Modern Slavery Act and Human Trafficking Statement 2018

This statement sets out what steps we, Jupiter Fund Management plc, have taken during the financial year ending 31 December 2018 in our efforts to help eliminate the risk of modern slavery and human trafficking.

Human rights

We recognise the importance of upholding human rights in our business operations, both in how an organisation we treat individuals and how we encourage individuals within the Group to interact with each other. This is at the heart of our corporate values. We protect the rights of our employees through our employment policies and practices, which prohibit discrimination and encourage diversity. We protect the rights of our other stakeholders through our insistence on high standards of ethical behaviour. This is embedded in our culture through our policies, principles, codes of conduct and our corporate values.

Group organisation and business

We are predominantly a UK based group with subsidiaries operating through offices in Luxembourg, Hong Kong, Singapore and Switzerland. There are also branches of Jupiter Asset Management Limited in a number of countries in mainland Europe. This statement applies to all parts of the Group.

Our business focus is primarily on managing investments on behalf of retail and institutional investors across a wide range of products including UK and offshore mutual funds, segregated mandates and investment trusts. As of 31 December 2018, we manage over £42.67 billion assets under management.

Jupiter employee base

As of 31st December 2018, we have 538 employees globally, of which 493 are based in the UK.

Our working practices respect and uphold all human rights. Employees receive a full corporate induction, including a core curriculum of subjects such as anti-bribery and anti-money laundering.

Our assessment of risk

Many of our suppliers are financial and professional services organisations, including banks, information service providers, lawyers and accountants. Other suppliers include providers of IT equipment, catering services, cleaning services, printing and consumables.

We maintain a set of criteria to be used in the evaluation of the level of potential risk posed by each supplier. These criteria relate to the nature of the good or service being procured, and the geographic regions involved in the supply process.

We consider that, given the nature of the services that we offer, the risk of modern slavery or human trafficking in our business and its supply chain is low.
The action taken

During 2017, we implemented a procedure to gain comfort that no instances of human trafficking or modern slavery are occurring in our suppliers' supply chains. Where a supplier qualified under the Slavery Act to publish a statement, we obtained and reviewed that statement. Should the supplier not be obliged to publish such a statement, a questionnaire was developed and sent to them to obtain the required assurances. The responses were positive.

During 2018 we re-visited the above process in its entirety, reconfirming our list of suppliers, reviewing and updating the criteria used in the evaluation of the level of potential risk posed by each supplier and upgrading the list of goods, services and countries deemed to be 'at risk' of modern slavery.

Minimum Wage

In all countries and territories where one exists, Jupiter operates the legal minimum wage. In countries where there is no legal minimum wage, we ensure all wages are in line with market rates. We also embedded this requirement in our standard contractual clauses.

Staff awareness

We continue to maintain awareness of all staff via our company wide newsletter, intranet site and internal advertising. The responsibility for ensuring compliance with the Slavery Act this year continues to be allocated to a specified team within the organisation. The business owners have also been involved.

Next Steps

We are committed to further strengthening our approach to respecting human rights and preventing modern slavery. As part of this approach, in 2019 we will:

- revisit our assessment of risk criteria to ensure they remain appropriate.
- continue with the training and education for all staff, as appropriate.
- investigate and identify accreditations and other codes of conduct in this area.

This statement is made 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 ending 31 December 2018 as approved by the Board of Jupiter Fund Management plc on 25 January 2019.

Maarten Slendebroek
Chief Executive Officer

13 February 2019
Appendix – List of Group Companies

Jupiter Fund Management Group Limited
Jupiter Asset Management Group Limited
Knightsbridge Asset Management Limited
Jupiter Investment Management Group Limited
Jupiter Asset Management Limited
Jupiter Unit Trust Managers Limited
Jupiter Investment Trust Limited
Tyndall Holdings Limited
Tyndall Investments Limited