



Janus Capital International Limited (“JCIL”)

Slavery and Human Trafficking Statement

JCIL is part of the Janus Capital Group which has offices around the world. JCIL has a number of branch offices internationally. As part of a larger group, JCIL is overall governed by a global management team who strive to ensure that all its offices worldwide work together to achieve the same goals and ethical commitments.

This statement is published on behalf of JCIL, headquartered in London and includes its branch offices based in Dubai, Frankfurt, Milan, Paris, The Hague and Tokyo in compliance with the requirements set out in the Modern Slavery Act 2015 (the “Act”).

JCIL Due Diligence Processes for Slavery and Human Trafficking

Modern Slavery is the term used to describe both offences within the Act as “slavery, servitude and forced or compulsory labour; and human trafficking” (“Modern Slavery”).

As a financial services organisation, it is considered that the risk of Modern Slavery existing within JCIL’s business is low, however JCIL has begun a due diligence programme on itself and its suppliers to determine compliance.

JCIL’s Internal Structure

JCIL has also implemented a Modern Slavery policy which works in conjunction with this statement. Within this, JCIL has described its zero-tolerance approach to Modern Slavery within the organisation and supply chain and describes the steps that employees can take should there be any concern of such behavior.

JCIL complies with all applicable employment legislation relating to employee terms and conditions, including wages and benefits which are aimed at supporting the health and wellbeing of its employees. There are two primary elements to JCIL’s pay structure, base pay and variable pay. Base pay provides a fixed salary to an employee for performing specific job responsibilities. The salary for an employee is based on industry market data that is determined through a job evaluation based on the responsibilities that the employee is hired to perform. Variable Pay provides employees with additional compensation linked directly to company and individual performance. This is awarded in the form of an annual discretionary bonus.



JCIL's Suppliers

As a financial services firm, JCIL has assessed the likelihood of the existence of Modern Slavery within its supply chain using a risk based approach. JCIL has assessed who its suppliers are, the nature of what is being provided and the origin of the supply in order to determine any high risk areas for Modern Slavery.

JCIL is currently in the process of issuing a modern slavery and human trafficking self-assessment to our suppliers to assess their current anti Modern Slavery policies and controls. As JCIL receives responses, it will evaluate the answers received and update its risk assessment accordingly. Where considered appropriate, suppliers will then be required to develop an action plan for any potential gaps. JCIL will then continuously monitor the progress of these actions being completed. The modern slavery and human trafficking self-assessment will be used to evaluate suppliers during the on-going process of any new agreements.

All suppliers will be required to comply with certain terms and conditions which will ensure that basic ethical requirements that suppliers must adhere to in order to do business with JCIL or complete services for JCIL are fulfilled. This includes providing employees the freedom to choose employment or not using any form of forced, bonded or involuntarily labour (including child labour). JCIL expects its suppliers to confirm their operations are in compliance with JCIL's principles.

The contractual terms and conditions with our suppliers are currently being reviewed and updated, where necessary to include clauses that represent and warrant that the supplier will not use Modern Slavery.

Should JCIL become aware of any non-compliance with the Act within its supply chain, JCIL will work with the supplier to implement remedial action and it is expected that the suppliers will engage with JCIL appropriately and demonstrate a willingness to remedy the issues identified in a timely manner. Should a supplier continue to demonstrate non-compliance and do not demonstrate any remedial action, JCIL reserve the right to terminate its relations with them.

Training on Modern Slavery

JCIL is currently in the process of training and raising internal awareness to relevant departments within Janus Capital Group on Modern Slavery. These departments include human resources, procurement and operational risk.

Training and internal awareness across JCIL's head office and branch offices will continue to be a key focus for JCIL in order to ensure that its supply chains remain appropriate.



JCIL remains committed to working with its suppliers to provide support and guidance when implementing anti-slavery policies.

JCIL Board Approval

This statement was approved by the JCIL Board of Directors on 28 September 2016.