PRINCIPLE ADVERSE IMPACT POLICY AND REMUNERATION STATEMENT

Statement on due diligence policies with respect to principal adverse impacts on investment decisions

Jupiter's approach to stewardship is borne out of a belief that allocating capital to well-governed companies with sustainable business models enhances the potential for positive, long-term outcomes for our clients and stakeholders. We recognise that investment activities may have impacts on sustainability factors linked to **climate and other environmental matters, social and employee issues, respect for human rights, anti-corruption and anti-bribery matters (principal adverse impacts)**. Jupiter will apply due consideration to these principal adverse impacts on sustainability factors with an initial reference period beginning 30 June 2021.

Jupiter's active management philosophy means that we only invest in securities issued by companies when we believe it in our clients' best interests to do so. These are companies in which we perceive a long-term value opportunity and our analysis integrates sustainability risks into investment decision making. Jupiter will consider principal adverse impacts with respect to the size, nature and scale of the companies we invest in.

Jupiter's active ownership approach utilises direct and collaborative engagement with companies. We may invest in companies that are demonstrating improvements with respect to principle adverse impacts. We may also remain invested in a company that has exhibited issues with principal adverse impacts provided we are satisfied that progress is being made.

This due diligence policy refers to entity level disclosures.

The identification of principal adverse impacts is centred on climate and other environmental matters, social and employee issues, respect for human rights, anti-corruption and anti-bribery matters. Jupiter will use primary research, third party datasets, direct and collaborative engagement with companies to identify these impacts and indicators.

Jupiter is a participant to the UN Global Compact whose principles are also aligned to the identification and prioritisation of principal adverse impacts. In practical terms, Jupiter may plan and prioritise actions in relation to the proportion of assets where principal adverse impacts are evident. However, volume of assets and position size within companies are not the only factors when considering our plans and actions.

Our stewardship duties involve responding to systemic risks and contributing to well-functioning markets. We are partnered with various investor organisations and civil society groups who have objectives that are connected to the advancement of the above sustainability factors in a collaborative setting. Consequently, discussions with our partners could also lead to further actions and engagement planning. Jupiter's active management philosophy creates a high conviction approach to managing client funds Prioritisation of principal adverse impact involve various considerations. We have group-wide commitments relating to climate change and other responsible business practices under the UN Global Compact (see below). Fund managers have discretion in relation to portfolio ESG decisions and this includes matters relating to the prioritisation of principal adverse impacts with respect to the assessment of company-specific issues. Therefore, prioritisation of principal adverse impacts may differ across investment strategies and geographies.

Engagement Policies

Please refer to Jupiter's Stewardship Policy which provides further detail regarding our engagement policies and is available on our website. Engagement is a key element of how we integrate sustainability risks into investment decisions. We engage directly with companies and this may involve dialogue with management teams or targeted discussions with independent directors which focus on longer term ESG issues. Experience has shown that it is important to not only react to problem scenarios. We engage proactively as part of our monitoring of companies to deepen investment insights and build relationships.

Investors and companies operate in complex ecosystems, especially when considering sustainability risks and principal adverse impacts. Therefore, collective engagement with other investors, industry bodies and civil society organisations is also part our stewardship toolkit.

Responsible Business Conduct Codes and Internationally Recognised Standards for Due Diligence and Reporting

Jupiter is a signatory of the following responsible business conduct codes and international standards. Principal adverse impacts can be of a systemic nature, and these frameworks along with their governing bodies can provide best practice guidance and a useful reference point when considering due diligence and reporting:

- The Principles for Responsible Investment
- The UK Stewardship Code
- The Japan Stewardship Code
- The Taskforce for Climate-related Financial Disclosures (TCFD)*
- Net Zero Asset Managers Initiative (NZAMI)*
- UN Global Compact*

**These initiatives are linked to the pursuit of the Paris Alignment goals. Both TCFD and NZAMI assist with our strategic planning and organisational approach towards a 2050 net zero pathway. These initiatives help shape best practice guidance and facilitate our industry collaboration around the Paris goals. As a participant in the UN Global Compact Jupiter is committed to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations.*

This policy statement has been reviewed and approved by the CIO Office in February 2021. For further details please refer to Jupiter's Stewardship Policy.

Transparency of remuneration policies in relation to the integration of sustainability risks

Jupiter has reviewed its remuneration policy for investment staff to ensure that this framework is consistent with the integration of sustainability risks. Remuneration is structured so that Jupiter is able to attract, retain and motivate high calibre investment professionals. Rewards are governed by various factors which promote long-termism, guard against excessive risk taking and reinforce client and stakeholder alignment. Various quantitative and qualitative factors are applied when assessing individual performance which shape remuneration outcomes and all Fund Managers are subject to regular performance appraisals and oversight by the CIO Office. This review process includes amongst other factors, an assessment of activities concerning the integration of sustainability risks and may focus on areas such as voting, engagement and the selection of securities. The ESG evaluation is one part of the overall performance assessment and should be viewed in that wider context.