



PUBLIC TRANSPARENCY REPORT

2023

Janus Henderson Investors

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About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Janus Henderson is committed to responsibility – both through our own Corporate Responsibility policies and practices and in our approach to Responsible Investing. We believe integrating financially material environmental, social, and governance (ESG) factors at each appropriate stage of our investment decision-making process can help us fulfil our fiduciary duty to our clients. Global environmental challenges such as climate change, biodiversity loss, and pollution, and societal issues such as wealth and income inequality, access to education and healthcare, and cyberwarfare can pose long-term material risks or opportunities in investor portfolios.

Stewardship is an integral part of Janus Henderson's long-term, active approach to investment management. Strong ownership practices through engagement with issuers and voting proxies can help protect and enhance long-term shareholder or bondholder value. Our investment teams engage with the issuers in which they invest to improve performance on material sustainability issues, with a particular focus on our three core engagement themes: climate change; diversity, equity, and inclusion (DEI); and corporate governance. These themes were chosen based on input from our investment teams and clients as key material investment themes across our portfolios and represent major areas of financial risk or opportunity.

Our firmwide ESG Investment Principles are based on four key beliefs:

- Investment portfolios are built to maximise long-term risk-adjusted returns for our clients.
- Evaluation of financially material climate and ESG factors is a fundamental component of our investment processes.
- Issuer engagement is vital to understanding and promoting business practices that position the issuers we invest in for future success.
- 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.

Overall Responsible Investment Approach

Our approach to ESG integration at Janus Henderson is thoughtful, practical, research-based, and forward-looking. We identify financially material ESG issues, and leveraging JH's long-standing focus on deep research, assess the impact of these issues on cash flows, valuations, discount rates, etc. Our investment teams (analysts and portfolio managers) are at the heart of this process. They are sector and company experts and are best placed to assess the impact of ESG issues on their holdings.

Our investment teams are supported by our central Responsibility team, who are ESG subject matter experts. This team manages ESG strategy and operations, client solutions, and responsible investment and governance, including partnering with the investment teams on research and engagement. This partnership leads to enhanced research and decision-making – marrying the sector and industry expertise of the investment teams with the ESG skills of the Responsibility team.

Corporate ESG

Our approach to corporate responsibility helps inform our responsible investment practices, as we strive to model strong corporate responsibility practices. Whether it is through reducing our energy consumption, sourcing materials responsibly, or finding innovative ways to reduce waste, we are constantly striving to find ways to minimise our impact on the environment. This is important to our people in attracting and retaining talent but also to many of our clients who expect their fiduciaries to behave responsibly. We define, monitor, and assess our corporate ESG strategy and practices along four key dimensions: people, communities, environment, and governance.

This belief and our actions supporting it are long held. In 2007, we recognised that as a business we had a responsibility to limit our greenhouse gas (“GHG”) emissions as much as possible to combat climate change and became one of the first asset managers to become a CarbonNeutral® company. Through these efforts, we have minimised all of our residual corporate emissions, including utilities from all our rented offices and all business travel, and we have proudly maintained this status every year since 2007.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

Since the submission of our last PRI report, we have enhanced our ESG capabilities to enable our clients to benefit from leading ESG research, data, and tools.

ESG investment policy

We established an ESG Investment Policy that sets out our core approach to ESG integration, engagement, proxy voting, governance and oversight, and baseline exclusions.

Specialist ESG resources

We appointed a Chief Responsibility Officer (CRO) to oversee our Responsible Investment strategy. To emphasise the importance of our responsibility efforts and embed them across our entire firm, the CRO reports directly to the CEO, provides quarterly reports to our Board of Directors, and sits on the firm's Strategic Leadership Team. We have also added specialist resources to our central Responsibility team, centred on three focus areas of ESG strategy and operations, client solutions, and responsible investment and governance.

Governance and oversight

We established an ESG Oversight Committee to assess the credibility of our ESG-focused strategies and processes, and to ensure that those strategies are fulfilling client goals and aspirations as stated. We have integrated day-to-day management of operational and portfolio ESG risks into our existing risk functions and committees to ensure that ESG is appropriately reflected in our client experience, that we respect emerging regulation pertaining to ESG, and that we are delivering appropriate ESG data to internal and external stakeholders.

Equipping our investment teams

We are enabling our analysts and portfolio managers to better identify and manage ESG risks and opportunities:

1. Enhancing data and analytics on ESG and climate risks and opportunities at security and portfolio levels

We have augmented the range and quality of ESG data available to our investment teams and risk teams. We launched a proprietary dashboard that shows portfolio-level analytics for the most material sustainability factors. It also identifies leader and laggard issuers to help uncover underappreciated risks and opportunities for the companies in which we invest.

2. Supporting investment teams with expert resources and training

We embarked on a campaign to upskill ESG knowledge and expertise. Over 90% of client-facing Distribution personnel have obtained an external ESG certification. All investment personnel associated with Funds in scope of the European SFDR took over four hours of mandatory ESG training, including on ESG metrics and financial materiality, climate data and scenario analysis, diversity, equity and inclusion, and human capital management. Specialised training on climate data and tools is available on demand.

3. Partnering with investment teams on proprietary ESG research, engagements, and insights

Our Responsibility team partnered with our investment teams to develop thematic ESG research covering a wide range of topics, including nuclear energy, cybersecurity, regulation of internet mega caps, climate stress tests, and physical climate risks/renewable energy opportunities in real estate. Through close collaboration, we also significantly increased our engagement with issuers; 2022 saw over 1,100 documented ESG engagements across a variety of topics. For more information on our collaborative engagements, please see our UK Stewardship Code report (pgs. 50-52). We also voted on over 64,000 proposals across over 6,000 meetings.

Educating our clients

As part of our commitment to advancing the industry dialogue around ESG, we seek to make the thinking of our investment teams widely available to our clients, shareholders, and other stakeholders through white papers, articles, videos, and panel debates.

In the reporting period, we generated 36 thought leadership and educational pieces on ESG topics. The insights included portfolio manager-specific views related to sustainable investment themes and broader papers on the investment implications of climate change and reaching net zero, nuclear energy, green hydrogen, biodiversity loss, deforestation, and the outlook for ESG investing.

We also debuted detailed client ESG reports covering ESG ratings, climate data, engagement statistics, and, for equities, proxy voting.

ESG solutions

To meet our clients' growing desire for ESG-focused strategies, we have extended our product range and capabilities. During the period, we launched three new strategies:

- Janus Henderson Sustainable Multi-Asset
- Janus Henderson Responsible International Dividend
- Janus Henderson Australian Sustainable Credit

In addition, 14 strategies were classified as Article 8 or 9 under the EU SFDR regime in the reporting period.

Industry initiatives

As a founding member of the PRI, we have long been active in the Responsible Investing Industry. Janus Henderson has a strong heritage of involvement with sustainability-related organisations and initiatives. A full list is available in the 2022 Janus Henderson Impact report on our Corporate Sustainability page.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

We recognise that in a fast-paced world, standing still means being left behind. As a result, we are continually striving to strengthen our ESG capabilities and governance to enable our clients to benefit from leading ESG research, data, and tools. In addition, we aim to continue to equip clients with the latest insights from our investment and Responsibility teams in the form of thought leadership, educational guides, and videos, as well as panels, conferences, and other interactive client events.

Over the next two years, we will continue to advance our commitment to Responsible Investing through the following:

- 1) Continuing to invest in our central Responsibility team to ensure our firm is properly resourced to support both our investment and non-investment teams. Specific hires include an experienced ESG executive to lead our ESG Strategy and Operations area, and incremental resources supporting ESG data, client solutions, reporting, regulatory, and marketing/communications.
- 2) Strengthening our ESG governance and oversight structure. We are undertaking a review of our ESG Oversight Committee and framework to ensure our practices and procedures remain best-in-class and sufficiently robust to provide appropriate oversight of the expanding breadth of ESG areas and regulations, while simultaneously being efficient. We are also enhancing board-level ESG capabilities and oversight. We are setting short- and long-term targets that will be reviewed quarterly with our corporate board, in addition to providing board training on ESG. Finally, ESG will be a quarterly discussion topic at our various fund boards.
- 3) Enhancing proprietary ESG data and tools. We are strengthening our data visualisation and analysis tools to provide easy access to interactive issuer and portfolio-level ESG insights and drill-down capabilities. While our analysts and portfolios managers will be the primary users of these tools, they will also be used by our oversight functions, including risk, and for client reporting. These tools will enable our investment teams to conduct analysis of financially material ESG issues in a way that aligns with their current research process and in a similar way to how they access non-ESG issuer and portfolio data.

- 4) Providing ongoing ESG training to various stakeholders. Sessions already planned for the second half of 2023 include training on conducting and documenting outcome-oriented engagements, climate change data and methodology, financial materiality, regulatory, and proprietary tool sets.
- 5) Strengthening and sharing our ESG thought leadership. Through the collaboration and partnership of our investment teams and central Responsibility Team, we will continue to develop ESG research insights across a variety of topics. We hope to enhance the depth of these insights through a partnership with an academic institution that will provide support on both training and research. We also aim to share these insights more broadly with our clients and other external stakeholders, through more personal and interactive events. One example is an event on the investment implications of the global water crisis that Janus Henderson in conjunction with the CDP will be hosting in October 2023.
- 6) Enhancing engagement impact and documentation. Our future focus is on active engagement – engaging with our portfolio holdings on material ESG issues to encourage outcomes that help better position them for future success. To support this, we are investing in extensive training for our investment teams and we are implementing a new engagement documentation system that will enable tracking of objectives, milestones, and escalation paths.
- 7) Enabling client solutions. We are investing significant resources and effort towards developing a tool kit of “ESG building blocks” that will enable us to satisfy our clients’ need for strategies that meet both their financial and ESG objectives. This includes ensuring we are continually improving the robustness of our ESG integration and delivering ESG-focused strategies that align with regional and global regulatory requirements. Increasingly, our clients are seeking bespoke solutions for custom ESG objectives; we are developing a flexible “menu” of options that will allow clients to align portfolios – including thematic portfolios – to deliver against those objectives. Finally, we hope to develop new and differentiated ESG-focussed portfolios for those clients interested in investing with a specific ESG objective in mind.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Michelle Dunstan

Position

Chief Responsibility Officer

Organisation's Name

Janus Henderson Investors

☒ A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

☐ B

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	30	06	2023

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- ☐ (A) Yes
- ☒ (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 332,067,060,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	>50-75%	0%
(B) Fixed income	>10-50%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	>10-50%	0%
(J) Off-balance sheet	0%	0%

(I) Other - (1) Percentage of Internally managed AUM - Specify:

Multi-asset, alternatives

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity	>0-10%
(B) Active – quantitative	0%

(C) Active – fundamental >75%

(D) Other strategies 0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA 0%

(B) Passive – corporate 0%

(C) Active – SSA >10-50%

(D) Active – corporate >50-75%

(E) Securitised >10-50%

(F) Private debt 0%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity	(2) >0 to 10%
(B) Fixed income – SSA	(2) >0 to 10%
(C) Fixed income – corporate	(2) >0 to 10%
(D) Fixed income – securitised	(1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(2) Listed equity - passive	(3) Fixed income - active	(11) Other
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active	(2) Listed equity - passive
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

	Percentage of your listed equity holdings over which you have the discretion to vote
(A) Listed equity – active	(11) >90 to <100%
(B) Listed equity - passive	(11) >90 to <100%

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(A) Listed equity - passive	<input type="radio"/>	<input checked="" type="radio"/>
(C) Listed equity - active - fundamental	<input checked="" type="radio"/>	<input type="radio"/>
(E) Fixed income - SSA	<input checked="" type="radio"/>	<input type="radio"/>
(F) Fixed income - corporate	<input checked="" type="radio"/>	<input type="radio"/>
(G) Fixed income - securitised	<input checked="" type="radio"/>	<input type="radio"/>
(V) Other: Multi-asset, alternatives	<input checked="" type="radio"/>	<input type="radio"/>

ESG IN OTHER ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG in other asset classes	1

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed
(C) Other

Our approach to ESG integration at Janus Henderson is thoughtful, practical, research-based, and forward-looking. We identify financially material ESG issues, and leveraging Janus Henderson's long-standing focus on deep research, assess the impact of these issues on cash flows, valuations, discount rates, etc. Our investment teams (analysts and portfolio managers) are at the heart of this process. They are sector and company experts and are best place to assess the impact of ESG issues on their holdings.

Our investment teams are supported by our central Responsibility team, who are ESG subject matter experts. This team manages ESG strategy and operations, client solutions, and responsible investment and governance, including partnering with the investment teams on research and engagement. This partnership leads to enhanced research and decision-making – marrying the sector and industry expertise of the investment teams with the ESG skills of the Responsibility team.

Our 'other' strategies include multi-asset and alternatives. Multi-asset strategies comprise the majority of the AUM in this bucket and we incorporate ESG factors in the majority of the assets in these strategies.

ESG NOT INCORPORATED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG not incorporated	1

Describe why your organisation does not currently incorporate ESG factors into your investment decisions.

Internally managed
(A) Listed equity – passive

We offer a range of passive products according to client needs. Some products do not incorporate ESG factors into investment decisions due to the nature of those products and client requirements. Increasingly, we can offer passive products that incorporate ESG factors, in line with client demand

ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	>75%
(D) Screening and integration	>10-50%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	>0-10%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	>75%
(C) A combination of screening approaches	>10-50%

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

	(1) Fixed income - SSA	(2) Fixed income - corporate	(3) Fixed income - securitised
(A) Screening alone	0%	0%	0%
(B) Thematic alone	0%	0%	0%
(C) Integration alone	>75%	>75%	>75%
(D) Screening and integration	>10-50%	>10-50%	0%
(E) Thematic and integration	0%	0%	0%
(F) Screening and thematic	0%	0%	0%
(G) All three approaches combined	0%	0%	0%
(H) None	0%	0%	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 FI	CORE	OO 17 FI	N/A	PUBLIC	Fixed income	1

What type of screening does your organisation use for your internally managed active fixed income where a screening approach is applied?

	(1) Fixed income - SSA	(2) Fixed income - corporate
(A) Positive/best-in-class screening only	0%	0%
(B) Negative screening only	>75%	>75%
(C) A combination of screening approaches	0%	0%

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

☒ **(A) Yes, we market products and/or funds as ESG and/or sustainable**

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>0-10%

- ☐ (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- ☐ (C) Not applicable; we do not offer products or funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

● **(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications**

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

>0-10%

○ **(B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

Which ESG/RI certifications or labels do you hold?

- ☐ (A) Commodity type label (e.g. BCI)
- ☐ (B) GRESB
- ☐ (C) Austrian Ecolabel (UZ49)
- ☐ (D) B Corporation
- ☐ (E) BREEAM
- ☐ (F) CBI Climate Bonds Standard
- ☐ (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- ☐ (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- ☐ (I) EU Ecolabel
- ☐ (J) EU Green Bond Standard
- ☒ **(K) Febelfin label (Belgium)**
- ☐ (L) Finansol
- ☐ (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- ☐ (N) Greenfin label (France)
- ☐ (O) Grüner Pfandbrief
- ☐ (P) ICMA Green Bond Principles
- ☐ (Q) ICMA Social Bonds Principles
- ☐ (R) ICMA Sustainability Bonds Principles
- ☐ (S) ICMA Sustainability-linked Bonds Principles
- ☐ (T) Kein Verstoß gegen Atomwaffensperrvertrag
- ☒ **(U) Le label ISR (French government SRI label)**
- ☐ (V) Luxflag Climate Finance
- ☐ (W) Luxflag Environment
- ☐ (X) Luxflag ESG
- ☐ (Y) Luxflag Green Bond
- ☐ (Z) Luxflag Microfinance
- ☐ (AA) Luxflag Sustainable Insurance Products
- ☒ **(AB) National stewardship code**

Specify:

Janus Henderson is a UK Stewardship Code Signatory

- ☐ (AC) Nordic Swan Ecolabel
- ☐ (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)
- ☐ (AE) People's Bank of China green bond guidelines
- ☒ (AF) RIAA (Australia)
- ☒ (AG) Towards Sustainability label (Belgium)
- ☐ (AH) Other

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(E) Fixed income – SSA	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(F) Fixed income – corporate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(G) Fixed income – securitised	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- ☐ (A) Publish as absolute numbers
- ☒ (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- ☒ (A) Overall approach to responsible investment
- ☐ (B) Guidelines on environmental factors
- ☐ (C) Guidelines on social factors
- ☐ (D) Guidelines on governance factors
- ☐ (E) Guidelines on sustainability outcomes
- ☐ (F) Guidelines tailored to the specific asset class(es) we hold
- ☒ (G) Guidelines on exclusions
- ☐ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☒ (I) Stewardship: Guidelines on engagement with investees
- ☐ (J) Stewardship: Guidelines on overall political engagement
- ☐ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☒ (L) Stewardship: Guidelines on (proxy) voting
- ☒ (M) Other responsible investment elements not listed here

Specify:

Governance and Oversight, Escalation Requirements

- ☐ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☐ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☐ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☐ (C) Specific guidelines on other systematic sustainability issues
- ☒ **(D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

- ☒ **(A) Overall approach to responsible investment**
Add link:
https://cdn.janushenderson.com/webdocs/JHI_ESG_InvestmentPolicy_April2023.pdf
- ☒ **(J) Guidelines on exclusions**
Add link:
https://cdn.janushenderson.com/webdocs/JHI_ESG_InvestmentPolicy_April2023.pdf
- ☒ **(L) Stewardship: Guidelines on engagement with investees**
Add link:
https://cdn.janushenderson.com/webdocs/JHI_ESG_InvestmentPolicy_April2023.pdf
- ☒ **(O) Stewardship: Guidelines on (proxy) voting**
Add link:
<https://cdn.janushenderson.com/webdocs/JH+Proxy+Voting+Policy+and+Procedures+-+March+2023+Revisions.pdf>
- ☒ **(P) Other responsible investment aspects not listed here**
Add link:
https://cdn.janushenderson.com/webdocs/JHI_ESG_InvestmentPolicy_April2023.pdf
- ☐ (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

☒ (A) Yes

Elaborate:

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. As an active manager, integrating environmental, social and governance (ESG) factors into our investment decision making and ownership practices is fundamental to delivering the results our clients seek. ESG issues can have a material impact on the financial outcomes of our investments.

☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- ☒ (A) Overall stewardship objectives
- ☒ (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- ☒ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- ☒ (D) How different stewardship tools and activities are used across the organisation
- ☒ (E) Approach to escalation in stewardship
- ☒ (F) Approach to collaboration in stewardship
- ☒ (G) Conflicts of interest related to stewardship
- ☒ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☒ (I) Other

Specify:

As outlined in our UK Stewardship Code report and Proxy Voting Policy.

- ☐ (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- ☐ (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- ☐ (B) Yes, it includes voting principles and/or guidelines on specific social factors
- ☒ (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- ☐ (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- ☒ (A) We have a publicly available policy to address (proxy) voting in our securities lending programme

Add link(s):

<https://cdn.janushenderson.com/webdocs/2022+JHI+UK+Stewardship+Code+Report.pdf>

- ☐ (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- ☐ (C) We rely on the policy of our external service provider(s)
- ☐ (D) We do not have a policy to address (proxy) voting in our securities lending programme
- ☐ (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment

(7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☒ (A) Listed equity

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ (11) 100%

☒ (B) Fixed income

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ (11) 100%

☒ (I) Other

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ (11) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

☒ **(A) Actively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

● **(11) 100%**

☒ **(B) Passively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

● **(11) 100%**

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- ☒ (A) Board members, trustees, or equivalent
☒ (B) Senior executive-level staff, or equivalent

Specify:

Chief Responsibility Officer

- ☒ (C) Investment committee, or equivalent

Specify:

Front Office Governance and Oversight Committee and ESG Oversight Committee

- ☒ (D) Head of department, or equivalent

Specify department:

Chief Responsibility Officer

- ☐ (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

- ☐ (A) Yes
- ☐ (B) No
- ☒ (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☒ (A) Internal role(s)

Specify:

Chief Responsibility Officer; Head of Responsible Investment and Governance; Head of Client Solutions

☐ (B) External investment managers, service providers, or other external partners or suppliers

☐ (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

☐ (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

☒ (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

While we do not use responsible investment KPIs to evaluate the performance of our board members or trustees, ESG considerations are included in the remuneration process for staff with ESG-specific responsibilities. In addition, we believe that creating a diverse and inclusive environment is a cultural value and is everyone's responsibility, and this measure of ESG is included in all staff performance evaluations which ties directly to the remuneration process.

Regarding sustainability KPIs for senior managers, sustainability risks are included as part of the Company's annual risk assessment, which is considered by the Compensation Committee to address types of risk relevant to the firm, and where required to adjust variable compensation pools. The Compensation Committee retains overall approval of senior manager compensation and will consider the annual risk assessment as part of the individual approval of variable compensation awards to senior managers.

Finally, our Governance and Nominations Committee, which has formal oversight of ESG and climate issues, consists of several members with significant expertise in ESG, including climate change, although their compensation is not linked to responsible investment KPIs.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

● (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

● (1) KPIs are linked to compensation

- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

The compensation of Janus Henderson's CEO is assessed using a scorecard, and in 2023, the scorecard included ESG-related objectives. These targets are rolled out to the performance scorecards of other members of the Executive Committee where this is relevant to their role.

ESG considerations are included in the remuneration process for staff with ESG-specific responsibilities. In addition, we believe that creating a diverse and inclusive environment is a cultural value and is everyone's responsibility and this measure of ESG is included in all staff performance evaluations which ties directly to the remuneration process.

Regarding sustainability KPIs for senior managers, sustainability risks are included as part of the Company's annual risk assessment, which is considered by the Compensation Committee to address types of risk relevant to the firm, and where required to adjust variable compensation pools. The Compensation Committee retains overall approval of senior manager compensation and will consider the annual risk assessment as part of the individual approval of variable compensation awards to senior managers.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☒ (A) Any changes in policies related to responsible investment
- ☒ (B) Any changes in governance or oversight related to responsible investment
- ☒ (C) Stewardship-related commitments
- ☒ (D) Progress towards stewardship-related commitments
- ☒ (E) Climate-related commitments
- ☒ (F) Progress towards climate-related commitments
- ☒ (G) Human rights-related commitments
- ☐ (H) Progress towards human rights-related commitments
- ☐ (I) Commitments to other systematic sustainability issues

- ☐ (J) Progress towards commitments on other systematic sustainability issues
- ☐ (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- ☒ (A) Yes, including all governance-related recommended disclosures
- ☒ (B) Yes, including all strategy-related recommended disclosures
- ☒ (C) Yes, including all risk management-related recommended disclosures
- ☒ (D) Yes, including all applicable metrics and targets-related recommended disclosures

- ☐ (E) None of the above

Add link(s):

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

- ☒ (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

<https://www.janushenderson.com/en-lu/advisor/eu-sfdr-absolute-return-fund/>

- ☐ (B) Disclosures against the European Union's Taxonomy
- ☐ (C) Disclosures against the CFA's ESG Disclosures Standard
- ☒ (D) Disclosures against other international standards, frameworks or regulations

Specify:

CDP

Link to example of public disclosures

<https://www.cdp.net/en/responses/8237>

- ☒ (E) Disclosures against other international standards, frameworks or regulations

Specify:

TCFD

Link to example of public disclosures

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

☒ **(F) Disclosures against other international standards, frameworks or regulations**

Specify:

UK Stewardship Code

Link to example of public disclosures

<https://cdn.janushenderson.com/webdocs/2022+JHI+UK+Stewardship+Code+Report.pdf>

☒ **(G) Disclosures against other international standards, frameworks or regulations**

Specify:

Modern Slavery and Human Trafficking

Link to example of public disclosures

https://s25.q4cdn.com/573549252/files/doc_downloads/governance/investor/2021/05/JHG-plc-Modern-Slavery-and-Human-Trafficking-Policy-2021.pdf

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

☒ **(A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement**

Add link(s):

<https://www.ici.org/member-organizations>

<https://my.sifma.org/Directory/Member-Directory>

- ☐ (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- ☐ (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- ☐ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☐ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☐ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☐ (D) Exclusions based on our organisation's climate change commitments

☒ (E) Other elements

Specify:

We have a firmwide exclusions policy which applies baseline exclusions for current manufacture, or minority shareholding, of 20% or greater in a manufacturer of:

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

- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

☒ (A) We incorporate ESG factors into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

☒ (B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

☒ (C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

☐ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

(1) Listed equity

(2) Fixed income

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

Janus Henderson prioritises investee engagement based primarily on our assessment of the materiality of ESG factors on financial/operational performance and input from our clients. Individual investment teams establish their own priorities best aligned with their investment process and client base. Additional factors include consideration of systemic sustainability issues such as climate change, one of our core engagement themes that we have identified based on input from our investment teams and our clients. Our other core themes are diversity, equity and inclusion, and corporate governance.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

We recognise that in some instances joint action by shareholders has the potential to be more effective than acting alone. This is especially so in relation to systemic sustainability issues. Janus Henderson proactively collaborates with other investors on sustainability issues, directly and through industry bodies. We review all proposals for collective engagement initiatives on a case-by-case basis. Alongside our usual criteria based on the size of our shareholding, the materiality of the issues and our ability to influence, the core criteria for collective engagement are the alignment of interests of participants and the potential for collaborative action to be more effective than acting alone.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- ☒ (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff
Select from the list:
☒ 1
- ☒ (B) External investment managers, third-party operators and/or external property managers, if applicable
Select from the list:
☒ 4
- ☒ (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers
Select from the list:
☒ 5
- ☒ (D) Informal or unstructured collaborations with investors or other entities
Select from the list:
☒ 3
- ☒ (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar
Select from the list:
☒ 2
- ☐ (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 26	PLUS	OO 8, OO 9, PGS 1	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation ensure that its policy on stewardship is implemented by the external service providers to which you have delegated stewardship activities?

- ☐ (A) Example(s) of measures taken when selecting external service providers:

☐ (B) Example(s) of measures taken when designing engagement mandates and/or consultancy agreements for external service providers:

☒ (C) Example(s) of measures taken when monitoring the stewardship activities of external service providers:

None of our engagement is outsourced. For proxy voting, we leverage external providers to facilitate voting logistics and help implement policy. We do not outsource voting decisions to external service providers.

Within the existing proxy landscape, there is currently no mechanism by which vote confirmations are provided by the issuer/tabulator to the voting investor/beneficial owner. As such, ISS is able to verify the following:

- The proxy delivery agent has delivered ballots that match its clients' reported holdings
- The proxy delivery agent has received the voting instructions sent by ISS on behalf of its clients
- The proxy delivery agent has delivered the votes (in aggregate) to the tabulator

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

Aside from expectations outlined under our ESG investment principles, the precise approach to and depth of ESG integration is down to the discretion and judgement of our investment teams, who apply their differentiated perspectives, insight and experience to identify sustainable business practices that can generate long-term value for investors.

We place our investment team analysts at the heart of the research process; they are sector / industry experts and best positioned to effectively conduct and integrate ESG analysis. They are the ones with primary responsibility for idea generation, identifying key controversies / areas of research, conducting detailed research, financial modelling / forecasting and engagement. To be truly integrated, ESG must be embedded throughout this process - and therefore driven by the investment teams. They are supported by the ESG subject-matter experts on our central Responsibility Team. The Responsibility Team's role is first to help equip the investment teams to conduct ESG analysis with training and toolsets, and then to partner with them to enhance the quality and depth of ESG research and engagement, where the investment teams need support.

We encourage and support investment teams in embedding ESG factors in their work. This support includes centralised functions, such as data management, research, investment platforms and risk management tools:

- Internal Research Platform: Investment teams are responsible for sharing relevant ESG research produced in-house by analysts on centralised research platforms.
- Responsibility Team: A central specialised group of ESG subject-matter experts that supports both the investments teams and non-investment teams on a range of ESG issues. The Responsibility Team equips investors with ESG training and toolsets, and supports them on ESG research, ESG engagements, proxy voting, and other ESG integration topics.
- 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.
- ESG Research, Data, and Ratings: Janus Henderson subscribes to a broad range of external ESG information providers and makes this information available directly to the investment teams

As it relates to our engagement activities, each investment team is responsible for assessing the ESG issues applicable to their portfolio holdings, with each investment team developing different objectives for their company engagements. Investment teams hold meetings with companies throughout the year, many of which cover ESG issues. In addition, if the teams have specific ESG-related issues that they wish to discuss with a company they will frequently proactively organise engagements to address any concerns.

The Responsibility Team also works with all investment teams to highlight potential areas for engagement on portfolio holdings. Objectives in terms of what we are seeking to achieve from more focused proactive engagement work are frequently set out in advance as part of pre-engagement preparation, and all engagements are recorded on our internal research platform.

The impact of voting on corporate behaviour is reviewed by investment teams where relevant as part of their broader company engagement work. In addition, the Responsible Investment and Governance team within the central Responsibility team reviews proxy voting results on an ongoing basis and monitor progress in support of company engagement work. While we do not seek to systematically track this across investments, we have numerous case studies where significant opposition to company proposals has likely contributed to change. Examples would include actions taken in response to voting on remuneration policies, director elections and shareholder proposals attracting a high degree of support.

All research and engagements, including ESG research and engagements, are documented by analysis in our existing fundamental research platform systems, Quantum (Fixed Income) and EQuantum (Equities). We distinguish between different types of engagement:

- Engaging for insight: where we strive to learn more about a company's ESG risks/opportunities and how they are managing them to leverage that information in the research and investment process
- Engaging for action: where we have identified an area where a company is not managing an ESG risk, we encourage them to take specific action that are in the best-interest of their long-term sustainable cash flows (outcome-oriented engagements)

This enables us to track these action-oriented engagements across multiple interactions, in order to assess progress and outcomes. It will also allow us to better capture the themes or topics engaged upon and will enable better reporting on engagements to our clients.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

Further details about our stewardship approach can be found in our 2022 UK Stewardship Code report:
<https://cdn.janushenderson.com/webdocs/2022+JHI+UK+Stewardship+Code+Report.pdf>

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

☒ (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes

Select from the below list:

☒ (1) in all cases

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☒ (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear

Select from the below list:

☒ (1) in all cases

☐ (2) in a majority of cases

☐ (3) in a minority of cases

☐ (D) We do not review external service providers' voting recommendations

☐ (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

☐ (A) We recall all securities for voting on all ballot items

☐ (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting

☒ (C) Other

Specify:

Stock lending makes an important contribution to market liquidity and provides additional investment return potential for our clients. Voting rights are transferred with any stock that is lent, however, Janus Henderson adopts a minimum recall policy to automatically recall all stock for Special meetings, and Mergers and Acquisitions. In addition, Portfolio Managers have the ability to automatically recall stock based on a company's governance risk rating and/or on an ad hoc basis.

☐ (D) We do not recall our securities for voting purposes

☐ (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- ☐ (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- ☒ (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- ☐ (C) We vote in favour of shareholder resolutions only as an escalation measure
- ☐ (D) We vote in favour of the investee company management's recommendations by default
- ☐ (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- ☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- ☒ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website

Add link(s) to public disclosure:

<https://www.bnnbloomberg.ca/janus-henderson-investors-to-oppose-ritchie-bros-deal-to-buy-iaa-1.1876814>

- ☒ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- ☐ (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- ☐ (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

- (A) Yes, for all (proxy) votes
- (B) Yes, for the majority of (proxy) votes

Add link(s):

<https://www.janushenderson.com/en-us/investor/proxy-voting/>

<https://www.janushenderson.com/en-gb/investor/who-we-are/esg-environmental-social-governance/esg-resources/>

- (C) Yes, for a minority of (proxy) votes
- (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33.1	CORE	PGS 33	N/A	PUBLIC	Stewardship: (Proxy) voting	2

In the majority of cases, how soon after an investee's annual general meeting (AGM) or extraordinary general meeting (EGM) do you publish your voting decisions?

- (A) Within one month of the AGM/EGM
- (B) Within three months of the AGM/EGM
- (C) Within six months of the AGM/EGM
- (D) Within one year of the AGM/EGM
- (E) More than one year after the AGM/EGM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

	(1) In cases where we abstained or voted against management recommendations	(2) In cases where we voted against an ESG-related shareholder resolution
(A) Yes, we publicly disclosed the rationale	(3) for a minority of votes	(3) for a minority of votes
(B) Yes, we privately communicated the rationale to the company		
(C) We did not publicly or privately communicate the rationale, or we did not track this information	○	○
(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year	○	○

(A) Yes, we publicly disclosed the rationale - Add link(s):

<https://cdn.janushenderson.com/webdocs/2022+ESG+Company+Engagement+and+Voting+Review-28.06.23.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

Within the existing proxy landscape, there is currently no mechanism by which vote confirmations are provided by the issuer/tabulator to the voting investor/beneficial owner. As such, ISS is able to verify the following:

- The proxy delivery agent has delivered ballots that match its clients' reported holdings
- The proxy delivery agent has received the voting instructions sent by ISS on behalf of its clients
- The proxy delivery agent has delivered the votes (in aggregate) to the tabulator

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

(1) Listed equity

(A) Joining or broadening an existing collaborative engagement or creating a new one



(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal



(C) Publicly engaging the entity, e.g. signing an open letter



(D) Voting against the re-election of one or more board directors



(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director



(F) Divesting



(G) Litigation



(H) Other



(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- ☒ (A) **Joining or broadening an existing collaborative engagement or creating a new one**
- ☐ (B) Publicly engaging the entity, e.g. signing an open letter
- ☒ (C) **Not investing**
- ☒ (D) **Reducing exposure to the investee entity**
- ☒ (E) **Divesting**
- ☐ (F) Litigation
- ☐ (G) Other
- o (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 38	PLUS	OO 8, OO 5.3 FI	N/A	PUBLIC	Stewardship: Escalation	2

Describe your approach to escalation for your internally managed SSA and/or private debt fixed income assets.

(A) SSA - Approach to escalation

Our focus regarding escalation and stewardship for SSA is on emerging market debt countries and quasi-sovereigns. In order to be a stronger voice in our pursuit of ESG principles and their application by investee countries and quasi-sovereigns, which form the focus of our EMD hard currency strategy, we have joined the Emerging Markets Investors Alliance (EMIA), which “enables institutional emerging market investors to support good governance, promote sustainable development, and improve investment performance in the governments and companies in which they invest”. There are over 30 leading investment managers members of the EMIA, running 10 programmes. Our Fixed Income team is involved in the sovereign decarbonisation programme and debt and fiscal governance programme, which allow us to join forces with other investors to work with selected emerging market countries on aspects such as biodiversity or hold advocacy campaigns promoting better governance.

Additionally, during our road trips to investee countries and issuers, we focus on discussing social and governance aspects with the relevant government and central bank officials.

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- ☒ (A) Yes, we engaged with policy makers directly
- ☒ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- ☒ (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
 - (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☒ (A) We participated in 'sign-on' letters
- ☒ (B) We responded to policy consultations
- ☒ (C) We provided technical input via government- or regulator-backed working groups

Describe:

Janus Henderson's technology team provided technical inputs to the European Commission's call for feedback on the EU Taxonomy Environmental Delegated Act.

- ☐ (D) We engaged policy makers on our own initiative
- ☐ (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- ☐ (A) We publicly disclosed all our policy positions
- ☐ (B) We publicly disclosed details of our engagements with policy makers
- ☒ (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

Explain why:

We report on membership of key ESG policy initiatives and provide examples of our work contributing to these initiatives, but do not report publicly on all of this work.

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Methane/flaring from oil and gas industry

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☒ (1) Environmental factors
- ☐ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☒ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Rationale for Engagement

Methane has ~80x the warming power of CO₂, and despite not being as long-lasting, it sets the pace for global warming in the near term. There is increasing coverage of how methane leaks have been previously underestimated and are a much greater climate risk than predicted. From an investment perspective, there is a clear financial incentive to encourage oil and gas companies to reduce methane leaks, particularly when gas prices are high. Regulations are also starting to catch up to this issue, at COP26 100 countries pledged to cut methane emissions by 30% by 2030, and oil and gas majors are developing The Oil & Gas Methane Partnership (OGMP) 2.0 reporting framework as a gold standard for reporting on methane. However, the issue persists. Last month a BBC investigation reported that communities in Iraq living close to Rumaila oil fields where gas is openly burned were at elevated risks of leukaemia. In 2019, Iraq accounted for 9% of global methane emissions, with wasted gas estimated to be worth USD 1.5 billion, enough to power 3 million homes.

What did we do?

We conducted engagements with three European oil and gas majors to specifically discuss methane emissions and the practice of flaring. In order to understand their approach to tackling methane emissions, to understand where the problem areas still exist, the level of visibility the companies have on this issue, and the barriers to reaching zero-flaring practices and eliminating fugitive methane emissions completely. We had email exchanges on certain topics and organised calls with each company.

Outcome and next steps

The engagements with the companies provided lot of insights. We understand there is lot of discrepancy between company reported methane data and satellite data, with media reports flagging issues of under-reporting in numerous countries.

After the calls and further research on this issue, we followed up with each company asking for more disclosure and transparency regarding methane (on partnerships; progress being made on data accuracy; what is in versus out of scope of methane reporting and why; which assets are difficult to monitor etc) as this will provide investors with more comfort that companies are taking action to address this issue.

We encouraged a clearer breakdown of emissions disclosure (by operated versus non-operated assets; by region; by emission type – i.e., flaring/venting/ fugitive emissions). When conducting the company's data collection exercise, we encouraged casting the largest possible net to include all methane emissions potentially associated with its business, including third party traded liquefied natural gas. The more visibility companies have of associated methane, the more likelihood of avoiding reputational damage associated with pollutive operators.

We also encouraged greater industry collaboration to address practices of venting/flaring and fugitive emissions in under-resourced methane hotspots (e.g., Iraq, Iran, Algeria, Nigeria, Libya etc) sharing expertise and improving capacity-building to mitigate this risk before it leads to further environmental pollution and community health risks like those reported in Iraq.

Lastly, we encouraged more ambitious and specific targets around methane, moving to absolute targets from intensity targets (and creating more targets focused on non-operated assets etc).

(B) Example 2:

Title of stewardship activity:

Carbon footprint and
decarbonisation

(1) Led by

- **(1) Internally led**
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☒ (1) **Environmental factors**
- ☐ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
- ☒ (2) **Fixed income**
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Rationale for Engagement

Engagement with an international energy company to understand and discuss the company's transition plans and implementation process. The purpose of engagement was to understand and discuss how company may be impacted by material climate risks and opportunities and how these factors are considered within strategy in a manner consistent with the company's business model and sector. We also wanted to push the company to improve transparency around carbon offsets, capital expenditure breakdown and other areas.

What did we do?

Discussions were held with the company's executives on carbon transition plans. The company explained its plan to significantly scale up its low-carbon business, invest in new technologies and lower carbon emissions as part of its decarbonisation goals. It also detailed how, as a group, it was targeting a reduction in its Scope 1, 2 and 3 emissions and its reliance on 'high-quality offsets' for a small proportion.

Engagement provided us with an opportunity to:

1. Convey our reservations about carbon-offset strategies.
2. Stress the need for improved reporting on the company's capex breakdown and carbon-offset targets and - given that shorter-term goals were missing from the existing strategy - request elaboration on how the company will achieve its transition targets over the next few years.
3. Suggest to the company that it investigates a green framework for its future issuance to solidify its transition strategy with binding commitments.

Outcome and next steps

While the company's transition strategy is broadly in line with other major oil and gas groups in Europe, its starting point is more advanced than its peers, given lower CO₂ and methane emissions. Moreover, Europe's current energy crisis should result in further investment into the company's decarbonisation goals. While activity change cannot be immediate, the expectation is to see management reflecting on the future business model and clarifying the targeted future contributions from all business lines.

The company agreed to provide regular reports on its progress. We remain in active conversation with company management to assess whether all our feedback has been acted upon.

(C) Example 3:

Title of stewardship activity:

Corporate culture, diversity and inclusion

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☒ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☒ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Rationale for Engagement

We engaged with a Japanese consumer electronics and video game company pursuant to lack of gender diversity at Board level and negative press reporting regarding its workplace culture. Diversity-related public disclosures by the company were also minimal. We believed dialogue on these issues could drive transparency and improve long-term financial performance of the company.

What did we do?

Engagement was held with company executives to discuss gender diversity and workplace culture. Company executives informed us about an ongoing investigation into the issue. They also acknowledged lack of diversity at Board level and are looking at ways to improve this. Discussion provided insight into employee turnover, which remains low both globally and in Japan.

Outcome and next steps

We plan to follow up with the company post the completion of investigation to discuss its outcome and next steps. We intend to continue to push to improve gender diversity at Board and across its workforce.

(D) Example 4:

Title of stewardship activity:

Corporate governance and ESG reporting

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☐ (2) Social factors
- ☒ (3) Governance factors

(3) Asset class(es)

- ☒ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Rationale for Engagement

We engaged with a large Japanese consumer goods company as part of an initiative led by the ACGA, to facilitate collaborate engagement with Japanese companies on corporate governance. (Janus Henderson actively participates in collaborative engagement where we consider that this has the clear potential to be more effective than our own engagement alone.)

The company was selected for engagement based on a range of quantitative and qualitative factors, which identified it as a laggard versus local market peers. The group identified several objectives as part of the engagement, including improvements to Board independence and diversity, increased independent audit oversight, and improvements to ESG reporting and transparency. We believed improving these issues could drive better governance and improve long-term financial performance of the company.

What did we do?

During the year, multiple calls were arranged with the company. On each occasion a senior manager was put forward by the company to lead the dialogue. Janus Henderson was an active participant in all calls (in a supporting role) and pre/post meeting calls with the investor group. There has not yet been a direct impact on proxy voting activity but this remains under review.

Outcome and next steps

The engagement has been successful in raising a wide range of corporate governance and ESG issues with the company, and on gaining a much higher level of understanding about company policy and practices. The company has been in the process of introducing a new corporate governance system, including major changes to the Board of Directors and decision-making processes, which has been an important backdrop to the engagement.

The engagement is ongoing, and we continue to press the company for improvements on Board diversity and ESG reporting as well as pushing for the opportunity to speak to a wider range of company representatives (including board directors). It is not possible to attribute specific changes at the company to this engagement activity. However, feedback from the company indicates that this engagement has been useful in highlighting investor views and priorities on governance and ESG to the Board during a period when significant changes are being made.

(E) Example 5:

Title of stewardship activity:

Corporate governance at
privately-owned telecom companies

- (1) Led by
- **(1) Internally led**
 - (2) External service provider led
 - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
- ☐ (1) Environmental factors
 - ☐ (2) Social factors
 - ☒ **(3) Governance factors**
- (3) Asset class(es)
- ☐ (1) Listed equity
 - ☒ **(2) Fixed income**
 - ☐ (3) Private equity
 - ☐ (4) Real estate
 - ☐ (5) Infrastructure
 - ☐ (6) Hedge funds
 - ☐ (7) Forestry
 - ☐ (8) Farmland
 - ☐ (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Rationale for Engagement

This was a proactive engagement with two European privately-owned telecom companies on corporate governance issues as these could materially affect long-term financial outcomes.

What did we do?

During the year, a meeting was organised with the general counsel and investor relations of these companies to discuss their existing governance structure and best practices. Both companies were recently delisted. Discussion allowed us to highlight the challenges bond investors face in privately-owned set-ups given ownership structure and fewer disclosures.

Outcome and next steps

The engagement allowed us to compare and contrast corporate governance practices at both companies. While one company retained most of the governance structure typically seen at listed companies, the other company had significantly scaled down listed company governance requirements. After the meeting, we held regular exchanges with these companies. We provided them with recommendations to be adopted in a proactive and timely manner that could help in further boosting investor confidence. The companies also came back with their perspectives and approach to addressing some of our recommendations.

During 2023, we will follow up engagements with these companies, focusing more on ESG governance, environmental commitments and progress made thereunder.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

☒ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Janus Henderson recognises that urgent action on climate change is imperative, and we are committed to fulfilling our role as a responsible corporate citizen by minimising our own environmental impact and embedding sustainable practices throughout our own business.

Corporate climate change risks and opportunities

In 2007, we recognised that as a business we had a responsibility to limit our greenhouse gas ("GHG") emissions as much as possible to combat climate change and became one of the first asset managers to become a CarbonNeutral® company. Through these efforts, we have minimised all of our residual corporate emissions and we have proudly maintained this status every year since 2007.

We pay close attention to the climate strategy and risks of our supply chain. We updated our procurement and vendor management questionnaires to encompass climate, including policy, disclosure, emissions, targets, and physical risk. We will engage if a material risk is identified to understand how it is or will be addressed. Unaddressed risks could result in termination of services.

Our assessment is that Janus Henderson's corporate climate change risk is low under all scenarios, from both physical and transition risk perspectives. We consider climate-related risks and opportunities over the short-term (0-1 years), medium-term (1-3 years) and long-term (3-20 years) and define a substantial financial or strategic impact on our business as one that potentially exceeds \$5 million. Risks that are potentially relevant to Janus Henderson as a corporate entity include those related to: current and emerging regulations, technology, legal frameworks, market dynamics, reputation, and acute or chronic physical situations. The measures that our internal Risk team have put in place to address other operational risks that can be related to climate change, such as flooding of the Thames or severe weather in Denver, are more than sufficient to address current and future physical risks. Our carbon footprint, and correspondingly our transition risk, is inherently low and has further reduced by our efforts to reduce consumption, switch to renewable energy, and purchase high-quality offsets.

We have also set science-based aligned targets on our upstream corporate emissions and are reviewing the downstream emissions of our supply chain, and in many portfolios.

Investment climate-related risks and opportunities

Our investment teams are primarily responsible for the research, financial modelling, portfolio construction and stewardship activities. Investment teams are supported by our central Responsibility team, which manages ESG data and training, and partners with the investment teams on research and engagement.

This process is a combination of bottom-up analysis, starting at the issuer level and is increasingly leveraging portfolio-level data. For bottom-up analysis, our investment teams have access to issuer-level and portfolio-level third-party data. They leverage this data to identify potentially financially material climate and ESG risks and opportunities as they research their issuers.

The investment teams conduct engagements to both obtain further insight on the climate or ESG issue and often to encourage the issuer to better manage these issues. Investment teams assess the materiality and the impact on relevant financial metrics for the issuer. Should a material unmanaged risk be identified and quantified, we evaluate the impact on a securities price and risk-adjusted return. Should we believe the risk is not fully priced in, the portfolio impact could include escalation through further engagement, reweighting of position sizes, changing target prices, or divestment for outsized unmanaged risks. We generally prefer engagement over exclusionary policies where we have identified investment risks.

To enable our analysts and portfolio managers to identify and manage climate risks and opportunities, we equip them with the requisite skills, data and tools:

- Data, metrics, and analytics on climate risks and opportunities at security and portfolio level
- Supporting investment teams with expert resources and training
- Delivering proprietary climate research and insights

Investment teams have access to a range of third-party data from providers including on ESG ratings, risks and controversies, business involvement, climate Value at Risk (cVaR), climate risk reports, United Nations Sustainable Development Goals-alignment, and principal adverse indicators. They also have access to climate data from our strategic data provider MSCI, including:

- Carbon metrics
- Physical and transition risks assessments through climate scenario analysis
- Implied temperature rise
- Low carbon transition score

We have also finalised a firm-wide proprietary portfolio ESG and Climate Dashboard, which shows portfolio-level analytics for the sustainability factors we believe to be most material for sectors and companies.

☒ **(B) Yes, beyond our standard planning horizon**

Specify the risks and opportunities identified and your relevant standard planning horizon:

Janus Henderson recognises that urgent action on climate change is imperative, and we are committed to fulfilling our role as a responsible corporate citizen by minimising our own environmental impact and embedding sustainable practices throughout our own business.

Corporate climate change risks and opportunities

In 2007, we recognised that as a business we had a responsibility to limit our greenhouse gas (“GHG”) emissions as much as possible to combat climate change and became one of the first asset managers to become a CarbonNeutral® company. Through these efforts, we have minimised all of our residual corporate emissions and we have proudly maintained this status every year since 2007.

We pay close attention to the climate strategy and risks of our supply chain. We updated our procurement and vendor management questionnaires to encompass climate, including policy, disclosure, emissions, targets, and physical risk. We will engage if a material risk is identified to understand how it is or will be addressed. Unaddressed risks could result in termination of services.

Our assessment is that Janus Henderson's corporate climate change risk is low under all scenarios, from both physical and transition risk perspectives. We consider climate-related risks and opportunities over the short-term (0-1 years), medium-term (1-3 years) and long-term (3-20 years) and define a substantial financial or strategic impact on our business as one that potentially exceeds \$5 million. Risks that are potentially relevant to Janus Henderson as a corporate entity include those related to: current and emerging regulations, technology, legal frameworks, market dynamics, reputation, and acute or chronic physical situations. The measures that our internal Risk team have put in place to address other operational risks that can be related to climate change, such as flooding of the Thames or severe weather in Denver, are more than sufficient to address current and future physical risks. Our carbon footprint, and correspondingly our transition risk, is inherently low and has further reduced by our efforts to reduce consumption, switch to renewable energy, and purchase high-quality offsets.

We have also set science-based aligned targets on our upstream corporate emissions and are reviewing the downstream emissions of our supply chain, and in many portfolios.

Investment climate-related risks and opportunities

Our investment teams are primarily responsible for the research, financial modelling, portfolio construction and stewardship activities. Investment teams are supported by our central Responsibility team, which manages ESG data and training, and partners with the investment teams on research and engagement.

This process is a combination of bottom-up analysis, starting at the issuer level and is increasingly leveraging portfolio-level data. For bottom-up analysis, our investment teams have access to issuer-level and portfolio-level third-party data. They leverage this data to identify potentially financially material climate and ESG risks and opportunities as they research their issuers.

The investment teams conduct engagements to both obtain further insight on the climate or ESG issue and often to encourage the issuer to better manage these issues. Investment teams assess the materiality and the impact on relevant financial metrics for the issuer. Should a material unmanaged risk be identified and quantified, we evaluate the impact on a securities price and risk-adjusted return. Should we believe the risk is not fully priced in, the portfolio impact could include escalation through further engagement, reweighting of position sizes, changing target prices, or divestment for outsized unmanaged risks. We generally prefer engagement over exclusionary policies where we have identified investment risks.

To enable our analysts and portfolio managers to identify and manage climate risks and opportunities, we equip them with the requisite skills, data and tools:

- Data, metrics, and analytics on climate risks and opportunities at security and portfolio level
- Supporting investment teams with expert resources and training
- Delivering proprietary climate research and insights

Investment teams have access to a range of third-party data from providers including on ESG ratings, risks and controversies, business involvement, climate Value at Risk (cVaR), climate risk reports, United Nations Sustainable Development Goals-alignment, and principal adverse indicators. They also have access to climate data from our strategic data provider MSCI, including:

- Carbon metrics
- Physical and transition risks assessments through climate scenario analysis
- Implied temperature rise
- Low carbon transition score

We have also finalised a firm-wide proprietary portfolio ESG and Climate Dashboard, which shows portfolio-level analytics for the sustainability factors we believe to be most material for sectors and companies.

- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

● **(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities**

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

At Janus Henderson, we place our own corporate responsibility at the heart of our Mission, Values and Purpose by 'investing in a brighter future together'. Whether it is through reducing our energy consumption, sourcing materials responsibly, or finding innovative ways to reduce waste, we are constantly striving to find ways to minimise our impact on the environment. This is important to our people in attracting and retaining talent but also to many of our clients who expect their fiduciaries to behave responsibly. This belief and our actions supporting it are long held. In 2007, we recognised that as a business we had a responsibility to limit our greenhouse gas ("GHG") emissions as much as possible to combat climate change and became one of the first asset managers to become a CarbonNeutral® company. Through these efforts, we have minimised all of our residual corporate emissions, including utilities from all our rented offices and all business travel, and we have proudly maintained this status every year since 2007.

In 2022, using guidance from the Science Based Target Initiative (SBTi), we set ambitious new five-year reduction targets:

- Reduction target of 29.4% in Scope 1 (fuel) and Scope 2 (electricity) emissions
- Reduction target of 17.5% in Scope 3 (business travel, freight, paper, water, waste, etc.) emissions
- Reduction target of 17.5% on water and waste consumption by full time employee.

In 2023, our Operational Risk team will be enhancing its evaluation of our physical and transitional corporate climate risk. This will include leveraging more data, including scenario analysis, to determine the risk level. Should the risk level increase from its current "low" status, the Operational Risk team will assess whether the measures that address the current risk level are sufficient. Both our Front Office Controls and Governance team embedded within the Investment function and our second line Financial Risk team will provide portfolio level oversight of climate and ESG risks. Our Investment Performance and Risk Committee and Front Office Governance and Risk Committee will provide oversight for their respective areas of governance.

Regarding our investment strategy, our investment teams are primarily responsible for the research, financial modelling, portfolio construction and stewardship activities. Investment teams are supported by our central Responsibility team, which manages ESG data and training, and partners with the investment teams on research and engagement. This process is a combination of bottom-up analysis, starting at the issuer level and is increasingly leveraging portfolio-level data. For bottom-up analysis, our investment teams have access to issuer-level and portfolio-level third-party data. They leverage this data to identify potentially financially material climate and ESG risks and opportunities as they research their issuers.

The investment teams conduct engagements to both obtain further insight on the climate or ESG issue and often to encourage the issuer to better manage these issues. Investment teams assess the materiality and the impact on relevant financial metrics for the issuer. Should a material unmanaged risk be identified and quantified, we evaluate the impact on a securities price and risk-adjusted return. Should we believe the risk is not fully priced in, the portfolio impact could include escalation through further engagement, reweighting of position sizes, changing target prices, or divestment for outsized unmanaged risks. We generally prefer engagement over exclusionary policies where we have identified investment risks.

To enable our analysts and portfolio managers to identify and manage climate risks and opportunities, we equip them with the requisite skills, data and tools:

- Data, metrics, and analytics on climate risks and opportunities at security and portfolio level
- Supporting investment teams with expert resources and training
- Delivering proprietary climate research and insights

Investment teams have access to a range of third-party data from providers including on ESG ratings, risks and controversies, business involvement, climate Value at Risk (cVaR), climate risk reports, United Nations Sustainable Development Goals-alignment, and principal adverse indicators. They also have access to climate data from our strategic data provider MSCI, including:

- Carbon metrics
- Physical and transition risks assessments through climate scenario analysis
- Implied temperature rise
- Low carbon transition score

We have also finalised a firm-wide proprietary portfolio ESG and Climate Dashboard, which shows portfolio-level analytics for the sustainability factors we believe to be most material for sectors and companies.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

- ☐ (A) Coal
- ☐ (B) Gas
- ☐ (C) Oil
- ☐ (D) Utilities
- ☐ (E) Cement
- ☐ (F) Steel
- ☐ (G) Aviation
- ☐ (H) Heavy duty road
- ☐ (I) Light duty road
- ☐ (J) Shipping
- ☐ (K) Aluminium
- ☐ (L) Agriculture, forestry, fishery
- ☐ (M) Chemicals
- ☐ (N) Construction and buildings
- ☐ (O) Textile and leather

- ☐ (P) Water
- ☐ (Q) Other
- ☒ (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- ☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- ☐ (B) Yes, using the One Earth Climate Model scenario
- ☐ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- ☒ (D) Yes, using other scenarios

Specify:

Network for Greening the Financial System (NGFS) scenarios

- ☐ (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

- ☒ (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

Our investment teams are primarily responsible for the research, financial modelling, portfolio construction and stewardship activities. Having investment teams lead the integration process for ESG risks and opportunities ensures that there is integration at each appropriate stage of the investment process, including portfolio decisions. Our investment teams are supported by our central Responsibility team, who are ESG subject matter experts. This team manages ESG data, training, and partners with the investment teams on research and engagement. This partnership leads to enhanced research and decision making – marrying the sector and industry expertise of the investment teams with the ESG skills of the Responsibility team.

This process is a combination of bottom-up analysis, starting at the issuer level and is increasingly leveraging portfolio-level data for an incremental lens and layer of oversight. For bottom-up analysis, our investment teams have access to the issuer-level and portfolio-level third-party data described previously. They leverage this data to identify potentially financially material climate and ESG risks and opportunities as they research their issuers. They may consider and utilise third-party financial materiality frameworks such as Sustainability Accounting Standards Board (SASB), mapping material factors to data from MSCI in conjunction with their own knowledge, to focus on the issues likely to be most material.

The geographical domicile of the issuer or its assets can also impact materiality. The investment teams conduct engagements to both obtain further insight on the climate or ESG issue.

To enable our analysts and portfolio managers to identify and manage climate risks and opportunities, we need to equip them with the requisite skills, data and tools. We address this in three ways:

- Providing investment teams with data, metrics, and analytics on climate risks and opportunities at both a security and portfolio level
- Supporting investment teams with expert resources and training
- Delivering proprietary climate research and insights to our investment teams

ESG Data

Investment teams have access to a range of third-party data from providers such as MSCI, Sustainalytics and others. This data includes ESG ratings, risks and controversies, business involvement, climate Value at Risk (cVaR), climate risk reports, United Nations Sustainable Development Goals (SDG)-alignment, and principal adverse indicators.

Carbon and Climate Data

Our investment teams have access to a wide range of third-party climate data from our strategic data provider MSCI that is available, as appropriate, at both an issuer and portfolio level. We are providing comprehensive education, training and embedding of climate metrics and scenario analysis in the investment process. This data includes:

- Carbon metrics
- Physical and transition risks assessments through climate scenario analysis
- Implied temperature rise
- Green revenues and low carbon transition score

ESG and Climate Dashboard

We finalised a firm-wide proprietary portfolio ESG and Climate Dashboard that was made available in January 2023. Our ESG and Climate Dashboard shows portfolio-level analytics for the sustainability factors we believe to be most material for all sectors and companies. It will identify the leader and laggard issuers that contribute to the overall portfolio metrics. The ESG and Climate Dashboard can help us uncover underappreciated risks and opportunities for the companies in which we invest - including by alerting us to changes and drawing attention to leaders and laggards across regions, sectors, and issuers.

(2) Describe how this process is integrated into your overall risk management

Board of Directors

While our Boards of Directors (parent company and relevant subsidiaries) received updates on climate and ESG issues in the past, formal oversight of these issues was put under the remit of the Governance and Nominations Committee of our Parent Company Board in 2023. Our Chief Responsibility Officer is establishing tangible metrics with the Committee and will be providing quarterly updates to the Committee on both operational and investment strategy, targets, and initiatives. These metrics and discussion will encompass both Corporate Responsibility and Responsible Investing. In addition, in 2023, our internal risk functions will be providing upgrades to the Risk Committee of the Parent Company Board and our UK entity Boards on both corporate climate risk and portfolio climate risk.

ESG Oversight Committees

Our ESG Oversight Committee, chaired by our Chief Responsibility Officer, provides oversight of a range of issues at a portfolio and security level, including monitoring of issuer-level positions for investments identified as having climate or ESG risks. Its remit includes:

- Review of ESG-related metrics and commitments for new funds and mandates and changes to ESG related commitments to existing mandates
- Review of ESG-related processes, systems and resources in place for funds and mandates
- Review of the effectiveness of ESG controls
- Monitoring of key ESG-related metrics and exceptions

Risk Management Functions

In 2023, our Operational Risk team will be enhancing its evaluation of our physical and transitional corporate climate risk. This will include leveraging more data, including scenario analysis, to determine the risk level. Should the risk level increase from its current “low” status, the Operational Risk team will assess whether the measures that address the current risk level are sufficient. Both our Front Office Controls and Governance team embedded within the Investment function and our second line Financial Risk team will provide portfolio level oversight of climate and ESG risks. Our Investment Performance and Risk Committee and Front Office Governance and Risk Committee will provide oversight for their respective areas of governance.

Internal Audit

Janus Henderson has an independent internal audit function, which reports to the corporate audit committee, that is responsible for the internal audit of the firm’s worldwide activities. Internal audit operates a multi-year risk-based audit plan that covers all aspects of the firm’s investment and stewardship activities such as proxy voting. In 2022, internal audit conducted multiple audits covering ESG-related investment desk controls, as well as a thematic audit of the firm’s ESG investment control framework, specifically assessing the governance over the firm’s ESG investment activities.

The findings of these internal audits are regularly shared with the audit committee of the Janus Henderson Board as well as other relevant boards. Further, in 2023, internal audit will assess the processes underpinning the firm’s corporate responsibility reporting, as well as continuing to embed ESG considerations in relevant audits and performing another dedicated review on the ESG control framework.

☒ (B) Yes, we have a process to manage climate-related risks

(1) Describe your process

The responsibility for managing financially material climate risks rests with our investment teams – our analysts and portfolio managers – who are best positioned to assess risks and integrate that into their research, engagement, and portfolio decisions. We do leverage third party data to provide the statistics, metrics, and scenario analysis that our investment teams need to conduct their assessments.

At Janus Henderson, we strive to equip our investment teams – analysts and portfolio managers – to manage financially material climate and ESG risks and opportunities within our portfolios. This includes providing training and a combination of third-party data and proprietary insights to enable our investment teams to assess risk at a security and portfolio level and evaluate the impact on the financial outcomes of each portfolio. This process is a journey on which we have made significant strides in recent years, yet we have identified ways in which we can continue to make progress.

We have tangible initiatives underway to enhance the data, analytics, and skills of our investment teams. We believe that active research and engagement, the foundation of Janus Henderson's investment processes, is the optimal way to identify and manage financially material climate and ESG risks and opportunities. ESG and climate data – such as carbon emissions and Climate Value at Risk – is still in its infancy. Much of the data and third-party analytics are estimated and backward-looking and availability across asset classes and issuers is often incomplete, therefore any conclusions drawn can be misleading and require interpretation and judgement. Our investment teams, who understand their portfolio holdings extremely well, and in partnership with the ESG subject matter experts on our central Responsibility team, are best positioned to provide the necessary distinctive actionable insight.

As part of the research process, investment teams assess the materiality and the impact on relevant financial metrics for the issuer, which could include cash flows, valuation, cost of capital, or credit ratings. This research and insight flow into the investment decision, similar to how an investment team would consider any other financially material factor.

Should a material unmanaged risk be identified and quantified, we evaluate the impact on a securities price and risk-adjusted return. Should we believe the risk is not fully priced in, the portfolio impact could include escalation through further engagement, re-weighting of position sizes, changing target prices, or divestment for outsized unmanaged risks. We generally do not support exclusionary policies, preferring instead to engage with companies where we have identified investment risks – including financially material ESG factors.

Our Financial Risk team leverages the data in our Climate and ESG Dashboard in their portfolio reviews and escalates to the ESG Oversight Committee (ESGOC) if it has concerns (please see below). Portfolios with climate commitments have those commitments overseen by Compliance, with escalation to the ESGOC if there are concerns. Further escalation to the Governance and Nominations Committee of our Parent Company Board in 2023 is possible in some circumstances.

(2) Describe how this process is integrated into your overall risk management

Board of Directors

While our Boards of Directors (parent company and relevant subsidiaries) received updates on climate and ESG issues in the past, formal oversight of these issues was put under the remit of the Governance and Nominations Committee of our Parent Company Board in 2023. Our Chief Responsibility Officer is establishing tangible metrics with the Committee and will be providing quarterly updates to the Committee on both operational and investment strategy, targets, and initiatives. These metrics and discussion will encompass both Corporate Responsibility and Responsible Investing. In addition, in 2023, our internal risk functions will be providing upgrades to the Risk Committee of the Parent Company Board and our UK entity Boards on both corporate climate risk and portfolio climate risk.

ESG Oversight Committees

Our ESG Oversight Committee, chaired by our Chief Responsibility Officer, provides oversight of a range of issues at a portfolio and security level, including monitoring of issuer-level positions for investments identified as having climate or ESG risks. Its remit includes:

- Review of ESG-related metrics and commitments for new funds and mandates and changes to ESG related commitments to existing mandates
- Review of ESG-related processes, systems and resources in place for funds and mandates
- Review of the effectiveness of ESG controls
- Monitoring of key ESG-related metrics and exceptions

Risk Management Functions

In 2023, our Operational Risk team will be enhancing its evaluation of our physical and transitional corporate climate risk. This will include leveraging more data, including scenario analysis, to determine the risk level. Should the risk level increase from its current "low" status, the Operational Risk team will assess whether the measures that address the current risk level are sufficient. Both our Front Office Controls and Governance team embedded within the Investment function and our second line Financial Risk team will provide portfolio level oversight of climate and ESG risks. Our Investment Performance and Risk Committee and Front Office Governance and Risk Committee will provide oversight for their respective areas of governance.

Internal Audit

Janus Henderson has an independent internal audit function, which reports to the corporate audit committee, that is responsible for the internal audit of the firm's worldwide activities. Internal audit operates a multi-year risk-based audit plan that covers all aspects of the firm's investment and stewardship activities such as proxy voting. In 2022, internal audit conducted multiple audits covering ESG-related investment desk controls, as well as a thematic audit of the firm's ESG investment control framework, specifically assessing the governance over the firm's ESG investment activities.

The findings of these internal audits are regularly shared with the audit committee of the Janus Henderson Board as well as other relevant boards. Further, in 2023, internal audit will assess the processes underpinning the firm's corporate responsibility reporting, as well as continuing to embed ESG considerations in relevant audits and performing another dedicated review on the ESG control framework.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

☒ **(A) Exposure to physical risk**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used

☒ **(2) Metric or variable used and disclosed**

- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

☒ **(B) Exposure to transition risk**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used

☒ **(2) Metric or variable used and disclosed**

- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

☐ (C) Internal carbon price

☒ **(D) Total carbon emissions**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - **(2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

☒ **(E) Weighted average carbon intensity**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - **(2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

☐ (F) Avoided emissions

☒ **(G) Implied Temperature Rise (ITR)**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - **(2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

☐ (I) Proportion of assets or other business activities aligned with climate-related opportunities

☒ **(J) Other metrics or variables**

Specify:

Climate Value at Risk

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
 - (1) Metric or variable used
 - **(2) Metric or variable used and disclosed**
 - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

- (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

☒ (A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
 - ☐ (1) Metric disclosed
 - ☒ (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

☒ (B) Scope 2 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
 - ☐ (1) Metric disclosed
 - ☒ (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

https://cdn.janushenderson.com/webdocs/H051804_0623_Brochure_TCFDEntityReport_2023_v2.pdf

☐ (C) Scope 3 emissions (including financed emissions)

- ☐ (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- ☐ (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☒ (B) The UNFCCC Paris Agreement
- ☐ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)

☒ **(D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**

☐ (E) The EU Taxonomy

☐ (F) Other relevant taxonomies

☐ (G) The International Bill of Human Rights

☐ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☐ (I) The Convention on Biological Diversity

☒ **(J) Other international framework(s)**

Specify:

UN Global Compact

☐ (K) Other regional framework(s)

☐ (L) Other sectoral/issue-specific framework(s)

☐ (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

☒ **(A) Identify sustainability outcomes that are closely linked to our core investment activities**

☒ **(B) Consult with key clients and/or beneficiaries to align with their priorities**

☐ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irreparable character

☒ **(D) Identify sustainability outcomes that are closely linked to systematic sustainability issues**

☐ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)

☒ **(F) Understand the geographical relevance of specific sustainability outcome objectives**

☐ (G) Other method

☐ (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

☒ **(A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities**

☐ (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☒ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☐ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- ☒ (C) We have been requested to do so by our clients and/or beneficiaries
- ☒ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☒ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☐ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- ☐ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

- ☒ (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

Human rights within company supply chains

Our investment teams supported by our central Responsibility team have engaged companies on human rights within company supply chains. We had a focus on apparel and clothing manufacturers. Discussions focused on how companies were auditing their supply chain and addressing potential human rights violations. We encouraged further company disclosure regarding human rights policies / practices where appropriate, including disclosure of supplier code of conduct and list of Tier 1 suppliers. Regarding global retailers importing products, we discussed due diligence, risk assessment and monitoring process, as well as monitoring audits from independent organisations, including the Fair Labour Association and the Better Work Programme.

We have engaged more broadly on responsible sourcing. Several reports from NGOs and workers' rights groups have highlighted labour abuses occurring within apparel supply chains. This includes accounts of unpaid severance benefits following factory closures, low wages, excessive overtime, wage theft during the COVID-19 pandemic and gender-based violence. Often apparel companies have supply chain exposure to countries where corruption is prevalent, there is a lack of freedom of association and companies face high political risk.

Outside of the apparel sector, we have engaged with technology companies regarding human rights within their supply chain. The discussion around human rights was amplified during the COVID-19 pandemic where the media highlighted unacceptable working conditions for employees in certain factories. The team escalated this by writing a letter to both the manufacturing company and the key client of the manufacturer to address the working and living conditions of employees affected. Human rights has been an ongoing topic of engagement across certain technology companies.

Regarding human rights impact on communities, one engagement last year was focused on the impact that building an oil & gas pipeline would have on affected communities. Media reports mentioned 'large scale land acquisition and resettlement' as well as human rights violations where NGOs and protesters were silenced and low or delayed compensation had been provided to those affected. We met with the company to discuss these allegations, understand how communities were affected and any relocation strategy, what grievance support mechanisms were in place, and how the company was addressing these issues.

Community engagement and human rights have been common topics of discussion with mining companies over the years particularly around how project developments impact indigenous communities/ first nation groups and associated heritage.

Child labour within company supply chains

We assessed child labour as part of our research on tobacco companies and included child labour management as a key component of how we ranked companies and their policies. Our engagements with tobacco companies in the reporting period focused on Next Generation Products but did also touch upon supply chain.

We were contacted by a US multinational food company ahead of the upcoming proxy season to get feedback on the company's current practices and disclosures related to key sustainability efforts. A particular focus was the company's efforts on child labour following the previous year's stockholder proposal regarding child labour. We set up a call to share our opinions on the company's current policies, disclosures and practices, where they are vs. peers and how the company compares to the tobacco industry in terms of child labour management which has experienced similar child labour issues and exposure.

Overall, we felt that the call went well and that the company was very receptive to our feedback that it could do better on child labour disclosure and management vs. peers, which we evidence through specific examples of where the company was falling short. The company acknowledged that it hasn't taken sufficient action on child labour and with the shareholder proposal filed last year. It is clear that these types of topics are becoming more important to shareholders. The company is evaluating how best to set appropriate and realistic targets in relation to child labour. The company noted that there will be another Child Labour disclosure shareholder proposal filed this proxy season and that it would like to continue the dialogue with us on child labour, but also other areas of their sustainability efforts.

- ☐ (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm
- ☐ (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts
- ☐ (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities
 - (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

☒ (A) Workers

Sector(s) for which each stakeholder group was included

- ☐ (1) Energy
- ☐ (2) Materials
- ☐ (3) Industrials
- ☒ (4) Consumer discretionary
- ☒ (5) Consumer staples
- ☐ (6) Healthcare
- ☐ (7) Finance
- ☒ (8) Information technology
- ☐ (9) Communication services
- ☐ (10) Utilities
- ☐ (11) Real estate

☒ (B) Communities

Sector(s) for which each stakeholder group was included

- ☒ (1) Energy
- ☒ (2) Materials
- ☐ (3) Industrials
- ☐ (4) Consumer discretionary
- ☐ (5) Consumer staples
- ☐ (6) Healthcare
- ☐ (7) Finance
- ☐ (8) Information technology
- ☐ (9) Communication services
- ☐ (10) Utilities
- ☐ (11) Real estate

☐ (C) Customers and end-users

☐ (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

☒ (A) Corporate disclosures

Provide further detail on how your organisation used these information sources:

Investment teams have access to multiple different sources to conduct their research. Analysts leverage quantitative and qualitative information from both primary and secondary research to develop proprietary views and insights on critical factors and their potential impacts.

☒ (B) Media reports

Provide further detail on how your organisation used these information sources:

Investment teams have access to multiple different sources to conduct their research. Analysts leverage quantitative and qualitative information from both primary and secondary research to develop proprietary views and insights on critical factors and their potential impacts.

☒ **(C) Reports and other information from NGOs and human rights institutions**

Provide further detail on how your organisation used these information sources:

Investment teams have access to multiple different sources to conduct their research. Analysts leverage quantitative and qualitative information from both primary and secondary research to develop proprietary views and insights on critical factors and their potential impacts.

☐ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

☒ **(E) Data provider scores or benchmarks**

Provide further detail on how your organisation used these information sources:

Investment teams have access to multiple different sources to conduct their research. Analysts leverage quantitative and qualitative information from both primary and secondary research to develop proprietary views and insights on critical factors and their potential impacts.

☒ **(F) Human rights violation alerts**

Provide further detail on how your organisation used these information sources:

Investment teams have access to multiple different sources to conduct their research. Analysts leverage quantitative and qualitative information from both primary and secondary research to develop proprietary views and insights on critical factors and their potential impacts.

☒ **(G) Sell-side research**

Provide further detail on how your organisation used these information sources:

Investment teams have access to multiple different sources to conduct their research. Analysts leverage quantitative and qualitative information from both primary and secondary research to develop proprietary views and insights on critical factors and their potential impacts.

☒ **(H) Investor networks or other investors**

Provide further detail on how your organisation used these information sources:

Investment teams have access to multiple different sources to conduct their research. Analysts leverage quantitative and qualitative information from both primary and secondary research to develop proprietary views and insights on critical factors and their potential impacts.

☐ (I) Information provided directly by affected stakeholders or their representatives

☐ (J) Social media analysis

☐ (K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

☐ (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

☐ (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

● (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

Explain why:

LISTED EQUITY (LE)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

(3) Active - fundamental

(A) Yes, our investment process incorporates material governance factors

(2) for a majority of our AUM

(B) Yes, our investment process incorporates material environmental and social factors

(2) for a majority of our AUM

(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period

(2) for a majority of our AUM

(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion

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(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

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MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?

(3) Active - fundamental

(A) Yes, we have a formal process that includes scenario analyses

(B) Yes, we have a formal process, but it does not include scenario analyses

(2) for a majority of our AUM

(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion

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(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies

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(B) Yes, we have a formal process but it does not include scenario analysis - Specify: (Voluntary)

For systematic monitoring, the ESG and Climate Dashboard is available for investment teams and includes a set of universally relevant and financially material Key Risk Indicators (KRIs) for specific portfolios. The Dashboard is leveraged by investment teams, risk teams, and the Central Responsibility team to regularly review KRIs across portfolios.

Given the ongoing evolution of frameworks, data, modelling, and tools available to our investors to measure and monitor unfolding ESG risks and opportunities, the Responsibility team has also been proactively supporting the investment teams with regular training and research on ESG megatrends and themes, and the evolving landscape around climate scenario analysis, in particular. Over the period, the Responsibility team has conducted internal education and training sessions for our investment teams on financial materiality frameworks, regulatory developments in materiality (financial vs. double vs. dynamic materiality) across regions, and various ESG data-related sessions (e.g. carbon metrics, including Scope 3 emissions, Climate Value at Risk (VaR), and Implied Temperature Rise). The Responsibility team has also collaborated with investment teams in thematic research on emerging ESG trends and implications, such as biodiversity loss, carbon pricing, cyber security, Scope 4 emissions, and nuclear energy.

While we have not systematically conducted climate scenario analysis for every portfolio firmwide (all TCFD in-scope strategies integrate Climate VaR into their investment processes), we have conducted the preparatory work and training to extend the roll-out to all our strategies in the near future.

Moreover, the Financial Risk team also monitors key ESG risk indicators across all our funds globally, based on current and emerging ESG trends, which are likely to signal ESG risks and opportunities. This analysis is used to challenge investors in quarterly risks meetings and in particularly if ‘red flags’ are identified.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?

(2) Active - fundamental

(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process

(2) in a majority of cases

(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process

(2) in a majority of cases

(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process

(2) in a majority of cases

(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?

(3) Active - fundamental

(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors

(2) in a majority of cases

(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors

(3) in a minority of cases

(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability

(2) in a majority of cases

(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors

(3) in a minority of cases

(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process

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ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.

Our Pan European Equity desk leverages ESG factors as part of the stock selection and research process and uses engagement pre- and post-investment to better understand key ESG risks and right-size holdings' portfolio weight. An example of this is through the desk's position in Solvay S.A., a multinational chemical and materials company that provides products for a range of industries including aerospace, automotive, agriculture, batteries, building, industrials, and more. Solvay operates in a high carbon intensity sector and has high level controversy around Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS), a class of synthetic chemicals that do not break down in the environment and can accumulate in humans, animals, and plants. This resulted in ongoing litigation due to the potential harm to human and environmental health.

The desk was aware of this controversy and the associated ESG risks prompting them to proactively engage with the company prior to investing. This engagement was a key step in understanding and addressing the material ESG risks Solvay faces before making an investment decision. Solvay showed a clear understanding of the emissions impact and ESG risks of certain products (particularly Soda Ash) and indicated that selling it off won't completely resolve the issue. The company also provided detail on the PFAS controversies and signalled that most of the cases had been dropped (the company won one case), signalling a decrease in legal risk. The company is working with regulators in Italy and Europe and ensured that those authorities approve Solvay's chemical discharge approach.

These engagement insights provided sufficient signals that the ESG risks were being appropriately managed going forward and the desk was able to take the decision to invest. Given that the PFAS litigation is ongoing, the desk continues to engage with the issuer with the help of Janus Henderson's Responsible Investment and Governance team. An engagement in January 2023 covered Solvay's One Planet Program which included updates on their 2030 targets, reporting, and more detailed site-by-site reporting, and internal carbon pricing. Impacting carbon/ESG targets, Solvay is splitting their business lines in two and does not aim to create a good/bad company, but acknowledged the two companies will have notably different carbon transition profiles, which is something the desk will need to continue to monitor.

Discussion regarding the PFAS controversies revealed that Solvay is one of the first companies to announce an exit from PFAS with a roadmap for a full exit of fluorosurfactants by 2026. Altogether, this post-investment engagement gave the desk the confidence to maintain a large active weight in the company while continuing to monitor the PFAS litigation and ESG targets of both business units.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?

(3) Active - fundamental

(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process

(2) for a majority of our AUM

(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process

(2) for a majority of our AUM

(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process

(2) for a majority of our AUM

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process

(2) for a majority of our AUM

(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process - Specify:

Material ESG factors contribute to stewardship decisions related to company engagement and proxy voting. As an active owner, Janus Henderson identifies material ESG risks and opportunities to engage with companies on, aiming to improve our portfolios' risk-return profile.

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?

- ☒ (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- ☒ (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- ☒ (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- ☐ (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(2) Active - fundamental

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings



(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents



(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities



(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents



(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion



(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

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PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.

Our Global Sustainable Equity strategy considers ESG and Sustainability factors as a fundamental consideration in its investment approach, both to identify attractive equity investments and to consider the risk to those business models.

As an example, our Sustainable Equity funds are invested in a company called Icon, one of the largest global clinical research organisations (CRO). These are companies which help pharma and biotech companies manage the human clinical trial process as they move towards drug approvals, thus helping to accelerate the development of drugs and devices that save lives and improve quality of life, with clear societal benefit. An example is the human trials organised for the COVID-19 vaccine. This was one of the largest and swiftest clinical trials ever performed, where over 44,000 patients were recruited within four months during the global pandemic. ICON has also had a hand in the development of 18 of the world's top 20 most popular drugs.

The under-representation of minority groups in clinical trials is a persistent issue within the healthcare industry. Diversity among clinical trial participants has been shown to help increase trust in medical institutions within disenfranchised groups, which, in turn, is linked to increased minority use of healthcare services and reduced mortality rates. Likewise, ensuring that trials deliver data representing the entire spectrum of traits, such as race, ethnicity, sex, gender, age, and genetics, provides a more holistic picture of how novel therapies will affect specific populations, or if any demographic is more or less likely to incur additional risks. ICON's scale and expertise across the clinical trial value chain has enabled the company to begin combatting this lack of diversity.

From an environmental perspective, ICON currently consumes 61.7% of its energy from renewable sources, is transitioning 12 of its locations to green power, and is targeting 100% renewable electricity usage by 2025. By 2030, the company is aiming to produce net zero carbon emissions and to reduce electricity consumption by 20%, despite anticipated company growth. Since 2018, ICON has reduced kWh electricity consumption by 10%, as well as Scope 1 and 2 emissions by 23.5%. The company has begun working with the CDP (formerly the Carbon Disclosure Project) to begin mapping Scope 3 (indirect) emissions generated in its supply chain and it has committed to setting science-based climate targets.

Our investment due diligence, fundamental analysis, and portfolio construction decision making considered all of these factors. It was the incorporation of these ESG and Sustainability factors that influenced our decision to invest in the company. Since we made the initial investment, our holding in the security has generated a positive contribution to our portfolio returns.

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☒ (A) We share a list of ESG screens
- ☒ (B) We share any changes in ESG screens
- ☒ (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- ☐ (D) We do not share the above information for all our listed equity assets subject to ESG screens

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, our investment process incorporates material governance factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, our investment process incorporates material environmental and social factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons

(1) for all of our AUM

(1) for all of our AUM

(1) for all of our AUM

(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion

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(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

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MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

(1) SSA

(2) Corporate

(3) Securitised

(A) Yes, we have a formal process that includes scenario analyses

(B) Yes, we have a formal process, but does it not include scenario analyses

(1) for all of our AUM

(1) for all of our AUM

(1) for all of our AUM

(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion

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(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets

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(B) Yes, we have a formal process, but it does not include scenario analyses - Specify: (Voluntary)

ESG trends are monitored by the Fixed Income ESG team and are discussed at the Fixed Income ESG Research Working Group. Any new key trends form part of identifying top-down engagement themes. Engagement is one of the four core pillars of the Janus Henderson Fixed Income ESG philosophy and is integral to the ESG assessment of companies we engage with. Key ESG trends for the SSA sector are monitored by the Fixed income ESG team and the sovereign ESG committee. All ESG trends are applied to individual sectors/asset classes as far as they are financially material. Climate scenario analysis is accessible through Janus Henderson's main data provider, MSCI's tool, and is used in managing climate-focused client mandates.

PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

	(1) SSA	(2) Corporate	(3) Securitised
(A) We incorporate material environmental and social factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) We incorporate material governance-related factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) We do not incorporate material ESG factors for the majority of our fixed income investments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Yes, we have a framework that differentiates ESG risks by sector	(3) for a minority of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector	○	○	○
(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers	○	○	○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

(1) SSA**(2) Corporate**

(A) We incorporate it into the forecast of financial metrics or other quantitative assessments

(B) We make a qualitative assessment of how material ESG factors may evolve

(1) for all of our AUM

(1) for all of our AUM

(C) We do not incorporate significant changes in material ESG factors

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 7	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

At what level do you incorporate material ESG factors into the risks and/or returns of your securitised products?

● **(A) At both key counterparties' and at the underlying collateral pool's levels**

Explain: (Voluntary)

As part of the Janus Henderson Fixed Income ESG framework for securitised products, we identify the most material ESG risks for each of the securitised 'sectors' (e.g. residential mortgage-backed securities (RMBS) consumer, autos – broken down into prime and non-prime, collateralised loan obligation (CLOs), and commercial mortgage-backed securities (CMBS), using the SASB materiality framework as a foundation, with the additional input of other frameworks / regulation. The analysis is performed at multiple layers. For example, for RMBS, loan terms are considered at borrower level, physical risk assessment is done at collateral level (floods and wildfires, for example), and risk management, while governance policies and lending practices are looked at originator level. For special purpose vehicles (SPVs), we consider the governance structure and its robustness.

The driver of the overall ESG profile may vary from transaction to transaction, even within the same asset class type. For example, in one transaction it could be that the negative ESG profile of the mortgage originator itself dominates our view, while in another it could be transaction governance weaknesses. One of the focus areas has been enhancing transparency and disclosure at CLO manager level, in order to improve further assessment of ESG risks and their incorporation into our investment decisions.

Janus Henderson has been co-chair of the CLO Investment Committee at the European Leveraged Finance Association (ELFA), which has launched the CLO ESG Questionnaire, focusing on carbon emissions disclosure and management, other aspects of decarbonisation, and key social and governance metrics, which form part of the CLO manager's own ESG profile.

- o (B) At key counterparties' level only
- o (C) At the underlying collateral pool's level only

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways			

(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors	(1) for all of our AUM	(1) for all of our AUM	(1) for all of our AUM
(D) We use another method of incorporating material ESG factors into our portfolio's risk management process			

(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

	(1) SSA	(2) Corporate	(3) Securitised
(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents



(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion



(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process



PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 14	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of environmental and/or social factors in your fixed income valuation or portfolio construction affected the realised returns of those assets.

We have held an overweight in a building products manufacturer since its inaugural bond was issued three years ago. At the sector level, we consider the Building Products and Furnishings industry to be exposed to limited ESG risks. This issuer has been assigned a 'Green' rating, which is in line with the Janus Henderson Fixed Income proprietary ESG sector rating, reflecting the non-material nature of ESG risks, as well as effective management of these risks by the company.

Our overweight positioning has been justified by a positive medium- to long-term earnings outlook, but was also supported by a number of global megatrends, including energy efficiency and climate protection (tighter regulatory building standards backed by government support / subsidy programs); urbanisation / population growth (noise insulation, structural under-supply of housing); and protection / security. In the past year, our overweight to this company contributed 9.8bps outperformance over the benchmark.

DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 18	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

For all your fixed income assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?

- ☒ (A) We share a list of ESG screens
- ☒ (B) We share any changes in ESG screens
- ☒ (C) We explain any implications of ESG screens, such as any deviation from a benchmark or impact on sector weightings
- ☐ (D) We do not share the above information for all our fixed income assets subject to ESG screens

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- ☐ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- ☐ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☒ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☐ (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- ☐ (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☒ (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- ☐ (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

- ☐ (A) Board, trustees, or equivalent
- ☒ **(B) Senior executive-level staff, investment committee, head of department, or equivalent**
 - Sections of PRI report reviewed
 - ☒ **(1) the entire report**
 - ☐ (2) selected sections of the report
 - ☐ (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year