

Status under the EU Sustainable Finance Disclosure Regulation (SFDR)

Janus Henderson Capital Funds plc – Janus Henderson Global Real Estate Equity Income Fund

The Fund is categorised as one which meets the provisions set out in Article 8 of SFDR as a product which promotes environmental and/or social characteristics.

Binding Investment Limitations

In order to meet the environmental and/or social characteristics promoted by the Fund, the Sub-Investment Adviser applies the following binding criteria to the selection of the underlying assets as part of its investment decision-making process:

The Sub-Investment Adviser applies screens to exclude direct investment in Prison Real Estate Investment Trusts (REITS). Companies are also excluded if they are deemed to have failed to comply with the UN Global Compact Principles (which cover matters including human rights, labour, corruption, and environmental pollution).

The Sub-Investment Adviser actively engages with companies to encourage the adoption of science-based emission targets, or a verified commitment to adopt science-based emissions targets. The Sub-Investment Adviser commits to a minimum of 10% of companies within the portfolio having approved or committed targets and will monitor the progress of those companies against those targets.

The Fund also applies the Janus Henderson Exclusion Policy, as detailed under the Prospectus section entitled “Investment Restrictions”.

Furthermore, the Sub-Investment Adviser carries out its ESG review (i.e., ‘extra-financial analysis’) on at least 90% of the securities to be invested in by the Fund.

The Sub-Investment Adviser may include positions in the Fund that meet the above exclusion criteria where the Sub-Investment Adviser believes that the data used to apply the exclusions may be insufficient or inaccurate

Sources of data include a wide range of specialist ESG research materials, internal and external research which includes data from data providers, industry bodies and organisations, academia, and intergovernmental organisations. Such data is integrated into the Sub-Investment Adviser’s investment and risk management systems and procedures as part of the investment process.

Further information can be found in the Prospectus for the Fund.

Information on how the environmental or social characteristics are met

All investments are monitored for compliance to the above forementioned positive and negative screening criteria to ensure that they meet the environmental and/or social characteristics promoted by the Fund. Investors should note that a specific index is not designated as a reference benchmark to determine whether the Fund is aligned with the environmental and/or social characteristics promoted.

Periodic Reports

A description of the extent to which environmental and/or social characteristics are met will be available as part of the annual report. This information will also be published on this website once available.

Principal Adverse Impacts

The EU's Sustainable Finance Disclosure Regulation ("SFDR") requires financial market participants to make a 'comply or explain' decision as to whether they consider principal adverse impacts ("PAIs") of investment decisions on sustainability factors in accordance with a specific regime outlined in SFDR (the "PAI Regime"). Janus Henderson Investors Europe S.A.' ("JHIESA") is a member of the Janus Henderson group incorporated in Luxembourg and is subject to SFDR as a financial market participant.

JHIESA is supportive of the general policy aims of the PAI Regime, to improve transparency to clients, investors and the market, as to how financial market participants integrate consideration of the adverse impacts of investment decisions on sustainability factors. Taking into account the size, nature and scale of JHIESA's activities, JHIESA has decided not to comply with the PAI Regime at the current time. Nonetheless, JHIESA wishes to affirm its overall commitment to ESG matters. As part of this commitment, JHIESA currently manages products that are classified under either Article 8 or Article 9 of SFDR. More information on Janus Henderson's overall commitment to ESG matters is also described in our [ESG overview](#).

JHIESA will keep its decision not to comply with the PAI Regime under regular review.

Principal adverse impacts - financial product disclosure

PAIs are considered at the product level.¹ The table below sets out where PAI is considered through the use of exclusionary screens:

| Principal Adverse Impact | How is PAI considered? |
|-----------------------------------|------------------------|
| Violations of UNGC and OECD | Exclusionary screens |
| Exposure to controversial weapons | Exclusionary screens |

¹ This was effective as of 31 October 2022 and periodic reporting will commence from 1 January 2023 for the first reference period from 31 October 2022.