Statement on Responsible Investing

Our Stewardship Responsibilities
We seek to earn the trust and confidence of our clients by providing superior long-term investment performance and outstanding client service. When we make investment decisions we always have our clients’ interests at heart and aim to act with a view to the interests of the Funds we manage on behalf of our clients.

Effectively exercising our ownership responsibilities is consistent with this objective, and we aim to fulfil our stewardship responsibilities in two broad ways:

- Engaging with investee companies (actual and potential) and, if deemed appropriate, other shareholders to further the interests of our Funds as shareholders; and
- Voting at shareholder meetings.

Responsible Investing at Orbis
In seeking superior risk-adjusted returns for our clients, we aim to invest in securities of companies that trade at a significant discount to our assessment of their intrinsic value, being the price that a prudent business person would pay for the business.

We have designed our investment process to maximise the chances that we can successfully implement our fundamental, long-term and contrarian investment philosophy. Our analysts use a structured research process to eliminate unattractive ideas in the early stages so that they can concentrate their efforts on only the most promising ideas.

As part of this bottom-up research process, our analysts consider a range of factors that might affect a company’s intrinsic value, which can include environmental, social and governance (ESG) issues. For example, if a company makes money in a manner that is not sustainable from an environmental or social perspective, the analyst will not gain conviction in the sustainability of its current level of profits. Similarly the consideration of governance issues is a critical part of an analyst’s assessment of a company’s intrinsic value.

Our analysts’ research of ESG factors informs decisions not to invest in a company as much as it informs decisions to invest, although there is no ESG issue that would automatically prevent us from investing in a company unless otherwise restricted by a Fund’s investment mandate. Just as there is scope for different views on the sustainability of a company’s competitive advantage, there is scope for investors (and individual Orbis analysts) to have different views on ESG matters. We believe that by performing rigorous, fact-based research on ESG matters, we may from time to time form a divergent view from the consensus that may alert us to the opportunity to buy a security at a discount to its intrinsic value.

All “Phase Three” fundamental research reports that are submitted to a Policy Group Meeting - a forum for rigorous peer review - include a section on relevant ESG matters.
Orbis is a signatory to the United Nations-supported Principles for Responsible Investment. The following documents, as well as this one, are available on our website (www.orbis.com):

- Policy on Engagement;
- Proxy Voting Policy;
- Conflicts of Interest Policy;
- Statements outlining how we apply the principles of the UK and Japanese Stewardship Codes; and
- Proxy voting records for the previous two quarters (additional proxy voting records are available on request).

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