

# Adamantem Responsible Procurement Policy

## 1. Scope

This policy applies to Adamantem Capital Holdings Pty Limited (ACN 606 371 724) (**Adamantem**), its Australian subsidiaries and the operations of its investment management business. It applies to the purchase of goods and services with a contract value in excess of \$50,000 (for office related acquisitions) and \$1 million (for advisory related engagements).

## 2. Responsible Investing Pillars

Adamantem is committed to identifying and addressing environmental, social and governance issues in its operations with a key focus on:

- (a) Environmental Sustainability – Responsible involvement with the environment to avoid deterioration of natural resources and support long-term quality for future generations;
- (b) Participation - Creating opportunities for positive social and economic inclusion and engagement across all stakeholders and the community more broadly, including doing our part to combat modern slavery; and
- (c) Transparency - Building a culture and practice of transparency and high ethical standards to build relationships of trust with all stakeholders.

Adamantem applies its Responsible Investing Pillars to its own investment management operations and seeks to advocate for awareness of these within its own supply chains.

## 3. Objectives

This Responsible Procurement Policy (**Policy**) seeks to ensure that the purchase of goods and services within the scope of this Policy minimise negative and enhance positive impacts on the environment and society in line with our Responsible Investing pillars, while meeting our business requirements, by:

- (a) prioritising suppliers who demonstrate a commitment to addressing Environmental, Social and Corporate Governance (**ESG**) within their organisation and who seek to drive such practices within their own supply chain;
- (b) working in partnership with suppliers to achieve ESG goals and improve performance over time; and
- (c) raising awareness among suppliers and stakeholders (internal and external) by communicating the Policy with them and advocating for their policies to conceptually align with our Responsible Investing Pillars.

## 4. Responsible Procurement Principles

By adopting this Policy, Adamantem aims to pursue “responsible value” through procurement by considering relevant financial and non-financial costs and benefits in its procurement decisions, including, but not limited to:

- (a) Cost;
- (b) Quality;
- (c) Fitness for purpose;
- (d) Relevant experience and performance history; and
- (e) Alignment to our Responsible Investing Pillars in accordance with paragraph 4 below.

## **5. Consideration of responsibility and sustainability credentials of suppliers**

Wherever possible Adamantem will favour suppliers that align with our Responsible Investing Pillars.

Adamantem’s suppliers and business partners are expected to respect the human rights of their employees and those who are impacted by their business. They are expected to not tolerate any form of modern slavery in their workplaces, or those of their supply chain.

Where possible, Adamantem will request potential suppliers to complete a “Responsible Investing Supplier Checklist” as part of the procurement process. The Supplier’s responses to the Checklist will be assessed to determine a potential supplier’s current alignment with our Responsible Investing Pillars approach, including their approach to human rights and modern slavery. A supplier’s willingness to commit to addressing any gaps in their responses to the Checklist will also be considered in the procurement decision.

A supplier or business partner’s approach to and record on human rights will be a factor in Adamantem’s decision to do business with them or in the case of existing suppliers, to continue to do business.

In circumstance where it is not feasible to request a potential supplier of professional advisory services to complete a Responsible Investing Supplier Checklist prior to their engagement<sup>1</sup>, they will be requested to complete it as part of the engagement process and it will form part of future engagement considerations.

Adamantem will actively consider Indigenous business providers of goods and services as part of its procurement decisions.

## **6. Actions after a supplier has been engaged**

As part of the onboarding process of new suppliers, Adamantem will ensure suppliers are provided with a copy of our Supplier Code of Conduct

---

<sup>1</sup> For example, for urgent specialist advice required to support investment processes

Adamantem encourages suppliers to report any concerns and will work with suppliers to build their understanding of the Supplier Code of Conduct and implement the most suitable measures to comply with it.

If Adamantem becomes concerned that the products or services supplied to us are directly linked to human rights violations, this will be communicated to the relevant supplier. If violations have occurred, Adamantem will work with the relevant supplier or business partner to mitigate the impacts and to seek to prevent them recurring. If the supplier is unable or unwilling to cooperate with us to mitigate the impacts, Adamantem may choose to end the relationship with the supplier (subject to contractual obligations).

## **7. Implementation of Policy**

The Director of People, Culture and Office is responsible for the implementation of this Policy.

To ensure effective implementation of this Policy, Adamantem will:

- (a) Train all staff in relation to the implementation of this Policy;
- (b) Make this Policy publicly available;
- (c) Establish a system to monitor and report on the outcomes of this Policy; and
- (d) Review this Policy annually.