

ADM Capital Anti-Slavery and Human Trafficking Policy

General Statement

Hong Kong currently does not have a Modern Slavery Act. Asia Debt Management Hong Kong Limited (“ADM Capital”) will reference UK’s Modern Slavery Act 2015 (the “UK Act”) as the foundation for this policy. ADM Capital will also reference IFC’s Good Practice Note on Managing Risks Associated with Modern slavery. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of ADM Capital with the aim of the prevention of opportunities for modern slavery to occur within its operations or its funds’, portfolio companies or supply chain.

In determining whether a situation involving slavery, servitude or forced, compulsory labour or human trafficking exists, regard may be had to all circumstances, including consent or personal circumstances (including family relationships, mental or physical illness, and whether the person is a child), as well as the principles of construction in Article 4 of the European Convention on Human Rights of 1950.

Additionally, ADM Capital is guided by the International Bill of Human Rights and supports the UN Declaration of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work. ADM Capital also supports the following standards, which reference modern slavery:

- The UN Principles for Responsible Investment
- IFC Performance Standards

ADM Capital has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of the portfolio companies owned by funds which we manage or advise.