

Responsible Investing Policy

Contrarius Investment Management Limited

1. Introduction

At Contrarius our objective is to create long-term wealth for our investors through superior long-term investment performance. We believe that long-term performance is driven by the consistent application of a sound investment philosophy. The key characteristics of our investment philosophy are that it is contrarian, valuation based, long-term, and based on proprietary fundamental research.

When investing on behalf of our fund investors, our overriding objective is to act in the best interest of the Funds. A prerequisite for a sound investment philosophy is that it is sustainable. As long-term investors, it is critical for us to understand the full range of factors that might affect a company's business and share price performance. While there is scope for investors to have diverse views about ESG-related matters, we believe there is a broad consensus that a company that acts in a way that damages the environment or is morally or socially irresponsible will eventually undermine its own profitability. We believe that by performing rigorous, fact-based research that carefully seeks to consider risks, including relevant ESG-related risks, we are able to maximise the chances that we can successfully implement our contrarian, valuation-based, and long-term investment philosophy in a sustainable manner.

Contrarius is a signatory to the United Nations-supported Principles for Responsible Investment ("PRI"). We have employed the PRI as a guiding framework for developing our Responsible Investing Policy.

This Policy provides an overview of our approach to responsible investing for the Contrarius Funds and covers how we deal with issues and risks relating to environmental, social, and governance ("ESG") matters.

2. Integration of Responsible Investing

Investment Process

As part of our investment philosophy and process, we select investments following detailed proprietary research. Our research efforts are directed to uncover companies that are trading below their underlying intrinsic values. The focus is on the long-term value of a business rather than short-term sentiment and earnings outlook. As part of our bottom-up research process, we consider a range of factors that might affect a company's intrinsic value. These factors include ESG issues.

Investment policy group meetings are where a fundamental investment policy group report is presented by the investment analyst for a company. The investment policy group report also addresses various risks considered relevant to the investment case (including ESG-related risks). The investment policy group meeting discusses the investment merits of individual companies and then votes on the companies' attractiveness versus the market and assigns an overall risk rating to the company.

We have a designated ESG analyst (with the necessary back-up resources) who prepares and presents an ESG report for each company discussed at investment policy group meetings. These separate ESG reports are presented and discussed prior to voting on a share. Incorporation of ESG-related risks and opportunities in both investment policy group reports by investment analysts and separate ESG reports prepared by a designated ESG analyst provides for the identification and assessment of these factors to be considered as part of the vote by the policy group meeting and, among other considerations, are incorporated into the risk rating assigned to the company and the resulting maximum position size of that share that may be purchased by the Funds.

ESG information is held within centralised databases or tools, and accessible by all relevant staff for ongoing analysis of investments.

Screening and Exclusions

Negative screens and broad ESG-related exclusions do not form part of our investment philosophy or fundamental research process. Contrarius believes that screening out investments purely on the basis of ESG-related metrics are not in the best interest of the Funds' investors.

Contrarius' approach to responsible investment includes the integration of ESG considerations into the investment process, and the Contrarius Funds may invest in securities with potentially higher exposure to ESG risks where it is believed the potential return outweighs the risks identified or where we believe engagement with management might lower the ESG risk.

Review and Monitoring

Our investment analysts conduct ongoing monitoring of individual securities within the investable universe. This ongoing monitoring includes the consideration of relevant ESG-related matters that may impact our assessment of a security's fair value. A designated ESG analyst collaborates closely with investment analysts and regularly monitors securities within the investable universe utilising third-party ESG data in addition to ongoing internal ESG research, providing an additional input that assists with investment decisions.

In addition to the monitoring of individual securities, the Funds' portfolio exposures are monitored on an ongoing basis. This portfolio review includes an assessment of exposures to material ESG-related risks and assists in informing the overall portfolio construction process.

As part of the ongoing monitoring, an ESG Report is presented to the RPC & ESG Committee of the Sub-Investment Manager on a monthly basis and the Investment Manager on a quarterly basis. This report includes third-party ESG risk ratings of the portfolio, portfolio exposure to products associated with ESG risks, and carbon intensity data of the Funds' equities as well as carbon intensity data for the Funds' top 10 equity holdings.

3. Proxy Voting

The incorporation of responsible investing in our research effort extends to our voting at shareholder meetings. Contrarius considers the exercise of proxy voting as central to its stewardship responsibilities. Our Proxy Voting Policy details how proxy voting is directed at Contrarius and sets out the process and procedures taken in relation to resolutions put forward at annual general meetings and extraordinary general meetings. This section of the Responsible Investing Policy should be read in conjunction with the Proxy Voting Policy, available on our website.

Our overriding objective is to act in the best interests of the Funds by voting in support of proposals that will further the long-term value of the companies that the Funds are invested in. We aim to vote on all resolutions wherever possible and practical, taking into consideration local market and operational requirements. We use our own research and make voting decisions without the use of external service providers.

When voting at shareholder meetings, we consider all the aspects of a proposal being put to the vote, including relevant ESG issues. We are mindful to not follow a prescriptive set of rules for proxy voting as this could restrict our ability to act in the Funds' best interests.

All voting actions are recorded in an internal register and proxy voting details are reported publicly on a quarterly basis.

4. Engagement

As part of our approach to responsible investing, we recognise our responsibility as stewards of our investors' capital and that engagement on ESG-related matters is an effective component of our investment process.

Our engagement activities are guided by our consideration of what is in the best interests of the Funds we manage for investors and subject to applicable laws and regulations in the relevant jurisdiction. Our engagement on ESG-related matters includes complying with the engagement requirements of the EU Shareholder Rights Directive.

We continually monitor our investee companies. This monitoring does not typically include speaking with management. We generally believe that managements' actions speak louder than words. We are cognizant that engagement with management may, on occasion, place the Funds in a position where they may be restricted in trading a share, sometimes for lengthy periods. As such we prefer to assess the merits of an investment and quality of management via publicly available information (including transcripts, conferences, presentations, investor Q&A's and detailed filings and company reports).

Where we conduct engagement activities with our investee companies, we prioritise our efforts and resources generally on areas that we believe may provide the most positive impact on the Funds. We generally conduct our engagement activities privately, but may consider public engagement, where appropriate, among other methods of escalation. Our engagement activities with investee companies may be for various reasons, including influencing corporate practice on ESG-related issues, encouraging improved ESG disclosure or gaining a better understanding of ESG strategy.

Our engagement efforts are documented internally and reviewed periodically to facilitate monitoring, review and reporting on our engagement efforts.

5. Reporting

As a signatory to the PRI, we have made a commitment to transparency and recognise its importance in creating higher standards for responsible investment practices and for the wider financial market. We will make the PRI's Transparency Report and the PRI Assessment Report available to investors upon request.

We report our proxy voting activity on a quarterly basis. These reports provide a summary of our voting activity during the period in addition to individual details of how we voted on each resolution. These reports are made available on our website and on request.

Our annual Responsible Investing and Stewardship Report constitutes the annual reporting on Contrarius' engagement and voting activities, as required by the Shareholder Rights Directive II (Directive (EU) 2017/828). As part of this report, we disclose information and examples of our engagement activity together with a summary of our proxy voting activity and a description of the most significant votes during the period. In this report we also make available relevant climate-related disclosures for the benefit of current and prospective investors in the Contrarius Funds. This report is made available on our website and on request.

6. Related Policies and Documents

The following documents, as well as this Policy, are available on our website (www.contrarius.com):

- Shareholder Rights Engagement Policy;
- Conflicts of Interest Policy;
- Proxy Voting Policy;
- Quarterly Summary and Detailed Proxy Voting Records; and,
- Responsible Investing and Stewardship Report.