



**ADAMANTEM GROUP**

# **MODERN SLAVERY STATEMENT 2024**

December 2024

This Statement is for the period 1 July 2023  
to 30 June 2024

In the spirit of reconciliation the Adamantem Group Acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their elders past and present and extend that respect to all Aboriginal and Torres Strait islander peoples today.



# FOREWORD

In today’s global economy, the prevalence of modern slavery and human trafficking remains a pressing concern. Modern slavery encompasses various forms of exploitation, including forced labour, debt bondage, human trafficking, and child labour. These violations of human rights are found across multiple industries and supply chains worldwide, often hidden from plain sight. With stakeholders across a variety of geographies, industries and sectors, the Adamantem Group recognises our exposure and the role we have to play in addressing these issues.

Our fifth voluntary modern slavery statement reaffirms the Adamantem Group’s unwavering commitment to combatting modern slavery and human rights abuses within our operations and supply chains. By actively identifying and mitigating risks, we strive to foster a business environment grounded in respect, dignity, and ethical practices and actively manage environmental, social and governance risks and opportunities to create value for our stakeholders.

We believe including sustainability in our investment decision-making and stewardship processes helps us make better investment decisions and deliver better investment outcomes for our investors. During this Reporting Period, we are proud to have developed our in-house capabilities and built a proprietary Modern Slavery Framework to guide our multifaceted approach to addressing modern slavery risks through our due diligence and risk management processes, and continuous engagement with stakeholders, including employees, suppliers, and industry partners.

This Statement includes the business and operations of our two key operating businesses: our private equity business Adamantem Capital,<sup>1</sup> and our public equities business Melior,<sup>2</sup> and represents the commitment and achievements of the entire Adamantem Group with respect to modern slavery.<sup>3</sup>

As we continue to grow and evolve, we remain steadfast in our commitment to eradicating modern slavery and promoting human rights across all aspects of our operations and supply chains. We look forward to continuing to share our journey with you.



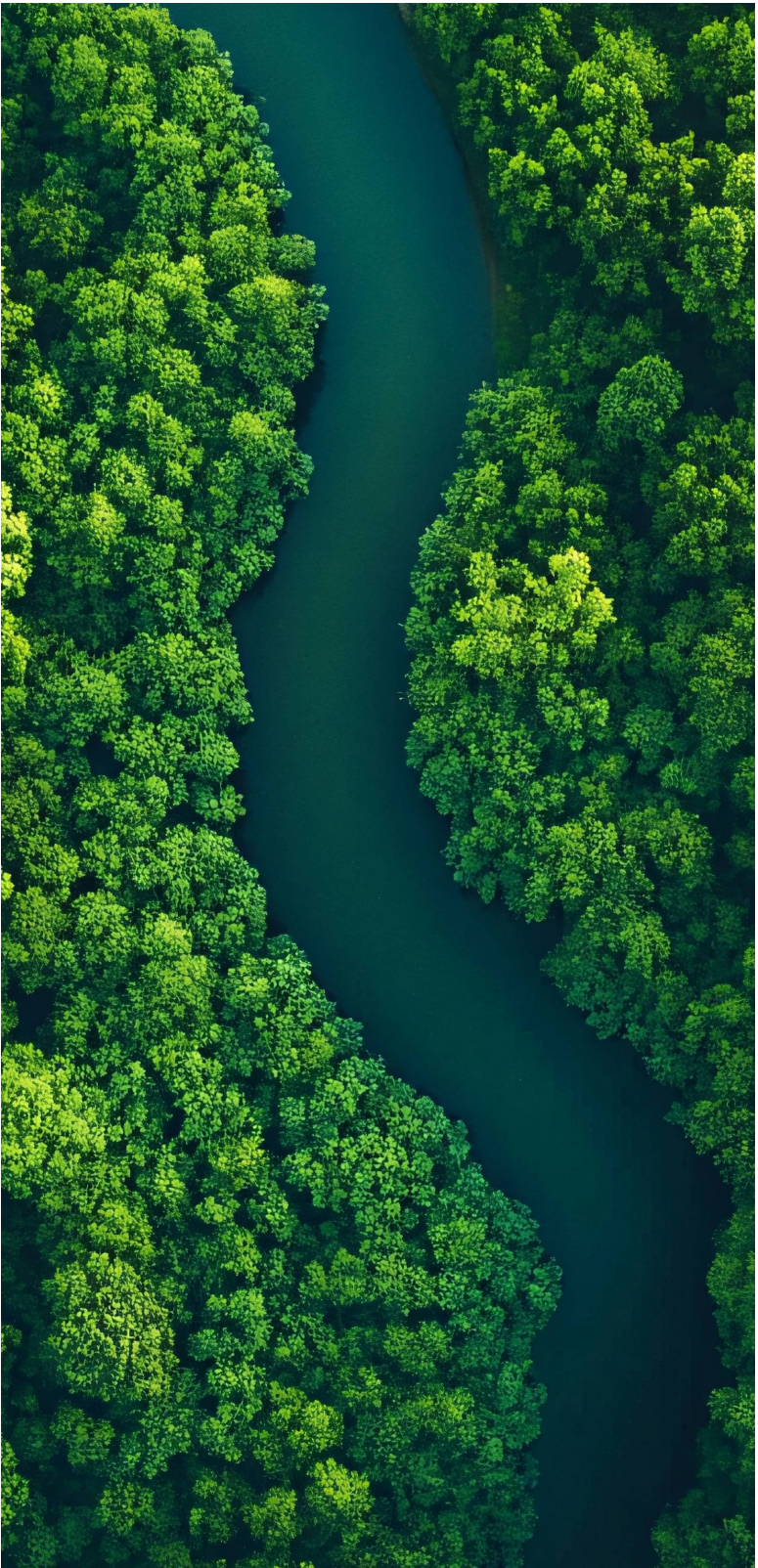
Rob Koczkar  
  
Director,  
Adamantem Holdings,  
Adamantem Capital & Melior



Lucy Steed  
  
Chief Executive Officer,  
Melior

*This joint Statement is made pursuant to section 14(1) of the Modern Slavery Act 2018 (Cth) (Act) and constitutes the joint statement of Adamantem Capital and Melior for the Reporting Period. This Statement has been approved by the board of Adamantem Holdings as the parent entity of Adamantem Capital and Melior on 10 December 2024 and is signed by Robert Koczkar as director of Adamantem Holdings, Adamantem Capital and Melior.*

1 Adamantem Capital Management Pty Ltd (ABN 31 616 283 124)  
2 Melior Investment Management Pty Ltd (ABN 16 629 013 896)  
3 The Adamantem Group covers both the Adamantem Capital and Melior businesses. All actions, policies and procedures apply at the Group level unless otherwise specified



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# 1. OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

## THE ADAMANTEM GROUP BUSINESS

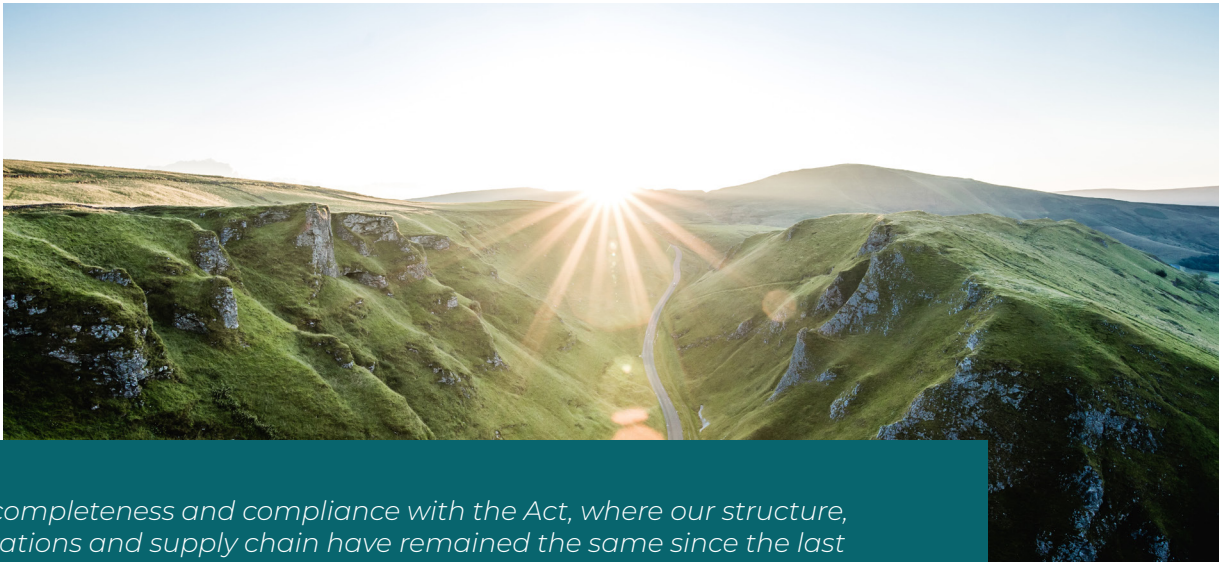
This Statement is submitted by Adamantem Holdings on behalf of the Adamantem Group.

The Adamantem Group is an Australian based investment manager committed to delivering outstanding financial returns for our investors alongside positive contributions to environmental and social outcomes, creating sustainable value for all stakeholders. We manage assets in Australia and New Zealand across both private equity and public market strategies, through Adamantem Capital and Melior respectively.

We integrate Environmental Sustainability, Social Inclusion and Governance and Transparency considerations into our investment and management processes, with a focus on identifying and addressing risks and opportunities that affect financial and sustainability performance.

Sustainability, including modern slavery, is integrated throughout the Group’s governance and operations structure with clear allocations of responsibilities throughout the business.

See Appendix 1 of this Statement for details regarding the Adamantem Group Corporate Structure and Governance Framework, which have not changed since the previous reporting period.



For completeness and compliance with the Act, where our structure, operations and supply chain have remained the same since the last reporting period, we have re-stated the same information in this Statement.
















Diagram 1: Adamantem’s Sustainability Governance Structure



ADAMANTEM CAPITAL

Adamantem Capital is the private equity arm of Adamantem Group, specializing in managing investments with a focus on responsible and sustainable growth. We aim to foster long-term value creation through strategic investments in mid-market companies across various sectors.

During the Reporting Period, Adamantem Capital managed three private equity investment funds that held investments in thirteen portfolio companies across a range of different industries (Adamantem Portfolio Companies).

ADAMANTEM CAPITAL FUND I		
 HERITAGE LIFECARE	 <i>Reporting entity under the Act.</i>	 <i>Reporting entity under the Act with respect to Australian operations.</i>
 <i>Reporting entity under the Act.</i>	 <i>Reporting entity under the Act.</i>	
ADAMANTEM CAPITAL FUND II		
	 <i>Reporting entity under the Act.</i>	
 <i>Reporting entity under the Act.</i>	 <i>Reporting entity under the Act.</i>	
ADAMANTEM ENVIRONMENTAL OPPORTUNITIES FUND		
 ecoware		

We report separately on the Adamantem Capital investment approach and sustainability performance during the Reporting Period in the Adamantem Capital 2024 Sustainability Report.

MELIOR

Melior is the public equities arm of the Adamantem Group, and manager of the Melior Australian Impact Fund. Melior seeks to generate competitive long-term returns and positive social and environmental impact by contributing to the United Nations Sustainable Development Goals through allocating its investment capital to positive impact companies, engaging management and boards to improve their sustainability and impact practices and publicly advocating for better social and environmental outcomes.

During the Reporting Period, the Melior Fund invested in ~35 ASX listed companies across a range of industries (Melior Portfolio Companies).

We report separately on the Melior investment approach and sustainability performance during the Reporting Period in the Melior 2024 Annual Impact Report.

SUPPLY CHAIN OVERVIEW

- Adamantem has maintained the same supply chain profile since the last reporting period, with no material changes to the products and services we directly procure which include:
- Products – office supplies, office equipment, catering supplies and consumables for the office
  - Services – professional services support (such as legal, accounting, financial advisory and management consultancy support), as well as services in relation to travel, telecommunications, recruitment, public relations, property rental (including cleaning) and IT support

During the Reporting Period, the Group had in excess of 170 suppliers.

Exclusion of Portfolio Companies

As investment managers, Adamantem Capital and Melior are contracted to manage the Funds. The operations of Adamantem Capital and Melior are therefore separate and distinct from the Portfolio Companies invested in by the Funds. As a result of the nature of these activities and the structure of the Funds, Adamantem Capital and Melior do not control the Adamantem Portfolio Companies or the Melior Portfolio Companies, and this Statement excludes consideration of the operations and supply chains of individual Portfolio Companies.



# 2. ADAMANTEM MODERN SLAVERY FRAMEWORK

The key focus for the Adamantem Group during the Reporting Period was to enhance our processes for assessing and addressing modern slavery risks in our operations and Adamantem Capital’s investment processes.

Modern slavery risks are monitored managed across the full spectrum of the Adamantem operations and private equity investment lifecycle:



During the Reporting Period, we developed an in-house Modern Slavery Framework (**Adamantem MS Framework**), designed with the support of an external human rights advisor, to enhance our approach to modern slavery risk assessment and management across the investment lifecycle. The Adamantem MS Framework includes:

MODERN SLAVERY RISK APPETITE STATEMENT	MODERN SLAVERY RISK IDENTIFICATION TOOL	MODERN SLAVERY RISK MANAGEMENT TOOL
Outlines our guiding principles and approach to identifying and managing modern slavery risk in Adamantem Capital’s investment decision-making and portfolio management. This was built through workshops with the senior leadership team to consider materiality of modern slavery risk from both a people and investment perspective.	Facilitates the assessment of the inherent modern slavery risk in potential investments and existing Adamantem Portfolio Companies’ operations and supply chains through a consideration of modern slavery risk factors including Geography, Industry, Products and Services, and Business Model, as well as any previous or existing human rights controversies. The Risk Identification Tool produces an overall “Risk to People” assessment rating of “Low”, “Moderate” and “High”.	Establishes Adamantem’s minimum expectations for the mitigation and management of modern slavery risks in Adamantem Portfolio Companies and sets out a suite of potential actions to be taken to meet the relevant Modern Slavery Risk Management Standards, aligned with identified inherent modern slavery risk rating. The Risk Management Tool also includes a template for a 2 year modern slavery action plan to enhance risk identification, mitigation and continuous improvement.



### 3. MODERN SLAVERY RISKS IN ADAMANTEM GROUP OPERATIONS AND SUPPLY CHAINS

Following the development of the Adamantem MS Framework, we applied our Modern Slavery Risk Identification Tool to our own operations this year to re-assess the inherent modern slavery risk exposure of the Group.

The assessment of our own operations and our top 10 material suppliers (by spend) produced an overall risk rating of “Low” for both our operations and each individual supplier, as well overall “Low” risk for each of Geography, Industry, Products and Services, Business Model Risks or Controversies factors.

Considering risk factors identified in the Risk Identification Tool, as well as the findings of previous modern slavery risk assessments conducted for the business in 2020, we remain cognisant that our key risk exposure is likely to arise from:

- Services which rely on base skilled labour such as premise cleaning, security and catering
- Products which are exposed to higher risks of modern slavery in their production such as IT & computer equipment and groceries and consumables

Despite our “Low” risk rating and the absence of any identified any incidents of modern slavery in our business or supply chain or whistleblower reports, we have continued to be active in our engagement with suppliers to monitor and manage potential risks. During the Reporting Period, 15 suppliers responded to the Supplier Checklist that was updated during the last reporting period to include more detailed questions regarding modern slavery risk management, 73% of those suppliers have policies specifically addressing modern slavery in place.

We intend to extend the application of our MS Framework assessment to a broader set of suppliers in future years.





# 4. ACTIONS TAKEN BY THE ADAMANTEM GROUP DURING THE REPORTING PERIOD TO ADDRESS MODERN SLAVERY RISKS

The focus of our efforts this Reporting Period was on the development and application of our Adamantem MS Framework. Additional new actions undertaken during the Reporting Period included:

- **Grievance and remediation review** - review with respect to best practice grievance and remediation mechanisms, including consideration of the Corporate Human Rights Benchmark 2023, and incorporation of further actions in our look-forward modern slavery action plan (**MS Action Plan**)
- **Policy reviews** - review of our Responsible Procurement Policy, Supplier Code of Conduct and Whistleblowing Policy
- **Training** - updates for all staff on the Adamantem MS Framework
- **Reporting guidance** - preparation of best practice modern slavery reporting guidance for Adamantem Portfolio Companies for 2023 reporting

We also continued ongoing modern slavery initiatives including:

POLICIES	MODERN SLAVERY CLAUSES	STEWARDSHIP ACTIVITIES
Implementation of our broad suite of policies designed to manage risks of modern slavery in our operations and supply chains including: Responsible Procurement Policy, Human Rights Statement, Diversity, Inclusion and Equal Opportunity Policy and Diversity and Inclusion Framework, Acceptable Workplace Behaviour Policy, Workplace Health and Safety Policy, Whistleblower Policy, Adamantem Capital Responsible Investing and Impact Policy, Melior Responsible Investing Policy and Melior Proxy Voting and Advocacy Policy.	Inclusion of standard terms and conditions relating to modern slavery in supplier contracts where possible.	Collection and analysis of data from all Adamantem Portfolio Companies through Adamantem Capital's proprietary 'ESG Metrics Reporting Framework' which includes data relating to consideration of child labour, young workers and forced or compulsory labour risks relating to the business. Melior continued to evaluate the quality and effectiveness of modern slavery statements as part of its Quarterly KPIs and ESG Frameworks.
	WHISTLEBLOWER SERVICES	
	Provision of external whistleblower and ethics services and support for our business and the Adamantem Portfolio Companies.	

## PORTFOLIO COMPANIES

While this Statement expressly excludes consideration of the operations and supply chains of individual Portfolio Companies, we recognise our role as stewards to create change, particularly with respect to the Adamantem Portfolio Companies. The Adamantem MS Framework is designed to be also used to create a framework of support for our Adamantem Portfolio Companies to assess and manage their own modern slavery risks, and we look forward to further enhancing the approach to modern slavery across our portfolio during 2025.





# 5. EFFECTIVENESS AND PERFORMANCE REVIEW

The Adamantem Group measures the impact of our modern slavery initiatives against a Modern Slavery Effectiveness Framework adopted in 2022, and have reported against standardised Effectiveness Metrics in our previous two modern slavery statements. We have continued to collate this data for the Reporting Period as set out below. The Effectiveness Metrics have been reported to the RCC and used to inform the development of our FY25-26 MS Action Plan.

We were pleased to see the increase in the % of suppliers returning our Supplier Code of Conduct and % of those that have policies specifically addressing modern slavery.

In addition to collating the Effectiveness Metrics, we assess effectiveness by:

- engaging with human rights experts & groups to develop our understanding of modern slavery risk management
- engaging closely with portfolio company management to continually assess their progress
- researching and comparing our approach with best market practice.

METRIC		FY22	FY23	FY24
INVESTMENT	# of investors specifically engaged with regarding modern slavery	ADM - 2	ADM - 2 MIM - 2	ADM - 5 MIM - 2
	% of ESG reviews conducted on potential Adamantem Fund transactions that included modern slavery as a focus area	ADM - 100%	ADM - 100%	ADM - 100%
STEWARDSHIP	% of material suppliers who have returned the Supplier Code of Conduct and Checklist issuing Modern Slavery Statements	ADM - 50%	ADM - 60%	ADM - 82%
	% of material suppliers who have returned the Supplier Code of Conduct and Checklist with policies specifically addressing modern slavery	ADM - 37.5 MIM - 97%	ADM - 60% MIM - 97%	ADM - 63.6% MIM - 97%
OPERATIONS (SUPPLY CHAIN)*	% of material suppliers who have returned the Supplier Code of Conduct and Checklist issuing Modern Slavery Statements	50%	57.9%	74%
	% of material suppliers who have returned the Supplier Code of Conduct and Checklist with policies specifically addressing modern slavery	65%	57.9%	94%
	# of material suppliers who have returned the Supplier Code of Conduct and Checklist engaged with regarding modern slavery	1	0	1
OPERATIONS (INTERNAL)	# of reports of modern slavery (and remediation undertaken if necessary)	0	0	0
	% of modern slavery actions implemented to deadline (i.e. compliance with MS Action Plan)	93%	88.9%	72% <sup>5</sup>
	% of staff completing human rights and modern slavery training	N/A <sup>6</sup>	100%	ADM Managing Directors only
INFLUENCE	# of instances of public engagement on modern slavery (includes conferences, interviews, webinars, working groups and thought pieces)	1 Thought piece 2 Working Groups 3 Webinars MIM - 20 Corporate Stewardship engagements	2 Working Groups 1 Webinars 1 Modern Slavery best practice meeting MIM - 21 Corporate Stewardship engagements	3 Working Groups and Associations 5 Conferences and webinars MIM - 11 Corporate Stewardship engagements

## CONTINUOUS IMPROVEMENT

Adamantem is dedicated to continually improving our approach to mitigating and tackling the risks of modern slavery. During the Reporting Period, we completed most of the actions in our FY22-24 MS Action Plan (postponing some actions to better align with the MS Framework) and have used our learnings and our in-house Modern Slavery Risk Management Tool to develop a new action plan for FY25-26, with a focus on enhancing our stakeholder engagement and support with respect to modern slavery including employees, suppliers and Portfolio Companies.

4 Note re material suppliers – The Effectiveness Framework metrics assesses the performance of Adamantem and Melior’s material suppliers in combination. Material suppliers are the top twenty suppliers for the Reporting Period, as determined by spend. Metric calculations do not include one individual consultant supplier.

5 Decline in achievement of Modern Slavery Action Items completed to time this year due to deliberate postponing of actions in line with MS Framework.

6 No human rights and modern slavery training was undertaken during the FY22 reporting period.



# 6. COLLABORATION AND CONSULTATION

We believe that a collaborative approach is required to achieve stronger sustainability outcomes across the investment community, and we continued to actively participate and contribute to cross-industry working groups that address modern slavery and human rights issues during the Reporting Period including:

- **United Nations Global Compact** – Since 2021, the Adamantem Group has been a member of UNGC. We submitted our third communication on progress during the Reporting Period. We also participated in the UNGC Modern Slavery Community of Practice and the UNGC Australian Dialogue on Business and Human Rights.
- **RIAA Human Rights Working Group** – The Adamantem Group continued to participate in the Human Rights Working Group and First Nations Peoples Working Group of the Responsible Investment Association Australasia.
- **IAST-APAC engagement** – Melior continued its participation in the Investors Against Slavery and Trafficking – Asia Pacific network, joined in 2023.
- **UNPRI reporting** – Each of Adamantem Capital and Melior are signatories to the Principles for Responsible Investment. Both Adamantem Capital and Melior reported in 2023.

*This Statement has been prepared by the Responsibility and Impact Team, with input from key stakeholders across the Adamantem Capital and Melior business. This includes the Managing Director, Responsibility and Impact, Group General Counsel, Director, People, Office and Culture and Senior Associate, Responsibility and Impact, who have key responsibility for the management and reporting of modern slavery across the Group.*

*All entities in the Adamantem Group are owned and controlled by the same shareholders and have appointed the same directors, who have reviewed and adopted this Statement.*





# 7. REFERENCES

This Statement has been prepared to meet the mandatory reporting criteria of the Act as follows:

MANDATORY CRITERIA	SECTION
Identify the reporting entity	1
Describe the reporting entity's structure, operations and supply chain	1 and Appendix 1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	2 and 4
Describe how the reporting entity assesses the effectiveness of these actions	5
Describe the process of consultation that any entities that the reporting entity owns or controls	6
Provide any other relevant information	6



GLOSSARY

Act	The Modern Slavery Act 2018 (Cth)
Adamantem Capital	Adamantem Capital Management Pty Ltd (ABN 31 616 283 124)
Adamantem Funds	The three private equity investment funds managed by Adamantem Capital
Adamantem Portfolio Companies	The thirteen investment companies held by the Adamantem Capital Funds
Adamantem Group or the Group	Adamantem Holdings and all subsidiary entities, including Adamantem Capital and Melior
Adamantem Holdings	Adamantem Capital Holdings Pty Limited (ABN 63 606 371 724)
Adamantem Modern Slavery Framework or MS Framework	Adamantem Group's in-house modern slavery framework including Risk Appetite Statement, Risk Identification Tool, Modern Slavery Risk Management Standards, and Risk Management Tool
Effectiveness Framework	Adamantem Group board-approved Modern Slavery Effectiveness Framework
Effectiveness Metrics	Standardised metrics measured in accordance with the Effectiveness Framework
Funds	Together, the Adamantem Funds and the Melior Fund
KPI	Key performance indicator

IAST-APAC	Investors Against Slavery and Trafficking- Asia Pacific
Melior	Melior Investment Management Pty Ltd (ABN 16 629 013 896)
Melior Fund	Melior Australian Impact Fund (ARSN 634 081 744)
Melior Portfolio Companies	ASX listed entities held by the Melior Fund as at the end of the Reporting Period
MS Action Plan	The Adamantem Group Modern Slavery Action Plan
Portfolio Companies	Together, the Adamantem Capital Portfolio Companies and Melior Portfolio Companies
Reporting Period	1 July 2022 to 30 June 2024
RI	Responsible Investing
SDGS	United Nations Sustainable Development Goals
Statement	Adamantem Group Modern Slavery Statement for the Reporting Period prepared in accordance with the Act
Supplier Checklist	Adamantem Group Supplier Onboarding Checklist
UNGC	United Nations Global Compact
UNGP	United Nations Guiding Principles on Business and Human Rights



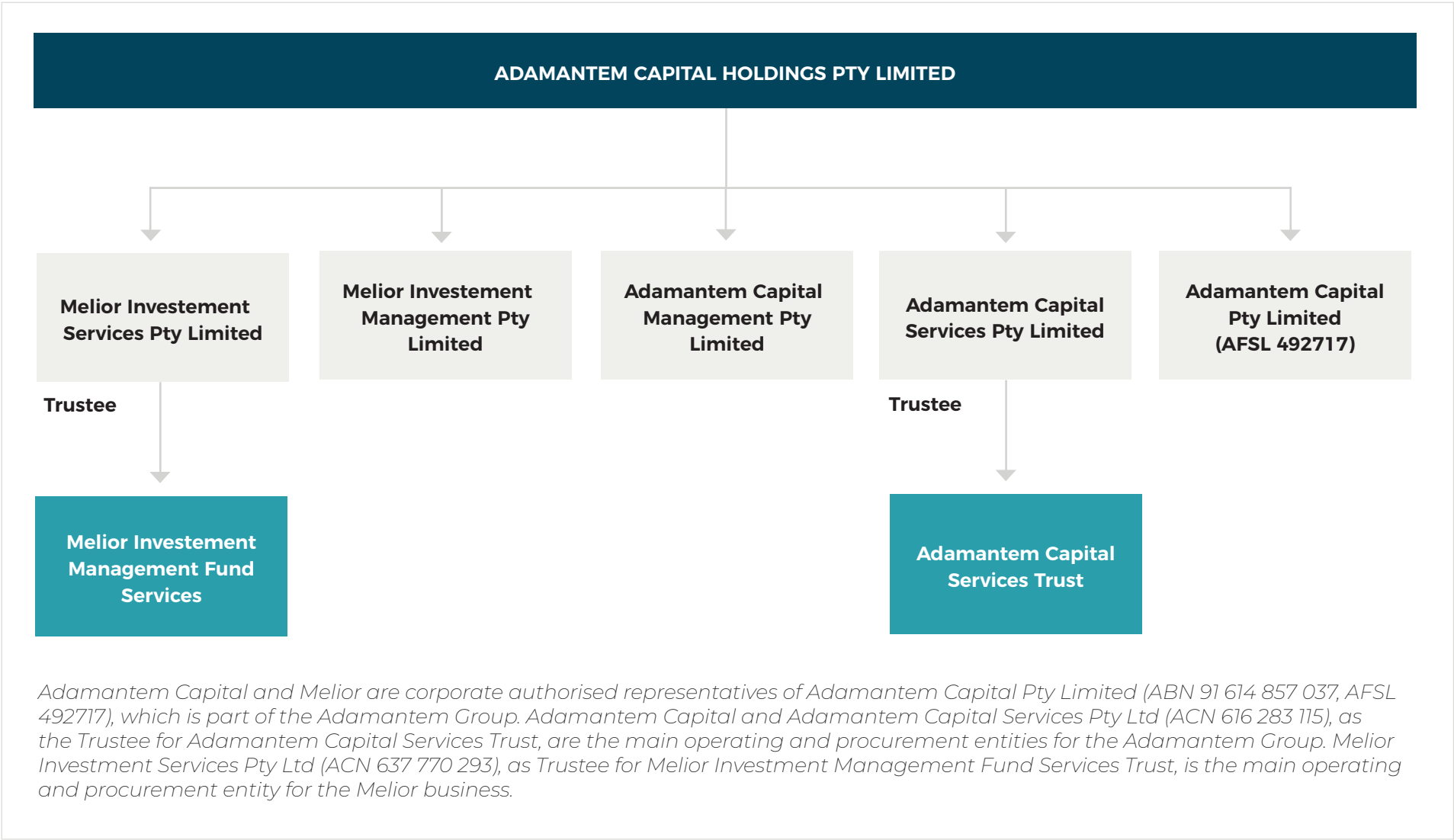
# APPENDIX 1 - CORPORATE STRUCTURE AND GOVERNANCE FRAMEWORK

## 1. OPERATIONS

The Adamantem Group has its registered office and headquarters at Level 8, 167 Macquarie Street, Sydney, NSW, 2000.

Over the Reporting Period, the Group had an average team of approximately 50 FTE, including investment and operations professionals. All members of staff work from the Sydney CBD office or from their home in the Sydney region.

## 2. CORPORATE STRUCTURE





### 3. GOVERNANCE

The Adamantem Capital Risk and Compliance Committee and Melior Risk and Compliance Committee (RCC) are delegated responsibility for the overall management of modern slavery risks in our business and are directly accountable to the Adamantem Capital Board and the Melior Board, respectively. The Adamantem Holdings Board of Directors is responsible for signing off on the Adamantem Group's voluntary Modern Slavery Statement.

#### **3.1 Risk management in our operations**

The Adamantem Group manages modern slavery risks within its own business in accordance with its Australian Standard ISO 31000:2018-aligned Risk Management Framework and its Board-approved MS Action Plan.

The Risk Management Framework sets out the processes for identifying, analysing, evaluating, monitoring and reporting on risks arising in the Adamantem Group business, and specifically identifies and allocates an inherent risk rating to the following modern slavery related risks:

- Unethical supply practices risk
- Modern slavery risk
- Responsible procurement risk

After the application of controls, each of these risks currently have a 'Low' residual risk rating. They are reviewed and reported on in accordance with our standard risk reporting processes. The MS Action Plan sets out the intended actions to be taken across key areas of the Adamantem Group business to strengthen our modern slavery management practices over a look forward 12-18 month period.

#### **3.2 Risk management in our supply chains**

The Adamantem Group manages modern slavery risks within its supply chains through the application of its Responsible Procurement Policy, Supplier Code of Conduct and Supplier Checklist.

#### **3.3 Risk management in our investments and stewardship**

Investments made by the Adamantem Funds are made in accordance with the Adamantem Capital Responsible Investing and Impact Investing Policy.

Investments made by the Melior Fund are assessed by Melior for modern slavery risk prior to investment as part of its ESG assessment process. During the investment period, Melior measures evidence of modern slavery performance indicators as one of 21 key KPIs. Melior actively advocates for continuous improvement in the reporting and analysis of modern slavery risks and has developed a three tier ranking system to assesses the quality of modern slavery statements published by the ASX 300 and Melior Fund Portfolio Companies. The Melior Proxy Voting and Advocacy Policy states that it will exercise its voting discretion with a consideration of ESG and sustainability, aligned with its Corporate Impact Pillars and SDG Strategic Advocacy Themes which include 'Social Inclusion'.

As noted in section 1, the operations and supply chains of individual Portfolio Companies are excluded from this Statement.

#### **3.4 Modern Slavery responsibilities**

The Group General Counsel is responsible for identifying, monitoring and reporting on modern slavery risks and impacts to the relevant RCCs, and overseeing the implementation of the risk controls specified in the Risk Management Framework.

The Senior Associate, Responsibility and Impact, together with the Director, People, Office and Culture, have day-to-day responsibility for assessing and managing modern slavery risks and impacts across the Adamantem Group business operations, by overseeing the implementation of the Responsible Procurement Policy and its associated processes. The Senior Associate, Responsibility and Impact, is also responsible for managing the implementation of our MS Action Plan, which is updated and reviewed by the Board annually.

The integration of modern slavery considerations into investment decision-making and Adamantem Portfolio Company stewardship is implemented by the Adamantem Capital investment and portfolio company operations teams, with oversight from the Managing Director, Responsibility and Impact.





# CONTACT

Level 8  
167 Macquarie Street  
Sydney NSW 2000

PHONE: +61 2 9004 6060

EMAIL: [info@adamantem.com.au](mailto:info@adamantem.com.au)

WEBSITE: [www.adamantem.com.au](http://www.adamantem.com.au)