

March 31, 2023 Form ADV Annual Amendment Summary

Part 1A

Item 1 – Identifying Information

- updated name of additional regulatory contact
- updated employee counts in satellite offices
- updated social media accounts
- updated books and records locations (including Section 1.F. Other Offices and Section 1.L. Location of Books and Records)

Item 5 – Information About Your Advisory Business

- updated number of employees
- updated number of employees in investment advisory roles
- updated number of registered representatives
- updated number of accounts and assets under management, including breakdowns
- updated breakdown of RAUM by asset type (Section 5.K.(1)) for “separate account” clients
- updated breakdown of RAUM by exposure (Section 5.K.(2)) for “separate account” clients
- updated breakdown of RAUM by custodian (Section 5.K.(3)) for “separate account” clients
- updated list of investment companies, including RAUM attributable to parallel managed accounts
- updated list of wrap plans
- updated responses to new Marketing Activities questions (Section 5.L(1)-(4))

Item 7 – Financial Industry Affiliations and Private Fund Reporting

- updated name Henderson Management SA to Janus Henderson Investors Europe S.A.
- removed Intech private funds
- added Cayman feeder fund for JH Biotech Innovation Fund
- updated general partners, managers, trustees and directors for certain private funds
- updated custodian and administrator information for certain private funds
- updated number of investors/owners and assets under management for private funds, including investor type breakdowns

Item 9 – Custody

- updated number of clients and RAUM associated with self- or affiliate-custody arrangements

Item 11 – Disclosure Information and Disclosure Reporting Pages

- updated to reflect SEC order against JHIUS

Schedule A – Direct Owners and Executive Officers

- removed Enrique Chang as Global CIO
- removed Bruce Koepfgen as President
- removed John Ingram as Head of Adviser Distribution
- added Michael Schweitzer as Head of Retail Distribution
- updated Michelle Rosenberg’s title to reflect President in addition to General Counsel

Part 2A (Brochure)

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

- updated to discuss a firmwide exclusion policy for certain types of controversial issuers

Item 9 – Disciplinary Information

- updated to reflect the entry of an order by the SEC against JHIUS in which, without admitting or denying the findings, JHIUS was found to have failed to timely deliver audited financial statements to certain pooled fund investors

Item 10 – Other Financial Industry Activities and Affiliations

- updated to align with relevant affiliation and organizational changes, including the winding up of Janus Henderson Investors Taiwan Limited

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

- updated to reflect changes to our cross-trading practices, including cessation of any cross-trades of fixed income securities with registered investment companies

Item 12 – Brokerage Practices

- updated to provide updated information regarding valuation of fixed income securities

Item 17 – Voting Client Securities

- updated to provide updated information on roles and responsibilities, including with respect to the escalation of votes involving potential conflicts of interest, and on disclosure of proxy voting records to clients and other interested persons

April 6, 2023 Form ADV Other-than-Annual Amendment Summary

Part 1A

Item 11 – Disclosure Information and Disclosure Reporting Pages

- updated to reflect AFM administrative fine against Janus Henderson Group plc regarding threshold disclosure

January 2, 2024 Form ADV Other-than-Annual Amendment Summary

Part 1A

Item 1 – Identifying Information

- updated title of name of additional regulatory contact
- updated office locations, removing Galleria

- updated websites and social media accounts, adding Threads
- updated books and records locations

Item 5 – Information About Your Advisory Business

- updated list of wrap program participation, reflecting change in sponsor name

Item 7 – Financial Industry Affiliations and Private Fund Reporting

- added Janus Henderson Services US LLC as affiliate, denoting status as custodian for Direct Advice Program clients
- corrected gross assets for the Janus Henderson Biotech Innovation Fund Limited and Janus Henderson Multi-Strategy Fund Limited

Item 9 – Custody

- added references to additional services provided by independent auditors, including surprise examinations and internal control reports
- updated response regarding affiliated persons acting as qualified custodian for clients, relating to Janus Henderson Services US LLC role as custodian for Direct Advice Program clients
- provided information on independent auditor used for Direct Advice Program surprise examination and internal control review

Schedule D – Miscellaneous

- explained role of Janus Henderson Services US LLC and reasons for answers to Item 9.D and Schedule D, Section 7.A

Part 2A (Brochure)

Item 4 – Advisory Business

- updated to provide additional details on impacts of cash flows and applications of reasonable restrictions in wrap accounts

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

- updated to provide additional detail regarding cybersecurity risks

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

- updated to reflect cessation of any cross-trades of fixed income securities

Item 12 – Brokerage Practices

- updated to reflect changes to trade rotation practices where we act as a portfolio manager to wrap accounts

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