



UK Modern Slavery Statement

Orbis Investment Advisory Limited (the “**Company**”) is a private limited company registered in England and Wales (registered number 02068389). This statement is made by the Company in accordance with section 54 of the Modern Slavery Act 2015 (the “**Act**”) for its financial year ending 31 December 2017. The purpose of this statement is to set out the overall commitment of the Company to ensure that human trafficking and slavery are not present in our business or its direct supply chain. The Company is committed to acting ethically and with integrity and our Core Values include a commitment by the Company and all employees to act responsibly.

Our Business

The Company is part of the Orbis Group (“**Orbis**”), a global investment management organisation headquartered in Bermuda. Orbis collectively manages long-only equity, balanced and absolute return mutual funds reflecting a variety of strategies, including global equities, Japanese equities and emerging markets equities. There are Orbis Funds domiciled in Australia, Bermuda, Luxembourg, the United Kingdom and the United States. Orbis is a signatory to the United Nations-supported Principles for Responsible Investment, a voluntary framework for incorporating environmental, social and governance issues into investment and ownership decisions.

Risk of Human Trafficking and Slavery

The Company does not tolerate modern slavery or human trafficking and takes a risk-based approach to its supply chain. The nature of our business means that the Company does not have complex supply chains and does not procure material services from suppliers located in high-risk countries. Our suppliers are predominantly regulated financial and professional services companies, including banks, data service providers, technology providers, accountants and law firms. The Company also has suppliers of equipment and maintenance and support services for our office locations. Given the professional nature of our business, the Company has a low risk of modern slavery or human trafficking existing within its business operations and supply chains.

Steps Taken

The Company believes that it undertakes appropriate due diligence in relation to new suppliers and expects our suppliers, and their supply chains, to comply with all relevant legislation and regulations in the countries in which they operate. The Company also has an Escalation Policy which allows employees to report issues and concerns without reprisals for doing so. The Company’s policies are periodically reviewed and, where necessary, will be updated to reflect the Company’s continuing commitment to ensuring that modern slavery and human trafficking are not present in its supply chain.

Conclusion

This statement will be reviewed annually and updated as required. It has been reviewed by key stakeholders and was approved by the board of directors of the Company on 9 May 2018.

Daniel Brocklebank
Director of Orbis Investment Advisory Limited