

# JUPITER WHISTLEBLOWING POLICY

Jupiter Fund Management PLC

This Policy applies to Jupiter Fund Management plc and/or any of its subsidiaries and affiliates' (subsidiaries and affiliates - being those companies which have Jupiter Fund Management plc as their ultimate parent company) (together the "Group"). In this policy, references to the "Company" are to the relevant Group entity with whom you are employed or engaged (and Group Company shall be construed accordingly).

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Policy Owner (Senior Manager/Board/Committee)	Jasveer Singh
Frequency of Review	Annual
Last Review	April 2021

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# 1. OVERVIEW

## 1.1 PURPOSE

The purpose of the Policy is to outline the confidential channels through which Employees can raise issues or concerns about the activities of the Jupiter Fund Management Group (hereafter “Jupiter”). This Policy has been adopted to foster a culture of openness and transparency and to encourage Employees to raise concerns of suspected wrongdoing without fear of any adverse consequences.

## 1.2 SCOPE

The Policy applies to all Jupiter Employees, as well as any contractors engaged either by Jupiter directly or via an agency or personal services company (hereafter “Employees”).

## 1.3 RESPONSIBILITIES

Employees are required to read and understand this Policy. All queries in relation to the contents should be directed to the General Counsel, Jas Singh.

## 1.4 ACCOUNTABILITY

This Policy is administered by the Legal Department who are responsible for the day-to-day oversight of it. The Senior Manager accountable for this Policy is the General Counsel, Jas Singh. This Policy and any amendments to it must be approved in writing by Jas Singh.

### Whistleblowing Champion

Jupiter has appointed Polly Williams to oversee the whistleblowing framework and monitor the effectiveness of this Policy. Ms Williams is a Non-Executive Director of Jupiter Fund Management plc and Chairman of the Audit and Risk Committee.

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Polly Williams	Email
Non-Executive Director and Chairman of Jupiter Fund Management plc’s Audit and Risk Committee	polly.williams@jupiteram.com

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## 1.5 GOVERNANCE

This Policy is subject to an annual review by the Legal Department.

## 2. THE POLICY

### 2.1 INTRODUCTION

All Employees are expected to adhere to both the letter and spirit of Jupiter's standards, policies and procedures.

Examples of concerns to which this Policy applies.

As an Employee, you are encouraged to draw to Jupiter's attention any concerns that you may have regarding Jupiter's activities, including:

- a. that a criminal offence has been or might be committed;
- b. the putting of the health and safety of any individual in danger;
- c. an applicable legal or regulatory obligation is not being met by Jupiter or that any malpractice is being committed by Jupiter or any other Employee or a client or customer with whom we are working;
- d. that there has been a breach of any of Jupiter's standards, policies or procedures (for example, any act or omission that would constitute a breach of Jupiter's Anti-Bribery and Corruption Policy);
- e. that any behaviour is being undertaken or proposed which may harm Jupiter's reputation or financial well-being; or
- f. that an Employee is attempting to conceal evidence relating to any of the above matters.

#### Concerns which are outside the scope of this Policy

If your concern is of a personal nature (for example it relates to your employment and/or the way you have been treated whilst at work), it will normally be appropriate to raise that matter under Jupiter's Grievance Procedure, a copy of which can be found in the Employee Handbook. Alternatively, you can contact the HR team for their support.

#### How we will deal with your concerns

Jupiter is committed to protecting you from any form of victimisation or retaliation for raising a concern in good faith in accordance with this Policy. This means you can expect to be treated no differently to any other Employee and will not be subject to any disadvantage or adverse attention for raising a genuine concern.

Jupiter takes any form of malpractice (including any retribution against a whistleblower) extremely seriously.

#### How to report your concerns

You can raise an issue pursuant to this Policy either:

- directly with your manager or with a member of Jupiter's Executive Committee; or
- using one of the confidential whistleblowing services provided to Jupiter by Navex Global (see below).

If your concern relates to a breach by Jupiter of a legal or regulatory obligation, you can raise your concern by contacting the relevant regulator (although we would encourage you to raise any concern internally first). Jupiter is under an obligation to report certain matters to its regulators in any event.

You are not however obliged to notify or obtain prior authorisation from Jupiter to report a concern to one of our regulators. Further, nothing in this policy prohibits you from recovering an award pursuant to a whistleblower program of a U.S government agency or entity.

The contact details for Jupiter's regulators are provided below.

It will assist Jupiter in investigating any issues you raise if you can provide as much detail as possible relating to the underlying concern (for example, the approximate dates on which the events occurred) and provide

**a. Raising concerns within Jupiter**

You can raise your concern with your manager or a member of Jupiter’s Executive Committee.

If you have any documentary evidence which supports your concern, this should be provided to your manager or the relevant Executive Committee member at the time the concern is raised.

Any matter raised with your manager or a member of the Executive Committee will be treated confidentially. This means, for example, that your identity will not be disclosed to individuals or Employees who are the subject matter of the concern, without your prior consent.

**b. Using the Navex Global whistleblowing services**

Jupiter recognises that an Employee may feel more comfortable raising an issue outside of Jupiter. In such circumstances, you can report your concerns using the Navex Global services. Raising your concern through Navex Global facilitates a two-way dialogue between you and Jupiter whilst allowing for you to remain anonymous.

**Navex Global provides the following confidential whistleblowing services:-**

- a confidential helpline number; and
- a secure web address.

Details of Navex Global’s services are provided below and are available 24 hours a day, 365 days a year.

<b>Navex Global Services</b>	<b>Details</b>
Confidential telephone line	+44 (0)800 046 5681
Secure web address	jupiteram.ethicspoint.com

Concerns raised using the Navex Global Services will be passed to the nominated recipient - the General Counsel, Jas Singh.

The nominated recipient will be responsible for undertaking a thorough investigation of the issues raised and for reporting the matter to the Whistleblowing Champion (see above).

If, however, your concern relates to the nominated recipient, it will be passed to the Whistleblowing Champion to oversee the investigation.

**Investigating concerns and providing feedback**

The matter raised by you will be acknowledged and investigated as soon as reasonably practical. If, as a result of the investigation, it appears to Jupiter that there has been a disciplinary or other offence committed by any person, appropriate action will be taken by Jupiter to address this. Jupiter will endeavour, where appropriate, to provide feedback to you (directly or through Navex Global) on the actions it has taken as a result of the concerns raised.

**False / malicious disclosures**

If you use this Policy to maliciously or to knowingly make false allegations, you may be subject to disciplinary proceedings or legal action.

**Regulator Contact Details**

If you wish to raise a matter directly with one of Jupiter's regulators, their contact details are:

Regulator	Email / phone number	Address	Website
UK Financial Conduct Authority	whistle@fca.org.uk 020 7066 9200	Intelligence Department (ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN	www.fca.org.uk
U.S. Securities and Exchange Commission	001 (202) 551- 4790.	SEC/OWB 14420 Albemarle Point Place Suite 102 Chantilly, VA 20151-1750	www.sec.gov/whistleblower

**2.2 NON-COMPLIANCE**

Consequences of non-compliance, to the extent applicable to the Policy, may result in disciplinary action or dismissal.

**3. ADDITIONAL INFORMATION****3.1 BREACH GUIDANCE**

In the event of a breach or potential breach of this Policy an Employee must raise the matter with the General Counsel, Jas Singh.

**3.2 INTERNAL/EXTERNAL GUIDANCE**

This Policy will be published on Jupiter's website.

## APPENDIX

Version	Date	Author	Description	Approver
1.1	30 March 2020	Chris Fincham	Annual Review	Robert Parker
2.1	12 April 2021	Robert Parker	Annual Review	Jas Singh
3.1	08 July 2021	Chris Fincham	U.S. Update	Tom Owen

