

APRIL 2024

RESPONSIBLE INVESTMENT POLICY

Our active approach to ESG, incorporating our
Sustainability Risk Policy



CONTENTS

1. Overview	1
1.1 Policy Statement.....	1
1.2 Key Principles.....	1
1.3 Roles and Responsibilities	2
1.4 Policy Escalation Requirements.....	2
2. Glossary	2
3. Policy Requirements.....	3
3.1 Firmwide Exclusions.....	3
3.2 Stewardship and Engagement.....	4
3.3 Proxy Voting.....	5
3.4 Conflicts of Interest.....	6
4. Governance & Oversight.....	6
5. Review	7
6. References.....	7

1 Overview

1.1 Policy Statement

As an active manager, integrating financially material Environmental, Social and Governance (ESG) factors into our investment decision-making and ownership practices is fundamental to delivering the results our clients seek from us. This firmwide Responsible Investment Policy applies globally to all JHG subsidiaries, except as noted below¹. The Policy outlines our Responsible Investment Principles, how we integrate Sustainability Risks into the investment process as well as controls and governance that support our overall approach.

1.2 Key Principles

Being a global asset management organisation comes with important responsibilities. ESG issues can have a material impact on the financial outcomes of our investments. Furthermore, ESG issues including climate change, demand active and ongoing engagement. At Janus Henderson, we are committed to maintaining our focus on ESG integration as a foundation for long-term investment returns.

Responsible Investment Principles for Long-Term Investment Success:

1. Investment portfolios are built with the aim to maximise long-term, risk-adjusted returns for our clients
2. Evaluation of financially material ESG factors is a fundamental component of the investment processes for most of our actively managed strategies²
3. Engagement is vital to understanding and promoting practices that position the issuers we invest in for future success
4. Investment teams should have the freedom to interpret and implement ESG factors in the way best suited to their asset class and investment strategy objective, as they do for any fundamental investment factor

Please note that integration language in this document covers our range of JHI Brighter Future Funds and ESG Integrated Funds.

Our Commitment to Clients

Janus Henderson understands responsible investing continues to evolve and mature. We are committed to maintaining an open dialogue with our clients, shareholders, employees, industry groups, and regional regulators to ensure we continue to meet their expectations and hold true to our values as a steward of our clients' capital. This includes listening to client needs and developing new products to meet changing requirements. It also means actively sharing the views of our managers on how they see ESG issues reshaping the investment landscape and where the risks and opportunities lie. The Janus Henderson website provides access to manager insights as well as our ESG policies, voting records, and annual reports.

Integration of Sustainability Risks

Sustainability risk is defined as an environmental, social or governance event or situation that, if it occurs, could have a material adverse impact on the value of the investment.

As investment professionals, our first responsibility is, and always has been, to our clients' interests and goals; growing and smartly managing their capital and fulfilling our fiduciary responsibilities. In many markets, client demand is also increasing for us to invest with processes that incorporate ESG and sustainability.

ESG factors are integral to how we think about risk and return. Among our clients, attitudes towards ESG and sustainability vary as much as risk profiles. We are respectful of this diversity of values and offer strategies and products accordingly.

ESG considerations are a key component of the active investment processes employed by most investment teams. These teams operate and are structured in ways that are best suited to their respective asset classes. Aside from the expectations outlined under our Responsible Investment Principles, the precise approach to ESG integration is at the discretion and judgement of our investment teams, who apply their differentiated perspectives, insight, and experience to identify business practices that can generate long-term value for investors. Commitments and accountability for the execution of ESG integration factors therefore rests with the relevant investment teams. Each team is responsible for articulating their specific objectives, which means that the implementation of ESG criteria is usually carried out at the strategy level. The investment teams are supported by ESG subject-matter experts within our centralised Responsibility team.

¹ Kapstream Capital has adopted its own ESG Policy, available at www.kapstream.com. ² including all UK and European funds

This support includes:

- **Responsible Investment and Governance Team:** a specialised group within our centralised Responsibility team, focused on governance and stewardship, ESG investment research, and ESG strategy and development. The team's mission is to promote ESG integration across Janus Henderson and serve as a resource for all investment teams.
- **ESG Solutions:** a team focused on helping our client and investment teams on new ESG product design, bespoke client advisory services and enhancing ESG integration.
- **ESG Strategy & Operations:** is focused on providing operational and regulatory support as well as facilitating thought leadership content and learning for both the investment as well as non-investment teams.
- **ESG Research, Data, and Ratings:** Janus Henderson makes third party and proprietary ESG data available directly to the relevant investment teams.
- **Internal Research Platform:** Investment teams share relevant ESG research produced in-house by analysts on centralised research platforms.

1.3 Roles and Responsibilities

Executive Committee (ExCo) reports to the Janus Henderson Board and has day to day responsibility for managing the firm. It has oversight responsibility over Investment Management, Product & Distribution, Corporate and a number of standalone committees.

ESG Oversight Committee (ESGOC): reports to ExCo and provides direct oversight of ESG investment matters. This committee, chaired by the Chief Responsibility Officer, provides oversight over ESG investment processes including portfolio design, portfolio management, various ESG data & toolsets, as well as non-investments oversight over ESG processes including regulatory and client reporting standards, and ESG disclosure. The committee is responsible for ensuring Janus Henderson Investors (JHI) framework to manage ESG-related risks is adequate and effective.

ESG Strategic Advisory Council: supports the ESGOC by reviewing, challenging and advising on firm-wide, or investment level ESG regulatory and non-regulatory developments; strategic priorities; pledges and partnerships as well as other ESG matters requiring strategic input as requested by the Chief Responsibility Officer.

Responsibility Team: is the centralised support function that has accountability for Corporate Responsibility as well as Responsible Investment at the firm. The four pillars that make up the team are Responsible Investment and Governance, Strategy & Operations, Client Solutions and Diversity & Community Relations.

Compliance: provides second line of defence on ESG Investment matters. The Compliance team ensures that the firm complies with its regulatory and legal requirements, as well as internal policies and bylaws. The individual Investment teams provide the first line of defence.

ESG Risk Reporting: ESG data is incorporated into our risk reporting tools, covering issues such as exposure to companies with low ESG ratings, controversies, weak corporate governance, and climate risk. Sustainability risk monitoring forms part of the ongoing risk monitoring carried out by the Financial Risk team. Where appropriate, escalations are made directly to the relevant governance committee.

1.4 Policy Escalation Requirements

Violations of this or any other JHI policy must be reported immediately upon detection by employees via the incident management form within the governance, risk management and compliance system. Anonymous reports can also be made by employees calling a toll-free hotline. Failure by employees to report policy violations may lead to appropriate disciplinary action.

2 Glossary

ESG Factors: aspects of an issuer's practices, operations, products, or services which may be financially material and/or impact the long-term sustainability of an investment.

Environmental Factors can include climate change, energy efficiency, resource depletion, and water and waste management. Social factors can include employee and community relations, diversity, quality of life, enhancements in knowledge, and advances in supportive technology for improved sustainability. Governance factors can include mitigating risks such as bribery and corruption, ensuring board independence and diversity, executive pay, accounting standards and shareholder rights, and positively influencing corporate behaviour.

ESG Integration: the practice of consistently incorporating financially material ESG information alongside traditional financial metrics into the investment analysis and decision process with the aim of improving the long-term risk-adjusted financial outcomes of portfolios.

Sustainability: a state where economic activity and/or development meets the needs of the present without compromising the ability of future generations to meet their own needs. While sustainability can be referenced as a holistic synonym of ESG factors, sustainability focuses more on the outcome rather than on financial materiality alone.

ESG approaches exist on a spectrum driven by client requirements, investment objectives and mechanisms to support achieving those objectives. Each of our investment strategies could adopt one or more of these approaches, based what is most appropriate for meeting the needs of its investment objectives and client requirements. These are defined below:

Exclusion Screening: aims to exclude sectors based on pre-defined ESG criteria. Which sectors get excluded depends on the criteria used.

Negative Screening: primarily aims to identify issuers that score poorly on ESG factors relative to their peers. These issuers might then be excluded during the portfolio construction process, either wholly or subject to thresholds agreed.

Screening based on International Norms: often referred to as norms-based screening refers to screening of investments based on compliance with relevant international norms and standards such as those issued by, but not limited to, the Organisation for Economic Co-operation and Development (OECD), International Labour Organization (ILO), United Nations Global Compact (UNGC) and UNICEF.

Positive Screening: focuses on the process of identifying and evaluating issuers that score highly on ESG factors and/or pre-defined Sustainability related criteria. Typically issuers that meet these criteria, coupled with financial performance, are considered for investment.

Engagement: includes an array of direct stewardship tools that are used in parallel with engagement activities like proxy voting and individual as well as collaborative escalations.

Sustainable Thematic Investing: aims to invest in issuers whose activities contribute to one or more areas of sustainable development such as biodiversity, renewable energy, gender equality or a circular economy.

Impact Investing: investments are made with the intention to generate positive, measurable social and/or environmental impact alongside a financial return.

Best-in-Class: focuses on finding the issuers that are leaders in their sector in terms of meeting ESG criteria. ESG Integration and Engagement are the preferred approach for a large number of strategies.

3 Policy Requirements

We expect our teams to:

- consider firmwide exclusions in their investment processes
- to provide stewardship and engage with the issuers they invest in to drive improved performance on sustainability issues
- vote proxies in the best interest of our clients

We seek to avoid financing practices prohibited by key international treaties and conventions as specified in this policy.

3.1 Firmwide Exclusions

Scope

Except as noted below, the firmwide exclusions generally apply to all Janus Henderson Funds and discretionary segregated mandates. They do not apply to index and certain other derivatives or passive portfolios (including ETFs) intended to track a benchmark.

Issuers Excluded:

A direct manufacturer of and / or minority shareholding of 20% or greater in a manufacturer of:

- Cluster munitions
- Anti-personnel mines
- Chemical weapons
- Biological weapons

Classification of issuers is primarily based on activity identification fields supplied by our third-party ESG data providers. This classification may be subject to an investment research override, following approval by the ESGOC, in cases where sufficient evidence exists that the third-party field is not accurate or appropriate.

In any scenario where a portfolio position is identified as not meeting this exclusion criteria for any reason (legacy holding, transition holding, etc.) the portfolio manager shall generally be granted 90 days to review or challenge classification of the issuer if appropriate. After this period, in the event an investment research override is not granted, divestment is required under normal market trading circumstances.

Cannabis Related Issuers

To ensure JHI complies with regional legal and regulatory obligations “Cannabis-Related Issuers” (CRI) may be excluded where an issuer’s revenue from cannabis related activities is understood to constitute more than 5% of their total revenue. A permissibility assessment is undertaken that gives consideration to various factors, including, without limitation:

- Domicile of JHG Fund;
- Domicile of JHG Fund Manager, including any sub-delegations;
- Domicile of the CRI; and
- Type of cannabis business operation, product, or activity conducted by the CRI.

Exceptions investing in CRI more broadly may be permitted following request to, and approval from, the ESGOC. All exceptions to this Policy requirement must be suitably documented with the accompanying rationale.

3.2 Stewardship and Engagement

Stewardship and a commitment to good governance is an integral and natural part of Janus Henderson’s long-term, active approach to investment management. Strong ownership practices, such as management engagement, can help protect and enhance long-term shareholder value and bondholder repayment. We support several stewardship codes, such as the UK and Japanese stewardship codes, and broader initiatives around the world including the Principles for Responsible Investment.

The primary route for engagement on stewardship-related issues is the regular meetings analysts and portfolio managers have with the issuers in which they invest. Janus Henderson’s analysts and portfolio managers hold thousands of issuer meetings each year. Meetings incorporate a wide range of topics including strategy, capital allocation, performance, risk, management succession, board composition, corporate governance and environmental and social issues where relevant.

Methods of engagement may vary depending on the level and nature of interaction required. We broadly classify our engagements as: engagements for insight and engagements for action. Engagement for insight involves meetings where ESG issues form a meaningful part of the interaction. The goal is to understand an issuer’s strategy and actions and leverage that insight in our investment research and decision-making. Engagement for action is outcome-oriented, where we encourage issuers to take decisions that we consider to be in the best long-term interests of shareholders and/or bondholders. Results of company engagement are documented and shared via an internal centralised research platform.

We take an active approach to communicating our views to issuers and seeking improvements where we believe there are shortcomings in performance, or an issuer has failed to apply appropriate standards, or to provide adequate disclosure. We will continue our dialogue with the issuer over an extended period if necessary. Common issues on which we have intervened in the past include concerns over executive or non-executive leadership, mergers & acquisitions, corporate governance standards, disclosure, and remuneration practices. Any decision to escalate our engagement is made on a case-by-case basis.

Escalation of our engagement activities depends upon a company’s individual circumstances. We prefer engagement over voting, due to the belief that engagement is generally more productive than simply voting against shareholder meeting proposals. In following our investment team-led approach to responsible investment and stewardship, each investment team has different strategies for escalation appropriate to their investment process and client needs. We do not have a top-down escalation process that applies across all funds, asset classes and geographies. However, we may escalate in one or more of the following ways:

- Outcome oriented engagement
- Letter to board
- Meeting with board
- Votes against directors
- Public recognition of issues
- Divestment (fully or partially) and/or do not refinance

Janus Henderson recognises that, in some instances, joint action along with other stakeholders may have the potential to be more effective in managing ESG risks than acting alone. Where appropriate, we pro-actively collaborate with other stakeholders on governance and wider environmental and social engagement issues, directly and through industry bodies in compliance with applicable law(s).

Above and beyond the expectation that investment teams incorporate ESG considerations in issuer engagement as appropriate to individual circumstances, teams are also encouraged to engage on the following Core Engagement Themes:

- Climate Change
- Diversity & Inclusion
- Good Corporate Governance

Investment teams are supported by our in-house Responsible Investment & Governance Team, which is part of our Responsibility Team. In addition to the Core Engagement Themes listed above, Janus Henderson also tracks engagements across the following Environment, Social and Governance sub-themes:

Environment	Social	Governance
Energy efficiency	Just transition	ESG disclosure
GHG emissions (Scope 1, 2, & 3)	Diversity, Equity & Inclusion	Delivery of ESG commitments (implementation & progress)
Progress toward net zero	Labour practices	ESG governance (strategy, oversight & accountability)
Recycling & circularity	Supply chain & human rights	Risk management (including cyber security)
Waste & hazardous materials management	Product quality & safety	Accounting practices & audit
Land, air and water pollution	Access & affordability	Business ethics
Biodiversity	Community relations	Bribery & corruption
Raw material sourcing	Consumer protection	Board independence & composition
Water management	Customer health & wellbeing	Ownership & corporate structure
Sustainability-linked bonds (E KPIs)	Data security & privacy	Management stability & succession planning
Labelled bonds (green, blue)	Sustainability-linked bonds (S KPIs)	Executive & board compensation
R&D / sustainable innovation	Labelled bonds (social)	Shareholder rights & returns
Other Env topic	Other Social topic	Other Gov topic

3.3 Proxy Voting

Janus Henderson has adopted proxy voting policy and procedures to ensure that proxies are voted in the best interests of clients. Our custom policy is designed to encourage the adoption of widely recognised principles of good corporate governance aligned with the creation of long-term shareholder value. We consider certain core principles to be universal:

- Disclosure and transparency
- Board responsibilities
- Shareholder rights
- Audit and internal controls

While we prefer that companies adhere to these principles, we recognise that a different approach may be justified in certain circumstances. As an active manager our preference is to engage with management and boards to resolve issues of concern. In our experience this approach is more likely to be effective in influencing company behaviour.

Key voting decisions are made by portfolio managers, with support provided by in-house corporate governance specialists. Janus Henderson has a Proxy Voting Committee, which is responsible for establishing positions on major voting issues and creating guidelines to oversee the voting process. The Committee is comprised of representatives with experience in investment portfolio management, corporate governance, accounting, legal, and compliance. Public links to our voting records are available on company websites in applicable jurisdictions. Janus Henderson’s Proxy Voting Policy is available on our website.

3.4 Conflicts of Interest

Janus Henderson recognises that conflicts of interest may arise in the course of our work on stewardship, corporate governance and engagement. We have a Conflicts of Interest Policy, the objective of which is to ensure that conflicts of interest, both potential and actual, across the Janus Henderson Group are identified, recorded and managed appropriately and, where necessary and appropriate, disclosed in order to ensure fair treatment of clients. The Ethics and Conflicts of Interest Committee, which is a sub-committee of the Audit Committee of Janus Henderson Group, is responsible for reviewing and overseeing the Group’s arrangements for identifying and managing conflicts of interest and ensuring the best interests of its clients are considered at all times.

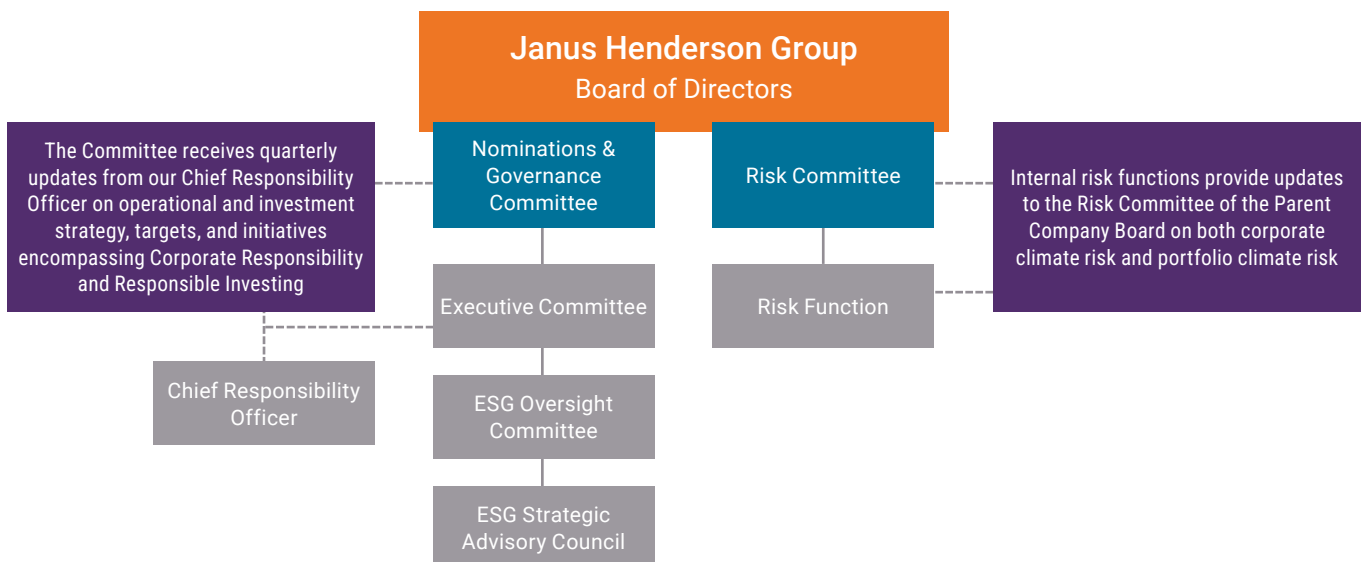
Additionally, the Janus Henderson Proxy Voting Committee is responsible for monitoring and resolving possible conflicts of interest with respect to proxy voting. A summary of Janus Henderson’s Conflicts of Interest Policy is available on our website.

4 Governance and Oversight

The Nominations and Governance Committee of the Board of Directors of Janus Henderson Group has overall oversight of ESG activity at the firm, including Corporate Responsibility as well as Responsible Investment.

The ESG Oversight Committee (ESGOC) provides direct oversight of ESG investment matters. This committee, chaired by the Chief Responsibility Officer, provides oversight over ESG investment processes including portfolio design, portfolio management, various ESG data & toolsets, as well as non-investments oversight over ESG processes including reporting regulatory and client reporting standards, and ESG disclosure. The Committee is responsible for ensuring that the Janus Henderson Investor’s (JHI) framework to manage ESG-related risks is adequate and effective.

ESGOC membership reflects a cross-functional governance body with a variety of skill sets and experience which provides oversight of the firm’s ESG obligations. The membership includes representation from teams such as Financial Risk, Front Office Controls, Responsibility, Product, Legal and Compliance.



In keeping with our Responsible Investment Principles, Janus Henderson’s investment teams define their own ESG priorities based on their research-driven view of materiality.

ESG Product Categorisation provides structured definitions which reflect the tiers of ESG involvement across JHI’s product suite. Given there is no global ESG labelling standard, the JHI categorisation aims to reflect common ESG language and clear criteria to support stakeholder understanding of our ESG capabilities. In practice, the categories can be used to:

- Track ESG AUM and product count for reporting to the Board and other stakeholders
- Support compliance and governance of content, disclosure, and reporting
- Reference in marketing material and website product filters
- Provide consistent client, RFI and RFP responses

ESG Product Categories

 <h4>Traditional</h4> <p>Does not formally consider E, S and G risks and opportunities as part of the investment process.</p>	 <h4>ESG Integrated</h4> <p>Considers financially material E, S and G risks and opportunities but does not have an explicit ESG objective. This can be evidenced by exclusionary or inclusionary screens, research and engagement, or commitments on specific ESG measures.</p>	 <h4>JHI Brighter Future Funds</h4> <p>Has an explicit E, S or G purpose goal, or objective in addition to a financial objective. This can be evidenced by, for example, thematic selection criteria, commitments to beat a benchmark on specific ESG metrics, focus on investing in ESG leaders or improvers, or targets a positive environmental or social impact.</p>
--	--	---

5 Review

This policy will be reviewed on at least an annual basis or as and when required.

6 References

Janus Henderson maintains other policies and documentation related to ESG and sustainability. This document includes, under broader ESG and sustainability content, Janus Henderson’s approach to integrating environmental and other sustainability risks into investment processes and engagement with investee companies.

Other Janus Henderson Policies / Documents

- Responsibility Report
- Diversity & Inclusion Report
- Annual ESG Company Engagement & Voting Review
- Proxy Voting Policy and Procedures
- Fund Disclosures
- Sustainability Risk Procedures

Regulatory References

Where this policy is relevant to funds domiciled and marketed in a particular regulatory jurisdiction, that regulation is referenced below.

Article 3 of the EU Sustainable Finance Disclosure Regulation (SFDR), and applies in respect of all portfolio management services, AIF management and UCITS management carried on by Janus Henderson Investors Europe S.A. (including its branches).

Additional information, including the extent to which Janus Henderson is compliant with the principal adverse impacts rules under Article 4 of SFDR can be found on relevant jurisdictional websites at janushenderson.com

Sections 3 and 7 of the Monetary Authority of Singapore Guidelines on Environmental Risk Management

Supranational conventions

This policy aligns with the requirements under the Convention on Cluster Munitions (Oslo) with regards to producers / production of Cluster Munitions.

This policy aligns with the requirements under the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction (Ottawa) with regards to producers / production of Anti-Personnel Mines.

FOR MORE INFORMATION, PLEASE VISIT JANUSHENDERSON.COM

Janus Henderson
INVESTORS

Important information:

The views presented are as of the date published. They are for information purposes only and should not be used or construed as investment, legal or tax advice or as an offer to sell, a solicitation of an offer to buy, or a recommendation to buy, sell or hold any security, investment strategy or market sector. Nothing in this material shall be deemed to be a direct or indirect provision of investment management services specific to any client requirements. Opinions and examples are meant as an illustration of broader themes, are not an indication of trading intent, are subject to change and may not reflect the views of others in the organization. It is not intended to indicate or imply that any illustration/example mentioned is now or was ever held in any portfolio. No forecasts can be guaranteed and there is no guarantee that the information supplied is complete or timely, nor are there any warranties with regard to the results obtained from its use. Janus Henderson Investors is the source of data unless otherwise indicated and has reasonable belief to rely on information and data sourced from third parties. Past performance does not predict future returns. Investing involves risk, including the possible loss of principal and fluctuation of value.

Not all products or services are available in all jurisdictions. This material or information contained in it may be restricted by law, may not be reproduced or referred to without express written permission or used in any jurisdiction or circumstance in which its use would be unlawful. Janus Henderson is not responsible for any unlawful distribution of this material to any third parties, in whole or in part. The contents of this material have not been approved or endorsed by any regulatory agency.

Janus Henderson Investors is the name under which investment products and services are provided by the entities identified in the following jurisdictions: (a) Europe by Janus Capital International Limited (reg no. 3594615), Henderson Global Investors Limited (reg. no. 906355), Henderson Investment Funds Limited (reg. no. 2678531), Henderson Equity Partners Limited (reg. no.2606646), (each registered in England and Wales at 201 Bishopsgate, London EC2M 3AE and regulated by the Financial Conduct Authority) and Henderson Management S.A. (reg no. B22848 at 2 Rue de Bitbourg, L-1273, Luxembourg and regulated by the Commission de Surveillance du Secteur Financier); (b) the U.S. by SEC registered investment advisers that are subsidiaries of Janus Henderson Group plc; (c) Canada through Janus Henderson Investors US LLC only to institutional investors in certain jurisdictions; (d) Singapore by Janus Henderson Investors (Singapore) Limited (Co. registration no. 199700782N). This advertisement or publication has not been reviewed by Monetary Authority of Singapore (e) Hong Kong by Janus Henderson Investors Hong Kong Limited. This material has not been reviewed by the Securities and Futures Commission of Hong Kong; (f) Taiwan R.O.C by Janus Henderson Investors Taiwan Limited (independently operated), Suite 45 A-1, Taipei 101 Tower, No. 7, Sec. 5, Xin Yi Road, Taipei (110). Tel: (02) 8101-1001. Approved SICE licence number 023, issued in 2018 by Financial Supervisory Commission; (g) South Korea by Janus Henderson Investors (Singapore) Limited only to Qualified Professional Investors (as defined in the Financial Investment Services and Capital Market Act and its sub-regulations); (h) Japan by Janus Henderson Investors (Japan) Limited, regulated by Financial Services Agency and registered as a Financial Instruments Firm conducting Investment Management Business, Investment Advisory and Agency Business and Type II Financial Instruments Business; (i) Australia and New Zealand by Janus Henderson Investors (Australia) Limited (ABN 47 124 279 518) and its related bodies corporate including Janus Henderson Investors (Australia) Institutional Funds Management Limited (ABN 16 165 119 531, AFSL 444266) and Janus Henderson Investors (Australia) Funds Management Limited (ABN 43 164 177 244, AFSL 444268); (j) the Middle East by Janus Capital International Limited, regulated by the Dubai Financial Services Authority as a Representative Office. No transactions will be concluded in the Middle East and any enquiries should be made to Janus Henderson. We may record telephone calls for our mutual protection, to improve customer service and for regulatory record keeping purposes.

Outside of the U.S., Australia, Singapore, Taiwan, Hong Kong, Europe and UK: For use only by institutional, professional, qualified and sophisticated investors, qualified distributors, wholesale investors and wholesale clients as defined by the applicable jurisdiction. Not for public viewing or distribution. Marketing Communication.

Janus Henderson is a trademark of Janus Henderson Group plc or one of its subsidiaries. © Janus Henderson Group plc.