WHISTLEBLOWING POLICY

Introduction

This policy is designed to ensure that the Jupiter Fund Management Group ("Jupiter") operates to high standards of probity and that Jupiter employees (including contractors and agency staff), 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 and 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 to any concerns that you may have regarding the activities of Jupiter, 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 worker 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:-

(i) directly with your manager or with a member of Jupiter’s Executive Committee; or

(ii) 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 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:-

a) the confidential helpline number;

b) a secure email address; and

c) a secure web address.

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

<table>
<thead>
<tr>
<th>Expolink Services</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confidential telephone line</td>
<td>+44 (0)800 374 199</td>
</tr>
<tr>
<td>Secure email address</td>
<td><a href="mailto:jupiteram@expolink.co.uk">jupiteram@expolink.co.uk</a></td>
</tr>
<tr>
<td>Secure web address</td>
<td>wrs.expolink.co.uk/jupiteram (access code: jupiteram)</td>
</tr>
</tbody>
</table>

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

a) Robert Parker – Compliance Director; and

b) Jas Singh – General Counsel and Company Secretary.

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 your concern relates to one of the nominated recipients above, it will be passed to the Whistleblowing Champion to oversee the investigation.

**Investigating Concerns**

The matter raised by you will be 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. She was appointed to this role in February 2016.

<table>
<thead>
<tr>
<th>Polly Williams</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Executive Director and Chairman of Jupiter Fund Management plc's Audit and Risk Committee</td>
<td><a href="mailto:polly.williams@jupiteram.com">polly.williams@jupiteram.com</a></td>
</tr>
</tbody>
</table>

FCA Contact Details

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

<table>
<thead>
<tr>
<th>Email / Phone Number</th>
<th>Address</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="mailto:whistle@fca.org.uk">whistle@fca.org.uk</a></td>
<td>Intelligence Department, Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN</td>
<td><a href="http://www.fca.org.uk">www.fca.org.uk</a></td>
</tr>
<tr>
<td>020 7066 9200</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

March 2019