April 2022

Dodge & Cox®
Worldwide Funds

Integration of Sustainability Risks into the Investment Process for the Funds

Pursuant to the EU Sustainable Finance Disclosures Regulation (2019/2088) on sustainability-related disclosures in the financial services sector ("SFDR"), KBA Consulting Management Limited (the "Manager"), in its capacity as the management company appointed by Dodge & Cox Worldwide Funds plc (the "Company"), is required to disclose the manner in which sustainability risks are integrated into the investment process and the results of the assessment of the likely impacts of sustainability risks on the returns of each of the Company's sub-funds (the "Funds"). A sustainability risk is defined in SFDR as an environmental, social or governance ("ESG") event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

The Manager has adopted the policy of Dodge & Cox (the "Investment Manager") on the integration of sustainability risks in its investment decision-making process. Please see the Investment Manager's ESG Policy Statement available at dodgeandcox.com under "ESG Integration".

When evaluating investment opportunities for the Funds, the Investment Manager considers ESG factors, along with other factors, to determine whether they are likely to have a financially material impact on a company or issuer's risks and opportunities. The Investment Manager views ESG factors as financially material when they are likely to affect a company's valuation or an issuer's ability to fulfill its debt obligations. The Investment Manager refers to this approach as ESG integration. The Funds are actively managed and seek to invest in companies with the potential to create long-term value for shareholders. The Investment Manager believes that evaluating financially material ESG factors helps it better understand a company or bond issuer's potential risks and opportunities.

The Funds' investments are selected through a disciplined approach that is characterized by intensive bottom-up research, a strict price discipline, and a team decision-making process. The Funds do not seek to promote environmental characteristics (under Article 8 of SFDR) and do not have an environmental or carbon reduction objective (under Article 9 SFDR). Each potential investment is evaluated based on a long-term investment horizon and ESG factors are considered as part of that investment process.

Financially material ESG factors can differ for each company or bond issuer. In its analysis, the Investment Manager seeks to understand how a company or issuer makes decisions, balances the interests of its stakeholders, and manages key risks. In doing so, the Investment Manager pays particular attention to governance structure and practices, as well as risks and opportunities associated with environmental and social factors, when applicable. In general, the Investment Manager believes governance factors have the potential to be financially material for every company, whereas financial materiality for environmental and social factors can vary by company, industry, and region.

The Investment Manager believes that its role as an active manager extends beyond selecting securities for the Funds. The Investment Manager seeks to maintain a dialogue with company management teams and boards to help build an understanding of their priorities and strategies over time. The Investment Manager looks for opportunities to engage directly with a company on issues when it believes its perspective has the potential to benefit the long-term outcome of the investment. With respect to ESG, the Investment Manager typically engages on governance factors, but may choose to engage and share its views on environmental or social issues that appear financially material.

No Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

The Manager, in conjunction with the Investment Manager, does not currently consider the principal adverse impacts of its investment decisions on sustainability factors, within the meaning of Article 4(1)(a) of the SFDR. The Manager, in conjunction with the Investment Manager, does not currently do so because of the size, nature and scale of the Funds, and due to absence of the financial regulatory technical standards relating to such disclosure. Furthermore, information required to meet the reporting obligations of SFDR is either not fully available or cannot currently be gathered or measured systematically, consistently, and at a reasonable cost to investors. This is in part because underlying companies or issuers are not widely obliged to, and overwhelmingly do not currently, report by reference to the same data. The Manager's position on this matter will be reviewed annually by reference to market developments.