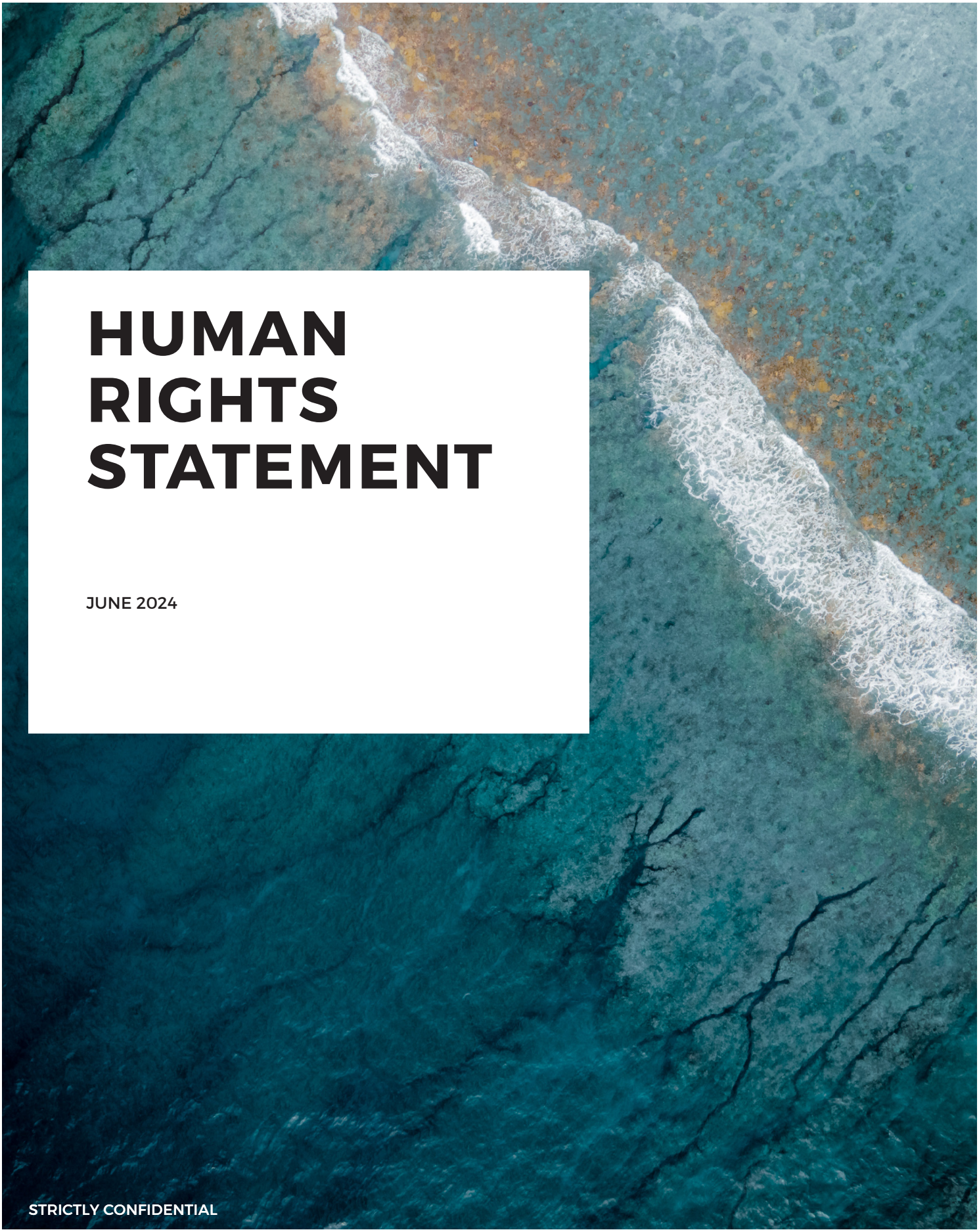
ADAMANTEM CAPITAL



HUMAN RIGHTS STATEMENT

JUNE 2024

STRICTLY CONFIDENTIAL

1. Scope

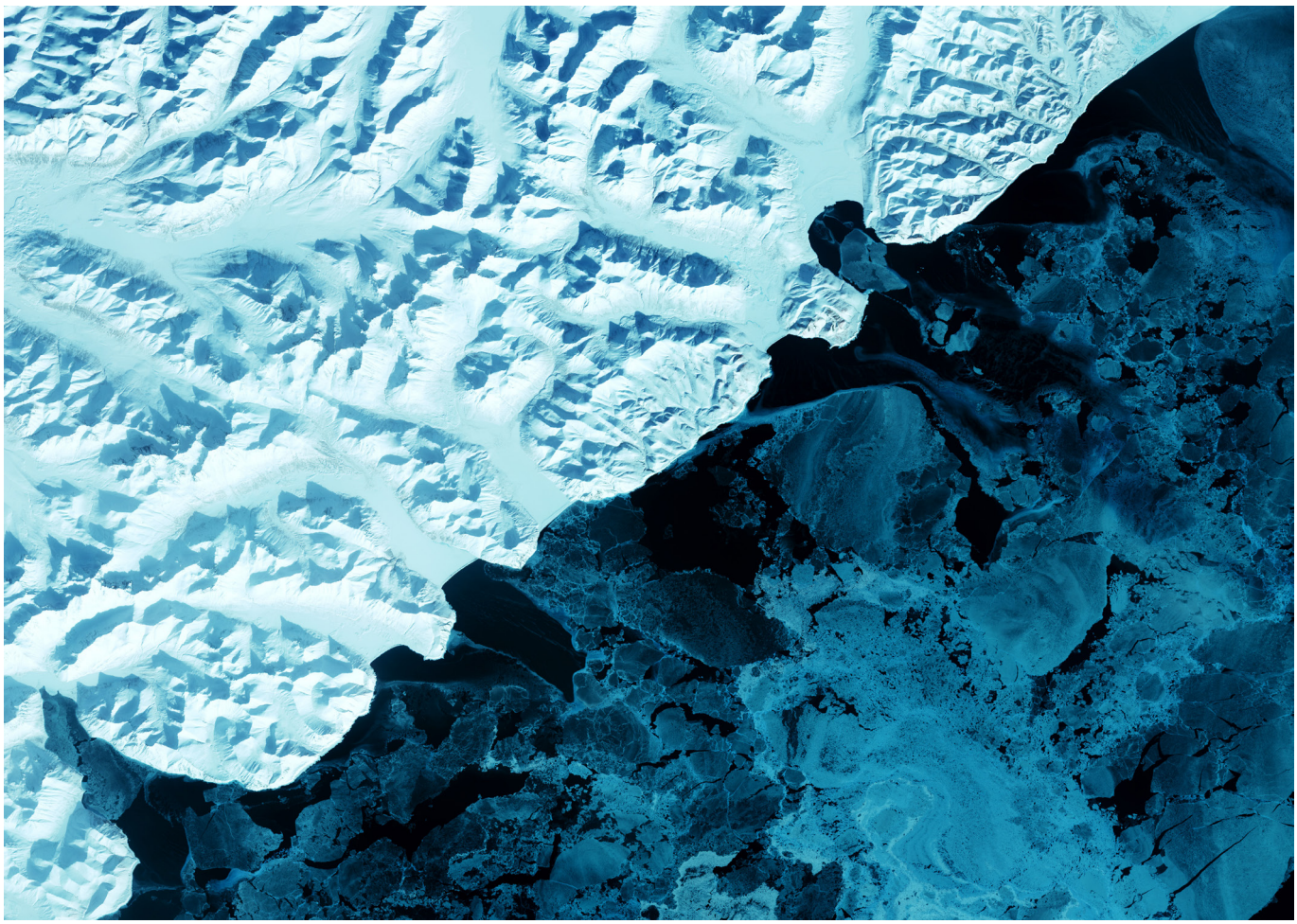
This Statement applies to Adamantem Capital Holdings Limited and its subsidiaries ("**Adamantem**").

2. Introduction

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.



3. Our commitment

Adamantem is committed to upholding the human rights of all stakeholders in our operations, our supply chain and our fund investments.

Our approach to identifying and managing human rights risks is influenced by international human rights standards, including the Universal Declaration of Human Rights, the International Labour Organisation's core conventions, the United Nations Guiding Principles on Business and Human Rights and the United Nations Declaration on the Rights of Indigenous Peoples.

Adamantem applies the following principles in our own operations and seeks to influence their adoption across our supply chain and within our fund investments as set out in Section 4:

A. Human rights – Adamantem commits to providing a fair and ethical workplace which upholds high standards of human rights and complies with all applicable human rights laws and regulations.

B. Labour Standards – Adamantem commits to upholding the human rights of workers and treating them with dignity and respect as understood by the international community. This applies to all workers, including temporary, migrant, student, contract, direct employees and any other type of worker. This includes:

    i. Not using, engaging in or permitting any form of slavery or servitude, including child, forced, compulsory, bonded (including debt bondage) or indentured labour, involuntary prison labour, child labour, or human trafficking;

    ii. Ensuring that compensation paid to workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits;

    iii. Providing a safe and healthy work environment free of harassment and unlawful discrimination;

    iv. Respecting the rights of workers to associate freely, bargain collectively, seek representation and join or not join in labour unions or similar organisations;

    v. Permitting workers to openly communicate and share grievances with management about working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

C. Indigenous Rights – Adamantem commits to respecting and protecting the rights of Indigenous peoples and places of Indigenous cultural significance.

4. Implementing our commitment

Adamantem is aware that every business has the potential to cause, contribute to or be linked to adverse human rights impacts:

"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."[1]

Addressing human rights risks is a fundamental part of our responsible investing approach and is integrated throughout the investment lifecycle and our operations:

- Investing – we assess human rights risks in operations and supply chains in due diligence on prospective fund investments, guided by the materiality of risk based on the location, industry and scale of the prospective investment and its supply chains
- Stewardship – we advocate for and support improved understanding, management and reporting of human rights risks in operations and supply chains in our fund investments during our hold period, guided by the materiality of risk based on the location, industry and scale of the investment and its supply chains
- Own operations – we manage and report on human rights risks in our own operations and supply chains, including through:
  - Our responsible procurement approach, through which we seek to ensure our suppliers commit to observing our Supplier Code of Conduct to ensure their businesses are aligned with our approach to human rights
  - Our commitment to reconciliation through our Reconciliation Action Plan
  - Our commitment to align our strategies with the United Nations Global Compact's 10 principles in human rights, labour, environment and anti-corruption
  - Ensuring our employee policies align with our human rights commitments
  - Annually voluntarily reporting on our approach to modern slavery risk management in our operations and supply chains under the *Modern Slavery Act 2018 (Cth)*, including monitoring the effectiveness of our approach
  - Providing human rights training and education to our staff and the staff of the companies in which our funds invest

Our Whistleblowing Policy provides internal and external avenues for reporting complaints and concerns and specifically addresses non-retaliation and victimisation of whistleblowers.

- Influence and Engage – we share our insights and contribute to broader industry discussion, working groups and collaborations regarding human rights. Through ongoing stakeholder engagement and collaboration we seek to understand best practice developments and share our learnings with others within our sphere of influence.

1 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*

5. Governance of this Statement

The Board of Adamantem has ultimate oversight responsibility for managing human rights risks within Adamantem. The Managing Director, Responsibility and Impact is responsible for the implementation of this Statement, including ensuring that the leaders of the business teams within Adamantem are aware of, and accountable for operating in alignment with, the principles set out within this Statement.

6. Our commitment to ongoing improvement

Adamantem is committed to continually improving our approach and response to human rights issues.

This Statement, and the practices described within it, will be reviewed annually.

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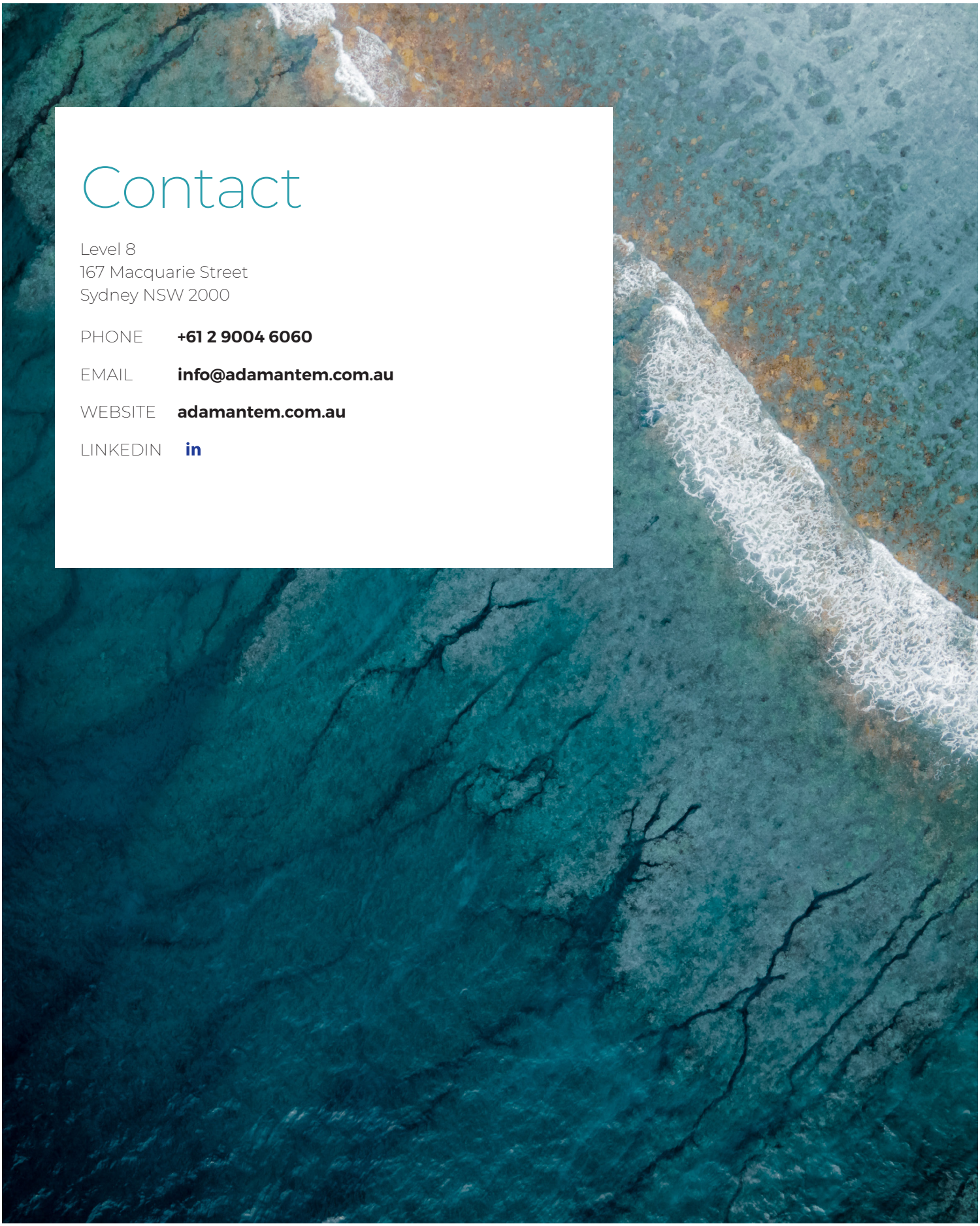

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