

From: [Chris Cuffe](#)
To: [Mavis Tan](#)
Subject: [External] Simplifying, clarifying and enhancing the integrity and efficiency of the ASX listing rules
Date: Sunday, 3 March 2019 6:08:30 PM
Attachments: [Very short CV.DOCX](#)
[ASX meeting July 2017.pdf](#)
[Cuffelinks article on LICs.pdf](#)
[Antipodes Interim Financial Report.pdf](#)

Dear Mavis,

I note that feedback on the consultation paper was due by Friday 1 March 2019. I have been away and only had a chance this weekend to put pen to paper to provide feedback. My apologies.

By way of background, I have been in the investment management industry for many years. Attached is a brief biography. You will note that I currently sit on the boards of four listed investment companies (LICs) which is relevant to my feedback on the consultation paper.

I am strongly of the view that the ASX listing rules require an additional requirement for LICs to report performance in a manner that is accurate, not misleading by omission, and in a manner that makes the performance comparable to relevant indices. I have tried to highlight the problems in the past in a number of ways:

1. I met with Dominic Stevens, Max Cunningham, Andrew Camion and Kevin Lewis at the ASX in July 2017 to highlight my concerns about the performance reporting of LICs and the fact that there were many examples of misleading performance reporting. Attached is a follow up email I sent after the meeting which is self explanatory.
2. I wrote a brief article in the weekly *Cuffelinks* publication in December 2017 on the issue of misleading and inconsistent performance reporting of LICs. Attached is a copy of the article which, again, is self explanatory.

Given that LICs are already required by the ASX Listing Rules to report their NTA on a monthly basis, some could argue that the ASX does not need to mandate that LICs report their performance. However, NTA only provides a point in time measurement, and says nothing about performance over time. In my view the ASX should require LICs to measure and disclose performance over different time periods, and in a consistent manner, so investors can judge whether the LIC is achieving its stated goals.

Some may also argue that there is no need for the ASX to require LICs to report performance because Total Shareholder Return (TSR) is easily calculated by anyone who wants.....that is, the information to calculate this is already publicly available. However, this ignores the fact that the performance of a LIC has two elements to it:

1. How the share price moves over different time periods; and
2. How the NTA moves over different time periods

Looking at the movements in share price alone is an inaccurate indicator of how the LIC assets perform, hence why LICs invariably trade at either a premium or discount to their underlying asset value.

I am a director of Antipodes Global Investment Company Limited (ASX ticker: APL). I commend their voluntary reporting of performance to you as best practice

and what I think should become mandatory by way of the ASX Listing Rules. Attached is their latest Interim Financial Report which, on page 4, has a comprehensive performance section. The only thing that would enhance this further would be for the various performance metrics to be stated over different periods of time, though this has not to date been needed as APL has not been operating that long.

In summary, I believe the ASX Listing Rules require amending to include a section on performance reporting by LICs. LICs should be required to report their performance in their financial statements over different time periods (eg 6 months, 1 year, 2 years, 3 years, 5 years, 7 years) and using both TSR calculations and calculations of movement in NTA. Calculations of movement in NTA should be mandated by the ASX to be on a consistent basis, which I believe should be adjusted for tax paid/provided and dividends paid, so the results can then be easily compared to relevant indices and directly comparable to the performance of unlisted managed funds.

LICs play a valuable role in the Australian capital markets and have been growing strongly over the past decade. They are simple and easy to use by retail investors. I believe the ASX has an important role to play to ensure retail investors also now receive transparent and consistent reporting.

Regards

Chris Cuffe AO

Company Director & Chairman | Investment Professional

Personal Assistant - Natasha O'Connor 02 9779 6300

Email noconnor@australianphilanthropicservices.com.au

From: **Chris Cuffe**

Date: Tue, 4 Jul 2017 at 12:51

Subject: Performance reporting by LICs

To: Dominic Stevens <Dominic.Stevens@asx.com.au>

Cc: <max.cunningham@asx.com.au>, <andrew.campion@asx.com.au>, <kevin.lewis@asx.com.au>

Thanks for the meeting with you and your team yesterday Dom. It was good that you guys are now looking at a number of things concerning LICs, particularly given the strong growth in this segment of the market.

The meeting also helped me crystallise my own thoughts on what should be done to improve LIC disclose around performance. And I think the ASX is better placed to set the rules rather than ASIC.

So given our discussions, what I would recommend is the following:

- Given the ASX already forces LICs to disclose their NTA on a monthly basis (both before and after tax on unrealised gains), the first thing that could be done is to ensure that this is calculated consistently by all LICs. I think there are 3 things that need clarification to ensure consistency: first, that any in-the-money options are taken into account in the NTA calculation; second, a decision is made on whether carried forward losses can be recognised as a deferred asset and included in the NTA calculation; and thirdly, whether capitalised costs of share issues can be recognised as a deferred asset and included in the NTA calculation.
- Given that the ASX requires LICs to report their NTA on a monthly basis, it would seem quite appropriate that the ASX could also require LICs, whenever/wherever they report their performance over different time periods (monthly, quarterly, yearly, three yearly etc), to base the calculations on the change in the reported NTA. This should not preclude LICs from also reporting performance in other ways (eg share price performance or investment managers performance) as long as NTA performance is included.

I think the growing number of LICs are an important part of the Australian capital markets and are a very useful vehicle for retail investors to use. I just want to make sure they are not misled in any way.

Please don't hesitate to contact me should you require any further information.

Regards

Chris Cuffe

Company Director & Chairman | Investment Professional

Personal Assistant - Natasha O'Connor 02 9779 6300

Email noconnor@australianphilanthropicservices.com.au

Antipodes Global Investment Company Limited

ACN 612 843 517

Interim Financial Report

For the half-year ended 31 December 2018

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This Interim Financial Report does not include all the notes of the type normally included in an Annual Financial Report. Accordingly, this report is to be read in conjunction with any public announcements made by Antipodes Global Investment Company Limited during the interim reporting period in accordance with the continuous disclosure requirements of the *Corporations Act 2001*.

Directors' report

The Directors present their report together with the financial statements of the Company for the half-year ended 31 December 2018.

The Company is a company limited by shares and is incorporated in Australia.

Directors

The following persons held office as directors during the half-year or since the end of the half-year and up to the date of this report, unless otherwise stated:

Jonathan Trollip (Chairman)

Lorraine Berends

Chris Cuffe AO

Alex Ihlenfeldt

Andrew Findlay

Principal activities

The principal activity of the Company is to provide shareholders with exposure to a high conviction portfolio of global investments, predominantly comprised of long and short positions in international listed securities. There have been no significant changes in the nature of this activity during the half-year.

Review of operations

The Company offers investors access to a long-short global securities investment portfolio with a currency overlay. The Company's portfolio is constructed in accordance with the investment approach of the Manager which aspires to grow wealth over the long-term by generating positive returns in excess of the benchmark at below market levels of risk.

Investment activities for the half-year ended 31 December 2018 resulted in an operating loss before tax of \$28,189,000 and an operating loss after tax of \$19,336,000. This compares to an operating profit before tax of \$25,848,000 and an operating profit after tax of \$18,430,000 in the prior corresponding period. The result for the half-year can largely be attributed to unrealised revaluation losses on the Company's investments during the period. This reflects weaker global markets during the half year, which saw the MSCI All Country World Net Index in AUD down by 4.5%.

The Company paid its maiden dividend of 5.0 cents per share, franked as to 50%, on 31 October 2018 with a record date of 22 October 2018. This was in accordance with the Company's intention to pay dividends to shareholders at least annually, subject to available profits, cash flow and franking credits.

The Board has resolved to pay an interim dividend of 2.0 cents per share, franked as to 50%, payable to shareholders on 22 March 2019 with a record date of 8 March 2019.

Performance

We consider that it is useful to report performance from three different perspectives:

- 1 Firstly, to show how the Manager has performed (after deducting management and performance fees paid to it and other direct costs of managing the portfolio) compared to a relevant benchmark. We refer to this as the **Manager Performance**. The relevant benchmark used is the MSCI All Country World Net Index in AUD; this is commonly used to measure international shares' performance and is also used in calculating any Manager performance fees;
- 2 Secondly, to show how the Company has performed based on the movement in NTA before tax, adjusted for dividends paid and company tax, which we refer to as **Company Performance**. This measure excludes company tax provided for or paid in order to make the result comparable to an unlisted managed fund. It incorporates portfolio performance after fees as mentioned above, but also takes into account impacts from capital management initiatives, and general administration costs.
- 3 Finally, to show the **Total Shareholder Return or TSR Performance**, which is a measure of the change in the share price adjusted for dividends paid during the period. The TSR Performance does not include the value of any franking credits when they are paid to shareholders. The TSR Performance can be an important measure as usually the Company shares will trade at a premium or discount to the NTA.

The results of each of these measures for the half-year ended 31 December 2018 are provided below:

Manager Performance	- 3.1%	(Performance net of management fees and direct costs of managing the portfolio. No performance fees were paid during the period)
Portfolio Benchmark	- 4.5%	
Manager Out-Performance	+ 1.4%	

Company Performance	- 9.3%	(the NTA before tax decreased from \$1.307 to \$1.137; a dividend of \$0.05 was paid during the year). This is reconciled to Manager Performance shown above as follows:
	Manager Performance	- 3.1%
	LIC administration costs	- 0.1%
	Dilution impact of options exercised	<u>- 6.1%</u>
	Company Performance	<u>- 9.3%</u>

TSR Performance	- 11.4%	(the share price decreased from \$1.18 to \$0.995; a dividend of \$0.05 was paid during the year).
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Options

183,613,342 ordinary shares in the Company were issued during the half-year following the exercise of the same number of APLO options at an exercise price of \$1.10 per option. The options expired 15 October 2018.

Of the 284,832,954 APLO options that were issued by the Company during its IPO in October 2016, a total of 266,719,493 were exercised prior to their expiry. This represents an exercise rate of 93.6%.

Matters subsequent to the end of the half-year

No matter or circumstance has occurred subsequent to period end that has significantly affected, or may significantly affect, the operations of the Company, the results of those operations or the state of affairs of the Company in subsequent financial years.

Significant changes in state of affairs

Apart from the items noted above, there were no significant changes to the state of affairs of the Company during the half-year.

Auditor's independence declaration

A copy of the auditor's independence declaration as required under section 307C of the Corporations Act is set out on page 6.

Rounding of amounts

In accordance with ASIC Corporations (Rounding in Financial/Directors' Reports) Instrument 2016/191, the amounts in the directors' report and in the financial statements have been rounded to the nearest one thousand dollars, or in certain cases, to the nearest dollar (where indicated).

This report is made in accordance with a resolution of the directors.



Jonathan Trollip

Chairman

Sydney

21 February 2019

**AUDITOR'S INDEPENDENCE DECLARATION
TO THE DIRECTORS OF ANTIPODES GLOBAL INVESTMENT COMPANY LIMITED
ABN 38 612 843 517**

In relation to the independent auditor's review for the half-year ended 31 December 2018, to the best of my knowledge and belief there have been:

- (i) no contraventions of the auditor independence requirements of the *Corporations Act 2001*; and
- (ii) no contraventions of any applicable code of professional conduct in relation to the review.

This declaration is in respect of Antipodes Global Investment Company Limited during the period.



SCOTT WHIDDETT
Partner

PITCHER PARTNERS
Sydney

21 February 2019

Financial statements

Statement of profit or loss and other comprehensive income

For the half-year ended 31 December 2018

	Notes	31 Dec 2018 \$'000	31 Dec 2017 \$'000
Investment income			
Interest income received		211	120
Dividends received		4,391	1,618
Net foreign exchange gains / (losses)		3,910	(127)
(Losses) / gains on financial instruments held at fair value through profit and loss	2	(32,270)	27,346
Total investment (loss) / income		(23,758)	28,957
Expenses			
Management fees		(3,185)	(2,142)
Brokerage costs		(901)	(719)
ASX and share registry fees		(157)	(96)
Professional fees		(30)	(30)
Director fees		(50)	(50)
Other expenses		(108)	(72)
Total expenses		(4,431)	(3,109)
(Loss) / profit before income tax		(28,189)	25,848
Income tax benefit / (expense)		8,853	(7,418)
Net (loss) / profit after income tax for the half-year		(19,336)	18,430
Other comprehensive income net of tax		-	-
Total comprehensive (loss) / income for the half-year attributable to shareholders		(19,336)	18,430
Earnings per share for profit attributable to ordinary equity holders of the Company			
		Cents	Cents
Basic earnings per share	6	(4.2)	5.9
Diluted earnings per share	6	(4.2)	5.4

The above statement of profit or loss and other comprehensive income should be read in conjunction with the notes to the financial statements.

Statement of financial position

As at 31 December 2018

	Note	31 Dec 2018 \$'000	30 Jun 2018 \$'000
Assets			
Cash and cash equivalents		53,404	52,460
Trade and other receivables		2,127	2,343
Financial assets at fair value through profit or loss		582,285	439,185
Deferred tax assets		16,987	1,696
Total assets		654,803	495,684
Liabilities			
Trade and other payables		6,029	6,906
Financial liabilities at fair value through profit or loss		4,864	6,368
Current tax liabilities		28,339	12,586
Deferred tax liabilities		1,481	10,796
Total liabilities		40,713	36,656
Net assets		614,090	459,028
Shareholders' equity			
Issued capital	4	600,146	398,171
Profits reserve		54,124	68,057
Retained earnings		(40,180)	(7,200)
Total equity		614,090	459,028

The above statement of financial position should be read in conjunction with the notes to the financial statements.

Statement of changes in equity

For the half-year ended 31 December 2018

	Note	Issued capital \$'000	Profits reserve \$'000	Retained earnings \$'000	Total equity \$'000
Half-year ended 31 December 2017					
Balance as at 30 June 2017		320,946	31,324	(4,489)	347,781
Total comprehensive income					
Profit for the half-year		-	-	18,430	18,430
Other comprehensive income		-	-	-	-
Total comprehensive income		-	-	18,430	18,430
Transfer between reserves					
Transfer to profit reserve		-	21,434	(21,434)	-
Total transfer between reserves		-	21,434	(21,434)	-
Transactions with owners in their capacity as owners					
Shares issued upon exercise of options		37,997	-	-	37,997
Total transactions with owners in their capacity as owners		37,997	-	-	37,997
Balance as at 31 December 2017		358,943	52,758	(7,493)	404,208
Half-year ended 31 December 2018					
Balance as at 30 June 2018		398,171	68,057	(7,200)	459,028
Total comprehensive loss					
Loss for the half-year		-	-	(19,336)	(19,336)
Other comprehensive income		-	-	-	-
Total comprehensive loss		-	-	(19,336)	(19,336)
Transfer between reserves					
Transfer to profit reserve		-	13,644	(13,644)	-
Total transfer between reserves		-	13,644	(13,644)	-
Transactions with owners in their capacity as owners					
Shares issued upon exercise of options	4	201,975	-	-	201,975
Dividends paid to shareholders	5	-	(27,577)	-	(27,577)
Total transactions with owners in their capacity as owners		201,975	(27,577)	-	174,398
Balance as at 31 December 2018		600,146	54,124	(40,180)	614,090

The above statement of changes in equity should be read in conjunction with the notes to the financial statements.

Statement of cash flows

For the half-year ended 31 December 2018

	Note	31 Dec 2018 \$'000	31 Dec 2017 \$'000
Cash flows from operating activities			
Proceeds from sale of investments		230,788	199,283
Payment for investments		(408,299)	(241,454)
Interest received		202	109
Dividends received		4,778	1,422
Payments to suppliers		(3,210)	(1,907)
Net cash used in operating activities		(175,741)	(42,547)
Cash flows from financing activities			
Proceeds from shares issued on exercise of options	4(b)	201,975	37,997
Dividends paid to shareholders	5(a)	(27,577)	-
Net cash provided by financing activities		174,398	37,997
Net increase in cash and cash equivalents		(1,343)	(4,550)
Effect of exchange rate changes on cash and cash equivalents		2,287	235
Cash assets at beginning of the financial period		52,460	41,739
Cash assets at the end of the financial period		53,404	37,424

The above statement of cash flows should be read in conjunction with the notes to the financial statements.

Notes to the financial statements

For the half-year ended 31 December 2018.

Note 1 Summary of significant accounting policies

The interim financial statements were authorised for issue on 21 February 2019 by the Board of Directors.

Basis of preparation

These interim financial statements for the half-year ended 31 December 2018 have been prepared in accordance with Australian Accounting Standard AASB 134 Interim Financial Reporting and the Corporations Act 2001.

The interim financial statements have been prepared on an accrual basis, and are based on historical costs modified by the revaluation of selected non-current assets, financial assets and financial liabilities for which the fair value basis of accounting has been applied.

As these financial statements do not include all of the disclosures normally provided in a set of annual financial statements, it is recommended that this half-year financial report be read in conjunction with the Company's annual report for the year ended 30 June 2018 and with any public announcements made by the entity during the interim reporting period.

In accordance with ASIC Corporations (Rounding in Financial/Directors' Reports) Instrument 2016/191, the amounts in the directors' report and in the financial report have been rounded to the nearest one thousand dollars, unless otherwise indicated.

Significant accounting policies

In accordance with its application requirements, the Company adopted AASB 9 from 1 July 2018. All of the Company's investments in financial assets continued to be accounted for at fair value through profit or loss under AASB 9. Accordingly, first time application of AASB 9 had no impact on the Company's accounting for its investments in financial assets. On initial application of AASB 9, the Company also adopted the expected credit loss impairment model. The adoption had no material impact on the carrying amounts of the Company's receivables.

The accounting policies adopted are consistent with those of the previous financial year and corresponding interim reporting period, as disclosed in the 30 June 2018 annual report.

Note 2 (Losses) / gains on financial instruments held at fair value through profit and loss

	31 Dec 2018	31 Dec 2017
	\$'000	\$'000
<hr/>		
(Losses) / gains on financial instruments held at fair value through profit and loss comprise:		
Realised gains on financial instruments	52,284	6,295
Unrealised (losses) / gains on financial instruments	(84,554)	21,051
<hr/>		
(Losses) / gains on financial instruments held at fair value through profit and loss	(32,270)	27,346
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Note 3 Fair value measurements

The Company measures and recognises its financial assets at fair value through profit or loss (FVTPL) on a recurring basis.

Fair value hierarchy

AASB 13: Fair Value Measurement requires the disclosure of fair value information using a fair value hierarchy reflecting the significance of the inputs in making the measurements. The fair value hierarchy consists of the following levels:

- (a) quoted prices (unadjusted) in active markets for identical assets or liabilities (Level 1);
- (b) inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (as prices) or indirectly (derived from prices) (Level 2); and
- (c) inputs for the asset or liability that are not based on observable market data (unobservable inputs) (Level 3).

Recognised fair value measurements

The following table presents the Company's assets and liabilities measured and recognised at fair value:

31 Dec 2018	Level 1	Level 2	Level 3	Total
Assets	\$'000	\$'000	\$'000	\$'000
<i>Financial assets at fair value through profit and loss</i>				
Australian and overseas listed equity securities	567,229	-	-	567,229
<i>Financial assets held for trading</i>				
Derivative financial instruments – Equity swaps	11,839	-	-	11,839
Derivative financial instruments – Futures	469	-	-	469
Derivative financial instruments – Forward exchange contracts	-	2,748	-	2,748
Total assets	579,537	2,748	-	582,285
Liabilities				
<i>Financial liabilities held for trading</i>				
Derivative financial instruments – Equity swaps	1,993	-	-	1,993
Derivative financial instruments – Futures	46	-	-	46
Derivative financial instruments – Forward exchange contracts	-	2,825	-	2,825
Total liabilities	2,039	2,825	-	4,864

Note 3 Fair value measurements (continued)

30 June 2018	Level 1	Level 2	Level 3	Total
	\$'000	\$'000	\$'000	\$'000
Assets				
<i>Financial assets at fair value through profit and loss</i>				
Australian and overseas listed equity securities	436,113	-	-	436,113
<i>Financial assets held for trading</i>				
Derivative financial instruments – Equity Swaps	1,755	-	-	1,755
Derivative financial instruments – Futures	120	-	-	120
Derivative financial instruments – Forward exchange contracts	-	1,197	-	1,197
Total assets	437,988	1,197	-	439,185
Liabilities				
<i>Financial liabilities held for trading</i>				
Derivative financial instruments – Equity Swaps	6,129	-	-	6,129
Derivative financial instruments – Forward exchange contracts	-	239	-	239
Total liabilities	6,129	239	-	6,368

Included within Level 1 of the hierarchy are listed investments and futures. The fair value of these financial assets and financial liabilities has been based on the closing quoted last prices at the end of the reporting period, excluding transaction costs.

Included within Level 2 of the hierarchy are forward exchange contracts. The fair value of these financial assets and financial liabilities has been determined using forward exchange market rates at the end of the reporting period.

There were no transfers between levels for recurring fair value measurements during the half-year.

The Company's policy is to recognise transfers into and transfers out of fair value hierarchy levels as at the end of the reporting period.

The carrying amounts of all financial instruments other than those measured at fair value on a recurring basis are considered to represent a reasonable approximation of their fair values.

Note 4 Issued capital

(a) Share capital

	31 Dec 2018	31 Dec 2018	30 Jun 2018	30 Jun 2018
	Number	\$'000	Number	\$'000
Fully paid ordinary shares	551,552,448	600,146	367,939,106	398,171
Total share capital	551,552,448	600,146	367,939,106	398,171

The Company does not have an authorised capital value or par value in respect of its issued shares.

(b) Movements in ordinary share capital

Date	Details	Number of shares	Price	Total \$'000
30 Jun 2018	Closing Balance	367,939,106		398,171
July-Oct 2018	Options exercised for \$1.10 per share	183,613,342	\$1.10	201,975
31 Dec 2018	Closing Balance	551,552,448		600,146

(c) Ordinary shares

Ordinary shares entitle the holder to participate in dividends and the proceeds on winding up of the Company in proportion to the number of and amounts paid on the shares held.

On a show of hands every holder of ordinary shares present at a general meeting in person or by proxy is entitled to one vote and upon a poll each share is entitled to one vote.

(d) Options

183,613,342 ordinary shares in the Company were issued during the half-year following the exercise of the same number of options at an exercise price of \$1.10 per option. The options expired 15 October 2018.

Note 5 Dividends

(a) Dividend paid

During the half-year ended 31 December 2018, a final dividend for the year ended 30 June 2018 of 5.0 cents per share, franked as to 50%, was paid on 31 October 2018 with a record date of 22 October 2018. The aggregate amount of the dividend paid was \$27,577,000.

No dividend was paid during the half-year ended 31 December 2017.

(b) Dividends not recognised at the end of the period

Since the end of the period the Board has resolved to pay an interim dividend of 2.0 cents per share, franked as to 50%, payable on 22 March 2019 with a record date of 8 March 2019.

Based on the number of issued shares at 31 December 2018, the aggregate amount of dividend payable but not recognised as a liability at period end, is \$11,031,000.

Note 5 Dividends (continued)

Dividend franking account

The balance of the Company's dividend franking account available for dividends paid in subsequent financial periods, when adjusted for franking credits that will arise upon payment of the amount of the 2018 provision for income tax, and dividends paid during the reporting period, is \$6,676,000.

The franking debit that will arise from the payment of the dividend not recognised at the end of the reporting period, based on the number of issued shares at 31 December 2018, is \$2,364,000.

Note 6 Earnings per share

(a) Earnings used in the calculation of basic and diluted earnings per share	31 Dec 2018 \$'000	31 Dec 2017 \$'000
(Loss) / profit from continuing operations attributable to the owners of the Company	(19,336)	18,430
(b) Basic earnings per share	Cents	Cents
(Loss) / profit from continuing operations attributable to the owners of the Company	(4.2)	5.9
(c) Diluted earnings per share	Cents	Cents
(Loss) / profit from continuing operations attributable to the owners of the Company	(4.2)	5.4
(d) Weighted average number of ordinary shares used in the calculation of earnings per share	Number	Number
Weighted average number of ordinary shares used as the denominator in calculating basic earnings per share	463,448,997	314,306,117
Adjustments for calculation of diluted earnings per share – weighted average number of options	-	27,524,247
Weighted average number of ordinary shares used as the denominator in calculating diluted earnings per share	463,448,997	341,830,364

Note 7 Subsequent events

No matter or circumstance has occurred subsequent to period end that has significantly affected, or may significantly affect, the operations of the Company, the results of those operations or the state of affairs of the Company in subsequent financial years.

Note 8 Contingencies and commitments

The Company has no known contingent assets or liabilities.

Directors' declaration

The Directors declare that:

- (a) the financial statements and notes as set out on pages 7 to 15 are in accordance with the Corporations Act 2001, including:
 - (1) complying with Accounting Standard AASB134 Interim Financial Reporting, the *Corporations Regulations 2001* and other mandatory professional reporting requirements; and
 - (2) giving a true and fair view of the Company's financial position as at 31 December 2018 and of its performance for the half-year ended on that date.
- (b) in the directors' opinion there are reasonable grounds to believe that Antipodes Global Investment Company Limited will be able to pay its debts as and when they become due and payable.

This declaration is made in accordance with a resolution of the Directors.



Jonathan Trollip

Chairman

Sydney

21 February 2019

**INDEPENDENT AUDITOR'S REVIEW REPORT
TO THE MEMBERS OF ANTIPODES GLOBAL INVESTMENT COMPANY LIMITED
ABN 38 612 843 517**

Report on the Interim Financial Report

We have reviewed the accompanying interim financial report of Antipodes Global Investment Company Limited ("the company"), which comprises the statement of financial position as at 31 December 2018, statement of profit or loss and other comprehensive income, statement of changes in equity and statement of cash flow for the half-year ended on that date, a summary of significant accounting policies, other selected explanatory notes and the directors' declaration of the company.

Directors' Responsibility for the Interim Financial Report

The directors of the company are responsible for the preparation of the interim financial report that gives a true and fair view in accordance with Australian Accounting Standards and the *Corporations Act 2001* and for such internal control as the directors determine is necessary to enable the preparation of the interim financial report that gives a true and fair view and is free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express a conclusion on the interim financial report based on our review. We conducted our review in accordance with Auditing Standard on Review Engagements ASRE 2410: "*Review of a Financial Report Performed by the Independent Auditor of the Entity*", in order to state whether, on the basis of the procedures described, we have become aware of any matter that makes us believe that the interim financial report is not in accordance with the *Corporations Act 2001* including: giving a true and fair view of the company's financial position as at 31 December 2018 and its performance for the half-year ended on that date; and complying with Accounting Standard AASB 134: "*Interim Financial Reporting*" and the *Corporations Regulations 2001*. As the auditor of Antipodes Global Investment Company Limited, ASRE 2410 requires that we comply with the ethical requirements relevant to the audit of the annual financial report.

A review of the interim financial report consists of making enquiries, primarily of persons responsible for the financial and accounting matters, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with Australian Auditing Standards and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.

**INDEPENDENT AUDITOR'S REVIEW REPORT
TO THE MEMBERS OF ANTIPODES GLOBAL INVESTMENT COMPANY LIMITED
ABN 38 612 843 517**

Independence

In conducting our review, we have complied with the independence requirements of the *Corporations Act 2001*.

Conclusion

Based on our review, which is not an audit, we have not become aware of any matter that makes us believe that the interim financial report of Antipodes Global Investment Company Limited is not in accordance with the *Corporations Act 2001*, including:

- (i) giving a true and fair view of the company's financial position as at 31 December 2018 and of its performance for the half-year ended on that date; and
- (ii) complying with Accounting Standard AASB 134: *Interim Financial Reporting* and *Corporations Regulations 2001*.



SCOTT WHIDDETT
Partner



PITCHER PARTNERS
Sydney

21 February 2019

Corporate directory

Board of Directors

Jonathan Trollip (Chairman)
Lorraine Berends
Chris Cuffe AO
Alex Ihlenfeldt
Andrew Findlay

Secretary

Calvin Kwok

Manager

Antipodes Partners Limited
ACN 602 042 035
Level 35
60 Margaret Street
SYDNEY NSW 2000
Fax: +61 (0) 2 8970 7799
Toll Free: 1300 010 311

ASX Code

APL Ordinary Shares

Lawyers

Kardos Scanlon
Level 5, 151 Castlereagh Street
Sydney NSW 2000
Tel: +61 (0) 2 9146 5290
Fax: +61 (0) 2 9146 5299
www.kardosscanlan.com.au

Auditors

Pitcher Partners
Level 22, MLC Centre
19 Martin Place
Sydney NSW 2000
Tel: +61 (0) 2 9221 2099
Fax: +61 (0) 2 9223 1762
www.pitcher.com.au

Share Register

Boardroom Pty Limited
Level 12, 225 George Street
Sydney NSW 2000
Toll Free: 1300 737760
International: +61 (0) 2 9290 9600
www.investorserve.com.au

Registered Office

Level 19, 307 Queen Street
Brisbane QLD 4000
Tel: +61 (0) 7 3020 3710

Principal Place of Business

Level 35, 60 Margaret Street
Sydney NSW 2000
Tel: 1300 651 577

Website Address

<http://antipodespartners.com/antipodes-lic/>

Chris Cuffe – Short bio

Commencing his career as a chartered accountant, Chris Cuffe entered the funds management industry in 1985. In 1988 he joined Colonial First State where he was CEO from 1990 until 2003. In 2003 he became CEO of the listed Challenger Group.

Chris now has a portfolio of activities in the investment and non-profit sectors which include:

- Member of the Investment Committee of UniSuper (\$70 billion), which provides superannuation services to employees of Australia's higher education and research sector
- Chairman of Australian Philanthropic Services and Atrium Investment Management
- Director of various listed and unlisted companies: Global Value Fund, Antipodes Global Investment Company, Argo Investments, Hearts & Minds Investments, and Class
- Founder, directors and manager of Third Link Growth Fund

Chris was previously a non executive director of UniSuper from 2007 to 2017, of which the last 6 years was as Chairman.

In October 2007 Chris was inducted into the Australian Fund Manager's RBS Hall of Fame for services to the investment industry. In 2017 he was appointed as an Officer in the General Division of the Order of Australia.

Chris holds a Bachelor of Commerce from the University of NSW and a Diploma from the Securities Institute of Australia. He is a Fellow of the Chartered Accountants in Australia and New Zealand, a Fellow of the Institute of Company Directors and an Associate of the Financial Services Institute of Australasia.