

JUPITER CORPORATE SUSTAINABILITY POLICY

JUPITER FUND MANAGEMENT PLC

January 2026

1. Overview

1.1. Purpose

Jupiter is required by applicable regulations (e.g. through the Financial Conduct Authority) to establish, implement, and maintain effective sustainability policies that are appropriate to its size, organisation, nature, scale, and complexity of its business.

The purpose of this Corporate Sustainability Policy (the “Policy”) is to outline Jupiter’s Corporate Sustainability strategy and commitments for implementing and managing measures across the Group’s business to ensure compliance with sustainability disclosure regulations and listing requirements. This includes expectations for Jupiter employees globally and their role in supporting the Jupiter Group’s commitment to reducing its environmental impacts and respecting social and governance factors.

At Jupiter, we recognise that, as an asset management business, we have a dual opportunity to promote sustainability. On the one hand, we are able to invest through our funds and client mandates in companies that respect environmental, social and governance (“ESG”) factors and use our voice as an active investor to influence investee companies’ ESG commitments through our stewardship activities. On the other hand, we aim to embed sustainability throughout our own operations, activities and supply chain, reducing our environmental impact and enhancing Jupiter’s contribution to social value. Through this approach, we look to create long-term value for all our stakeholders.

Recognising that our corporate/operational activities (relating to our offices and people) and investment approach are distinctly separate, please refer to Jupiter’s [Responsible Investment Policy](#) for information on how we consider sustainability issues across our products and portfolio investments.

1.2. Scope

Within the Jupiter Group (whose parent company is Jupiter Fund Management plc) our regulated entities are:

- Jupiter Asset Management Ltd (“JAM”); Jupiter Unit Trust Managers Ltd (“JUTM”), and Jupiter Investment Management Limited (“JIML”) which are together regulated by the UK Financial Conduct Authority (FCA), Jupiter Asset Management Ltd is also regulated by the U.S. Securities and Exchange Commission (SEC);
- Jupiter Asset Management International S.A. (“JAMI”) and JAMI’s branches which are regulated by the Commission de Surveillance du Secteur Financier (CSSF) in Luxembourg;
- Jupiter Asset Management (Europe) Ltd (“JAMEL”) which is regulated by the Central Bank of Ireland (CBI); and
- Jupiter Asset Management (Hong Kong) Limited (“JAM HK”) which is regulated by the Securities and Futures Commission of Hong Kong (SFC).
- Jupiter Asset Management (Asia) Private Limited (“JAM AP”) which is regulated by the Monetary Authority of Singapore

These entities are collectively known as “Jupiter” or the “Group”.

The Policy applies to the Group, as well as Jupiter employees and any contractors engaged either by Jupiter directly or via an agency or personal services company (hereafter “Employees”) and relates to all Jupiter physical operations (in leased offices and excluding investments).

It is expected that Jupiter will acquire CCLA Investment Management Limited (“CCLA”) during Q1 2026 and this Policy shall apply in relation to CCLA on a phased basis following completion of the acquisition.

1.3. Responsibilities

All Employees are expected to use reasonable efforts to ensure their and Jupiter’s compliance with the obligations, commitments and initiatives set out in this Policy and all associated operational procedures relating to Corporate Sustainability, in particular, supporting Jupiter’s operational decarbonisation efforts.

Employees are expected to complete any sustainability which is indicated as a requirement for their specific roles (such as Jupiter’s internal Anti-Greenwashing Guidance, the United Nations Declaration of Human Rights, etc) and comply with all applicable regulations.

1.4. Accountability

This Policy is administered by the Corporate Sustainability Team who are responsible for the day-to-day oversight of this Policy.

1.5. Governance

This Policy is subject to an annual review by the Sustainability Forum, and if required by the Strategy and Management Committee (“SMC”).

For governance related to investment matters, please refer to Jupiter’s [Responsible Investment Policy](#).

For governance related to sustainability at a Group-level, please refer to Jupiter’s latest Sustainability Report, available on the website.

2. The Policy

2.1. The Policy

The Group promotes and encourages consideration of sustainability and implementation of associated initiatives at a corporate level by Employees and agents on behalf of any Group company. The Group is committed to acting in accordance with legislation and regulation on ESG (including, but not limited to topics of carbon emissions, biodiversity, deforestation, water security, and plastic pollution, where these are material to the physical operations of our offices (excluding our investments)).

Please refer to Jupiter's [Responsible Investment Policy](#) for information on how we consider these issues across our products and portfolio investments.

2.2. Sustainability in our operations

Operational environmental footprint & Net Zero Targets: Jupiter is committed to reducing our operational greenhouse gas ("GHG") emissions in line with the Paris Agreement. To do this we track our carbon footprint across our offices, and report this in line with relevant methodologies in external publications. In May 2023, we revised our net zero targets to align with the latest climate science and external guidance. We developed near-term and long-term targets that are consistent with limiting global temperature rise to 1.5°C.

Near-term 2030 target

- Jupiter commits to reduce absolute Scope 1 & 2 GHG emissions (location-based) by 46% from a 2019 baseline.

Long-term 2050 target

- Jupiter commits to reduce absolute Scope 1 & 2 GHG emissions (location-based) by 90% from a 2019 baseline.
- Residual emissions will be balanced by carbon offset or removal programmes according to best practice guidance.

Please see our Sustainability Report for more information on our targets.

Energy-saving initiatives: Where possible and with support from landlords in leased premises, Jupiter will seek to minimise its consumption of energy and increase energy efficiency.

Renewable energy: Where possible and commercially viable, Jupiter endeavours to source 100% renewable energy for its physical offices (either through renewable energy tariffs, or through renewable energy certificates).

Waste: Across all of our offices we are committed to preventing pollution and disposing of waste in a responsible manner, including recycling in accordance with local rules and facilities.

Travel: Where possible, Jupiter will seek to reduce its emissions from travel by encouraging and facilitating the use of video conferencing technology.

2.2.1. Sustainability in our supply chain

The [Supplier Code of Conduct](#) outlines our expectations for suppliers working with Jupiter and sets out the minimum standards we expect from our suppliers. This includes respect for human rights, DE&I and environmental sustainability. We expect suppliers to adhere to the Supplier Code of Conduct as we believe that holding shared values and goals benefits our business, our people, and our planet.

We have due diligence procedures in place to ensure our suppliers uphold human rights in their own organisations and in their supply chains. We also ask certain suppliers about their carbon reduction strategies and the reporting they have in place to measure their GHG emissions. We publish an annual [Modern Slavery and Human Trafficking Statement](#) stating our approach to understanding and mitigating

the risk of modern slavery in our supply chains and our operations in line with the UK Modern Slavery Act. As part of our management of supplier performance and risk, we assess the risk of modern slavery in our supply chains, as well as supplier responses to sustainability questions.

We include sustainability criteria when assessing new potential suppliers, and when monitoring the ongoing performance of existing key suppliers using a set of sustainability Key Performance Indicators.

2.2.2. Human capital

As signatory to the United Nations Global Compact (“UNGC”), we are committed to upholding human rights in our business operations and supply chains. At Jupiter we value our people, and we believe in the benefits of collaboration, inclusion and diversity of thought as described in our [Diversity and Inclusion Statement](#). Four cultural pillars describe how we treat each other and how we do business. Each pillar is underpinned by a set of individual behaviours:

- We put clients first
- We value our people
- We succeed together
- We challenge ourselves

We are committed to promoting mutual understanding and respect amongst our employees and the wider industry by valuing and supporting individuality. We facilitate schemes such as Investment20/20 and offer traineeships and apprenticeships to college leavers and graduates as well as supporting wider social initiatives such as financial education for young people. Jupiter also collaborates with industry associations such as the Women in Finance Charter and has an active and thriving set of employee resource groups, covering ethnicity, gender, LGBTQ+, and faith, each reporting to a central DE&I Committee which is chaired by the CEO.

We encourage high engagement, involvement and commitment from our people by supporting them across the employee life cycle. This includes a commitment to flexible working through a hybrid working model, to providing comprehensive support for professional and personal development and supporting our employees through the ‘moments that matter’ with our approach to benefits, support arrangements and policies.

Our employee network, Connections, is a vital channel for two-way feedback between employees and management, acting as the company’s formal workforce advisory panel. We communicate regularly with our people to gather views on strategy, people, culture, and facilities. The Chair of Connections provides updates to senior management and the Board, and the network acts as the company’s formal workforce advisory panel. We also survey our employees at least annually to hear collective views on how employees feel about work, our business, and how we can improve.

Our reward framework is designed to attract, motivate, and retain talent. It creates a tangible link between performance and compensation, while ensuring that our people’s interests are aligned with those of our clients. Jupiter’s Remuneration Committee determines and agrees with the Board the overarching principles and policies for the remuneration of employees. We also have an internal Employee Handbook, Code of Ethics, and Code of Conduct which outlines our policies and procedures in more detail for employees.

2.2.3. Industry associations

We engage in industry associations and initiatives where we believe we can add value and make a positive contribution.



A full list of Jupiter’s sustainability initiatives is available from the Corporate Sustainability Team.

2.2.4. Relevant Laws / Regulation

The Group requires compliance with all relevant sustainability laws in all jurisdictions in which it operates, as well as listing rules. This includes the UK Streamlined Energy and Carbon Reporting (“SECR”), the UK Energy Savings Opportunity Scheme (“ESOS”), the EU Sustainable Finance Disclosure Regulation (“SFDR”), the EU Corporate Sustainability Reporting Directive (“CSRD”), the EU Taxonomy, and the Financial Conduct Authority (“FCA”) requirements for compliance with recommendations of the Task Force on Climate-Related Financial Disclosures (“TCFD”), and other regulations as they arise.

This Policy is also made with consideration of other sustainability frameworks, including the United Nations Convention on Human Rights, the International Sustainability Standards Board (“ISSB”), as well as emerging recommendations of the Transition Plan Taskforce (“TPT”) and the Taskforce on Nature-related Financial Disclosures (“TNFD”).

We also provide updates via the Jupiter website on our sustainability strategy and performance by means of:

- Annual Report and Accounts
- Annual Sustainability Reports
- Annual Stewardship Reports, and
- Online proxy voting report disclosure.

2.3. Investments

Please refer to Jupiter’s [Responsible Investment Policy](#) for information on how we consider sustainability matters across our products and portfolio investments.

3. Additional Information

3.1. Breach guidance

In the event of a breach or potential breach of this Policy an Employee should report this to the Corporate Sustainability Team, as well as any suspicions of activities involving breaches of environmental, social and governance regulations, factors or commitments by Employees or associated persons.

Attention is also directed to the Whistleblowing Policy should an Employee feel that an anonymous report is more appropriate. It is particularly important for Employees to act quickly if any breach is suspected and not alert the party of concern until concerns have been satisfactorily investigated.

3.2. External publication

This Policy will be published on Jupiter's website.