**2021 ABRIDGED** 

# Financial Statements

ORBIS SICAV
GLOBAL EQUITY FUND



# ORBIS SICAV

# **TABLE OF CONTENTS**

Directory	1
Appointments	2
Independent Auditor's Report	3 - 4
Statement of Net Assets	5
Statement of Operations and Changes in Net Assets	6
Schedule of Investments	7 - 8
Notes to the Financial Statements	9 - 13
Notices	14

# **DIRECTORY**

### Registered office and mailing address

Orbis SICAV - Global Equity Fund 31, Z.A. Bourmicht L-8070 Bertrange Luxembourg

### **Directors**

William Gray

Orbis Investment Management Limited

Bermuda

William Gray is the President and a Director of the Orbis funds and President of Orbis Investment Management Limited.<sup>1</sup>

John C. R. Collis

Consultant

Bermuda

John C. R. Collis is a Director of the Orbis funds.

Claude Kremer

Arendt & Medernach

Luxembourg

Claude Kremer is a Partner of Arendt & Medernach in Luxembourg.

Austin J. O'Connor

Consultant Luxembourg Austin J. O'Connor is an independent consultant in Luxembourg.

David T. Smith Ecosse Limited

Bermuda

David T. Smith is the Managing Director of Ecosse Limited and a Director of the Orbis

funds.

<sup>&</sup>lt;sup>1</sup> Effective 31 December 2021, William Gray stepped down as President of Orbis Investment Management Limited. Adam R. Karr assumed this role from 1 January 2022.

### **APPOINTMENTS AT 31 DECEMBER 2021**

### Manager

Orbis Investment Management (Luxembourg) S.A. 4, rue Albert Borschette L-1246 Luxembourg Luxembourg

### **Investment Manager**

Orbis Investment Management Limited
Orbis House
25 Front Street
Hamilton HM 11
Bermuda

### **Placing Agent**

Orbis Investment Management Limited Orbis House 25 Front Street Hamilton HM 11 Bermuda

# Depositary, Administrator, Domiciliary, Registrar and Transfer Agent

Citibank Europe plc Luxembourg Branch 31, Z.A. Bourmicht L-8070 Bertrange Luxembourg

### **Legal Advisor in Luxembourg**

Arendt & Medernach 41A, Avenue John F. Kennedy L-2082 Luxembourg Luxembourg

### **Sub-Portfolio Managers**

Orbis Investment Management (Hong Kong) Limited Rooms 3405-3408 34th Floor Alexandra House 18 Chater Road Central, Hong Kong

Orbis Portfolio Management (Europe) LLP 28 Dorset Square London NW1 6QG United Kingdom

### **Investment Advisors**

In relation to Orbis Investment Management Limited:
Orbis Investment Advisory Limited
28 Dorset Square
London NW1 6QG
United Kingdom

Orbis Portfolio Management (Europe) LLP 28 Dorset Square London NW1 6QG United Kingdom

Orbis Investment Management (U.S.), L.P. 600 Montgomery Street, Suite 3800 San Francisco, California 94111 United States of America

Allan Gray International Proprietary Limited 1 Silo Square V&A Waterfront Cape Town, 8001 South Africa

### **Auditor**

Ernst & Young Société Anonyme 35E, Avenue John F. Kennedy L-1855 Luxembourg Luxembourg

### INDEPENDENT AUDITOR'S REPORT

To the Shareholders of Orbis SICAV – Global Equity Fund 31 Z.A. Bourmicht L-8070 Bertrange Luxembourg

### Opinion

The abridged financial statements, which comprise the statement of net assets and the schedule of investments of Orbis SICAV – Global Equity Fund as at 31 December 2021, and the statement of operations and changes in net assets for the year then ended, and the notes to the financial statements, including a summary of significant accounting policies, are derived from the complete audited financial statements of Orbis SICAV (the "Company") and of each of its sub-funds for the year ended 31 December 2021 (the "complete financial statements").

In our opinion, the accompanying abridged financial statements are consistent, in all material respects, with the complete financial statements from which they were derived.

### Abridged financial statements

The abridged financial statements do not contain all the disclosures required by Luxembourg legal and regulatory requirements relating to the preparation and presentation of the financial statements. Reading the abridged financial statements and the auditor's report thereon, therefore, is not a substitute for reading the complete audited financial statements and the independent auditor's report thereon.

### The audited financial statements and our report thereon

We expressed an unmodified audit opinion on the complete financial statements in our report dated 25 January 2022.

### Other information

The Board of Directors of the Company is responsible for the other information. The other information comprises the information included in the annual report but does not include the abridged financial statements and our reports of the "réviseur d'entreprises agréé" thereon.

Our opinion on the complete financial statements and on the abridged financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the complete financial statements and of the abridged financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the complete financial statements and the abridged financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report this fact. We have nothing to report in this regard.

# Responsibilities of the Board of Directors of the Company for the complete financial statements and for the abridged financial statements

The Board of Directors of the Company is responsible for the preparation of the abridged financial statements derived from the complete financial statements and for such internal control as the Board of Directors of the Company determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

# **INDEPENDENT AUDITOR'S REPORT (CONTINUED)**

In preparing the abridged financial statements, the Board of Directors of the Company is responsible for assessing the Company's and each of its sub-funds' ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors of the Company either intends to liquidate the Company or any of its sub-funds or to cease operations, or has no realistic alternative but to do so.

# Responsibilities of the "réviseur d'entreprises agréé" for the audit of the abridged financial statements

Our responsibility is to express an opinion on whether the abridged financial statements are consistent, in all material respects, with the complete financial statements based on our procedures, which were conducted in accordance with International Standard on Auditing (ISA) 810 (Revised), Engagements to Report on Summary Financial Statements.

Ernst & Young Société Anonyme Cabinet de révision agréé

Kerry Nichol

Luxembourg 25 January 2022

STATEMENT OF NET ASSETS (€ 000'S)	
As at 31 December	2021
Assets	
Investments in Transferable Securities at Cost	1,439,383
Unrealised Appreciation	279,019
Investments in Transferable Securities at Fair Value	1,718,402
Other Assets	
Cash and Cash Equivalents	24,817
Due from Brokers	655
Accounts Receivable and Accrued Income	6,110
Total Other Assets	31,582
Total Assets	1,749,984
Liabilities	
Due to Shareholders	292
Due to Brokers	1,019
Accounts Payable and Accrued Expenses	1,242
Net Unrealised Loss on Forward Currency Contracts	2,295
Total Liabilities	4,848
Net Assets	1,745,136

See accompanying notes on page 9

# STATEMENT OF OPERATIONS AND CHANGES IN NET ASSETS (€ 000'S)

For the Year Ended 31 December	2021
Investment Income	34,518
Dividends and Interest	34,518
Expenses	8,999
Manager's Fees	7,837
Administration, Custody Fees and Other	1,162
Net Investment Income	25,519
Net Gain from Investments and Currencies	188,378
Realised	129,481
Unrealised	58,897
Increase in Net Assets Resulting from Operations	213,897
Shareholders' Activity During the Year	
Subscriptions	
Orbis Funds	1,896
Shareholders	409,610
Switches Between Funds	235,567
Redemptions	
Orbis Funds	(53,936)
Shareholders	(214,050)
Switches Between Funds	(22,788)
Increase in Net Assets	570,196
Net Assets at Beginning of Year	1,174,940
Net Assets at End of Year	1,745,136

See accompanying notes on page 9

# SCHEDULE OF INVESTMENTS AT 31 DECEMBER 2021 (€ 000'S)

Transferable Securities		
		% of
Security	Fair Value	Net Assets
Developed Markets		78
United States		38
GXO Logistics	61,310	4
XPO Logistics	58,980	3
UnitedHealth Group	55,819	3
Anthem	53,843	3
Global Payments	48,190	3
FLEETCOR Technologies	46,109	3
Comcast	43,696	3
Howmet Aerospace	43,336	2
The Progressive Corporation	38,509	2
Dollar General	36,697	2
Motorola Solutions	31,686	2
MGM Resorts International	28,235	2
Meta Platforms	27,690	2
Arconic	22,969	1
The AES Corporation	21,397	1
Netflix	20,742	1
Positions less than 1%	32,660	2
United Kingdom	·	13
British American Tobacco - ADR	67,232	4
British American Tobacco	36,260	2
Diageo	25,953	1
Rolls-Royce Holdings	21,997	1
Legal & General Group	21,159	1
B&M European Value Retail	20,003	1
Positions less than 1%	34,631	2
Japan	34,001	 11
Sumitomo Mitsui Financial Group	25,833	1
Mitsubishi	24,888	1
Asahi Group Holdings	23,935	1
INPEX	21,306	1
		1
Daiwa House Industry	17,646	1
Positions less than 1%	72,300	4
Continental Europe	40.011	10
ING Groep	48,211	3
Bayerische Motoren Werke	29,042	2
Swedish Match	27,418	2
Positions less than 1%	68,610	4
Other		6
Newcrest Mining	43,523	2
Jardine Matheson Holdings	32,894	2
Positions less than 1%	32,192	2
See accompanying note	s on page 9	

# SCHEDULE OF INVESTMENTS AT 31 DECEMBER 2021 (€ 000'S) (CONTINUED)

### **Transferable Securities (continued)**

Sociality	Fair Value	% of
Security	Fair Value	Net Assets
Emerging Markets		20
Asia		10
NetEase - ADR	39,405	2
Taiwan Semiconductor Manufacturing	35,012	2
Samsung Electronics	34,253	2
KB Financial Group	27,338	2
Positions less than 1%	46,385	3
Europe and Middle East		4
Sberbank of Russia	27,813	2
Yandex	20,118	1
Positions less than 1%	17,631	1
Africa		3
Naspers	54,261	3
Americas		3
Fomento Económico Mexicano - BD Units - ADR	17,533	1
Positions less than 1%	31,753	2
	1,718,402	98

May not sum due to rounding.

See accompanying notes on page 9

### NOTES TO THE FINANCIAL STATEMENTS AT 31 DECEMBER 2021

#### General

Orbis SICAV (the "Company") qualifies as an open-ended investment company with variable capital (Société d'Investissement à Capital Variable ("SICAV")), with limited liability under Part I of the Luxembourg law of 17 December 2010 (as amended) on undertakings for collective investment.

The Company is structured as an umbrella fund, providing both individual and institutional investors with an opportunity to invest in a variety of funds. The Company currently offers shares in the Emerging Markets Equity Fund, the Global Balanced Fund, the Global Cautious Fund, the Global Equity Fund, the International Equity Fund and the Japan Equity Fund (collectively, the "Funds"). Each Fund's share capital consists of one or more of the following share classes: AG Base Fee, Base Refundable Reserve Fee, Core Refundable Reserve Fee, Fee Reserve, Fixed Fee, Founding Refundable Reserve Fee, Institutional Investor, Institutional Investor Refundable Reserve Fee, Investor, Investor Refundable Reserve Fee, Shared Institutional Refundable Reserve Fee, Shared Investor Refundable Reserve Fee (A) and Zero Base Refundable Reserve Fee. These share classes may differ with respect to their eligibility requirements and the management fees applied.

A separate pool of assets is maintained for each Fund. A Fund is not a separate legal entity. All of these Funds together comprise the Orbis SICAV single legal entity. Under Luxembourg law, the rights of the shareholders and creditors of a Fund which arise in connection with the creation, operation or liquidation of the Fund are limited to the assets of that Fund and the assets of the Fund are exclusively available to satisfy such rights.

This abridged version of the Annual Report of Orbis SICAV - Global Equity Fund (the "Fund") does not contain certain Luxembourg legal and regulatory disclosure requirements as included in the complete version of the Annual Report. A complete version of the Annual Report is available upon request and free of charge at the registered office of the Company 15 days prior to the Annual General Meeting of Shareholders of the Company.

### **Significant Accounting Policies**

These financial statements have been prepared and presented in accordance with Luxembourg legal and regulatory requirements applicable to investment funds.

**Investments.** Investments are recorded as of the trade date and are stated at their fair values. Investments in marketable securities are valued at their closing prices and forward currency contracts at their mid prices. If these prices are unavailable or considered unrepresentative of fair value, a price considered fair by the Manager will be used, subject to the overall control and supervision of the Board of Directors. The amounts realised may differ from these valuations due to variations in pricing, exchange rates, trading volumes and regulations.

Foreign Currency Translation. Assets and liabilities, including forward currency contracts, denominated in foreign currencies are translated into euro using exchange rates prevailing at the year-end. Income and expenses in foreign currencies are translated into euro at the exchange rates prevailing at the date of the transactions. Translation exchange gains and losses are included in the Statement of Operations and Changes in Net Assets. The unrealised gains or losses on forward currency contracts are included in the Statement of Net Assets and the movement in the unrealised gains or losses is included in the Statement of Operations and Changes in Net Assets.

**Cash and Cash Equivalents.** Cash and cash equivalents include cash and other highly liquid investments held for meeting short term cash commitments.

Margin Balances Paid and Received. Margin balances represent cash variation margin paid or received in respect of forward currency contracts.

Income and Expenses. The accrual basis is used to recognise income and expenses. Dividends are accrued, net of withholding taxes, on the ex-date of the dividend once the ex-date and amount are known with reasonable certainty. Reclaims of withholding taxes are considered on a case-by-case basis and normally recognised once recovery is certain. Realised gains and losses on investments are based on average cost. All income and expenses which can be allocated directly to individual share classes are charged to those share classes. Income and expenses which do not relate specifically to a particular share class are allocated between the share classes pro rata to their Net Asset Values.

**Accounting Estimates.** The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Actual results could differ from those estimates.

#### **Taxes**

Under current law and practice, the Company is not liable to Luxembourg taxes on income or capital gains, nor are dividends paid by the Company liable to any Luxembourg withholding tax. Income and capital gains on the Company's investments, however, may be subject to withholding or capital gains taxes in certain countries.

The Fund is subject to a tax (taxe d'abonnement) in Luxembourg on the net assets attributable to its Investor share class of 0.05% per annum and to its Fixed Fee, Refundable Reserve Fee and Fee Reserve share classes of 0.01% per annum, such tax being payable quarterly and calculated on the net assets of each share class at the end of each calendar quarter.

### **Share Capital**

At 31 December 2021, the Fund offers Fixed Fee and Investor shares, and Base, Core, Founding and Zero Base Refundable Reserve Fee shares. The Fixed Fee and Base Refundable Reserve Fee shares are offered in US dollars, the Core Refundable Reserve Fee shares are offered in euro and US dollars, and all other Refundable Reserve Fee and the Investor share classes are offered in euro. The Fixed Fee shares are offered to collective investment schemes portfolio-managed by the Investment Manager, Allan Gray Proprietary Limited or one of their affiliates or to eligible South African tax free savings account providers. Fee Reserve shares are issued to the Investment Manager in relation to the performance fee.

At 31 December 2021, the following shares were issued and outstanding:

Share Class		Net Asset Value per Share	Number of Shares
Fixed Fee	USD	302.06	730,791
Investor	EUR	265.39	986,833
Base Refundable Reserve Fee			
A-21	USD	318.92	16,219
A-33	USD	309.02	17,811
B-13	USD	318.44	20,913
C-23	USD	315.25	14,946
C-29	USD	311.67	13,353
F-16	USD	308.08	5,578
G-10	USD	317.09	5,529
G-11	USD	318.44	20,913
G-18	USD	314.86	8,453
G-20	USD	313.30	12,185
G-21	USD	313.31	2,993
G-23	USD	312.87	38,347

Share Class		Net Asset Value per Share	Number of Shares
Base Refundable Reserve Fee (continued)			
G-25	USD	310.93	3,917
G-27	USD	309.12	18,342
G-28	USD	308.10	19,034
H-14	USD	307.68	8,032
J-5	USD	309.53	5,600
K-7	USD	326.31	26,745
K-8	USD	309.19	25,809
L-11	USD	308.89	2,925
N-12	USD	314.03	19,569
N-19	USD	309.65	7,810
N-20	USD	309.29	44,189
S-27	USD	307.68	8,161
Core Refundable Reserve Fee			
L-12	EUR	272.58	47,227
D-11	USD	310.03	68,106
D-12	USD	308.47	64,597
H-11	USD	310.87	122,798
J-3	USD	317.63	51,685
O-17	USD	309.64	30,279
O-18	USD	309.69	19,230
Founding Refundable Reserve Fee			
F-2	EUR	299.03	137,193
F-5	EUR	294.98	954,056
G-6	EUR	296.02	154,547
T-5	EUR	296.34	1,257,286
Zero Base Refundable Reserve Fee			
C-19	EUR	288.39	314,408
T-5	EUR	271.49	907,107

### **Material Contracts - Forward Currency Contracts**

At 31 December 2021, the Fund held open forward currency contracts settling on or before 10 June 2022 having net contract and net fair values as set out on the next page. These contracts expose the Fund to credit risk arising from the potential inability of a counterparty to perform under the terms of a contract. To limit its risk to the amount of any net unrealised gain, less any variation margin received, the Fund has entered into agreements whereby all its currency transactions with the counterparty to that agreement can be netted. The Fund uses the commitment approach to determine its global exposure related to derivative instruments.

		Contract Value	Fair Value	Net Unrealised Gain (Loss)
Currency	Contract Value	€	€	€
CAD	37,440,000	25,949,160	26,005,566	56,406
CNH	(310,700,000)	(40,735,336)	(42,632,507)	(1,897,171)
GBP	(14,800,000)	(17,686,338)	(17,578,616)	107,722
HKD	(680,000)	(76,657)	(76,672)	(15)
KRW	(43,552,388,686)	(32,214,913)	(32,118,359)	96,554
MXN	(74,660,000)	(3,074,023)	(3,147,137)	(73,114)
USD	(33,849,808)	(29,085,000)	(29,670,292)	(585,292)
		(96,923,107)	(99,218,017)	(2,294,910)

### **Commitments**

The Funds along with ten other Orbis funds have entered into an uncommitted multi-currency line of credit which may be drawn upon for the purpose of paying redemptions. The maximum which may be drawn across all Funds is US\$500 million and for each Fund cannot exceed 10% of its Net Asset Value. Drawdowns bear interest at market rates and cannot be outstanding for more than seven business days. The facility expires on 12 August 2022. During 2021 no amounts were drawn upon by the Fund.

### Administrator, Depositary and Custodian Fees

Fees due in respect of administration, depositary, custody and other related services for the year amounted to €757,998 of which €76,606 was payable at year-end.

#### **Transaction Costs**

Transaction costs, which include brokerage and other costs incurred in connection with the purchase and sale of investments, for the year amounted to €1,684,272 and are recorded as part of Realised Net Gain from Investments and Currencies in the Statement of Operations and Changes in Net Assets or as part of Investments in Transferable Securities at Cost in the Statement of Net Assets.

### Directors' Fees and Expenses

There are no existing or proposed service contracts between any of the Directors and the Company. The Shareholders of the Company have approved Director's fees for 2021 to each of John C. R. Collis, Claude Kremer, Austin J. O'Connor and David T. Smith of US\$50,000 before withholding tax. No other Directors have received any remuneration or other direct benefit material to them.

### Indemnification

The Fund may enter into agreements that contain indemnifications or warranties for the benefit of service providers and others in connection with the Fund's investments. The Fund's exposure under these agreements is dependent upon future claims that may be made against the Fund. The risk of material loss from such future claims is considered remote.

### **Related Party Transactions**

Orbis Investment Management (Luxembourg) S.A. is the Manager, and Orbis Investment Management Limited is the Investment Manager of the Fund.

The Investor shares pay the Manager and the Investment Manager a fee which can vary between 0.5% and 2.5% per annum of weekly net assets, determined by that share class' rate of return versus its performance fee benchmark. The Fixed Fee shares pay the Manager and the Investment Manager a fee of 1.5% per annum of their net assets.

The Manager and Investment Manager are paid a base fee by the Base Refundable Reserve Fee shares of 0.6% per annum of their net assets and, by each of the Core and Founding Refundable Reserve Fee shares, a base fee of between 0.2% and 0.45% per annum of their net assets. The Zero Base Refundable Reserve Fee shares do not pay a base fee. The Base, Core and Founding Refundable Reserve Fee shares each pay the Investment Manager a performance related fee of 25%, and for the Zero Base Refundable Reserve Fee shares, a fee of 33%, of the share class' rate of return versus its performance fee benchmark since the last Dealing Day. At each Dealing Day, the Investment Manager is issued Fee Reserve shares to the extent of any performance fee accrued. The performance fee is partially refundable in the event of future underperformance, with the refund limited to the value of the Fee Reserve shares related to each investor's Refundable Reserve Fee shares and the fee subject to a high water mark should the available refund be exhausted. The Fee Reserve shares bear no fee.

For each investor in the Base, Core and Founding Refundable Reserve Fee share classes, when the value of their related Fee Reserve shares exceeds 3% and 7% of the total Net Asset Value of their Refundable Reserve Fee shares, the Investment Manager is paid in cash at an annualised rate of 1% and 2%, respectively, of the total Net Asset Value of those Refundable Reserve Fee shares. For each investor in the Zero Base Refundable Reserve Fee share class, payment is made at an annualised rate of 0.75% of the total Net Asset Value of their Refundable Reserve Fee shares when there is value in their related Fee Reserve shares, and is increased to an annualised rate of 1.75% and 2.75% when the value of the related Fee Reserve shares exceeds 3% and 7%, respectively, of the total Net Asset Value of their Refundable Reserve Fee shares.

At 31 December 2021, there were no Fee Reserve shares in issue.

Performance fees (refunds) for the year amounted to, for the Base Refundable Reserve Fee share classes: A-33 - (US\$40,930), D-11 - US\$32,411, F-16 - (US\$5,016), F-17 - US\$8,059, F-20 - (US\$5,306), F-21 - US\$1,249, G-20 - US\$6,039, G-25 - (US\$81), G-27 - (US\$25,984), G-28 - (US\$410), H-14 - (US\$422), J-5 - (US\$372), K-8 - (US\$70,194), L-11 - (US\$7,089), N-19 - (US\$403), N-20 - (US\$99,508) and S-27 - (US\$425), for the Core Refundable Reserve Fee share classes: L-12 - (€101,356), D-11 - (US\$65,175), D-12 - (US\$3,926), H-11 - (US\$110,921), O-17 - (US\$87,232), O-18 - (US\$65,757) and S-26 - US\$87,268, and for the Zero Base Refundable Reserve Fee share class: T-5 - €195,749. At 31 December 2021, no performance fees (refunds) were payable or receivable.

The Manager and Investment Manager have agreed that for the year ended 31 December 2021 the operating expenses, excluding the Manager's fees, brokerage and transaction costs, interest and certain taxes, attributable to the Investor share class will be capped at 0.2% per annum and to each of the Fixed Fee, Refundable Reserve Fee and Fee Reserve share classes will be capped at 0.15% per annum.

At the year-end, other Orbis funds held 719,309 Fixed Fee shares in the Fund. Other related parties, which include institutional and other clients managed on a discretionary basis and the Directors and Officers of the Orbis funds and of their Managers and Investment Advisors, held 33,488 Investor, 11,482 Fixed Fee and all the G-6 Founding Refundable Reserve Fee shares of the Fund, excluding their indirect holdings via other Orbis funds.

The Investment Manager holds all the Fee Reserve shares.

Certain of the Company's Directors also act as executives and directors of related companies, details of which are provided on page 1 of this report.

### **NOTICES**

**Annual General Meeting.** In accordance with Luxembourg law, notice of the Annual General Meeting of Orbis SICAV - Global Equity Fund (the "Fund") will be sent to Shareholders shortly prior to the scheduled date of the meeting on 2 May 2022.

Notice to Persons in the European Economic Area (EEA) and the United Kingdom. The Fund, a sub-fund of Orbis SICAV, a UCITS-compliant Luxembourg collective investment scheme, is admitted for public marketing in Ireland, Luxembourg, the Netherlands, Norway, Sweden and the United Kingdom. Persons located in any EEA member state will only be permitted to subscribe for shares in the Fund under certain circumstances as determined by, and in compliance with, applicable law.

Supplemental Disclosure under the Distance Marketing of Financial Services Directive. Council directive 2002/65/EC concerning the distance marketing of consumer financial services (the "DM Directive") was implemented in Luxembourg by the Law of 18 December 2006, which was later replaced by the Law of 8 April 2011 implementing a consumer code (the "DM Law"). The DM Law applies, among other things, to financial services supplied at a distance to consumers. The Company has determined that Luxembourg laws and accordingly the DM Law shall apply to the establishment of relations with prospective and current Shareholders who are entitled to the benefit of the DM Directive.

The DM Directive and DM Law require the Company to provide specified information to consumers before the contract to subscribe for its Shares is concluded. The specified information is contained in the Prospectus, Subscription Form and (for investors who elect to view their account online on the website www.orbis.com) the terms for online services. The DM Law confers cancellation rights for certain types of financial services and in specified circumstances. However, the Company's Shares are not a type of financial service to which cancellation rights apply.

**Disclosure under European Sustainability Regulations.** The Funds are classified as "Article 6" under Regulation (EU) 2019/2088 of the European Parliament and of the Council of the European Union of 27 November 2019 on sustainability-related disclosures in the financial services sector and the investments underlying the Funds do not take into account the EU criteria for environmentally sustainable economic activities.

**Other.** This Report does not constitute a financial promotion, a recommendation, an offer to sell or a solicitation to buy shares of the Fund. Subscriptions are only valid if made on the basis of the current Prospectus of the Fund. Certain capitalised terms are defined in the Glossary section of the Fund's Prospectus, a copy of which is available upon request. Orbis Investment Management Limited is licensed to conduct investment business by the Bermuda Monetary Authority. This Report is approved for issue in the United Kingdom by Orbis Investment Advisory Limited, 28 Dorset Square, London, England NW1 6QG; a firm authorised and regulated by the Financial Conduct Authority.

