Eligibility

Eligible complainants are any natural or legal persons who have submitted a complaint to JHIESA in relation to a product or service provided by JHIESA, including current or former shareholders in funds managed by JHIESA, prospective shareholders, and any other person or entity acting on behalf of such shareholders (hereinafter referred to as "the complainant"). Complaints may be submitted directly by the eligible complainant or via an intermediary, distributor, nominee, or service provider. Where a complaint is received through a third party, JHIESA remains responsible for overseeing the handling of the complaint in accordance with this Policy. Any expression of dissatisfaction that constitutes a claim to recognise a right or to seek redress for an alleged harm will be treated as a complaint under this Policy. The term "complaint" does not need to be used explicitly for a communication to qualify as a complaint. Requests for information, explanations, clarifications, or routine service matters that do not involve such a claim are not considered complaints for the purposes of this Policy.

Process Description

In order to ensure a consistent and robust approach and, as per the regulatory provisions, JHIESA has appointed a Complaints Handling Officer with overall responsibility for the complaints handling process. The appointed Complaints Handling Officer, Mr. Casey Harrell, has been duly notified to the CSSF as well as any subsequent changes thereto.

To ensure complaints are handled in an effective and transparent manner, complaints must be submitted in writing, either by letter or by e-mail to:

Janus Henderson Investors Europe S.A.

Attn: Complaints Handling Officer

78, Avenue de la Liberté

L-1930 Luxembourg

Luxembourg

Email: JHIESAComplaints@janushenderson.com

The complaint must clearly set out the facts giving rise to the complaint as well as the person, service and entity to which it relates. Furthermore, the complaint should describe any steps already taken by the complainant. Where the complainant is acting on behalf of another party, appropriate evidence of legal authority should be provided. The complaint will, in principle, be acknowledged within 48 business hours and responded to in writing within 15 business days of receipt. During this period, JHIESA will seek to gather and assess all relevant information and evidence on each complaint.

Where a full response cannot be provided within 15 business days, the complainant will be informed accordingly. JHIESA will provide an answer without undue delay and in any event, as prescribed in the CSSF Regulation 16-07, within one month of receipt of the complaint. If JHIESA is unable to provide an answer within this timeframe, it will inform the complainant of the reason for the delay and provide an expected timeframe within which the examination is likely to be completed.

In the interactions with the complainant, JHIESA shall communicate in a plain and easily comprehensible language. Complaints shall be handled in an objective and independent manner by personnel free from any conflict of interest in relation to the subject of the complaint. Where the response provided by the Complaints Handling Officer is not deemed satisfactory, the complainant may escalate the complaint to the Conducting Officers of JHIESA. Contact details of the Conducting Officers can be provided by JHIESA upon request.

JHIESA will ensure that the investment managers, distributors, 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 JHIESA 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 handled, and the expected timeline for resolution.

Complaint Referral

Luxembourg domiciled Funds:

If the complaint relates to a Luxembourg-domiciled fund managed by JHIESA (please refer to Appendix 1 for further details) and the complainant is not satisfied with the response, it may be referred to the CSSF under regulation 16-07 on out-of-court resolutions of customer complaints. The request must be submitted to the CSSF within one year from the date on which the complaint was initially filed with JHIESA. Further information on how to submit a complaint to the CSSF is available on the CSSF website:

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

Irish domiciled Funds:

If the complaint relates to an Irish-domiciled fund managed by JHIESA (please refer to Appendix 1 for further details) and the complainant is not satisfied with the response, it may 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 responsible for resolving disputes between

consumers and financial service providers. Further information on how to submit a complaint to the CSSF or the FSPO is available at the following websites:

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

<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 and services. Additional information is available on the Central Bank of Ireland's website:

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

Reporting and Review

All relevant data relating to each complaint, together with the measures taken to address it, will be recorded in a complaints register and communicated to the JHIESA Conducting Officers and Board as part of the ongoing governance and oversight reporting.

On an annual basis, and in accordance with applicable regulatory requirements, the Complaints Handling Officer will send a report to the CSSF detailing the number of complaints received classified by type, together with a description of the complaints, the measures taken to handle them and their status.

This Policy is subject to an annual review, and it will be updated when required. It is also made available to all relevant staff.

Policy Owner	Complaints Handling Officer
Author	JHIESA Operations
Approval Body	JHIESA Board
Date Last Reviewed	March 2026
Date Due for Next Review	March 2027

Appendix 1

Luxembourg domiciled Funds

Janus Henderson Horizon Fund
Janus Henderson Fund

Irish domiciled Funds

Janus Henderson Capital Funds plc
Janus Selection