



Whistleblowing Policy

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).

Policy Owner (Senior Manager/Board/Committee)	<i>Robert Parker</i>
Frequency of Review	<i>Annual</i>
Last Review	<i>March 2020</i>

1. OVERVIEW

1.1 PURPOSE

The purpose of the Policy is to outline the 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.

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”).

Exceptions to this Policy are prohibited due to regulatory obligations.

1.3 RESPONSIBILITIES

Employees are required to read and understand this Policy. All queries in relation to the contents should be directed to the Compliance Director, Robert Parker.

1.4 ACCOUNTABILITY

This Policy is administered by the Compliance Department who are responsible for the day-to-day oversight of it. The Senior Manager accountable for this Policy is the Compliance Director, Robert Parker. This Policy and any amendments to it must be approved in writing by Robert Parker.

1.5 GOVERNANCE

This Policy is subject to an annual review by Compliance.

2. THE POLICY

2.1 THE POLICY

Introduction

This Policy is designed to ensure that Jupiter operates to high standards of probity and to provide channels through which Employees are able to raise issues and concerns without worrying that they will be treated any differently as a result. Such high standards can only be achieved and maintained with the active support of everyone within Jupiter. All Employees are expected to conduct themselves in a way that supports standards, policies and procedures which underpin Jupiter’s corporate values.

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) a failure by Jupiter to comply with any legal obligation;
- (c) the putting of the health and safety of any individual in danger;
- (d) a legal 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;
- (e) 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);



- (f) that any behaviour is being undertaken which may harm Jupiter's reputation or financial well-being; or
- (g) that an Employee is attempting to conceal evidence relating to any of the above matters.

You may be concerned about an action (or failure to take action) relating to financial or non-financial matters; or you may be worried about a possible fraud or serious breach of a Jupiter Policy. All are matters which are reportable under the terms of this Policy (as explained below in the section headed "How to report your concerns").

Concerns which are outside the scope of this Policy

If your concern relates purely 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 extremely seriously and encourages Employees to draw any reportable concerns to its attention.

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 Expolink (see below).

If your concern relates to a breach by Jupiter of a legal or regulatory obligation, you can raise a concern by contacting our regulator, the Financial Conduct Authority (although we would encourage you to raise any concern internally first). Jupiter is under an obligation to report certain matters to the regulator in any event. The Financial Conduct Authority's contact details 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 any supporting evidence.

(i) 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.

(ii) Using the Expolink 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 Expolink services. Raising your concern through Expolink facilitates a two-way dialogue between you and Jupiter whilst allowing for you to remain anonymous.



Expolink provides the following confidential whistleblowing services:-

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

Details of Expolink's services are provided below and are available 24 hours a day, 365 days a year.

Expolink Services	Details
Confidential telephone line	+44 (0)800 374 199
Secure email address	jupiteram@expolink.co.uk
Secure web address	wrs.expolink.co.uk/jupiteram (access code: jupiteram)

Concerns raised using the Expolink Services will be passed to the nominated recipients who are:

- Robert Parker – Compliance Director; and
- Jas Singh – General Counsel.

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

If, however, your concern relates to one of the nominated recipients above, 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 possible. 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 Expolink) 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.

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.

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



FCA Contact Details

If you wish to raise a matter directly with the Financial Conduct Authority, their contact details are:

Email / Phone Number	Address	Website
whistle@fca.org.uk 020 7066 9200	Intelligence Department, Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN	www.fca.org.uk

2.2 RELEVANT LAWS/REGULATION

This Policy conforms to all applicable provisions detailed within SYSC 18 of the FCA Handbook.

2.3 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 Compliance Director, Robert Parker.

3.2 INTERNAL/EXTERNAL PUBLICATION

This Policy will be published on Jupiter's website.



APPENDIX

Version	Date	Author	Description	Approver
1.1	30 March 2020	Robert Parker	Annual Review	Robert Parker <i>RAPL</i>

* Delete as appropriate.

