

Janus Henderson Group UK
Pension Scheme

Implementation Statement

**For year ended
31 December 2024**

July 2025

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Section 1: Introduction

This document is the annual Implementation Statement (“the Statement”) prepared by the Trustee of the Janus Henderson Group UK Pension Scheme (“the Scheme”) covering the year from 1 January 2024 to 31 December 2024 (“the Scheme Year”) in relation to the Trustee’s Statement of Investment Principles (“SIP”).

The purpose of this statement is to:

- Set out the extent to which, in the opinion of the Trustee, the Scheme’s SIP was followed during the Scheme Year;
- Detail any reviews of the SIP the Trustee undertook during the Scheme Year and any changes made to the SIP as a result of the review;
- Describe the voting and engagement behaviour by, or on behalf of, the Trustee over the year.

A copy of this implementation statement is made available on the following website (<https://www2.myworkpension.co.uk/SchemeNoticesJAN>).

This Statement has been produced in accordance with The Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018, The Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019 and guidance published by the Pensions Regulator.

The Scheme makes use of a wide range of investments; therefore, the principles and policies in the SIP are intended to be applied in aggregate and proportionately, focusing on areas of maximum impact. The Trustee confirms that the investments which the Scheme holds were chosen in line with the requirements of s36 of the Pensions Act 1995.

Section 2: SIP reviews / changes

The SIP was reviewed during the Scheme Year. The last review was undertaken in July 2024 with the following changes made:

- Added details of the Freestyle investment options available under the Money Purchase (MP) Section including reflecting the change in the Gilts fund offered from the Janus Henderson UK Gilt Fund to the Legal & General All Stocks Gilts Index Fund following the closure of the Janus Henderson fund.
- Reflected the changes in the Final Salary (FS) Section's investment strategy following to being fully de-risked from return-seeking assets and holding only liability matching assets.
- The new regulatory framework that now applies including the Pensions Regulator's General Code of Practice.
- Updating the Trustee's position on stewardship to confirm that they do not wish to set out specific priority areas for these activities but instead will engage with managers on their approach in this area to ensure this is aligned with the Trustee's fiduciary duties and the financial security of its members.
- The Trustee introduced its policy on investing in illiquid assets within the Scheme's default arrangement, noting that such investments are not currently included. However, the Trustee may consider incorporating illiquid assets in the future if it is deemed to be in the best interests of members.
- Noted that some of the Trustee Directors are employed in roles for Janus Henderson Investors that may have influence over some of the Janus Henderson funds held by the Scheme and how this conflict would be managed.
- Clarified the investment options available to members under the FS Section who paid additional voluntary contribution (AVC).
- Updated the investment risk for the FS and MP Sections to either refine existing risks, or add new risks to reflect developments since the SIP was last updated.
- Included the following amendments for MP Section to align with the Department for Work and Pensions' (DWP) minimum governance standards for SIPs:
 - The objective for the default arrangement
 - The expected risk and return on different asset classes
 - The ability to realise the assets held

Section 3: Adherence to the SIP

The SIP comprises the following sections:

- Introduction
- Investment managers
- FS Section
- MP Section
- Appendix A – Investment Strategy – FS Section
- Appendix B – Investment Strategy – MP Section

The Trustee considers that all policies outlined in the SIP, have been adhered to during the Scheme Year. The remainder of this Statement sets out details of how this has been achieved, and these details relate to those parts of the SIP which set out the Trustee's policies, and not those which are statements of fact.

Introduction

1 – This paragraph provides introductory comments and background information on the relevant regulatory framework rather than setting out any policies.

2 – As mentioned in Section 2 of this Statement, the Trustee reviewed and updated the SIP in 2024. The SIP was formulated after receiving appropriate written advice and Company consultation.

Investment managers

3 – This paragraph sets out the regulatory framework that has been considered when preparing the SIP.

4 – This paragraph sets out the Trustee's relationship with its investment managers: namely BlackRock Investment Management (UK) Limited, Janus Henderson Investors Limited (JHI) and Legal & General Investment Management Limited (L&G), in accordance with the relevant regulatory framework.

5 – The Trustee has delegated day-to-day investment management operations to the investment managers and, during the Scheme year, monitored performance on at least a quarterly basis in scheduled Trustee meetings.

6 to 7 – The Trustee considers long-term sustainability to be an important and relevant issue to consider throughout the investment process. Whilst the Trustee recognises limitations to its influence over its investment manager's practices, given the Scheme's assets are held in pooled funds, the Trustee reviews and engages with its investment managers to promote positive practices.

As part of drafting this Statement, the Trustee requested updated Sustainable Investment policies from the Scheme's managers and confirmed they were comfortable that these issues are being considered adequately.

8 – The Trustee's investment managers support a number of stewardship codes including the UK Stewardship Code and other broader initiatives such as the UN Principles for Responsible Investment.

9 – The Trustee does not currently take account of non-financial matters in setting investment strategy.

10 to 17 – These paragraphs set out the Trustee’s policies in relation to their arrangements with their investment managers.

The Trustee sends a copy of the SIP to the Scheme’s investment managers following any policy updates to keep managers informed of the Trustee’s latest policies; and particularly the policies around sustainable investment. The SIP was re-sent as part of the data collection exercise for this statement.

The Trustee receives annual costs and charges reporting as part of fulfilling its annual defined contribution (DC) governance statement requirements and as part of the MiFID regulations for both FS and MP Sections assets.

The Trustee monitors the Scheme’s investment managers on an ongoing basis and engages with managers as required. The Trustee met with Blackrock and JHI during the year.

The Trustee receives voting and engagement records for the applicable L&G and JHI funds (where voting rights apply) to review whether the activity is aligned with the Trustee meeting its fiduciary duty and has been undertaken in the best interests of members to ensure their financial security.

The Trustee has reviewed the level of turnover within the non-LDI pooled funds, where this information was available, over the course of 2024 and are satisfied that this is in line with expectations.

Final Salary Section

18-19 – These paragraphs set out the investment objectives for the FS Section. The Trustee is satisfied that the objectives as set out in this section of the SIP have been followed. The FS Section has reached a high level of funding on self-sufficiency basis and hence the Trustee has decided to fully de-risk the Section by disinvesting from return-seeking assets to minimise funding level volatility.

The Trustee is satisfied that:

- the Scheme remained on track to meet its liabilities over the long term;
- investment risk relative to the Scheme’s expected liabilities was appropriately managed through regular monitoring;

20-24 – These paragraphs are a statement of fact rather than setting out any policies.

25 – The Scheme’s liability profile is updated on a triennial basis following agreement of the Scheme’s actuarial valuations and the Scheme’s liability hedging portfolio is constructed based on the profile of the Scheme’s liability cashflows. Performance of the hedging portfolio relative to the sensitivities of the Scheme’s liabilities as measured by the investment advisor is monitored by the hedging manager on a quarterly basis.

26 – The Trustee reviewed the portfolio’s expected level of return during 2023 as part of the decision to reduce, and ultimately remove, the exposure to return-seeking assets. Over the year, the Trustee, with assistance from its investment adviser, monitored the portfolio’s liability hedging characteristics on a quarterly basis relative to their respective acceptable tolerance ranges.

27 – The Trustee has decided to move the LDI portfolio from a pooled to a segregated mandate following a review of the liability hedging arrangements. This will provide greater flexibility for the Scheme’s liquidity management and is due to take place in 2025.

28-29 – These paragraphs are a statement of fact rather than setting out any policies.

Other matters

30 The Trustee is satisfied that the range of AVC funds offered to FS Section members remained appropriate over the year. The range of funds available is being reviewed as part of the MP Section investment strategy review which commenced in 2024 and is expected to be completed in 2025. The Trustee will also be undertaking a separate review of the ongoing suitability of the legacy AVC funds held with Utmost and Scottish Widows in 2025.

31 These paragraphs state how the Trustee defines the various investment risks which the Scheme is exposed to and how each risk is measured and managed. Over the year, the Trustee was satisfied that each of the defined risks were managed appropriately. Following the gilt market volatility in September 2022, the Trustee undertook a detailed review of the impact on the Scheme and reviewed their liability hedging arrangements. They assessed the liquidity, interest rate and inflation risk that arises from various alternative solutions. As referenced in point 27, following this review the Trustees decided to move the LDI assets to a segregated mandate. This is due to be completed in 2025.

The Trustee has established an Integrated Risk Management Plan ('IRMP') which considers how various risks within the Scheme interact with each other.

Money Purchase Section

32 – This paragraph sets out the investment objectives for the Money Purchase Defined Contribution (DC) Section. It outlines the Trustee's recognition that Scheme members may have different investment needs and attitudes to risk which may change over time. Therefore, the Trustee's overall objective is to offer a range of investment options to serve these varying investment needs and risk appetites whilst being mindful of the associated administrative requirements. The Trustee is undertaking a strategic review of the Scheme's DC investments options including its default option, this process commenced in 2024 and is expected to be completed in 2025. This review will look to ensure the DC investment options provided to members continues to support this objective.

33 – The Trustee has chosen to offer pooled funds to members for investment purposes as they provide diversification, liquidity, transparency and simple administration.

34 – It is the Trustee's policy to offer mostly passive funds for the Scheme's members to reduce manager risk. The Trustee reviews manager performance on a quarterly basis.

35 – The Trustee offers lifestyle options for members seeking a managed investment journey which reflects the gradually changing risk appetite over time as members get closer to retirement.

36 – The Scheme's default strategy does not currently include an allocation to illiquid assets. The Trustee will periodically review whether introducing illiquid assets to the default strategy would be in the best interests of members.

37 – This paragraph sets out the Trustee's objectives for its default strategy. As noted the review of the default strategy is currently being undertaken and this process will consider the Trustee's objective as part of this.

38 – This paragraph is a statement of fact giving a high-level description of the default investment option (Flexible Lifestyle) and the availability of alternative lifestyle options. It does not set out any policies.

39 – The Trustee has agreed investment beliefs and principles around sustainable investing, stewardship and engagement, whilst explicitly acknowledging that it prioritises the financial

objectives of its membership. The Trustee is satisfied that these remained valid over the year.

40 – This paragraph is a statement of fact setting out the Trustee’s view on the risk and return characteristics of various asset classes.

41 – This section details the Trustee’s recognition of the different risks faced by members which could ultimately lead to members accumulating insufficient assets to support their desired level of consumption in retirement. The Trustee provides members with a range of investment options that aim to offer members the ability to navigate and mitigate these risks themselves. The investment options also include lifestyle options which aim to manage some of these risks on members behalf by gradually changing the asset mix held by members as they get closer to retirement age.

The Trustee also seeks to mitigate some of these risks through ongoing monitoring and review of the Scheme’s investment options. The Trustee reviews performance of the investment funds on a quarterly basis through quarterly investment monitoring reports produced by the investment adviser. These reports were used for discussion at the quarterly Trustee meetings. The reports included short-term and long-term performance assessment which the Trustee, along with the investment adviser, discussed and evaluated any incidences where performance deviated materially from the benchmark/expectations.

42 – The Trustee only invests in funds that are daily dealt and can be easily realised to support a disinvestment request by members.

43 – The Scheme rules allow members to use their pension savings to purchase an annuity or access as a lump sum. Members must transfer their savings to another pension arrangement if they want to secure their benefits in a different form.

Appendix A – Investment Strategy – Final Salary Section

These paragraphs provide factual details of the portfolio.

Appendix B – Investment Strategy – Money Purchase Section

These paragraphs provide a more detailed description of the three lifestyle options and information on Freestyle investment options available to members under the MP Section of the Scheme. During the Scheme year the Gilt fund used within the three lifestyle and offered as a Freestyle fund was updated from the Janus Henderson Institutional UK Gilt Fund to the Legal & General All Stocks Gilts Index Fund.

Section 4: Voting and engagement

The Trustee invests in pooled investment funds and, as set out in the SIP, the Trustee's policy is to delegate the day-to-day sustainable investment considerations factors to the investment managers. These sustainable investment considerations include the way in which an organisation manages its impacts on, risks related to, and opportunities arising from, environmental, social and governance (ESG) issues. However, the Trustee understands that the ultimate voting and engagement of the portfolio holdings is their responsibility. The Trustee has considered its approach to stewardship activities including establishing specific priority areas to focus on and agreed they do wish to select specific aspects but would instead focus on votes based on other criteria such as votes against management.

The Scheme's investment funds cover a range of asset classes; however, this section focuses on the equity investments managed by Janus Henderson Investors (JHI) and Legal & General Investment Management (L&G) which have voting rights attached. JHI and L&G have their own voting policies which determine their approach to voting, and the principles they follow when voting on investors' behalf.

The Trustee believes that engagement activities are important, and the links below set out some of the investment managers' approaches to stewardship and engagement. The. Examples of engagements that the Scheme's investment managers have undertaken directly with companies within their portfolios are included below.

JHI – <https://www.janushenderson.com/en-gb/adviser/esg-investor/> and <https://www.janushenderson.com/en-gb/investor/environmental-social-governance-principles/>

L&G - <https://www.lgim.com/uk/en/responsible-investing/active-ownership/>

JHI and L&G also use proxy voting advisors which aid in their decision-making when voting and details are summarised below.

JHI use of proxy advisor services

JHI believe they have a fiduciary duty to ensure that proxies are voted in the best interest of all their clients for which they have voting responsibility. JHI have adopted proxy voting policies and procedures, along with internal procedures, to fulfil their proxy voting responsibilities.

To assist JHI in assessing the corporate governance of investee companies, JHI subscribe to the independent proxy voting adviser Institutional Shareholder Services (ISS). ISS provides voting recommendations based upon JHI's policies and procedures.

L&G use of proxy advisor services

L&G's Investment Stewardship team uses Institutional Shareholder Services' (ISS) electronic voting platform to electronically vote clients' shares. All voting decisions are made by L&G, and they do not outsource any part of the strategic decision.

L&G use ISS recommendations to augment their own research. L&G's internal investment stewardship team also use research reports of Institutional Voting Information Services (IVIS) to supplement the research reports that they receive from ISS for UK companies when making specific voting decisions.

L&G have a custom voting policy in place which includes specific voting instructions which apply to all markets globally. L&G have the ability to override any vote decisions which are based on this custom voting policy if they see fit.

The Trustee understands the importance of carrying out periodic reviews of the voting and engagement information of its investment managers to ensure they align with its own policies. As such, the Trustee, with support from its investment adviser, has contacted each of the investment managers to request information on the managers’ voting and engagement activity for the year to 31 December 2024.

The table below sets out the voting activities of the investment managers and examples of votes deemed to be significant in line with the priorities outlined above.

Section	Fund name	Voting activity	Most significant votes cast
Money Purchase	JH Diversified Growth Fund	Number of resolutions eligible to vote on: 154 Percentage of eligible votes cast: 100% Percentage of votes with management: 96.8% Percentage of votes against management: 3.3% Percentage of votes abstained from: 0%	N/A* *Voting is based on equity holdings. The Diversified Growth Fund only held two equity holdings, with the rest of the holdings classified as Mutual Funds, including several Janus Henderson funds and as a result limited voting directly applies to the JH Diversified Growth Fund. The criteria used to assess the “most significant votes” involve votes against management with the highest level of dissent, followed by votes that received significant levels of overall dissent. There were no votes against management that met the “most significant” criteria during the reporting period.
Money Purchase	JH Institutional Global 50/50 Index Opportunity Fund	Number of resolutions eligible to vote on: 22,354 Percentage of eligible votes cast: 99.24% Percentage of votes with management: 94.45% Percentage of votes against management: 5.55% Percentage of votes abstained from: 0.05%	Topic: Governance - accounting Company: Spirent Communications Plc Resolution: Accept Financial Statements and Statutory Reports Decision: Against Rationale for inclusion: JHI stated that a vote against this resolution was warranted as the Group’s auditors have not provided an opinion on the Group’s financial statements. The auditors have also included an emphasis of matter in their report; and the publication of its annual report is beyond the requirement for UK-incorporated public companies. Outcome: Fail
Money Purchase	JH Global Sustainable Equity Fund	Number of resolutions eligible to vote on: 748 Percentage of eligible votes cast: 97.5% Percentage of votes with management: 94.7% Percentage of votes against management: 5.4%	Topic: Governance – Board management Company: Uber Technologies, Inc. Resolution: Elect Director David I. Trujillo Decision: Against

Section	Fund name	Voting activity	Most significant votes cast
		Percentage of votes abstained from: 0.0%	Rationale for inclusion: JHI believe that Mr. Trujillo has too many responsibilities to be effective on Uber's board. Outcome: Pass

JHI have been engaging with underlying companies during the Scheme year. Over 2024, they recorded more than 700 ESG company engagements and voted at almost 5,500 meetings with over 61,000 items where ESG topics were part of the discussion and included themes such as climate change and supply chain/human rights.

Section	Fund name	Voting activity	Most significant votes cast
Money Purchase	L&G Global Equity (70:30) Index Fund	Number of resolutions eligible to vote on: 72,352 Percentage of eligible votes cast: 99.8% Percentage of votes with management: 81.1% Percentage of votes against management: 17.8% Percentage of votes abstained from: 1.1%	Topic: Climate Change Company: Unilever Plc Resolution: Approve the Unilever Plc Climate Transition Action Plan Decision: For Rationale for inclusion: A vote FOR the CTAP is applied as this was understood to meet L&G's minimum expectations. This includes the disclosure of scope 1, 2 and material scope 3 GHG emissions and short, medium and long-term GHG emissions reduction targets consistent with a 1.5°C Paris goal. Despite the SBTi recently removing their approval of the company's long-term scope 3 target, L&G noted that the company has recently submitted near term 1.5 degree aligned scope 3 targets to the SBTi for validation and therefore at this stage believe the company's ambition level to be adequate. L&G therefore remain supportive of the net zero trajectory of the company at this stage. Outcome: Pass.
Money Purchase	L&G All World Equity Index Fund	Number of resolutions eligible to vote on: 64,461 Percentage of eligible votes cast: 99.8% Percentage of votes with management: 79.6% Percentage of votes against management: 19.2% Percentage of votes abstained from: 1.3%	Topic: Diversity and inclusion Company: Apple Inc. Resolution: Report on Risks of Omitting Viewpoint and Ideological Diversity from Equal Employment Opportunity Policy Decision: Against Rationale for inclusion: L&G felt a vote against this proposal was warranted, as the company appears to be providing shareholders with sufficient disclosure around its diversity and inclusion efforts and non-discrimination policies, and including viewpoint and ideology in EEO policies does not appear to be a standard industry practice. Outcome: Fail.

Section	Fund name	Voting activity	Most significant votes cast
Money Purchase	L&G World Emerging Markets Equity Index Fund	Number of resolutions eligible to vote on: 35,559 Percentage of eligible votes cast: 99.9% Percentage of votes with management: 80.4% Percentage of votes against management: 17.6% Percentage of votes abstained from: 2.0%	Topic: Governance – Board leadership Company: Fomento Economico Mexicano SAB de CV Resolution: Elect Board Chairman and Secretaries; Approve Remuneration of Directors; Verify Director's Independence Classification Decision: Against Rationale for inclusion: A vote against was applied as L&G expects the roles of Board Chair and CEO to be separate and not to be recombined once separated. These two roles are substantially different and a division of responsibilities ensures there is a proper balance of authority and responsibility on the board. Outcome: Pass.
Money Purchase	L&G Global Real Estate Equity Index Fund	Number of resolutions eligible to vote on: 4,142 Percentage of eligible votes cast: 100% Percentage of votes with management: 79.1% Percentage of votes against management: 20.8% Percentage of votes abstained from: 0.1%	Topic: Diversity and inclusion and Governance – Board tenure Company: Simon Property Group, Inc. Resolution: Elect Director Glyn F. Aepfel Decision: Against Rationale for inclusion: A vote against was applied as L&G expects a company to have at least one-third women on the board. A vote against was also applied as L&G expects a board to be regularly refreshed in order to maintain an appropriate mix of independence, relevant skills, experience, tenure, and background. Outcome: Pass.

Industry wide/public policy engagement

The Trustee has appointed investment managers and advisers who engage with industry wide initiatives and collaborative engagements, including:

- Being signatories to the UK Stewardship code
- Co-founding the Net Zero Investment Consultants Initiative
- Being signatories to the UN Principles for Responsible Investment (PRI)
- Leading collaboration through the Thinking Ahead Institute and Willis Research Network
- Co-founding the Investment Consultants Sustainability Working Group

Section 5: Conclusion

The Trustee considers that all SIP policies and principles were adhered to during the year.