

# Best Execution Policy

**Effective Date: June 2023**

Version: 1.8

## Contents

1.	Document control .....	2
2.	Scope .....	2
3.	Definitions.....	3
4.	Regulatory Requirements .....	5
5.	Policy .....	5
6.	Roles and Responsibilities .....	8
7.	Policy Maintenance .....	8
	Appendix .....	9
A.	Equities – Shares and Depositary Receipts.....	9
B.	Debt Instruments – Bonds.....	10
C.	Debt Instruments – Money Market Instruments .....	11
D.	Exchange-Traded Derivatives (ETD) – Options and Futures .....	12
E.	Over-The-Counter (OTC) Derivatives – inc Swaps, Forwards, Options and Warrants .....	13
F.	Foreign Exchange – Currency Forwards, Spots, Currency Swaps .....	14
G.	Contracts for Difference .....	16
H.	Loans and Asset-Backed Securities .....	17
I.	Collective Investment Schemes .....	18
J.	Securities Financing Transactions (SFTs) .....	19

## 1. Document control

Title	Best execution policy
Policy description	This Policy sets out Janus Henderson Group's ("JHG") approach to achieving Best Execution for its clients
Version	1.8

<b>Sponsor</b>	Head of Equities – EMEA & Asia Pac Head of Equities – Americas Head of Fixed Income
<b>Policy owners</b>	Global Head of Equities Trading Global Head of Fixed Income Trading
<b>Governance approval</b>	Best Execution Committee
<b>Authors</b>	Front Office Controls & Governance
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### Referenced documents

Document name
JHG Conflicts of Interest Policy
Trade Execution and Allocation Policy

## 2. Scope

The Policy applies globally to JHG and its subsidiaries except Kapstream Capital Pty Limited ("Kapstream") for which a separate policy is in place.

This document sets out JHG's Best Execution policy and associated arrangements for the financial instruments for which it trades. These financial instruments include but are not limited to:

- Equities, e.g. shares in companies, typically listed on an exchange;
- Fixed income products e.g. government and corporate bonds;
- Money market instruments e.g. cash deposits or other cash like instruments;
- Units in collective investment schemes e.g. funds, both regulated and unregulated;
- Foreign Exchange;
- Commodity Derivatives;
- Derivatives of these instruments.

JHG principally provides discretionary investment management services to its clients, during the course of which the firm will execute orders on behalf of clients to invest or divest clients' money. Investments may be made in a combination of the instruments listed above.

This Policy describes how JHG achieves Best Execution (as later defined) when placing orders as agent on behalf of clients and reflects the firm's obligations in taking sufficient steps to obtain the best possible client outcomes under the circumstances. The process by which we deliver Best Execution will vary from asset class to asset class and this Policy intends to describe what those factors are, how we rank them and how we will provide Best Execution to clients in each of our asset classes.

Our Best Execution Policy is available on our website. Clients can contact JHG should they have any requests related to the Policy and activities governed by the Policy.

### 3. Definitions

**Best Execution** – The process of taking all sufficient steps to obtain, when executing orders, the best possible result for our clients under the circumstances taking into account the Execution Factors.

**Execution Factors** – Factors that may be considered and prioritised, when executing orders, in order to obtain the best possible result for our clients. Execution Factors include but are not limited to:

- Price
- Cost of the transaction
- Speed
- Likelihood of execution and settlement (completion)
- Liquidity
- Nature of the transaction
- Characteristics of the financial instrument
- Portfolio Manager instructions
- Specific Client instructions
- Multiple order coordination
- Anonymity of the transaction
- Availability of competing execution venues
- Prevailing market conditions
- Counterparty Risk diversification

For a list of Execution Factors typically prioritised in the execution of different asset classes, please refer to Policy appendices.

**Execution Venues** - A source of liquidity for the relevant financial instrument. In some cases there will only be one execution venue for a specific financial instrument (particularly for funds and structured products). The types of execution venues used by JHG, either directly or via our approved counterparties, include the following:

- Regulated Markets - a multi-lateral system operated and/or managed by a market operator which brings together or facilitates the bringing together of multiple third-party buying and selling interests in financial instruments in the system and in accordance with its non-discretionary rules in a way that results in a contract, for financial instruments admitted to trading under its rules and/or systems, and which is authorised and functions regularly in accordance with MiFID II.
- Electronic Crossing Networks / Alternative Trading Systems - an electronic execution venue that enables asset managers to match buying and selling orders in securities directly with other asset managers and occasionally other brokers and market participants, away from the primary exchange, but using the best bid and offer price from the market as a reference.
- Multilateral Trading Facilities (MTFs) - multilateral system, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments in the system and in accordance with non-discretionary rules in a way that results in a contract in accordance with MiFID II.

- Organised Trading Facilities (OTFs) - a multilateral system that is not a Regulated market or MTF. Within an OTF, multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in a way that results in a contract.
- Systematic Internalisers (counterparties using internal pools of liquidity) / Central Risk Book - investment firms which, on an organised, frequent, systematic and substantial basis, deal on own account by executing client orders outside a regulated market, MTF or OTF without operating a multilateral system.
- Swap Execution Facilities (SEFs) - a trading system or platform in which more than one market participant has the ability to execute or trade swaps with more than one other market participant on the system or platform.
- Counterparties, and/or affiliates acting as a Market Maker.
- Request for Quote (RFQ) platforms - where trading counterparties are invited to quote a price to either buy or sell a particular financial instrument in an agreed quantity.
- Other liquidity providers performing a similar function to those venues outlined above.

## 4. Regulatory Requirements

Various regulators have articulated regulatory requirements or have provided guidance relating to Best Execution, the list below is not exhaustive but summarises the main regulatory regimes which Janus Henderson Group is subject to.

### United Kingdom

- **Financial Conduct Authority** – COBS 11.2A
- **Markets in Financial Instruments Directive 2014/65/EU (MiFID)** and **Markets in Financial Instruments Regulation EU 600/2014 (MiFIR)** (the Directive and Regulation together “MiFID II”) and the onshored UK MiFID II framework

### United States of America

- **Securities and Exchange Commission** – Investment Advisers Act of 1940: Section 206
- **Securities and Exchange Commission** – Section 28(e) of the Securities Exchange Act of 1934: 17 CFR – Part 241 Release No. 34-23170 – V. Best Execution Obligations

### Asia Pacific

- **Australian Securities & Investments Commission** – Regulatory Guide 104 Licensing: Meeting the general obligations
- **Financial Services Agency (Japan)** - Financial Instruments and Exchange Act - Article 40-2-1 (Best Execution Policy)
- **Investment Management Association of Singapore** – Code of Ethics & Standards of Professional Conduct: 4.3 Best Execution
- **Investment Management Association of Singapore** – Notice SFA 04-N16 on Execution of Customer's Orders
- **Investment Management Association of Singapore** - Guidelines to Notice SFA04-N16 on Execution of Customers' Orders

## 5. Policy

### 5.1 Execution Strategy

- 5.1.1 Orders will be addressed in a prompt, fair and expeditious manner and order execution effected in a manner and pace consistent with prioritised execution factors, the characteristics of the order, and market conditions.
- 5.1.2 Orders will generally be managed by the JHG trading desk within the region that covers the time zone in which the instructed investment instrument primarily trades, or that has the most relevant information about the market and /or instrument of each particular transaction.
- 5.1.3 JHG will take all sufficient steps to obtain, when executing orders on its clients' behalf, the best possible results under the circumstances, taking into account relevant Execution Factors, the requirements of JHG's Conflicts of Interest policy, and any applicable client and firm counterparty and venue restrictions.
- 5.1.4 When determining execution strategy, JHG will take into consideration relevant Execution Factors, dependent upon the characteristics of the order, including any relevant Portfolio Manager instructions or specific Client instructions, and the prevailing market conditions.
- 5.1.5 In determining the relative importance of Execution Factors when effecting order execution, JHG will typically consider the following:

- the investment objective(s);
  - the characteristics of the financial instrument(s) to which the order relates;
  - the regulatory requirements applicable to the investment instrument(s);
  - prevailing market conditions;
  - any permissible instructions submitted by portfolio managers participating in the investment order;
  - any specific underlying client instructions;
  - the availability of competing execution venues and counterparties;
  - the characteristics of available execution venues
  - the trading tools and channels utilized by relevant execution venues or counterparties.
- 5.1.6 Execution Factors may, from time to time, be competing and JHG will use its commercial experience and judgment in all cases; this may mean choosing not to execute the trade if we believe that it is in the clients' interest.
- 5.1.7 JHG does not receive any inducements or payments from brokers, venues or other third parties. JHG may receive services which would be considered as minor non-monetary benefits as defined by the Financial Conduct Authority. All JHG employees are subject to the JHG Gifts and Entertainment Policy and any receipt of such services from brokers or other third parties must be within this policy.
- 5.1.8 JHG does not consider a counterparty's sale of shares of its sponsored funds or gifts and entertainment received from registered representatives of an approved counterparty when choosing a counterparty to effect a transaction. More specifically, JHG shall not compensate a broker-dealer for proposing or selling fund shares by directing brokerage transactions to that broker. This applies both to directing transactions to selling brokers, and to indirectly compensating selling brokers by participation in a step-out or similar arrangement in which the selling broker receives a portion of the commission. This ban includes any payment, including any commission, mark-up, mark-down or other fee (or portion of another fee) received or to be received from portfolio transactions effected through any broker or dealer.
- 5.1.9 While JHG trading desks may submit orders for portfolio transactions to broker dealers who also sell JHG mutual funds, this potential conflict of interest is subject to specific control and monitoring arrangements.
- 5.1.10 By investing with JHG, clients are giving their consent to trade from time to time outside Regulated Markets, Systematic Internalisers / Central Risk Book, Organised Trading Facilities (OTF) and Multilateral Trading Facilities (MTF). In these cases, JHG's commitment to obtain the best possible client outcomes under the circumstances will remain our priority and we will therefore ensure that we do not take unreasonable risks with our client funds. Trading outside of regulated markets may however result in additional risks including increased counterparty risk. Upon request by a client, JHG is able to provide additional information on the consequences of this means of execution.
- 5.1.11 JHG may cross orders received in opposite directions in the same financial instrument provided that doing so is determined to be in the best interest of both sides of the transaction, is consistent with the investment restrictions of participating client accounts, and provided that legal, regulatory and internal policy requirements are satisfied.
- 5.1.12 Clients may instruct JHG to execute a specific order or group of orders in a certain way and/or can prohibit JHG from using certain counterparties. Depending on the specifics of the order the client has provided to JHG, any such instructions and/or restrictions from a client may prevent JHG from taking the steps designed in this Policy to achieve Best Execution. In such circumstances, JHG will try to achieve the best possible outcomes whilst also following such client's instructions.
- 5.1.13 JHG may place trades with sponsors or their affiliated counterparties because trading commissions are included in the fee the client pays to the sponsor. There may be circumstances however when JHG, in seeking Best Execution, executes trades through counterparties or other security intermediaries other than the sponsors or their affiliated broker-dealers.

- 5.1.14 Events such as extreme volatility in markets, system disruptions and other circumstances that are beyond our control may be considered when formulating execution strategy in pursuit of best execution.
- 5.1.15 Except for principal transactions by the broker and for clients falling within the protections of MiFID II, JHG may execute transactions with counterparties for a higher commission than another broker-dealer would have charged if JHG determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and/or research services provided by that particular broker-dealer. In determining the reasonableness of a commission, JHG may view the value of the services provided either in terms of that particular transaction or the value of the services provided to JHG as they relate to the overall responsibilities of JHG as an investment adviser.

## 5.2 Counterparty Management and Selection

- 5.2.1 JHG utilizes preferred brokers who have the skills, resources and capabilities to provide favourable access to suitable liquidity and a greater potential for an advantageous outcome in the execution process.
- 5.2.2 JHG gives consideration to a number of quantitative and qualitative factors when selecting a broker or execution venue to facilitate trade execution. These include but are not limited to:
- Past performance in relation to prioritised execution factors such as Price, Cost, Speed and Trade Completion;
  - Quality of service levels and engagement; and
  - Trade workflow integration and connectivity.
- 5.2.3 JHG conducts a commensurate level of independent due diligence, including an assessment of potential conflicts of interest prior to any broker being approved and added to the approved broker list.
- 5.2.4 JHG only places orders to be executed with approved brokers. The list of approved brokers is reviewed regularly and changes over time. The performance of key brokers in providing Best Execution for JHG's clients is evaluated regularly and is subject to oversight by the Best Execution Committee.
- 5.2.5 Execution commissions paid to brokers are generally determined by a standardized rate card. Commissions accumulated by brokers are monitored on a regular basis.

## 5.3 Best Execution Monitoring & Oversight

- 5.3.1 JHG's Best Execution Committee, comprising senior management from Trading, Investment, Control and Compliance functions; is responsible for overseeing the firm's best execution framework including its Policy, relevant processes, controls, and monitoring arrangements.
- 5.3.2 JHG monitors best execution with reference to Transaction Cost Analysis ("TCA") where relevant to the asset class, and through the verification of appropriate price discovery (such as obtaining competing quotes, reference to on-screen indicative pricing, and/or demonstration of fair value assessment) in markets for which requisite TCA data is limited or inappropriate. Such analysis enables JHG to evaluate performance with respect to prioritised execution factors at the individual order level, and in aggregate across execution channels, venues, and brokers.
- 5.3.3 Output from review and monitoring activities performed by Trading, independent control functions, and Compliance, is reported to the Best Execution Committee to enable its oversight of execution performance and adherence to Policy.



## 6. Roles and Responsibilities

JHG operates a three lines of defence model. In relation to this Policy, this means that the three lines of defence have the following responsibilities.

- First line of defence:
  - Achieving Best Execution and being able to demonstrate it.
  - Establishing an adequate level of systems, controls and expertise to meet requirements set out in this Policy.
  - Cascading the Policy requirements and providing training where applicable.
  - Operation of relevant best execution and order handling controls
- Second line of defence:
  - Ensuring that the Policy adequately sets out JHG's regulatory responsibilities; promptly communicating changes in regulatory requirements where applicable.
  - Reviewing and providing sign-off on first line of defence activities where relevant.
  - Monitoring and testing activities to ensure that the level of systems and controls in place within the first line of defence is adequate to meet the requirements set out in this Policy.
  - Providing advice and guidance to the first line of defence when setting requirements within this Policy or implementing systems and controls.
- Third line of defence:
  - Providing independent assurance on the adequacy of the systems and controls in place within the first and the second lines of defence to meet the requirements set out in this Policy.

## 7. Policy Maintenance

This document will be reviewed on an annual basis or more frequently in case of material changes.

## Appendix

### A. Equities – Shares and Depositary Receipts

#### Approach

- Equity orders will normally be executed by our counterparties, through proper recognized venues utilized for that market. In achieving Best Execution, we will consider the Execution Factors identified in this Policy and permitted by applicable regulation.
- A fund manager, when instructing an order, may communicate a preferred execution strategy which will be considered by the trading desk when prioritising execution factors.
- The centralised trading desk is tasked with sourcing liquidity, so all trades are dealt through regulated venues and markets. JHG's trading methods will include agency, net, execution-only, institutional crossing networks, programme trading, capital commitment, internal crossing and algorithmic trading, but this list is not exhaustive.

Note: this section also applies to trading in Exchange Traded Funds (ETFs)

#### Execution factors

- **Price, liquidity and cost** will normally be prioritised factors though order characteristics and market conditions might mean that alternative factors, such as likelihood of completion, are prioritised.

#### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

- Goldman Sachs
- Morgan Stanley
- Bank of America
- Jefferies
- UBS Securities
- Citigroup
- JP Morgan
- Liquidnet
- Cowen & Co
- RBC Capital

## B. Debt Instruments – Bonds

### Approach

- Fixed income orders will generally be directed by JHG to our counterparties or executed through an electronic trading platform or via telephone dealing facilities depending on the size and complexity of the order.
- Typically, we will undertake sufficient price discovery to enable us to transact at an optimal price. To do so, we will often request competing quotes from multiple counterparties. However, where order characteristics, including bond attributes, or the market environment are such that doing so may compromise execution outcomes, price discovery may be informed with reference to indicative pricing or a relative value pricing assessment. Such an approach is often required when trading illiquid bonds, where likelihood of order completion and minimisation of market impact is prioritised ahead of price, for example.

Note: this section also applies to Exchange Traded Notes

### Execution factors

- **Price, liquidity, and likelihood of completion** will typically be prioritised factors, however, execution speed may be prioritised over price optimisation during heightened or extreme market volatility to minimise market risk.

### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

- JP Morgan
- Bank of America
- Goldman Sachs
- Citigroup
- Deutsche Bank
- Nomura
- Morgan Stanley
- Barclays
- Natwest
- BNP Paribas

### Trading venues on which Janus Henderson Group places significant reliance (non-exhaustive)

- Tradeweb
- Market Axess
- Bloomberg

## C. Debt Instruments – Money Market Instruments

### Approach

- We instruct investments in Fixed Term Deposits (FTDs), call accounts, Certificates of Deposit (CDs) and Commercial Paper (CP) to diversify our risk away from our funds' operational custodial counterparties, and as an investment in their own right for our cash-based funds. FTDs are typically dealt directly with our pre-approved deposit counterparty banks, whereas a selection of money market brokers provides access to CD and CP market liquidity.
- When entering into Repurchase agreements (Repos), JHG will do so to maximise rate of return on short term lending, aligning maturities with short term liquidity needs. While repos are a secured form of lending, JHG enters into such agreements with approved counterparties only, to mitigate counterparty credit risk.
- Fund mandates dictate both the money market instruments (e.g. call accounts, FTDs and CDs), and the individual liquidity exposure period and the overall fund average exposure.
- JHG also maintains firm-wide counterparty exposure limits. For both pure investment strategies and other cash transactions, the relevant trade is chosen based on the best market rate available that also ensures adherence with exposure and diversification requirements. This can result in directing trades away from certain counterparties if our overall, or fund-specific, exposure to that counterparty is too high, even if the price or other terms offered by that counterparty might be the best available.
- Established trading practice with our counterparties is to obtain the rate applied to cash dealing and placements via a recorded telephone call or electronic message. In either case, trading is subsequently affirmed by our outsourced back-office operations, which enables independent control verification.

### Execution factors

- **Price, liquidity and counterparty risk diversification** will typically be prioritised factors.

### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

#### Certificates of Deposit and Commercial Paper

- JP Morgan
- Credit Agricole
- Wells Fargo
- Bank of America
- Citigroup
- Mitsubishi UFJ
- Mizuho
- Barclays
- RBC Capital Markets
- Goldman Sachs

#### Repurchase Agreements

- RBC
- ING Bank
- Goldman Sachs
- Credit Agricole
- HSBC

## D. Exchange-Traded Derivatives (ETD) – Options and Futures

### Approach

- ETD orders will generally be directed by JHG to our counterparties or executed through an electronic trading platform or via telephone dealing facilities depending on the size and complexity of the order.
- Dependent on the nature and objectives of the order, ETDs may be executed as part of a multi-leg trade. In such circumstances, execution timing and counterparty selection may be determined in the interest of trade efficiency, likelihood of completion and overall deal value.

### Execution factors

- **Price, cost and liquidity** will typically be prioritised factors however, factors such as execution speed might be prioritised in periods of heightened market volatility to minimise market risk. In circumstances where an ETD order is part of a multi-leg, contingent or structured trade, overall deal value and likelihood of total order completion may be prioritised ahead of price optimisation of the individual ETD component(s) of the trade.

### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

- UBS
- Goldman Sachs
- Barclays
- Bank of America
- Morgan Stanley
- Macquarie
- Citigroup
- JP Morgan
- Deutsche Bank
- Société Générale

## E. Over-The-Counter (OTC) Derivatives – inc Swaps, Forwards, Options and Warrants

### Approach

- Orders in OTC Derivatives will generally be executed through an electronic trading platform or via telephone dealing facilities depending on the size and complexity of the order.
- Derivatives traded OTC that are not guaranteed by a clearing agency may be subject to increased counterparty credit risk. To mitigate such risk, JHG only places such trades with approved counterparties for which a financial risk analysis has been conducted. Additionally, JHG enters into collateral agreements with such counterparties. Such mitigation controls may reduce the number of counterparties available to execute such trades.
- When we trade OTC Derivatives, we will typically seek to obtain competing quotes from our approved OTC counterparties. However, where there are liquidity constraints and we believe doing so might negatively affect execution outcomes, we may elect to approach only one counterparty.
- JHG maintains firm-wide counterparty exposure limits. This can result in directing trades away from certain counterparties if our overall, or fund-specific, exposure to that counterparty is too high, even if the price or other terms offered by that counterparty might be the best available.

Note: this section applies to centrally cleared swaps as well.

### Execution factors

- **Liquidity, price and cost** will typically be prioritised factors. However, factors such as speed may be prioritised in periods of heightened market volatility to minimise market risk. In circumstances where an OTC-traded derivative order is part of a multi-leg, contingent or structured trade, overall deal value and likelihood of total order completion will be prioritised ahead of price optimisation of the individual OTC derivative component(s) of the trade.

### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

- Australia and New Zealand Bank
- Morgan Stanley
- JP Morgan
- Goldman Sachs
- Westpac Banking Corp
- Deutsche Bank
- Citigroup
- BNP Paribas
- Bank of America
- Barclays

### Trading venues on which Janus Henderson Group places significant reliance (non-exhaustive)

- Tradeweb
- Bloomberg

## F. Foreign Exchange – Currency Forwards, Spots, Currency Swaps

### Approach

- We instruct foreign exchange (FX) transactions primarily to hedge our exposure to different currencies, to allow transactions between currencies to take place, or to express directional investment views for the instructing fund(s). We will typically do this directly with a counterparty from a selection of banks which are approved for FX trading for the appropriate underlying fund.
- Trades are typically dealt electronically through an e-trading platform where multiple counterparties are requested to quote for each trade. If there are liquidity constraints due to the size or market conditions where we believe putting trades in competition may negatively affect the outcome, we may use a single counterparty who we believe is best placed to execute the trade.
- When the execution platform is restricted from sending non-deliverable forward (NDF) trades electronically to a single counterparty for execution, a trader may trade over the phone. The trader will seek to obtain competitive quotes from a number of approved banks where possible, and reference against current market rates.
- Certain FX transactions, such as share class hedging for certain funds or portfolios, will be outsourced to the third-party administrator for the relevant fund or portfolio. In these circumstances, the service provided by the third-party administrator will be overseen by JHG.
- FX trades are not guaranteed by a clearing agency and may be subject to increased credit risk of the counterparty. To mitigate such risk JHG only places such trades with approved counterparties for which a financial risk analysis has been conducted. Such mitigation controls may reduce the number of counterparties available to execute such trades.

### Execution factors

- **Price, liquidity and cost** will typically be prioritised factors. However, other execution factors such as speed may be prioritised during periods of heightened market volatility in order to minimise market risk, for example.

### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

## Best Execution Policy

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- Bank of America
- Citigroup
- JPMorgan
- HSBC
- Morgan Stanley
- State Street Bank
- Barclays
- Goldman Sachs
- UBS
- BNP Paribas

### Trading venues on which Janus Henderson Group places significant reliance (non-exhaustive)

- FX All
- FX Connect



## G. Contracts for Difference

### Approach

- CFD orders will be executed by our approved counterparties and communicated through electronic trading platforms or via telephone dealing facilities. In the US market, CFDs will be executed with the Financing Broker due to market convention (i.e. non give-up market).
- In determining execution strategy, we will consider the reason for and the objectives of the CFD order, the size of the order relative to available liquidity, the availability of approved counterparties, and any portfolio manager instructions associated with the order. The Trader reviews the borrowing rates available from the financing broker.
- A 'locate' is secured from the broker for any CFD to be sold short.
- CFD trades are not guaranteed by a clearing agency and may be subject to increased credit risk of the counterparty. To mitigate such risk JHG only trades with approved counterparties for which a financial risk analysis has been conducted. Such mitigation controls may reduce the number of counterparties available to execute such trades.
- JHG also maintains firm-wide counterparty exposure limits. This can result in directing trades away from certain counterparties if our overall, or fund-specific, exposure to that counterparty is too high, even if the price or other terms offered by that counterparty might be the best available.

### Execution factors

- **Price, liquidity and cost** will typically be prioritised factors but other reasons may mean for example that certainty of completion is prioritised.

### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

- UBS
- Bank of America
- Goldman Sachs
- Barclays
- Citigroup
- JP Morgan
- Liquidnet
- Morgan Stanley
- ITG
- Instinet

## H. Loans and Asset-Backed Securities

### Approach

- When trading Loans and Asset-Backed Securities (ABS), we will undertake sufficient price discovery to enable us to transact at an optimal price. To do so, we will typically request competing quotes from multiple counterparties. However, where order characteristics, or the market environment are such that doing so may compromise execution outcomes, price discovery may be informed with reference to indicative pricing or a relative value pricing assessment.
- There may often be limited liquidity in a particular ABS tranche given the large number of distinct transactions, each backed by separate and specific collateral pools. In such instances, we will use our expert judgement based upon comparable trading or bid/offer levels from similar securities to determine fair pricing.

### Execution factors

- **Likelihood of completion, price and cost** will typically be prioritised factors.

### Counterparties on which Janus Henderson Group places significant reliance (non-exhaustive)

#### Secured Loans

- Barclays
- JP Morgan
- Goldman Sachs
- Deutsche Bank
- Bank of America
- Morgan Stanley
- UBS
- Citigroup
- Wells Fargo
- BNP Paribas

#### Asset-Backed Securities

- Morgan Stanley
- JP Morgan
- Bank of America
- Wells Fargo
- Citigroup
- Nomura
- Goldman Sachs
- Barclays
- BNP Paribas
- StoneX Group

## I. Collective Investment Schemes

### Approach

- Dealing terms in collective investment schemes will be dictated by the price available at the time at which we trade. This is normally obtained from the scheme issuer and is not normally comparable (i.e. there is only one price available at the time of trading). Typically, most of the relevant CIS trading is done at a certain time each day, as agreed with the relevant client.

### Execution factors

- **Timing of execution** will typically be the prioritised factor.

### Venues on which Janus Henderson Group places significant reliance

*N/A Scheme Issuer*

## J. Securities Financing Transactions (SFTs)

### Approach

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

### Execution factors

JP Morgan Securities Services disclose the following in relation to their Agent Lending Activities:

**Price:** J.P. Morgan will endeavour to generate a competitive return assessed across a client's portfolio of lendable assets (rather than on an individual transaction basis).

**Costs:** J.P. Morgan will take into account costs associated with execution (including costs to J.P. Morgan). These could include but are not limited to transaction costs and J.P. Morgan's capital costs.

**Likelihood of execution:** counterparties may be looking for certain trade attributes which can impact their ability to trade or impact trade pricing. These may include but are not limited to netting opinions, collateral and dividend status of a client.

**Likelihood of settlement:** if we become aware that a particular execution strategy may compromise likelihood of settlement, we may elect not to pursue that strategy. This covers both settlement of the underlying loan/cash investment and the ability to settle client transactions e.g. sale of loaned securities.

**Size:** large transactions will be filled by clients that have the required number of securities/amount of cash or who are part of a pool of securities/cash that can facilitate that trade.

### Venues on which Janus Henderson Group places significant reliance

- JP Morgan Securities Services as Lending Agent

**Janus Henderson Investors**

201 Bishopsgate, London EC2M 3AE

Tel: 020 7818 1818 Fax: 020 7818 1819

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