



LEA 02	Disclosures: Mandatory	Reason for Interaction
Individual/ internal staff engagements	<input checked="" type="checkbox"/> To support investment decision-making in a company relevant ESG issues <input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> To engage investor ESG objectives <input type="checkbox"/> Other: specify _____ <input type="checkbox"/> We do not engage in internal staff	
Collaborative engagements	<input type="checkbox"/> To support investment decision-making in a company relevant ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> Other: specify _____ <input type="checkbox"/> We do not engage in collaborative engagements	
Service provider engagements	<input type="checkbox"/> To support investment decision-making in a company relevant ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> Other: specify _____ <input type="checkbox"/> We do not engage in service provider	

RI TRANSPARENCY REPORT

2014/15

ADM Capital

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2014-15 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ⓜ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Segregated mandates or pooled funds	🔒	n/a							✓
OO 08	Breakdown of AUM by market	✓	Private							✓
OO 09	Additional information about organisation	-	n/a							✓
OO 10	RI activities for listed equities	🔒	n/a							✓
OO 11	RI activities in other asset classes	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓

Overarching Approach				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OA 01	RI policy and other guidance documents	✓	Public							✓
OA 02	Publicly available policies / documents	✓	Public							✓
OA 03	Policy components and coverage	✓	Public	✓	✓					
OA 04	Conflicts of interest	✓	Public							✓
OA 05	RI goals and objectives	✓	Public							✓
OA 06	Main goals/objectives this year	✓	Private							✓
OA 07	Governance, management structures and RI processes	✓	Private							✓
OA 08	RI roles and responsibilities	✓	Public							✓
OA 09	RI in performance management, reward and/or personal development	✓	Private							✓
OA 10	Collaborative organisations / initiatives	✓	Public				✓	✓		
OA 11	Promoting RI independently	✓	Public				✓			
OA 12	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
OA 13	ESG issues in strategic asset allocation	✓	Private	✓						
OA 14	Allocation of assets to environmental and social themed areas	✓	Private	✓						
OA 15	ESG issues for internally managed assets not reported in framework	✓	Private							✓
OA 16	ESG issues for externally managed assets not reported in framework	🔒	n/a							✓
OA 17	RI/ESG in execution and/or advisory services	🔒	n/a	✓	✓					
OA 18	Innovative features of approach to RI	✓	Private							✓
OA 19	Internal and external review and assurance of responses	✓	Private							✓

Direct – Private Equity				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PE 01	Breakdown of investments by strategy	✓	Private							✓
PE 02	Typical level of ownership	✓	Private							✓
PE 03	Description of approach to RI	✓	Private	✓						✓
PE 04	Investment guidelines and RI	✓	Public		✓					
PE 05	Fund placement documents and RI	✓	Public	✓			✓		✓	
PE 06	Formal commitments to RI	✓	Private				✓			
PE 07	Incorporating ESG issues when selecting investments	✓	Public	✓						
PE 08	ESG advice and research when selecting investments	✓	Private	✓						
PE 09	ESG issues in investment selection process	✓	Public	✓		✓				
PE 10	Types of ESG information considered in investment selection	✓	Private	✓		✓				
PE 11	Encouraging improvements in investees	✓	Private	✓	✓					
PE 12	ESG issues impact in selection process	✓	Private	✓						
PE 13	Proportion of companies monitored on their ESG performance	✓	Public		✓					
PE 14	Proportion of portfolio companies with sustainability policy	✓	Public		✓					
PE 15	Actions taken by portfolio companies to incorporate ESG issues into operations	-	n/a		✓					
PE 16	Type and frequency of reports received from portfolio companies	✓	Private		✓	✓				
PE 17	Disclosure of ESG issues in pre-exit	✓	Private		✓					
PE 18	ESG issues affected financial/ESG performance	✓	Private	✓	✓					
PE 19	Examples of ESG issues that affected your PE investments	✓	Private	✓		✓				
PE 20	Disclosure of ESG information to public and clients/beneficiaries	✓	Public							✓
PE 21	Approach to disclosing ESG incidents	✓	Private							✓

ADM Capital

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information

OO 01	Mandatory	Gateway/Peering	General
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OO 01.1 Select the services you offer.

Fund management

% of assets under management (AUM) in ranges

<10%

10-50%

>50%

Fund of funds, manager of managers, sub-advised products

Other, specify

Execution and advisory services

OO 02	Mandatory	Peering	General
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OO 02.1 Select the location of your organisation's headquarters.

Hong Kong

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

1

2-5

6-10

>10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

54

OO 03	Mandatory	Descriptive	General
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OO 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

Yes

No

OO 04	Mandatory	Gateway/Peering	General
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OO 04.1 Indicate the year end date for your reporting year.

31/12/2014

OO 04.2 Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on, and advisory/execution only assets.

	trillions	billions	millions	thousands	hundreds
Total AUM		1	200	000	000
Currency	USD				
Assets in USD		1	200	000	000

OO 04.5 Indicate the level of detail you would like to provide about your asset class mix.

- Approximate percentage breakdown to the nearest 5% (e.g. 45%)
- Broad ranges breakdown (i.e. <10%; 10-50%; >50%)

OO 06

Mandatory

Descriptive

General

OO 06.1 To contextualise your responses to the public, indicate how you would like to disclose your asset class mix.

- Publish our asset class mix as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	0	0
Fixed income – corporate	<10%	0
Fixed income – government	0	0
Fixed income – other	0	0
Private debt	10-50%	0
Private equity	10-50%	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0

Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Other (1), specify	0	0
Other (2), specify	0	0

○ Publish our asset class mix as per attached file (the following image formats can be uploaded: .jpg, .jpeg, .png, .bmp and .gif)

Gateway asset class implementation indicators

OO 11	Mandatory	Gateway	General
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OO 11.1

Indicate if in the reporting year you incorporated ESG issues into your investment decisions and/or your active ownership practices in the following internally managed asset classes.

- Fixed income – corporate
- Private debt
- Private equity
- None of the above

OO 12	Mandatory	Gateway	General
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OO 12.1

The modules and sections that you will be required to complete are listed below.

This list is based on the percentages provided in your AUM breakdown and your responses to the gateway indicators. You are only required to report on asset classes that represent 10% or more of your AUM. You may report voluntarily on any applicable modules or sections by selecting them from the list. Fixed Income and Infrastructure are voluntary.

Core modules

- Organisational Overview
- Overarching Approach (including assets which do not have a separate module)

RI implementation directly or via service providers

Private Equity

Closing module

Closing module

ADM Capital

Reported Information

Public version

Overarching Approach

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Responsible investment policy

OA 01	Mandatory	Gateway/Core Assessed	General
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OA 01.1 Indicate if you have a responsible investment policy.

- Yes
 No

OA 01.2 Indicate if you have other guidance documents or more specific policies related to responsible investment.

- Yes
 No

OA 01.3 Provide a brief description of the key elements of your responsible investment policy or, if you do not have a policy, of your overall approach to responsible investment. [Optional]

Statement of environmental, social and ethical values

General Policy Standard

In conducting its business and making investments on behalf of its funds, ADM Capital is committed to striving towards the "International Finance Corporation's Performance Standards on Social and Environmental Sustainability".

General Policy Statement

ADM Capital believes that we can help foster sustainable development through our own operations and also through our influence with companies in which we invest in Asia and Europe.

ADM Capital primarily works in developing nations and the challenges we face such as environmental degradation, corruption and poor business practices are particularly acute. ADM Capital strives where possible to foster good corporate governance, respect for the environment, responsible labour policies, ethical business practices and, of course, compliance with local laws. We believe all of these practices will benefit the local community, as well as ultimately improving business efficiency and performance so that we can achieve our ultimate goal of attaining the maximum returns for our investors.

ADM Capital's founders and employees helped in establishing the ADM Capital Foundation to support communities and conservation efforts in Asia and beyond. The Foundation, with a dual commitment to working with 'children at risk' and environmental degradation, allows us to view needs first-hand and to act on perceived imbalances. The Foundation emphasizes ADM Capital's commitment to social and environmental standards.

The Environment

ADM Capital is conscious of environmental effects of its activities and those of its investments and recognises the need to minimise avoidable adverse environmental impacts where possible.

We continuously work towards improving our business practices to reduce any environmental impact of ADM Capital and our investments.

We work to ensure that the practices of ADM Capital and our investments with regard to the environment at least meet local laws and regulations.

We strive to lessen our imprint and to avoid damaging the environment by minimizing waste, reducing packaging materials, promoting recycling and, in general considering, the impact of our daily operations and those of our investments.

Social Principles

ADM Capital respects the protection of internationally proclaimed human rights and works to support these principles.

We recognise the importance of ensuring that our own and our investments' labour conditions, health and safety guidelines and wages are fair and are not less than those required by local laws.

Ethical Conduct

ADM Capital considers its reputation for integrity and fairness as one of its most valuable and carefully guarded assets.

We insist on honesty and integrity in all aspects of our business operations.

We strive to avoid conflicts of interest, and to act lawfully and ethically.

We expect our employees to practice the highest moral and ethical standards in all their business activities. This includes honesty and integrity when working with other company employees, the general public, business associates, governmental and regulatory authorities.

We expect our employees to maintain the confidentiality of information entrusted to them by the company, investors or others involved in any business dealings.

ADM Capital values the diversity of its employees and is committed to equal opportunity and fair compensation in all aspects of employment to all employees without regard to sex, race, national origin or religion.

Environmental, Social and Ethical Responsibilities

Environmental, Social and Ethical Responsibilities are the direct responsibility of all staff of ADM Capital and training on ADM Capital's policies shall be provided to all ADM Capital staff following commencement of their employment. Compliance with Environmental, Social and Ethical Responsibilities shall be supervised and monitored by each of:

Alexander Shaik for Asia Debt Management Hong Kong Limited, Beijing branch office;

Navin Sambtani for India Debt Management Private Limited;

Anthony Stalker for ADM Capital Europe LLP;

Baris Sivri for Asia Debt Management Hong Kong Limited Türkiye (İstanbul) İrtibat Bürosu and ADM Capital's Central and Eastern European investment operations;

overall supervision by Alexander Shaik in Asia Debt Management Hong Kong Limited.

It shall be the responsibility of each of the above supervisors to monitor and report on compliance with Environmental, Social and Ethical Responsibilities by investee companies in their jurisdiction.

General Investment Approach

ADM Capital's investment process involves two key stages.

(a) Preliminary Due Diligence / Hunting Licence

Prior to making any investment ADM Capital staff will conduct preliminary due diligence on the following five key investment criteria (the "General Investment Criteria"):

asset backing for ADM Capital's investments;

cash flow and profitability projections demonstrating the obligor's ability to satisfy in full all obligations when due and payable;

accounting and financial due diligence to the satisfaction of ADM Capital;

legal and regulatory due diligence; and

employment, environmental and social due diligence .

In particular, for any investments in our limited partnership funds, due diligence procedures shall include a full and detailed analysis of environmental, social and ethical issues, including the following stages:

Implementation

Identification of controls/mitigation (incl. remedial measures to be included in transaction documents and quantification of impact on investment target)

Evaluation and scoping of risks

Identification of risks and screening

During the initial "hunting license" stage of preliminary due diligence, ADM Capital staff will screen investments for excluded activities set out in Annex A.

After the proposed transaction obtains approval from the investment committee to proceed to formal due diligence, a more close review of environmental, social and ethical standards may be conducted based on guidelines such as the checklist of guidelines attached as Annex B for small and medium business enterprises. Professional environmental, social and ethical consultants may also be engaged to provide a written report of compliance with IFC's eight performance standards as follows:

1. Performance Standard 1: Social and Environmental Assessment and Management System;
2. Performance Standard 2: Labor and Working Conditions;
3. Performance Standard 3: Pollution Prevention and Abatement;
4. Performance Standard 4: Community Health, Safety and Security;
5. Performance Standard 5: Land Acquisition and Involuntary Resettlement;
6. Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resource Management;

7. Performance Standard 7: Indigenous Peoples;

8. Performance Standard 8: Cultural Heritage.

The environmental and social analysis conducted by ADM Capital is intended to identify risks and implications for the Fund's portfolio related to environmental and social impacts which will be presented to the investment committee.

Each investment should aim to have internal risk categorization using list of industries and risk categories at IFC's website or using E&S toolkit that can be downloaded at <http://www.fmo.nl/smartsite.dws?id=1680> as follows:

Environmental and social risk impact

Low Risk (equivalent to IFC category C)

Medium Risk (equivalent to IFC category B)

High Risk (equivalent to IFC category A)

Assessment

No specific environmental appraisal required.

Environmental and social compliance check with guidelines in Annex B.

Environmental audit by a qualified external consultant.

Environmental and social requirements

Compliance with applicable laws.

(1) For SME companies: Compliance with applicable laws; and

(2) For non-SME companies, compliance with IFC performance standards and EHS guidelines.

If necessary, remedial measures to be included in transaction documents.

Compliance with applicable laws, IFC performance standards and EHS guidelines and, if necessary, remedial measures to be included in the transaction documents.

Examples

Software development / consulting or service-based businesses.

General industrial companies and plants on existing sites.

New infrastructure and extraction projects.

IFC Performances Standards: www.ifc.org/ifcext/enviro.nsf/Content/PerformanceStandards

IFC Environmental, Health and Safety Guidelines: www.ifc.org/ifcext/enviro.nsf/Content/EnvironmentalGuidelines

Across all industries, each investment has its own unique different features relevant to its risk categorization. However, typically certain sectors such as green-field infrastructure, large-scale agri-business, mining typically present higher risk than sectors such as transport, small scale construction or manufacturing, utilities and real estate. At the low risk end of the scale, one would typically find investments in sectors such as telecommunications or secondary loans. The industry sector and risk categorization are relevant in determining the level of due diligence and monitoring required.

(b) Investor Reporting / Transaction Monitoring

After the initial investment, ADM Capital continuously monitors and provides reports on the General Investment Criteria and includes investor reporting on Employment, Environmental and Social issues as agreed in the relevant fund offering documentation. High and intermediate risk category investments will require more active ongoing monitoring of environmental social issues. Ongoing monitoring will include aspects such as periodic reviews, ongoing client contact and environmental and social action plans.

ADM Capital reviews results

ADM Capital monitoring

Investment Company implementation

ADM Capital identifies E&S Targets

A central file of all Environmental, Social and Ethical action plans and compliance procedures implemented in respect thereof shall be maintained by ADM Capital for each investee of company and updated annually.

General guidelines for excluded activities

In applying the environmental, social and employment principles set forth in this Statement, ADM Capital shall strive to avoid engaging in any activities specified the "Exclusion List" published by the International Finance Corporation (a copy of which is attached to this Statement as Annex A).

ADM Capital should ensure that all staff are provided with a copy of this Statement and attend a briefing on its contents.

OA 02	Mandatory	Core Assessed	PRI 6
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OA 02.1 Indicate if your responsible investment policy is publicly available.

- Yes
- No

OA 02.3 Indicate if your other policies or guidance documents related to responsible investment are publicly available.

- Yes
- No

OA 03	Mandatory	Core Assessed	PRI 1,2
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OA 03.1 Indicate the components/types and coverage of your responsible investment policy and guidance documents.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach	<input type="radio"/> Applicable policies cover all AUM
<input checked="" type="checkbox"/> Engagement/active ownership policy	<input checked="" type="radio"/> Applicable policies cover a majority of AUM
<input checked="" type="checkbox"/> Specific guidelines on corporate governance	<input type="radio"/> Applicable policies cover a minority of AUM
<input checked="" type="checkbox"/> Specific guidelines on environmental issues	
<input type="checkbox"/> Specific guidelines on social issues	
<input type="checkbox"/> Asset class-specific guidelines	
<input checked="" type="checkbox"/> Screening/exclusion policy	
<input type="checkbox"/> Other, specify	
<input type="checkbox"/> Other, specify	

OA 04	Mandatory	Core Assessed	General
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OA 04.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

- Yes

OA 04.2

Describe your policy on managing potential conflicts of interest in the investment process.
[Optional]

Identifying Conflicts: The Firm takes all reasonable steps to identify conflicts of interest between: (a) the firm (including its managers, employees or any person directly or indirectly linked to it by control), and a client of the firm; or (b) one client of the firm and another client; that arise or may arise in the course of the firm providing any services in the course of carrying on our business.

Conflict may arise where there may be a material risk of damage to the interests of a client, and in such situation the Firm must take into account, as a minimum, whether the Firm or a relevant person, or a person directly or indirectly linked by control to the Firm: (a) is likely to make a financial gain, or avoid a financial loss, at the expense of the client; (b) has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome; (c) has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client; (d) carries on the same business as the client; or (e) receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services other than the standard commission or fee for that service.

Segregation of functions: Senior management of the Firm should segregate duties so as to avoid conflicts of interest.

Disclosure of conflicts to clients/investors : Where the arrangements made by the Firm are not sufficient to ensure with reasonable confidence that the risk of damage to the client will be prevented, the Firm shall refer the conflict of interest to the relevant governing body (eg. Advisory Board) of the fund relevant to the conflict.

No

Objectives and strategies

OA 05

Mandatory

Gateway/Core Assessed

General

OA 05.1

Indicate if your organisation sets objectives for its responsible investment activities.

Yes

OA 05.2

Indicate how frequently your organisation sets or revises objectives for responsible investment.

- At least once per year
- Less than once per year

OA 05.3

Indicate how frequently your organisation formally reviews performance against its objectives for responsible investment.

- Quarterly
 - Biannually
 - Annually
 - Every two years or less
 - It is not reviewed
- No

Governance and human resources

OA 08	Mandatory	Gateway/Core Assessed	General
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OA 08.1	Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.
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Roles present in your organisation

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - General Counsel**
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Dedicated responsible investment staff
 - External managers or service providers
 - Other role, specify
 - Other role, specify

Promoting responsible investment			
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OA 10	Mandatory	Core Assessed	PRI 4,5
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OA 10.1	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.
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Select all that apply

- Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced
- Asian Corporate Governance Association
- Association for Sustainable & Responsible Investment in Asia
- Australian Council of Superannuation Investors
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- Global Investors Governance Network (GIGN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

OA 11	Mandatory	Core Assessed	PRI 4
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OA 11.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
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Yes

OA 11.2

Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Other, specify

No

ADM Capital

Reported Information

Public version

Direct – Private Equity

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Overview

PE 04	Mandatory	Core Assessed	PRI 2
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PE 04.1 Indicate if your organisation's investment guidelines for private equity refer to responsible investment.

- Our investment guidelines do refer to responsible investment
- Our investment guidelines do not refer to responsible investment
- We do not have investment guidelines

Fundraising of private equity funds

PE 05	Mandatory	Core Assessed	PRI 1,4,6
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PE 05.1 Indicate if your fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.

- Yes

PE 05.2 Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation:

- Policy and commitment to responsible investment
 - Always
 - In a majority of cases
 - In a minority of cases
 - Approach to ESG issues in pre-investment processes
 - Always
 - In a majority of cases
 - In a minority of cases
 - Approach to ESG issues in post-investment processes
 - Always
 - In a majority of cases
 - In a minority of cases
- No
 - Not applicable as our organisation does not fundraise

Pre-investment (selection)

PE 07	Mandatory	Gateway	PRI 1
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PE 07.1	Indicate if your organisation typically incorporates ESG issues when selecting private equity investments.
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- Yes
- No

PE 09	Mandatory	Core Assessed	PRI 1,3
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PE 09.1	Indicate which E, S and/or G issues are typically considered by your organisation in the investment selection process and list up to three typical examples per issue.
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ESG issues

- Environmental

	List up to three typical examples of environmental issues
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- Environmental pollution
- Waste
- Noise pollution

- Social

	List up to three typical examples of social issues
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- Workplace Safety
- Local community issues
- Worker health

- Governance

	List up to three typical examples of governance issues
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- Board of Directors oversight
- MIS systems
- Compliance Systems

Post-investment (monitoring and active ownership)			
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PE 13	Mandatory	Gateway/Core Assessed	PRI 2
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PE 13.1	Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.
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- Yes

PE 13.2

Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies

(in terms of total number of portfolio companies)

PE 13.3

Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.

ESG issues

- Environmental

List up to three example targets of environmental issues

Pollution reduction

- Social

List up to three example targets of social issues

Accident reduction

Community Health

- Governance

List up to three example targets of governance issues

Board of Directors oversight, meetings etc

MIS systems

Compliance Oversight

- We do not set and/or monitor against targets

- No

PE 14

Mandatory

Core Assessed

PRI 2

PE 14.1

Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).

- Yes

PE 14.2

Indicate what percentage of your portfolio companies has an ESG/sustainability policy (or similar guidelines).

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies
- 0% of portfolio companies

(in terms of total number of portfolio companies)

- No

Communication

PE 20

Mandatory

Core Assessed

PRI 6

PE 20.1

Indicate whether your organisation proactively discloses ESG information on your private equity investments.

- Disclose publicly
- Disclose to investor clients (LPs)/beneficiaries only

PE 20.5

Indicate the type of ESG information that your organisation proactively discloses to your clients (LPs)/beneficiaries.

- ESG information in relation to our pre-investment activities
- ESG information in relation to our post-investment monitoring and ownership activities
- Information on our portfolio companies' ESG performance
- Other, specify

PE 20.6

Indicate your organisation's typical frequency of disclosing ESG information to your clients(LPs)/beneficiaries.

- Quarterly or more frequently
 - Semi annually
 - Annually
 - Every two years or less frequently
 - Ad-hoc, specify
- No proactive disclosure to the public or to clients (LPs)/beneficiaries