

ADAMANTEM GROUP

MODERN SLAVERY STATEMENT 2023

DECEMBER 2023

This Statement is for the period 1 July 2022 to 30 June 2023

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

We are proud to present our fourth voluntary annual Modern Slavery Statement, reflecting the ongoing dedication of the Adamantem Group to identifying and managing the risk of modern slavery in our operations and supply chains. This Statement includes the business and operations of our two key operating businesses: our private equity business Adamantem Capital,¹ and our public equities business Melior,² and represents the commitment and achievements of the entire Adamantem Group business with respect to modern slavery.³

Adopting a responsible investing and impact investing approach, the Adamantem Group believes in the importance of actively managing environmental, social and governance risks and opportunities to create value, and recognises that our success is intertwined with a commitment to ethical business practices and human rights. Issues associated with human rights and modern slavery continue to be considered more fully by investors and businesses alike, and we expect this to continue to grow in importance, particularly as the results of the recent review of the *Modern Slavery Act 2018* (Cth) are implemented in Australia.

Recent global slavery estimates of 50 million people living in modern slavery,⁴ an increase in 10 million people since 2016, underscore the need for continued efforts to prevent, identify and address modern slavery in all its forms, including by investors and businesses.

Over the past year, we have sought to further embed the assessment and management of potential risks of modern slavery across our operations and supply chains. Our intention is to move beyond compliance requirements, to proactively shape a business environment where human rights are not just respected, but actively championed.

As we reflect on the accomplishments detailed in this Statement, we hope to contribute to broader dialogue and collective action to address modern slavery.

Thank you for joining us on our journey.



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 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 12th December 2023 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

⁴ *Global Slavery Index 2023*, <https://www.walkfree.org/global-slavery-index/>

Contents

	PAGE
Foreword	1
1. Executive Summary	3-4
2. The Adamantem Group Business	5-8
2.1 About Adamantem Capital	6-7
2.2 About Melior	8
2.3 Exclusion of investments from this Statement	8
3. Structure	9-12
3.1 Operations	9
3.2 Corporate Structure	9
3.3 Governance	10
4. Adamantem Group supply chains	13
5. Modern slavery risks in Adamantem Group operations and supply chains	14-16
5.1 How we assess modern slavery risk exposure	14
5.2 Findings	15-16
6. Actions taken by Adamantem during the Reporting Period to address modern slavery risks	17-18
7. Assessing the effectiveness of our actions	19-20
8. Process of consultation	21
9. Other relevant information	22
10. References	23-24
10.1 Mandatory criteria	23
10.2 Glossary	23-24

1. Executive Summary

The Adamantem Group recognises that every business has the potential to cause, contribute to or be linked to adverse human rights impacts, including modern slavery. We continue to include modern slavery risks within our responsible investing approach, integrating efforts across our investing, stewardship, business operations and external influence activities.

Building upon the foundations laid by initiatives developed in previous years, our focus this Reporting Period has been on continuing to embed these initiatives into the core of Adamantem Group operations.



Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.⁵

⁵ United Nations Human Rights, Office of the High Commissioner Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework

Key achievements this year include:

Human Rights Statement

The Adamantem Group adopted a Human Rights Statement that articulates our dedication to upholding the highest standards of human rights throughout our value chain and creating a culture of respect and responsibility. By codifying our commitment, we aim to build a shared understanding of our values, ensuring that every decision and action aligns with the protection of human rights.

Supplier Risk Matrix

The Adamantem Group developed a Supplier Risk Matrix as a tool to assist with assessing and engaging on potential modern slavery risks within our supply chain, and applied it to a subset of suppliers to test its efficacy. Once further developed, we anticipate this will enhance our ability to work with our suppliers to ensure they adhere to the high standards of ethical conduct that we expect.

IAST- APAC

Melior joined Investors Against Slavery and Trafficking – Asia Pacific to collaborate with other investors to contribute to a comprehensive and impactful effort to find, fix and prevent modern slavery. Sharing insights and best practice allows us to continuously reflect upon and improve our strategies and solutions.

As we navigate the complex landscape of modern slavery, we recognise the importance of continuous improvement and adaptability, and we will look to re-asses our risks and further sophisticate our initiatives in future reporting periods.

Defined terms in this Statement have the meanings set out in section 10.2 (Glossary).

2. The Adamantem Group business

The Adamantem Group manages assets in Australia and New Zealand across both private equity and public market strategies, through Adamantem Capital and Melior, respectively. Our ambition is to deliver outstanding financial returns for investors, including through generating environmental and social outcomes.

The responsible investing and impact investing practices of Adamantem Capital and Melior are designed to take into account the pillars of Environmental Sustainability, Social Inclusion and Governance and Transparency.



Environmental Sustainability	Social Inclusion	Governance and Transparency
Responsible involvement with the environment to avoid deterioration of natural resources and support long-term quality for future generations	Creating opportunities for positive social and economic inclusion and engagement across all stakeholders and the community more broadly	Building a culture and practice of transparency and high ethical standards to build relationships of trust with all stakeholders

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.

2.1 ABOUT ADAMANTEM CAPITAL

2.1.1 Overview

Adamantem Capital is a private equity investment manager, established in 2016, specialising in the Australian and New Zealand mid-market, with a strong focus on responsible and impact investing. It invests with conviction behind clear, well-articulated and well-researched value creation opportunities.

During the Reporting Period, Adamantem Capital managed three private equity investment funds which were established to make investments in companies with an enterprise value of up to A\$300 million operating in Australia and New Zealand, in accordance with its responsible investing and impact investing approaches.

2.1.2 Adamantem Capital investments

As at the end of the Reporting Period, the Adamantem Funds held investments in ten portfolio companies across a range of different industries:

ADAMANTEM CAPITAL FUND I	
	<p><i>New Zealand aged care and retirement operator.</i></p>
	<p><i>Australian community-based healthcare business specialising in the provision of allied health and home care services to the aged and disability sectors.</i></p> <p><i>Zenitas is a reporting entity under the Act.</i></p>
	<p><i>Leading producer of processed meats in New Zealand.</i></p> <p><i>Hellers is a reporting entity under the Act in relation to its Australian operations.</i></p>
	<p><i>An Australian manufacturer of specialised, premium horse feed and supplements for the horse racing, breeding and equestrian markets.</i></p> <p><i>Hygain is a reporting entity under the Act.</i></p>
	<p><i>An Australian firm that engineers and distributes electrical components for commercial and industrial buildings, power distribution networks, infrastructure and mining operations.</i></p> <p><i>Legend is a reporting entity under the Act.</i></p>

ADAMANTEM CAPITAL FUND II

	<p>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.</p>
	<p>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.</p> <p>Linen Services is a reporting entity under the Act.</p>
<p>NAK HAIR</p>	<p>An Australian producer of professional haircare products with mainly vegan formulations.</p>
	<p>A national provider of cardiology services, providing services and specialists to treat cardiovascular disease.</p> <p>Advara will be a reporting entity under the Act as of 2023.</p>
	<p>Australian food business in the fast refreshment and casual dining categories, with a range of retail brands including Betty's Burgers and Boost Juice.</p> <p>Retail Zoo is a reporting entity under the Act.</p>

An overview of the Adamantem Capital investment approach and performance during the Reporting Period can be found in the Adamantem Capital Annual Responsible Investing and Impact Investing Report [here](#).

2.2 ABOUT MELIOR

2.2.1 Overview

Melior is a specialist equities manager founded in Australia in 2018, and manager of the Melior Australian Impact Fund. Melior seeks to deliver long term competitive returns and positively contribute to the United Nations Sustainable Development Goals.

Melior's investment philosophy is that investments in companies that contribute to the SDGs and have strong financial and ESG credentials, have the potential to outperform the benchmark over time. Melior seeks to contribute to the SDGs 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.

2.2.2 Melior investments

During the Reporting Period, the Melior Fund invested in ~30 ASX listed companies across a range of industries. An overview of the Melior investment approach and performance during the Reporting Period can be found in the Melior Annual Impact Report Summary [here](#).

2.3 EXCLUSION OF INVESTMENTS FROM THIS STATEMENT

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 Portfolio Companies, and this Statement excludes consideration of the operations and supply chains of individual Portfolio Companies.



While this Statement excludes consideration of the operations and supply chains of individual Portfolio Companies, the Adamantem Group recognises that supporting Portfolio Companies to assess and manage their own modern slavery risks presents the biggest opportunity for the Adamantem Group to effect change. During 2024, Adamantem Capital intends to support further work across our private equity portfolio to enhance modern slavery approaches.

3. Structure

3.1 OPERATIONS

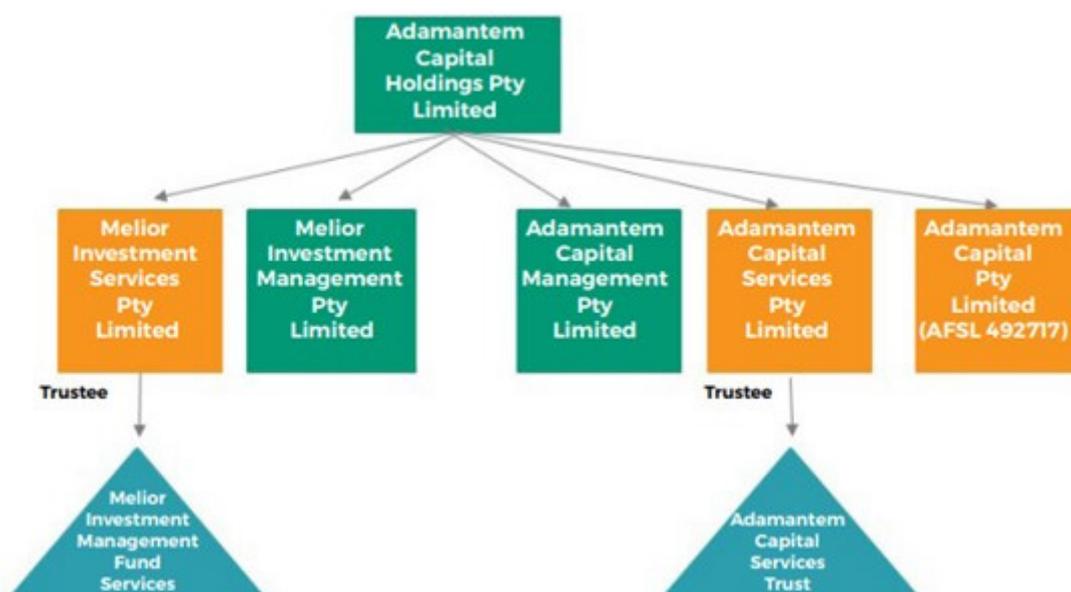
The Adamantem Group has its registered office and headquarters at Level 8, 167 Macquarie Street, Sydney, NSW, 2000.

As at the end of the Reporting Period, the Group had a team of approximately 45 permanent staff, including investment and operations professionals. All members of staff work from the Sydney CBD office or from their home in the Sydney region.

3.2 CORPORATE STRUCTURE

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

The corporate structure of the main operating entities in the Adamantem Group has not changed since the last reporting period and is set out below.

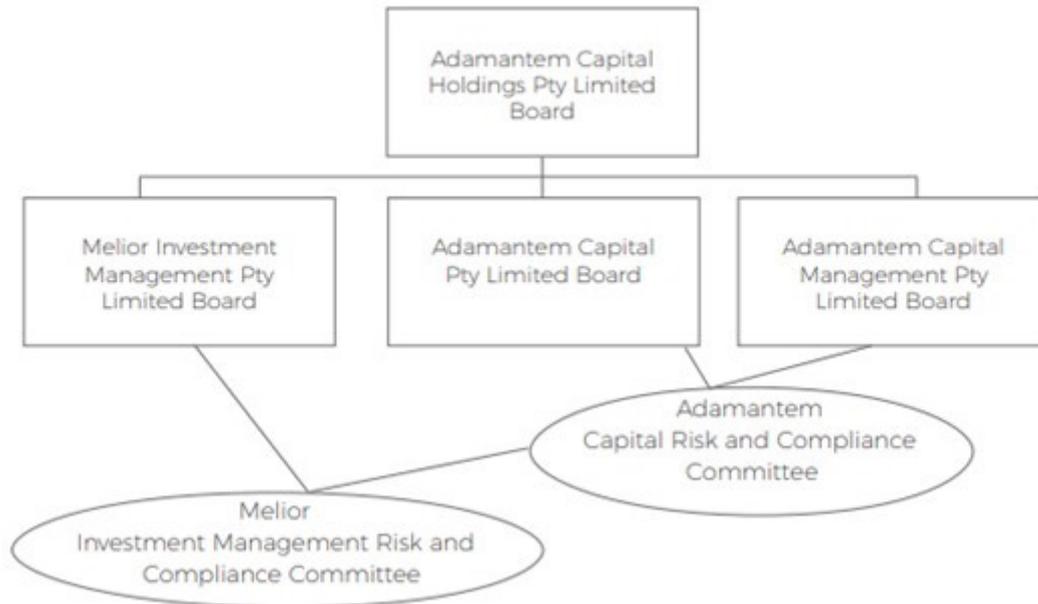


Adamantem Capital and Melior are corporate authorised representatives of Adamantem Capital Pty Limited (ABN 91 614 857 037, AFSL 492717), which is part of the Adamantem Group. Adamantem Capital and Adamantem Capital Services Pty Ltd (ACN 616 283 115), as the Trustee for Adamantem Capital Services Trust, are the main operating and procurement entities for the Adamantem Group. Melior Investment Services Pty Ltd (ACN 637 770 293), as Trustee for Melior Investment Management Fund Services Trust, is the main operating and procurement entity for the Melior business.

3.3 GOVERNANCE

The Adamantem Capital Risk and Compliance Committee and Melior Risk and Compliance Committee (RCCs) 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.

The following table illustrates the Adamantem Group’s governance structure as it is relevant for assessing and managing modern slavery risks:



3.3.1 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. The MS Action Plan is reviewed and updated annually.

3.3.2 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 and associated processes. During the Reporting Period, the Adamantem Group developed a Supplier Risk Matrix as an additional tool to assist with assessing and engaging on potential modern slavery risks within our supply chain – further details are set out in section 5.1 below.

3.3.3 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. The RI&I Policy clearly states that Adamantem Capital will not invest in businesses that engage in modern slavery, as defined by the Act. Modern slavery risk is diligenced by Adamantem Capital in pre-investment due diligence where it is considered to be a material risk. As part of our stewardship activities, Adamantem Fund Portfolio Companies are supported during their ownership period to assess modern slavery risks in their operations and supply chains, develop modern slavery action plans, and report under the Act where they are legally required to do so.

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 20 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 2.3, the operations and supply chains of individual Portfolio Companies are excluded from this Statement.

3.3.4 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 portfolio company stewardship is implemented by the investment and portfolio company operations teams, with oversight from the Managing Director, Responsibility and Impact.

3.3.5 Policies

The Adamantem Group manages the risk of modern slavery in our operations and supply chains as well as in our investments through a broad suite of policies which were outlined in our previous statement.

During the Reporting Period, the following policies were reviewed and updated as required to comply with legislation and best practice: 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; Melior Proxy Voting and Advocacy Policy.

In June 2023, we adopted a Human Rights Statement, setting out the Adamantem Group's commitment to upholding the human rights of all stakeholders in our operations, supply chain and investments. The Human Rights Statement formalises the Adamantem Group's stance on human rights to provide clear guidance for our operations and interactions within the broader business ecosystem, and specifically addresses the issues of labour standards and modern slavery. The Human Rights Statement is publicly available [here](#).



Adamantem aims to deliver outstanding financial returns for our investors alongside positive contributions to environmental and social outcomes:

- Environmental sustainability outcomes: reduced impact on the natural environment and contribution to climate solutions to avoid deterioration of natural resources
- Social inclusion outcomes: increased opportunities for positive social and economic inclusion for all stakeholder groups and the broader community
- Governance and transparency outcomes: enhanced relationships of trust with all stakeholders

We recognise that a commitment to human rights is essential to achieving these outcomes.

4. Adamantem Group supply chains

Since the last reporting period, there has been no material change to the products and services directly procured by the Adamantem Group.

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

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

5. Modern slavery risks in Adamantem Group operations and supply chains

5.1 HOW WE ASSESS MODERN SLAVERY RISK EXPOSURE

As our operations and supply chain have not materially changed in the past 3 years, we continue to leverage the findings of a modern slavery risk exposure assessment conducted by an external consultant in 2020, and a related readiness assessment conducted in 2022.

The Adamantem Group's modern slavery risk exposure remains higher through our supply chains than through our own operations,⁶ we therefore continue to focus our efforts on assessing and managing our supply chain risk as follows:

RESPONSIBLE PROCUREMENT POLICY

This provides the framework for an initial assessment of the ESG credentials of certain new suppliers (based on monetary thresholds), including in relation to modern slavery. The Policy stipulates that all such suppliers must agree to the Supplier Code and complete the Supplier Checklist

SUPPLIER CHECKLIST

This assesses suppliers' ESG capabilities, and specifically requires the provision of information regarding mandatory modern slavery reporting, to assist our risk assessment.

During the Reporting Period, the Supplier Checklist was updated to include two new modern slavery related questions, such that in future reporting periods it will include questions relating to:

- Mandatory modern slavery reporting
- Supply chain review for risks of modern slavery
- Operations in regions with increased risk of modern slavery
- Organisational standards / policies in relation to modern slavery or ethical practices for employees and contractors

SUPPLIER CODE

This communicates expectations for supplier behaviour and contains obligations with respect to modern slavery, including clauses addressing freedom of association, collective bargaining, child labour and forced labour

SUPPLIER RISK MATRIX

During the Reporting Period, we developed a Supplier Risk Matrix as a tool to assist with assessing and engaging on potential modern slavery risks within our supply chain. The matrix has been designed to help us identify suppliers with heightened vulnerability to modern slavery risks (based on inputs including responses to our Supplier Checklist), and sets out a protocol for engaging with suppliers based on their categorisation. During the Reporting Period, we applied it to a subset of our Tier 1 suppliers to test its efficacy (see section 5.2 below). During the course of 2024, we intend to refine the matrix and commence implementation.

⁶ Excluding our exposure through our investments, which is outside the scope of this Statement.

5.2 FINDINGS

As our operations and supply chain have not materially changed in the past 3 years, our findings from the last reporting period in relation to modern slavery risks in our operations and supply chains, as set out below, remain applicable, and have not been updated during the Reporting Period.

OPERATION / SUPPLY CHAIN ELEMENT	DESCRIPTION OF POTENTIAL MODERN SLAVERY RISKS
<p>Procurement of services that rely on base skilled labour, which are considered at higher risk of modern slavery practices</p>	<p>We have identified that there is a risk that the Adamantem Group may be directly linked to modern slavery through our use of the following services:</p> <ul style="list-style-type: none"> ▪ Premises cleaning ▪ Premises security ▪ Catering
<p>Procurement of products which are exposed to higher risks of modern slavery in their production processes</p>	<p>We have identified that there is a risk that the Adamantem Group may be directly linked to modern slavery through our procurement of the following products:</p> <ul style="list-style-type: none"> ▪ IT & computer equipment, which often contain high risk commodities that are connected with child labour and forced labour ▪ Groceries and consumables, which are exposed to sector, commodity and geographic risk
<p>Investment in Adamantem Fund Portfolio Companies which operate in sectors with higher risks of modern slavery</p>	<p>Adamantem Capital has identified that there is a risk that it may be indirectly linked to modern slavery through the Adamantem Funds' investments in Portfolio Companies which operate in the following high risk sectors:</p> <ul style="list-style-type: none"> ▪ Manufacturing ▪ IT services & software ▪ Healthcare services ▪ Agriculture/Agricultural products <p>These portfolio companies may also have supply chains which contain areas of high geographic risk</p>

OPERATION / SUPPLY CHAIN ELEMENT	DESCRIPTION OF POTENTIAL MODERN SLAVERY RISKS
<p>Our overall exposure to modern slavery risk is considered to be Low</p>	<p>The risk that modern slavery exists in the Adamantem Group or any of its suppliers is rated as 'low' in the Risk Management Framework. Our Risk Management Framework notes that the causes of this potential risk include supplier conduct, Group 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 the Adamantem Group. 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.</p>

As at the end of the Reporting Period:

- 34 suppliers have responded to the Supplier Checklist since November 2021
- Our initial assessment of these suppliers under the Supplier Risk Matrix identified only 1 supplier as “high risk”, based on the goods and services provided. We reviewed their responses to the Supplier Checklist and downgraded their classification to “low risk” due to the controls in place, including their Modern Slavery Policy and Modern Slavery reporting.

6. Actions taken by Adamantem during the Reporting Period to address modern slavery risks

During the previous two reporting periods, the Adamantem Group implemented a number of major initiatives to address modern slavery risk in our operations and supply chain. This Reporting Period, our focus has been on consolidating our actions, embedding these new processes throughout the business, and assessing the effectiveness of our actions in order to develop our FY24-26 MS Action Plan.

Key actions during the Reporting Period included:

WHAT WE DID	WHY WE DID IT
<p>Human Rights Statement – we adopted a Human Rights Statement, setting out our commitment to upholding the human rights of all stakeholders in our operations, our supply chain and our fund investments</p>	<p>To integrate human rights throughout the investment lifecycle and our operations, by embedding our commitment to human rights, labour standards and Indigenous rights across our business and seeking to influence their adoption in our supply chains and our fund investments.</p> <p>To increase our accountability by publishing the Human Rights Statement on our website</p>
<p>Supplier Risk Matrix and updated Supplier Checklist – we developed a Supplier Risk Matrix and updated the Supplier Checklist to include more detailed modern slavery questions (see section 5). These new tools will apply for the Reporting Period commencing on 1 July 2023</p>	<p>To enhance our due diligence processes and facilitate systematic analysis, identification and management of supplier risk, allowing us to ensure that purchasing decisions align with our modern slavery commitment and to target engagement with high risk suppliers</p>
<p>IAST-APAC – Melior joined IAST-APAC as part of collective efforts to address modern slavery</p>	<p>To collaborate with other investors to find, fix and prevent modern slavery, improve our own initiatives to meet best practice and develop a shared advocacy approach</p>

During the Reporting Period, the Adamantem Group also continued ongoing modern slavery initiatives that reflect our commitment to awareness, mitigation and control, including:

Responsible Investment – we considered modern slavery in pre-investment due diligence processes and stewardship activities for each of Adamantem Capital and Melior, in accordance with our respective Responsible Investing policies

Modern Slavery Clauses – we included standard terms and conditions relating to modern slavery in supplier contracts where appropriate

Whistleblower services – we provided whistleblower and ethics services and support for our business and the Adamantem Fund Portfolio Companies

Research and training materials – we reviewed academic commentary and best practice reporting examples and prepared an updated ‘Modern Slavery Reporting’ guidance note, which was also shared with Adamantem Fund Portfolio Companies required to report

Training – we conducted all staff training ‘Modern Slavery: obligations in Australia and the importance for businesses, and update of Adamantem/Melior’s progress’

UNGC CoP reporting – we completed UNGC CoP reporting with respect to the Reporting Period,⁷ which includes public disclosure of policies and actions regarding human rights and labour rights (see further details in section 9 below)

Engagement – Adamantem Capital conducted targeted engagement on the topic of modern slavery with 2 key investors. Melior had 21 engagements with listed companies on the topic of modern slavery. Melior also regularly engages with investors on the topic of modern slavery as part of its ESG performance discussions. Melior also shared additional insights and information with a key institutional client

Public Reporting – we shared our last Modern Slavery Statement with our staff, investors, Portfolio Companies and publicly on the Adamantem Capital and Melior websites, and included commentary on modern slavery and commitments in our investor reporting

Stewardship activities – Adamantem Capital collected and analysed data from all Adamantem Fund Portfolio Companies through its proprietary “ESG Metrics Reporting Framework”, including reporting relating to child labour, young workers and forced or compulsory labour. Melior continued to evaluate the quality and effectiveness of modern slavery statements as part of its Quarterly KPIs and ESG Framework

We have not identified any incidents of modern slavery in our business or supply chain and have not received any whistleblower reports. A key focus area for the following reporting period will be to actively explore and develop grievance and remediation processes that align with industry best practices.

⁷ The CoP was prepared as at June 2023, for the period 1 January 2022 to 31 December 2022. Due to UNGC technical issues, voluntary submission was delayed until December 2023.

7. Assessing the effectiveness of our actions

In our previous Statement, we outlined in detail the implementation of our Modern Slavery Effectiveness Framework, that sets out:

- (a) a cross-functional approach to assessing effectiveness, through applying standardised Effectiveness Metrics; and
- (b) the process for how the Group will report against this Effectiveness Framework.

The finalised results are used to inform amendments to the MS Action Plan and our annual Modern Slavery Statement.

The following Effectiveness Metrics have been collated for the Reporting Period.

	METRIC	FY22	FY23
INVESTMENT	# of investors specifically engaged with regarding modern slavery	Adamantem Capital - 2	Adamantem Capital - 2 Melior - 2
	% of ESG reviews conducted on potential Adamantem Fund transactions that included modern slavery as a focus area	Adamantem Capital - 100%	Adamantem Capital - 100%
STEWARDSHIP	% of Adamantem Fund Portfolio Companies (as at the end of the Reporting Period) that have completed a supply chain modern slavery risk assessment (not necessarily during the Reporting Period)	Adamantem Capital - 50%	Adamantem Capital - 60%
	% of Portfolio Companies issued Modern Slavery Statements (mandatory / voluntary)	Adamantem Capital - 37.5% Melior - 97%	Adamantem Capital - 60%⁸ Melior - 97%

⁸ This does not include Advara, which was captured as part of the GenesisCare Group in the previous reporting period and will be reporting as a stand alone entity for the first time in 2023.

	METRIC	FY22	FY23
OPERATIONS (Supply Chain) ⁹	% of material suppliers who have returned the Supplier Checklist who issue Modern Slavery Statements	50%	57.9%
	% of material suppliers who have returned the Supplier Checklist with policies specifically addressing modern slavery	65%	57.9%
	# of material suppliers who have returned the Supplier Checklist that we engaged with regarding modern slavery	1	0
OPERATIONS (Internal)	# of reports of modern slavery (and remediation undertaken if necessary)	0	0
	% of MS Action Plan action items implemented to deadline	93%	88.9%
	% of staff completing human rights and modern slavery training	N/A¹⁰	100%
INFLUENCE	# of instances of public engagement on modern slavery (includes conferences, interviews, webinars, working groups and thought pieces)	1 Thoughtpiece 2 Working Groups 3 Webinars Melior - 20 Corporate Stewardship Engagements	2 Working Groups 1 Webinar 1 Modern Slavery best practice meeting Melior - 21 Corporate Stewardship Engagements

These results will continue to inform our approach for future reporting periods and have highlighted opportunities for initiatives to be included in the FY24-26 MS Action Plan, with renewed focus on its timely implementation.

9 Note re material suppliers - Phase 1 of 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.

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

8. Process of consultation

This Statement was drafted with input from key stakeholders across the Adamantem Capital and Melior businesses. 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 two businesses.

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.

9. Other relevant information

The Adamantem Group seeks to engage and positively influence individuals, organisations and the broader investment community in relation to responsible investing principles and practices, including in relation to modern slavery. We do this through engaging with industry collaborations, and sharing our thinking and initiatives through publications and in public forums including:

- **UNGC CoP Reporting** – The Adamantem Group joined the UN Global Compact in 2021. We submitted our second Communication on Progress on 4 December 2023.¹¹ The CoP specifically addresses how modern slavery is managed throughout the business through Policies, Prevention, Concerns and grievance mechanisms, and Lessons learnt – our responses are publicly available [here](#).
- **UNPRI Reporting** – Each of Adamantem Capital and Melior remain a signatory of the Principles for Responsible Investment. Both Adamantem Capital and Melior reported in 2023.
- **RIAA working group engagement** – 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 joined Investors Against Slavery and Trafficking – Asia Pacific in 2023. IAST-APAC was launched in 2020 as an investor initiative to promote effective company action to find, fix and prevent modern slavery, labour exploitation and human trafficking across their value chain. More information can be found in the inaugural IAST-APAC Annual Report available at iastapac.org.

Statutory review of the Modern Slavery Act 2018 (Cth)

The Modern Slavery Act 2018 (Cth) requires a review of the Act and its operation to be conducted three years after it commenced. The 12-month review of the Act commenced on 31 March 2022, with the report of the outcomes of the review delivered on 25 May 2023.

Through our involvement in the RIAA Human Rights Working Group and Business Council of Australia, Adamantem Group actively considered the operation of the Act and areas for improvement, discussing its own internal views, and ultimately joined the RIAA Joint Submission to the Modern Slavery Act Review (publicly available [here](#)). Recognising the interconnected nature of supply chains and the collective responsibility of businesses to address human rights abuses, our endorsement of these submissions reflects a commitment to collaboration and shared advocacy for robust and comprehensive regulation of modern slavery.

¹¹ The CoP was prepared as at June 2023, for the period 1 January 2022 to 31 December 2022. Due to UNGC technical issues, voluntary submission was delayed until December 2023.

10. References

10.1 MANDATORY CRITERIA

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

MANDATORY CRITERIA	SECTION
Identify the reporting entity	2
Describe the reporting entity's structure, operations and supply chain	3 and 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	5
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	6
Describe how the reporting entity assesses the effectiveness of these actions	7
Describe the process of consultation that any entities that the reporting entity owns or controls	8
Provide any other relevant information	9

10.2 GLOSSARY

Act	<i>The Modern Slavery Act 2018 (Cth)</i>
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 Fund Portfolio Companies	The ten 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)
CoP	UNGC Communication on Progress

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
GRI Standards	Global Reporting Index global standards for sustainability impacts
KPI	Key performance indicator
IAST-APAC	Investors Against Slavery and Trafficking- Asia Pacific
ILO	International Labour Organisation
Melior	Melior Investment Management Pty Ltd (ABN 16 629 013 896)
Melior Fund	Melior Australian Impact Fund (ARSN 634 081 744)
Melior Fund 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 2023
RCC	The Adamantem Capital Risk and Compliance Committee and the Melior Risk and Compliance Committee
RI	Responsible Investing
RI Pillars	Adamantem Group Responsible Investing Pillars being Environmental Sustainability, Social Inclusion, and Governance and Transparency
RI&I Policy	Adamantem Capital Responsible Investing and Impact Policy
SDGs	The 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
Supplier Code	Adamantem Group Supplier Code of Conduct
Supplier Risk Matrix	Adamantem Group Supplier Risk Assessment Matrix
UNGC	United Nations Global Compact
UNGP	United Nations Guiding Principles on Business and Human Rights

CONTACT

Level 8
167 Macquaire Street
Sydney NSW 2000

PHONE: **+61 2 9004 6060**

EMAIL: **info@adamantem.com.au**

WEBSITE: **www.adamantem.com.au**