

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial year ending 31 December 2021



This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 (the 'Act') and sets out the actions that we, Jupiter Fund Management plc (the 'Group'), have taken to understand all potential modern slavery risks related to our business, and to implement steps to ensure that slavery and human trafficking are not taking place in our business or supply chains during the financial year ended 31 December 2021.

Contents

Introduction	3
Our Business	4
Our approach to modern slavery and human trafficking	5
Our Policies and Processes	6
Modern Slavery in the supply chain	7
Our role as a responsible investor	8
Training and Communication	9
Focus areas in 2022	10
Statement Confirmation	11

INTRODUCTION

Jupiter is a specialist, high conviction, active asset manager. We exist to help our clients achieve their long-term investment objectives. We are also committed to operating our business in the best long-term interests of our planet and its people as well as our broader stakeholders.

In line with our values, we have made commitments to a number of international human rights frameworks, including the United Nations Global Compact that guide our approach to combatting modern slavery. We incorporate these frameworks as well as broader Environmental, Social and Governance (ESG) factors into our investment decision-making and ownership practices. This is a core aspect of how we exercise our stewardship responsibilities on behalf of our clients and sits alongside our focus on removing modern slavery and human trafficking from our business operations and supply chains.



OUR BUSINESS

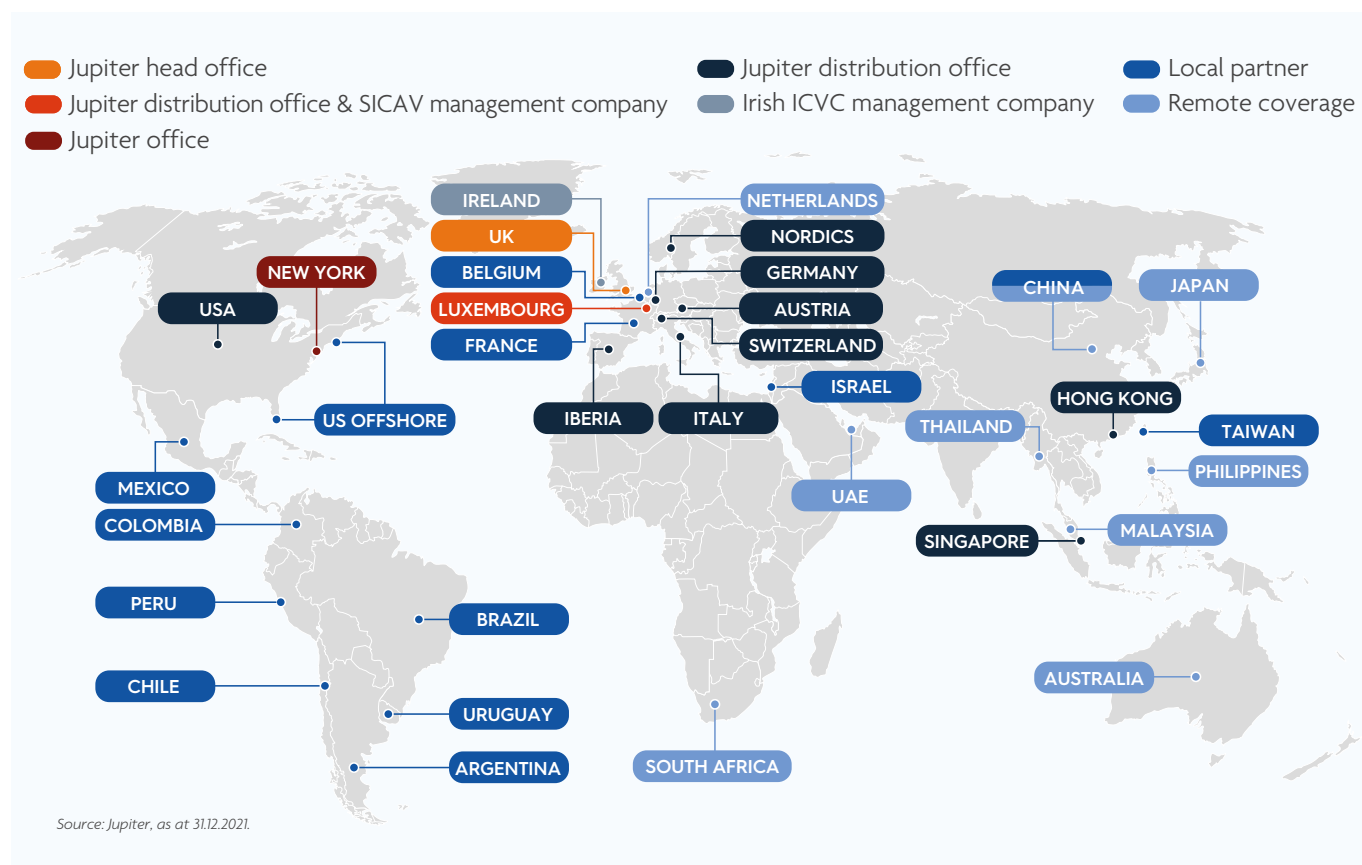
The Group operates principally in the United Kingdom with a presence across the globe as shown below. As at 31 December 2021, we have approximately £60.5bn in assets under management and 585 employees, of which 516 are based in the UK.

£60.5bn
AUM

585
employees

88.2%
UK-based employees

Source: Jupiter, as at 31.12.2021.



OUR APPROACH TO MODERN SLAVERY AND HUMAN TRAFFICKING

As a financial institution, we recognise that our corporate values must be in harmony with our investment beliefs. The link between our approach to ESG matters, and our corporate values have a direct bearing on our approach to human rights as investors. We are responsible investors and are committed to the principles of good stewardship as we engage with our clients to consider issues such as modern slavery and human trafficking.

This engagement process is informed by dialogue with industry bodies, policy makers and non-governmental organisations when considering these systemic risks to encourage collaboration and the sharing of knowledge to reduce the risk of modern slavery.

“Jupiter opposes all forms of slavery and forced labour. We are committed to upholding human rights in our business operations and supply chains, both in how we treat our people and in how we encourage and expect them to treat others. This is at the heart of our culture and values.”

Wayne Mephram
Chief Financial Officer



OUR POLICIES AND PROCESSES

We recognise that having strong, clear policies and processes protect the rights of stakeholders by reinforcing the prohibition of discrimination and encouraging diversity. This is embedded in our culture through our policies, principles, codes of conduct and our corporate values.

These policies and processes are guided by internationally recognised frameworks and are regularly assessed to ensure their efficacy.



Procurement Policy

This policy governs the procurement process and sets out the required due diligence process for new and existing suppliers, including in relation to modern slavery.



Risk Assessment Framework

We risk assess all new suppliers for goods or services to Jupiter for a variety of risks, including modern slavery. The assessment provides assurance that suppliers are in compliance with relevant legislation and continue to be so while we work with them.



Employee Handbook

The Employee Handbook includes details of our conduct rules framework, and our expectation that all employees act with integrity, due skill, care and diligence.



Whistleblowing

At Jupiter, we have a culture of 'speaking up' and our employees can report unethical behaviour or practices, such as suspected modern slavery, through internal and external channels set out in our 'whistleblowing policy'.



Supplier Code of Conduct

We are continuing to develop this document to set out the standards we expect from our suppliers. They reflect our values and the requirement for suppliers to conform with legislation and uphold human rights at all times.



Recruitment

In the UK, we manage the risk of modern slavery for potential employees by conducting pre-employment checks to ensure anyone recruited to work for Jupiter in the UK has the right to do so.

MODERN SLAVERY IN THE SUPPLY CHAIN

We actively work with suppliers during the pre-selection and on-boarding process to understand and mitigate the risk of modern slavery. This process includes due diligence of the supplier's reputation; respect for the law; compliance with health, safety and environmental standards; and the risk of modern slavery and human trafficking in the supply chain.

We operate supply chains predominantly comprising of business and professional services organisations and have minimal contact with the countries and sectors that are generally considered to have a risk of modern slavery and human trafficking.

Nonetheless, we take a risk-based approach to addressing matters of modern slavery and human trafficking within our supply chains, that includes assessing the risks associated with particular industries and delivery locations during the on-boarding process and at regular intervals with existing suppliers. This forms part of our wider due diligence assessment which includes a review of our suppliers' other policies and standards.

As part of our approach to due diligence around modern slavery, we also review the prospective organisation's modern slavery statement. Where one exists, we check that the statement and underlying policies are as rigorous as the Act requires. For suppliers who do not publish a statement, we make use of a questionnaire to ensure that their approach to identifying and mitigating the risks of modern slavery again meets the same standards as those required by the Act. This approach ensures a consistent and rigorous approach to modern slavery across our supply chains.



OUR ROLE AS A RESPONSIBLE INVESTOR

The Group is committed to the principles of good stewardship and responsible investment, as outlined in our Stewardship Policy and 2020 Annual Stewardship Report. We integrate ESG factors into our investment decision-making and ownership practices and this forms a core aspect of how we exercise our stewardship responsibilities on behalf of clients, in order to meet their investment objectives. Jupiter announced our alignment with the UN Global Compact Principles. Fund managers retain responsibility for integrating ESG within their investment strategies. We monitor our portfolios for potential UN Global Compact violations, such as modern slavery and child labour in company supply chains. This process makes use of rapidly evolving third party ESG data, with assistance from the Governance and Sustainability (G&S) Team and oversight from the CIO Office.

To further strengthen our commitment to responsible investment, we became an investor member of the Workforce Disclosure Initiative (WDI) in November 2020. This initiative mobilises investors to ensure companies disclose comparable and comprehensive data on their workforce practices.

Furthermore, in February 2021 we joined the ShareAction Good Work Investor Coalition which brings together institutional investors to collaboratively engage on workforce issues, including the Living Wage, diversity and inclusion and insecure working practices.

We believe that asset managers have a critical leadership role to play in helping to resolve some of the greatest challenges facing the world. In this spirit, we are proud of our long-established credentials in the fields of ESG and sustainable investment, and of our ongoing commitment to specialism and innovation in these areas. Jupiter is a constituent member of the FTSE4Good Index, and a signatory on a number of key initiatives such as the UN Principles for Responsible Investment.

Jupiter's values and responsible business practices are aligned with the principles of the UN Global Compact and the 2020 UK Stewardship Code. Having engaged with the Financial Reporting Council (FRC) on the implementation of the 2020 UK Stewardship Code, we support this reinvigorated framework and have undertaken further investor outreach with the FRC and the Investment Association (IA). We are proud of the A+ score for strategy and governance we obtained in the latest assessment of our activities under the Principles for Responsible Investment (PRI). We also maintained our 'A' status under the PRI principles for our Equities strategies and improved our ranking to an 'A' in Fixed Income.



OUR TRAINING AND COMMUNICATION

Employee Handbook

This year we have updated the Employee Handbook with further specific references to modern slavery and human trafficking to build awareness of the topic and to ensure employees are aware of their responsibilities.

Training

We have deployed modern slavery training to employees with high levels of interactions with our supply chains. The training provides employees with the tools needed to identify potential risks of modern slavery and human trafficking and will be extended to a wider audience in 2022.



OUR FOCUS AREAS IN 2022

Existing policies

CONTINUE TO

strengthen our approach to identifying and managing modern slavery risks with our supplier risk framework assessment both for new and existing suppliers.

CONTINUE USING

our influence as a responsible investor to protect human rights and address modern slavery.

CONTINUE TO

develop and roll-out our modern slavery training material to Jupiter employees.

New policies

COLLABORATE AND PARTNER

with external experts to identify, apply and share best practice in combatting modern slavery.

DEVELOP CAPABILITIES

to monitor the risk and impact of modern slavery in our business operations and supply chains.

ROLL OUT

our new Supplier Code of Conduct to bring focus to the existing standards we expect our suppliers to. adhere to.

There have been

NO REPORTED INSTANCES OF MODERN SLAVERY

within our supply chains in 2021.

STATEMENT CONFIRMATION

This statement has been published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the financial year ended 31 December 2021 as approved by the Board of Jupiter Fund Management plc on 23 February 2022.



Andrew Formica
Chief Executive Officer
23 February 2022



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For further information:

Visit **www.jupiteram.com** for more information on Jupiter's approach to ESG and stewardship.

For more information about our Modern Slavery Statement, contact: **procurement@jupiteram.com**