

O A S I S



GROUP HOLDINGS (PTY) LTD

SOCIAL RESPONSIBLE INVESTMENT

We incorporate sustainability considerations into our investment analysis and investment activities

- Responsible (Environmental, Social and Governance 'ESG') and sustainable investing is an important consideration for Oasis Group Holdings.
- Since inception, our investment-decision making process has been designed to adhere to global best practice including amongst others, the CFA Code of Ethics and Standards of Professional Conduct, the United Nations Principles for Responsible Investment ('UN PRI'), King III Code of Governance for South Africa and other relevant codes.
- For a number of years we have been signatories to the UN PRI and taking into consideration the substantial overlap between the UN PRI and the Code for Responsible Investing in South Africa ('CRISA'), Oasis complies with CRISA since coming into effect
- Over and above adhering to global best practice, our investment approach incorporates the belief that sustainability issues have an impact on corporate financial performance and thus long-term stock returns.
- We believe that companies which adopt responsible investment principles, including low risk business strategies and best practice ESG considerations are more likely to be successful.
- Thus we overlay a review of the above factors in our detailed investment decision-making process, including quantifying potential risks arising from the ESG practices of the firm.
- Once we have made a decision to invest, we continue to integrate responsible investment principles through our proxy voting process and ongoing engagement with company management teams.

We will be active owners and incorporate ESG issues into our ownership policies and practices

- In-line with our investment decision making process, Oasis' ownership policy has been developed in accordance with global best practice including amongst others, the CFA Code of Ethics and Standards of Professional Conduct, the United Nations Principles for Responsible Investment (UN PRI), King III Code of Governance for South Africa and other relevant codes.
- Our ownership policy includes a detailed proxy voting document which sets out Oasis' voting process and our proxy voting guidelines. We have set out a summary of the key points.
- Oasis' proxy voting process has been developed to ensure that we are active owners:
 - o We endeavour to vote on all investee company resolutions
 - o The analyst responsible for a specific company plays an important role in making the voting recommendation to ensure that our proposed vote is in-line with our proxy voting guidelines
 - o The Corporate Action Committee reviews and makes decisions regarding matters that need to be raised directly with the company's chairman or an independent, non-executive director
 - o If deemed necessary, we will attend annual general meetings and raise at these meetings
- Our proxy voting guidelines require that ESG issues are appropriately disclosed in a company's annual financial statements.
- Appropriate disclosure of ESG issues would include a standalone corporate social responsibility or sustainability report, dealing with issues such as AIDS/Safety/Carbon disclosure and a detailed Governance Section within the annual financial statements which sets out all the required information with regards to best corporate governance principles, including a summary of the attendance records of the various board meetings (audit, remuneration etc.)
- Should the Corporate Actions Committee determine that the company's disclosure does not sufficiently address the issues at hand, we will vote against the acceptance of the annual report and raise our concerns with the company.
- We interact with our clients with regards to all aspects of social responsibility and we also disclose our voting records to our clients.
- With regards to the public disclosure of certain information, we do not deem this to be in the best of interests of our clients and as such only make disclosures as set out above.

We will avoid and/or mitigate conflicts of interest as follows:

- We consider all circumstances and relationships that could potentially lead to a conflict of interest;
- We prevent or manage the conflict of interest;
- We make attempts to mitigate the conflict of interest; and
- We disclose the necessary conflicts of interests to the Client and intermediary to ensure transparency.