

Statement on Political Influence

Janus Henderson Group plc (“JHG” or the “Company”) is committed to promoting the best interests of the Company, its shareholders and its clients through compliant, responsible and transparent political and regulatory engagement. To help meet this objective, JHG has adopted various policies and procedures, including its Code of Business Conduct and Personal Code of Ethics, and prepared this Statement on Political Influence which summarizes core principles and practices.

Corporate Political Engagement and Spending

JHG is subject to extensive laws and regulations concerning political spending in the U.S. and in other jurisdictions in which we operate. In an effort to ensure compliance and minimize potential conflicts of interest, JHG globally prohibits corporate cash donations or in-kind contributions to all political candidates, political campaigns, political parties, political committees and other political organizations, such as those defined under section 527 of the U.S. Internal Revenue Code. JHG also does not maintain a separate political action committee, spend corporate funds on independent expenditures or spend corporate funds in support of ballot measures or ballot measure committees. Any request to make such a donation or contribution as an exception to these prohibitions must be submitted to the Compliance department and approved by the Governance and Nominations Committee of the JHG Board of Directors.

While JHG does not engage in corporate political spending, it may advocate for public policies believed to be in the best interests of the Company, its shareholders, and its clients, and oppose those believed not to be in their best interests. JHG generally does not engage in direct advocacy and lobbying but partners with other industry participants and stakeholders to engage with policymakers, including through the trade associations as discussed below. Any decisions on whether and how to engage with policymakers on matters specific to our regulated activities, including through issuance of public statements, are made by the Legal and Compliance departments’ leadership. Any decisions on whether and how to engage with policymakers on matters of public interest are made by the ESG Strategic Advisory Council and the Executive Committee.

Trade Association Membership

JHG is a member of various trade associations across the globe, including the Investment Company Institute (ICI), the Money Management Institute (MMI), and the Securities Industry and Financial Markets Association (SIFMA) in the U.S.; the Association of Investment Companies (AIC), the Association of the Luxembourg Fund Industry (ALFI), the Institut Luxembourgeois des Administrateurs (ILA), the European Fund and Asset Management Association (EFAMA), the Investment Association (IA), and the Irish Funds Industry Association (IFIA) in Europe; and the Investment Management Association of Singapore (IMAS), the Hong Kong Investment Fund Association (HKIFA), the Investment Trust Association, Japan (JITA), and the Japan Investment Advisers Association (JIAA) in Asia. These organizations provide members with access to news, events, resources and contacts and may advocate on their members’ behalf with respect to existing and proposed legislation and regulation. As a member, JHG may provide input on and help influence actions or positions taken by these organizations; however, JHG does not control them, does not necessarily agree with all their positions and actions, and does not intend that its membership dues be used for election-related purposes.

Employee Political Activities and Contributions

At JHG, employees are able to engage in political activities and make political contributions on their own behalf subject to preclearance requirements and certain monetary limits. JHG does not generally restrict employees' political activities and contributions except to the extent it would create a conflict of interest and/or prevent JHG from obtaining investment advisory business under applicable laws, regulations or policies, such as Rule 206(4)-5 in the U.S. JHG expressly prohibits employees from undertaking any political activity (1) using the Company's name, (2) during working hours, (3) on the Company's premises and/or (4) using the Company's equipment, property, funds or personnel without obtaining pre-approval from the Compliance department. JHG also expressly prohibits employees from circumventing applicable prohibitions and restrictions, such as making unpermitted contributions through a family member.

Compliance and Oversight

The Legal and Compliance departments support the implementation of the policies and procedures described herein, including by reviewing political contribution requests. The Ethics & Conflicts Committee of JHG reviews and approves the Personal Code of Ethics and Code of Business Conduct on an annual or more frequent basis. The Governance and Nominations Committee of the JHG Board of Directors reviews and approves the Code of Business Conduct and this Statement on Political Influence on an annual or more frequent basis. Any exceptions or changes to the principles described herein, including the prohibition on corporate political spending, must be approved by the Governance and Nominations Committee.