



ADAMANTEM CAPITAL

# MODERN SLAVERY STATEMENT

This statement is made by Adamantem Capital Management Pty Limited ("Adamantem") for the period 1 July 2020 – 30 June 2021 ("Reporting Period")

**STRICTLY CONFIDENTIAL** 

# Foreword

Adamantem aims to deliver outstanding returns on investments alongside positive environmental and social impacts, contributing to sustainable change and a better future beyond our stewardship. We do this through integrating our responsible investing approach across the lifecycle of our investments and within our own operations.

Our responsible investing approach is built on three pillars – Environmental Sustainability, Participation and Transparency. By "Participation", we mean creating opportunities for positive social and economic inclusion and engagement across all stakeholders and the community more broadly. Assessing and addressing the risks of modern slavery in our own operations and supply chains – and those of the businesses we invest in – is an important part of this.

This is our second voluntary modern slavery statement – we are not required to lodge one under the Modern Slavery Act 2018 (Cth) but do so as part of our proactive commitment to integrating responsible investing approaches within our own business. We are proud of the progress we have made during the Reporting Period in identifying, managing and mitigating the risks of modern slavery in Adamantem's operations and supply chains, while acknowledging that there is still much more to do. Through ongoing engagement on the issue of modern slavery with our suppliers, our portfolio companies and the broader investment community, we look forward to continually improving our approach and sharing our learnings so that others may do the same.

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Rob Koczkar Director

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Anthony Kerwick Director

This Modern Slavery Statement was approved by the Board of Adamantem Capital Management Pty Ltd on 6 December 2021.

Adamantem acknowledges the Traditional Owners of country throughout Australia and recognises their continuing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging. Adamantem also accepts the invitation in the Uluru Statement from the Heart to walk together with Aboriginal and Torres Strait Islander peoples in a movement of the Australian people for a better future.

# **Executive Summary**

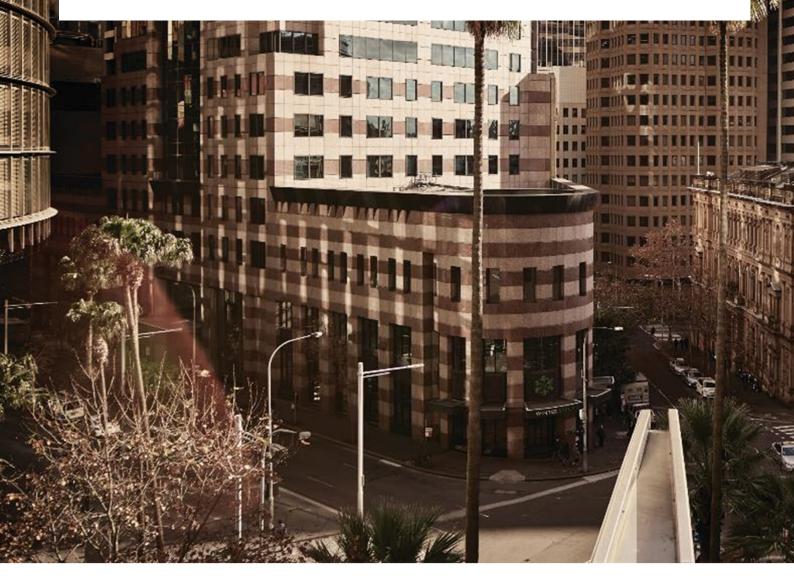
Adamantem believes that organisations have a responsibility to consider their role in ensuring the respect of human rights and the avoidance of human rights abuses.

Our Responsible Investing Policy clearly states that Adamantem will not invest in businesses that engage in modern slavery as defined by the Modern Slavery Act 2018 (Cth) ("**Act**"). However, we believe that our approach needs to go beyond this, to actively consider and address modern slavery risks in our own operations and supply chains.

Assessing and addressing the risks of modern slavery not only reduces the risks to people, but also improves the integrity and quality of our operations and global supply chains, limiting the financial impacts of operational disruption and creating long-term value.

We have therefore made an ongoing commitment to voluntarily report under the Act, and this modern slavery statement ("**Statement**") follows the mandatory reporting criteria, setting out:

- An overview of the Adamantem business, including details of our structure, operations and supply chains, to provide context and background
- The actions we have taken during the Reporting Period to *assess* potential modern slavery risks in our operations and supply chains, with a focus on how they may cause, contribute to or be directly linked to modern slavery
- Building on the commitments made in last year's modern slavery statement, the actions we have taken during the Reporting Period to *address* these modern slavery risks, and how we intend to assess the effectiveness of these actions going forward



# 1. THE ADAMANTEM BUSINESS

## **1.1. About Adamantem**

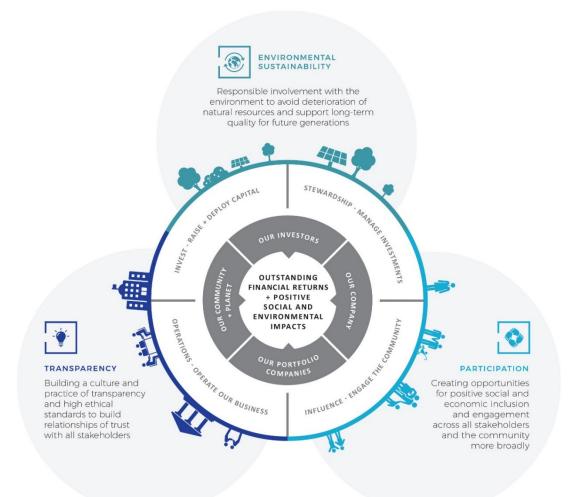
Adamantem Capital Management Pty Limited (ABN 31 616 283 124) ("Adamantem") is a private equity investment manager, established in 2016, specialising in the Australian and New Zealand mid-market. We invest with conviction behind clear, well-articulated and well-researched value creation opportunities.

Our ambition is to consistently produce outstanding financial returns for investors alongside positive environmental and social impacts for all our stakeholders – our investors, our portfolio companies (and their stakeholders), our company (including our employees, suppliers, regulators and policy makers) and the broader community.

In order to do this, we have developed an outcomes-based responsible investment framework that embeds responsible investing practices across our four key business activity areas:

- Invest raise and deploy capital
- Stewardship manage investments
- Operations operate our business
- Influence engage the community

Our responsible investing practices are designed to take into account our pillars of Environmental Sustainability, Participation and Transparency.



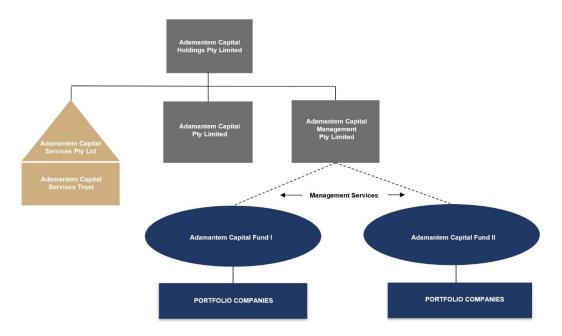
# **1.2. Adamantem's Structure**

#### 1.2.1.Corporate Structure

This statement is made by Adamantem<sup>1</sup>, a private company with its registered office at Level 27, Chifley Tower, 2 Chifley Square, Sydney, NSW 2000.

Adamantem is part of the broader Adamantem Capital group of companies ("the Adamantem Capital Group").

The corporate structure of the main operating entities in the Adamantem Capital Group is set out below. All entities shown in the corporate structure are companies, other than Adamantem Capital Funds I and II, which comprise various vehicles, including limited partnerships.



Adamantem is a corporate authorised representative of Adamantem Capital Pty Limited ("Adamantem Capital") the holder of Australian Financial Services Licence No. 492717. Adamantem Capital Services Pty Ltd is the main operating and procurement entity for the Adamantem Capital Group.

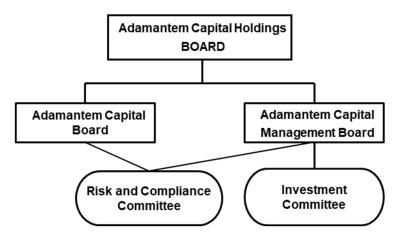
#### 1.2.2. Governance structure

The Adamantem Board Charter sets out the Board's duties and responsibilities with respect to risk management which includes both financial and non-financial risks and, specifically, Adamantem's three pillars of responsible investing. The Adamantem Board is responsible for reviewing and approving Adamantem's modern slavery statements.

The Adamantem Risk and Compliance Committee is delegated responsibility for the overall management of modern slavery risks in our business and is directly accountable to the Adamantem Board and the Adamantem Capital Board.

<sup>1</sup> It includes the operations of Adamantem which are conducted through the Adamantem Capital Services Pty Ltd (ABN 29 616 283 115) as trustee for the Adamantem Capital Services Trust ("Adamantem Services").

The following table sets out a representation of Adamantem's governance structure as it is relevant for assessing and managing modern slavery risks:



The Adamantem risk management framework is aligned to the principles of Australian Standard ISO 31000:2018, and identifies modern slavery and unethical supply practices as supply chain risks. These risks have an inherent rating as low (modern slavery risks) and moderate (unethical supply practices risk) and are reviewed and reported on annually by Adamantem's Director, Responsible Investing. This report covers the status and effectiveness of the risk controls adopted and any recommendations for improvement and is provided to the Risk and Compliance Committee for review.

Although our investments are not included in the scope of this modern slavery statement (see Section 1.3.2), we note that the Adamantem Investment Committee is delegated the responsibility for the application of responsible investing principles throughout our investment process and portfolio companies and is directly accountable to the Adamantem Board. The Investment Committee Charter specifies that the role of the Investment Committee is to "design, implement and monitor initiatives consistent with the responsible investment approach".

# **1.3. Adamantem's operations**

#### 1.3.1.General operations

During the Reporting Period Adamantem managed two private equity investment funds ("Adamantem Funds") which were established to make control investments in companies with an enterprise value of between A\$100 million and A\$300 million operating in Australia and New Zealand. Together, the Adamantem Funds have committed capital of over A\$1.5 billion from a variety of domestic and international investors.

Adamantem has a team of approximately 30 permanent staff, including investment and operations professionals. Adamantem is headquartered in Sydney, Australia, with all members of staff working from the Sydney CBD office or from their home in the Sydney region.

#### 1.3.2.Adamantem Portfolio Companies

As at the end of the Reporting Period, the Adamantem Funds held investments in seven portfolio companies across a range of different industries ("**Portfolio Companies**"):

Adamantem Capital Fund I <sup>2</sup>		
HERITAGE LIFECARE* Menter af Heritage Lifecare Disas	New Zealand aged care and retirement operator	
	Australian community-based healthcare business specialising in the provision of allied health and home care services to the aged and disability sectors	
Hellers NZ's Butcher	Leading producer of processed meats in New Zealand	

<sup>2</sup> Servian, a specialised Australian-based data and analytics consultancy was divested by Adamantem Capital Fund I during the Reporting Period.

HYGAIN	An Australian manufacturer of specialised, premium horse feed and supplements for the horse racing, breeding and equestrian markets	
	An Australian firm that engineers and distributes electrical components for commercial and industrial buildings, power distribution networks, infrastructure and mining operations	
Adamantem Capital Fund II		
climate friendly	An Australian carbon farming project services provider, supporting rural, regional and remote Australians to reduce Australia's greenhouse gas emissions and regenerate the landscape through carbon farming	
LINEN SERVICES AUSTRALIA	A market leader in outsourced laundry services in Australia and New Zealand, serving customers across healthcare, aged care, manufacturing, mining, construction, transport, hospitality and food industries.	

As an investment manager, Adamantem's operations are separate and distinct from those of the companies in which it invests. As a result of the nature of these activities and the structure of the Adamantem Funds, Adamantem does not control the investee Portfolio Companies. This statement excludes the operations and supply chains of individual Portfolio Companies<sup>3</sup>.

# **1.4. Adamantem's Supply Chains**

Since last year's modern slavery statement, there has been no substantial change to the products and services directly procured by Adamantem. These continue to 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.

Across all these supply categories Adamantem has in excess of 100 suppliers. Building on the initial analysis we did last year on our supply chains, during this Reporting Period we have developed a more detailed understanding of our supply chain through the following activities:

- In 2020, we analysed our suppliers by spend, and selected 16 suppliers above a specified threshold for the purpose of engaging with them on modern slavery. 15 of these suppliers were providing us with "Services" of the nature listed above, and the majority were Australian or New Zealand based (or Australian or New Zealand based practices of larger international organisations). We tend to have long standing relationships and working histories with suppliers of this nature.
- In 2021, we conducted a "match & track" process through givvable, an online platform that collates millions
  of 3rd party verified environmental, ethical, social, diversity, community & governance supplier credentials
  which are mapped to sustainability targets and frameworks. 67 suppliers<sup>4</sup> were provided for analysis, split
  between 14 higher risk direct suppliers, 33 lower risk direct suppliers and 20 higher risk indirect suppliers,
  with these categorisations based on a combination of spend and likely modern slavery risk exposure based
  on last Reporting Period's analysis.

The results of this supplier engagement work are set out in Section 2.2.

<sup>&</sup>lt;sup>3</sup> As part of our approach to responsible investing, modern slavery risk is assessed in pre-investment due diligence where it is considered to be a material risk and Adamantem supports portfolio companies during our ownership period to conduct their own assessment of modern slavery risks in their operations and supply chains, and to report under the Act where required to do so.

<sup>&</sup>lt;sup>4</sup> Supplier search was done in combination with our affiliate organisation Melior Investment Management.

#### Impact of COVID-19 on Adamantem's operations and supply chains

The ongoing COVID-19 pandemic continued to impact Adamantem during the Reporting Period.

Adamantem staff continued to work from home for a large part of the Reporting Period, and we have continued to take steps to ensure the health and safety of our staff.

As we became accustomed to working from home, fewer of our planned initiatives were delayed or interrupted by the pandemic. We continued to be able to engage with our suppliers on the topic of modern slavery (see Section 2.2) and a number of our portfolio companies completed their own modern slavery assessments, including training sessions for their senior management teams and Board members.

## 2. MODERN SLAVERY RISKS IN ADAMANTEM'S OPERATIONS AND SUPPLY CHAINS

#### 2.1. How we assess our modern slavery risk exposure

We are aware that Adamantem has the potential to inadvertently *cause, contribute to, or be directly linked to* modern slavery<sup>5</sup>.

During the last Reporting Period we engaged an external consultant to assess our modern slavery risk exposure through analysing:

- Risk factors within our own workforce
- Geographical risks based on the location of our operations and material suppliers
- Product, service, sector and industry risks based on the sector(s) in which we operate and the nature of the products and services supplied by our material suppliers
- The level of modern slavery risk management being practised by our material suppliers

We continue to use the findings from this analysis as the starting point for assessing our modern slavery risk exposure.

As Adamantem's modern slavery risk exposure is higher through our supply chains than through our own operations<sup>6</sup>, during this Reporting Period we undertook focused activities to more accurately assess our supply chain risks, as follows:

- **Supplier questionnaires**: Requesting our material suppliers to complete a detailed modern slavery questionnaire to enable us to assess the level of modern slavery risk exposure in our most material supply chains more accurately. The questionnaire covered topics of mandatory reporting, operations, policies and responsibilities, due diligence processes, training and improvement, and supplier and subcontractor management. We sent this questionnaire to 16 suppliers and had a 100% completion rate.
- **Policy support**: Developing a Responsible Procurement Policy, Supplier Code of Conduct and Supplier Onboarding Checklist, each of which specifically address modern slavery risk. The Responsible Procurement Policy facilitates a deliberate consideration of human rights and responsible sourcing (including modern slavery risks) when making purchasing decisions. The Supplier Onboarding Checklist assesses suppliers' capabilities with respect to environmental sustainability, participation and transparency and requests information regarding mandatory modern slavery reporting requirements and any modern slavery or ethical policies in place in order to gain greater visibility of potential risk, including that beyond Tier 1 suppliers. The Supplier Code of Conduct creates an obligation on suppliers to support Adamantem's commitment to protect human rights.
- **External supplier due diligence**: Conducting the "match & track" process through givvable allowed us to assess the ethical sourcing and modern slavery-related credentials held by our suppliers to identify direct and indirect supply chain risks, and frame future spending.

<sup>&</sup>lt;sup>5</sup> Key terms applied by the United Nations Guiding Principles on Business and Human Rights.

<sup>&</sup>lt;sup>6</sup> Excluding our exposure through our investments, which is outside the scope of this modern slavery statement.

• **Risk management framework**: Modern slavery risk is managed through our Risk Management Framework. This risk modern slavery in our supply chain is considered "Low" on an inherent basis and "Low" following the application of our controls. Risk owners of "Low" inherent risks are required to assess the effectiveness of the control framework and provide a report in this regard on at least an annual basis to the Adamantem Risk and Compliance Committee. The most recent risk review occurred in June 2021.

# 2.2. Findings

Our findings from the last Reporting Period in relation to modern slavery risks in our operations and supply chains remain broadly applicable. However, we have refined our analysis in two meaningful ways during this Reporting Period:

- We have specifically considered whether our particular operations or supply chain elements could be considered to have *caused, contributed to or be linked to* modern slavery risks<sup>7</sup>. This allows us to assess how to respond. We did this by reviewing the level of likely modern slavery risk exposure in our supply chain elements based on last year's Reporting Period, and then considering whether our activities in procuring the product or service could, of themselves, increase the risk of modern slavery.
- We have determined that Adamantem's modern slavery risk exposure is primarily at the "linked" level of responsibility and therefore our actions are focused on monitoring and reviewing modern slavery risks and implementing control measures to mitigate it.
- We have overlaid the findings from our supplier questionnaires and the "match & track" assessment (outlined in section 2.1) in order to provide a deeper level of understanding of the modern slavery risks in our supply chains and methods for improvement.

	Operation/Supply Chain Element	Description of potential modern slavery risks
1	Procurement of services that rely on base skilled labour, which are considered at higher risk of modern slavery practices	<ul> <li>Adamantem has identified that there is a risk that we may be directly linked to modern slavery through our use of the following services:</li> <li>Premises cleaning</li> <li>Premises security</li> <li>Catering</li> </ul>
2	Procurement of products which are exposed to higher risks of modern slavery in their production processes	<ul> <li>Adamantem has identified that there is a risk that we may be directly linked to modern slavery through our procurement of the following products:</li> <li>IT &amp; computer equipment, which often contain high risk commodities that are connected with child labour and forced labour</li> <li>Groceries and consumables, which are exposed to sector, commodity and geographic risk</li> </ul>
3	Investment in portfolio companies which operate in sectors with higher risks of modern slavery	<ul> <li>Adamantem has identified that there is a risk that we may be indirectly linked to modern slavery through our investments in portfolio companies which operate in the following high risk sectors:</li> <li>Manufacturing</li> <li>IT services &amp; software</li> <li>Healthcare services</li> <li>Agriculture/Agricultural products</li> <li>These portfolio companies may also have supply chains located in areas of high geographic risk.</li> </ul>
4	The supply chain analysis conducted during the Reporting Period did not flag any high risks of modern slavery or any incidents of modern slavery	The results of the supplier questionnaire indicated a "lower" inherent modern slavery risk rating, as none of the 16 participating suppliers have operations that produce or manufacture high risk commodities, and only 4 of these suppliers have operations in countries with modern slavery risk factors. Of those 4 suppliers, 3 are subject to mandatory modern slavery reporting, and all have functions for oversight and training with respect to modern slavery. Although no incidents of modern slavery have been identified by any material supplier during the Reporting Period, Adamantem is committed to working with suppliers to improve their impact and management of modern slavery in their business. The "match & track" analysis returned matches for 43 of the 67 suppliers provided by Adamantem. 26 suppliers hold one or more ethical sourcing or modern-slavery related credentials which provides additional comfort in our procurement decisions and guidance for future considerations. 12 of these suppliers (notably, 4 high risk direct suppliers) issued Modern Slavery Statements for 2020.

<sup>&</sup>lt;sup>7</sup> As per the United Nations Guiding Principles on Business and Human Rights ("UNGP").

	<b>Operation/Supply Chain Element</b>	Description of potential modern slavery risks
5	Our overall exposure to modern slavery risk is considered to be Low	The risk that Modern Slavery exists in Adamantem or any of its suppliers is rated as low in the Adamantem Risk Management Framework. Our Risk Framework notes that the causes of this potential risk include supplier conduct, Adamantem processes not identifying risk areas, not requiring suppliers to disclose these issues and/or lack of awareness of the issues. This may result in severe human risks to those involved and reputational risks to Adamantem. We aim to mitigate this risk via controls, including deliberate consideration of human rights and responsible sourcing (including modern slavery risks) when making purchasing decisions.

These findings informed the development of our multi-year modern slavery action plan described in Section 3 below.

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

During the Reporting Period we fulfilled the commitment we made in last year's Modern Slavery Statement to develop a multi-year modern slavery action plan ("**Action Plan**") to:

- Target more closely the elements of our operations and supply chains which we identified have a higher risk of being directly linked to potential modern slavery risks
- Focus on strengthening our supply chain management processes and policies.

The Action Plan contains a number of items across all our four key business activity areas (see Section 1.1), and the following table sets out the action items that were completed during the Reporting Period.

Business activity area	What we did	Why we did it
<b>Invest</b> – raise and deploy capital	Amended our Responsible Investing Policy to state that Adamantem will not invest in businesses that engage in modern slavery as defined by the <i>Modern Slavery Act 2018 (Cth)</i>	To elevate the consideration of modern slavery risks in potential investments to the earliest stages of our Investment Committee process
	Updated the Adamantem Investment Committee Charter to specifically refer to progress against responsible investing initiatives as the responsibility of the Investment Committee, in relation to Adamantem's investment funds	To ensure that the committee charged with responsibility for investment decisions for Adamantem's funds was formally committed to implementing all responsible investing initiatives
	Continued to incorporate modern slavery due diligence in our pre-acquisition investment due diligence	To identify any high risks of modern slavery in the operations and supply chains of potential investee businesses
Stewardship – manage investments	Supported two portfolio companies required to report under the Modern Slavery Act to carry out a detailed, expert-led assessment of modern slavery risks in their operations and supply chains using a framework co-designed by Adamantem, incorporating principles from the UNGP, develop modern slavery action plans and submit their first Modern Slavery Statement	To manage the risk of modern slavery exposure in our investment portfolio and to increase understanding of modern slavery risks and a best practice response
	Supported a further two portfolio companies – NOT required to report under the Modern Slavery Act - to carry out an assessment of modern slavery risks in their operations and supply chains and develop modern slavery action plans	
	Required portfolio company management teams to update their Boards on progress against their modern slavery action plans on a regular basis	
	Continued to develop and effectively share a knowledge bank of resources from our own internal modern slavery work and our engagement across the portfolio	

Business activity area	What we did	Why we did it	
<b>Operations</b> – operate our	Adamantem operations		
business	Updated the Adamantem Board Charter to specifically note that the Board is responsible for overseeing the Company's approach to responsible investment, including the implementation of responsible investing initiatives within the Company (as the appointed investment manager of the Fund) and the Funds' investments and the impact of our responsible investing initiatives on our stakeholders	To highlight that the Board is charged with responsibility for managing responsible investing initiatives	
	Incorporated modern slavery as a specific risk in our risk management framework, with a risk owner and control measures which are reviewed at least annually	To acknowledge that modern slavery is a potential rist to our business with potential adverse consequences for both the people involved and to Adamantem as an organisation	
	Held an all staff training session on modern slavery risks in September 2020 facilitated by an external expert	To increase staff awareness and skills in integrating modern slavery risk assessment in investment decision making and portfolio company management	
	Developed a Responsible Procurement Policy specifically addressing modern slavery. We have committed to undertaking staff training, making the policy publicly available and reviewing the policy annually	To ensure that staff members making purchasing decisions on behalf of Adamantem understand and adhere to our commitment to addressing modern slavery and consider potential modern slavery risk when making office purchases – in particular for highrisk products.	
		The policy also serves to set expectations for all direc suppliers in relation to human rights and responsible sourcing	
	<ul> <li>Made the following changes to our employee policies:</li> <li>Updated our Acceptable Workplace Behaviour Policy to include a statement regarding non-retaliation for individuals who make a complaint in good faith</li> <li>Updated our Company Procedures Manual to cover freedom of association and collective bargaining, child labour, forced labour and non-discrimination</li> <li>Employees are required to attest that they have read, understood and complied with current</li> </ul>	To better comply with the United Nations ILO Eight Fundamental Conventions and reduce the risk of modern slavery in our own operations	
	policies on a quarterly basis Supply chain		
	Engaged with 16 material suppliers to complete a modern slavery questionnaire. This included providing a briefing paper to our suppliers to explain modern slavery risks as part of our broader supplier engagement and education approach	To develop a deeper understanding of the modern slavery risks in our supply chain (see Section 2.2 for findings) and advocate for broader change through supplier education	
	Analysed the sustainability credentials, including ethical sourcing and modern slavery credentials, of 67 suppliers through the givvable "match & track" process	To better understand our suppliers and their actions with respect to modern slavery, and identify new considerations for future spending decisions to enhance our approach to preventing modern slavery	
	Developed a Supplier Code of Conduct that contains the minimum standards expected of any supplier doing business with Adamantem, including modern slavery and human rights expectations	To control the potential risk of modern slavery and facilitate education and engagement of our suppliers using our purchasing power	
	Developed Supplier Onboarding Checklist that assesses a supplier's capabilities with respect to environmental sustainability, participation, and transparency, including specific modern slavery requirements	To better identify and manage modern slavery risk exposure in our supply chain, where possible gaining greater visibility of potential risk beyond Tier 1 suppliers	
	Met with the Charter Hall, our landlord, to develop a deeper understanding of the cleaning and security labour arrangements in our office building	To better understand this supplier and its actions with respect to modern slavery risk in these work areas	

Influence – engage the community	Shared last year's Modern Slavery Statement with our staff, investors, portfolio companies and publicly	To increase awareness of the issue of modern slavery across the broader investment community, contribute our experience and encourage others to consider it in their investment and business decision making processes
	Released our inaugural Annual Responsible Investing Report, which includes commentary on modern slavery and our commitments to action	
	Continued to be on the Human Rights Working Group of the Responsible Investment Association Australasia	
	Participated in the Women in Sustainable Finance's Webinar: Shining a Light on Modern Slavery	
	Reported annually in line with obligations as a signatory to the United Nations Principles for Responsible Investing.	
	We received A+ for the Strategy and Governance topic, and A for the Private Equity topic for the most recent Reporting Period	

# 4. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

During the Reporting Period our focus was on developing our multi-year modern slavery action plan, and we primarily assessed the effectiveness of our actions through progress reporting against the milestones in our action plan.

Adamantem has a "minimal" risk appetite with respect to supply chain risks and our proactive approach to modern slavery actions to date is reflective of this. Notwithstanding, no cases of modern slavery have been identified in the Adamantem supply chain, and to date Adamantem has not been required to apply or test its approach.

Moving forward, one of our key areas of focus for the next 12 months will be to mature our approach to tracking and assessing the effectiveness of our modern slavery action plan items. We will be considering doing this through our compliance framework and through the setting of Key Risk Indicator metrics which are formally monitored on a quarterly basis. This will assist us to be able to systematically assess the effectiveness of our controls.

During the next reporting period we also intend to conduct an updated modern slavery readiness assessment to measure our progress against our 2020 baseline, which is one way we will assess the effectiveness of the actions we have taken to improve our internal procedures and processes.

# 5. OUR PROCESS OF CONSULTATION

Adamantem is the main operating subsidiary of the Adamantem Capital Group. All entities within the Adamantem Capital Group are owned and controlled by the same shareholders and have appointed the same directors who have prepared, reviewed and adopted this Modern Slavery Statement. Adamantem's internal consultation process involved engaging those shareholders and directors with other members of the Adamantem Capital Group leadership team to discuss the matters the subject of this Statement. As a result, there is a common awareness throughout the Adamantem Capital Group of modern slavery risks in the business and the actions that need to be taken.

# 6. OTHER RELEVANT INFORMATION

During the Reporting Period Adamantem became a Participant in the United Nations Global Compact corporate responsibility initiative, committing to its principles in the areas of human rights, labour, the environment and anticorruption. The principles which relate specifically to modern slavery include:

- Businesses should support and respect the protection of internationally proclaimed human rights
- Business should make sure that they are not complicit in human rights abuses
- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
- Businesses should uphold the elimination of all forms of forced and compulsory labour
- Businesses should uphold the effective abolition of child labour
- Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Adamantem continues to be a signatory to the United Nations Principles for Responsible Investing and a member of the Responsible Investing Association Australasia (with representation on their Human Rights Working Group).

# Company & Contact Information



# Company

Level 27, Chifley Tower 2 Chifley Square Sydney NSW 2000, Australia

Telephone: 02 9004 6060 Email: <u>info@adamantem.com.au</u> Website: <u>www.adamantem.com.au</u>

