

Modern Slavery Statement

The Modern Slavery Act 2015—Statement for the Financial Year Ending 31 December 2023

This statement is made on behalf of Dodge & Cox Worldwide Investments Ltd. (the “Company”) to address section 54 (1) of the Modern Slavery Act 2015. The statement describes the steps taken to mitigate the risk of slavery and human trafficking taking place in our business and supply chains.

Organisation Structure and Business

The Company is a UK private limited company and a wholly owned subsidiary of Dodge & Cox. Dodge & Cox is a privately held investment adviser incorporated in the United States. The Company provides distribution, marketing, and support services as the distributor of the Dodge & Cox Worldwide Funds. The Company employs fewer than ten employees across its operations. As a provider of financial services, the Company operates in a regulated sector and is authorised and regulated by the UK Financial Conduct Authority.

The reporting entity for the purposes of this statement is the Company. This statement does not describe the activities of the Company’s two wholly owned subsidiaries, Dodge & Cox Investment Consulting (Shanghai) Co., Ltd. and Dodge & Cox (Europe) GmbH, because the activities of those entities did not form part of the supply chain of the business of the Company during the period covered by the statement.

Supply Chains and Due Diligence

Given the nature of the services offered by the Company and its limited supply chain, we believe the risk of modern slavery or human trafficking in the Company’s business and its supply chain is low. Most of our relationships are with firms and individuals in professional, regulated service industries, such as accountants, consultants, and data service providers. The Company does not produce, manufacture, or sell any physical goods and therefore has no supply chain related to such activities. Nevertheless, we do not tolerate slavery, forced labor, child labor, or human trafficking in any form and will not knowingly work with parties that engage in these practices.

The Company contracts with a number of suppliers of goods and services (“vendors”) including IT technical support, cleaning services, and professional services. Under the

vendor management policy that is followed by the Company, due diligence on the vendors that are directly engaged by the Company is conducted at the start of the relationship and then on a periodic basis. Our vendor management team considers the annual fees paid to each vendor, their geographic location or coverage, and operational dependency as part of the risk assessment framework to appropriately scope vendors and ensure that the diligence undertaken is proportionate to the services provided. Modern slavery is examined as part of our due diligence checklist for in-scope vendors.

Policies in Relation to Slavery and Human Trafficking

We expect our vendors to fully comply with all applicable laws and regulations in the conduct of their business, including in relation to slavery, forced labor, child labor, and human trafficking. In addition, we expect our vendors to meet appropriate standards related to labor practices, wages, and workplace safety.

Within its own business, the Company and its employees must comply strictly with the Dodge & Cox Anti-Corruption Policy, which applies to our activities worldwide and requires that Dodge & Cox and its employees be good citizens in every country where it does business. Our employees are also required to uphold the highest level of ethical conduct in their day-to-day business. This expectation is outlined in the Dodge & Cox Code of Ethics, which also provides reporting mechanisms for individuals who suspect fraudulent, illegal, or other unethical activity, and is reinforced by regular training and annual certification.

Approval

This Statement has been approved by the Company’s board of directors and will be reviewed annually.

26 March 2024

Stephen A. Haswell, Director of Dodge & Cox Worldwide Investments