

Platinum Asset Management Limited (ASX: PTM)

# Human Rights Policy

FEBRUARY 2024



# Contents

1	Introduction	2
2	Which entities does this Policy cover and who does it apply to?	2
3	Platinum's commitment	3
4	Platinum's approach & focus areas	4
5	Whistleblower Protections Policy	5
6	Governance & oversight	5
7	Commitment to ongoing improvement	5

# 1. Introduction

Consistent with our core values of integrity, excellence and team mindset, this Policy sets forth our commitment to respect human rights and how we address human rights issues in our own operations, supply chains and investment portfolios.

## 2. Which entities does this Policy cover and who does it apply to?

This Policy covers the following entities:

- (a) Platinum Asset Management Limited;
- (b) Platinum Investment Management Limited ("PIML");
- (c) Platinum Asia Investments Limited;
- (d) Platinum Capital Limited; and
- (e) Platinum UK Asset Management Limited ("PAM UK"),

"Platinum", "we", "us", "our".

This Policy applies to all persons working for us or on our behalf in any capacity, including our employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This Policy does not form part of any Platinum employee's contract of employment and we may amend it at any time.

### 3. Platinum's commitment

We are committed to ensuring respect for human rights, freedom from modern slavery and acting ethically and with integrity in of our business dealings and relationships.

Our approach is influenced by the United Nations Guiding Principles on Business and Human Rights<sup>1</sup>, the Universal Declaration of Human Rights<sup>2</sup>, the International Bill of Human Rights<sup>3</sup> and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work<sup>4</sup>.

As part of our commitment:

- Platinum is a participant in the United Nations Global Compact ("UN GC") Network Australia. The UN GC aims for companies to do business responsibly by aligning their strategies and operations with the UN GC's Ten Principles on human rights, labour, environment and anti-corruption; and to take strategic actions to advance broader societal goals, such as the United Nations Sustainable Development Goals ("UN SDGs").
- Platinum is a signatory to the United Nations Principles for Responsible Investment, a voluntary framework for incorporating environmental, social and governance issues into investment decision-making and ownership practices. Within this framework, Platinum supports the UN SDGs and our corporate sustainability activities and portfolio company investment stewardship focus fall within the areas of:



**Gender Equality**  
including gender diversity and pay equity



**Climate Action**  
(and the broader environment) including GHG emissions



**Decent Work and Economic Growth**  
including broader diversity and inclusion and modern slavery



**Peace Justice and Strong Institutions**  
including governance, advocacy & transparency

<sup>1</sup> [https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>2</sup> *The Universal Declaration of Human Rights*, adopted by the UN in 1948

<sup>3</sup> <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

<sup>4</sup> <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

# 4. Platinum's approach & focus areas

At Platinum, we have a core belief that if we responsibly and successfully look after our clients' money, our business should prosper. This belief has led Platinum to maintain a deep and persistent commitment to responsible and sustainable business practices, including strong governance plus social and environmental awareness. We seek to apply a pragmatic approach to both how we run our business, and the expectations that we place on the companies in which we invest.

The focus areas of our approach in addressing human rights across our organisation as part of our consideration of broader ESG issues, are in relation to our: (1) own corporate operations, (2) corporate supply chains; and (3) investment operations (ie within the investment portfolios we manage).

**Focus area 1: Platinum – corporate operations:** We hold high standards of integrity in all aspects of our own operations and have put in place robust policies and procedures aimed at preventing unlawful or improper conduct. These include our:

- [Diversity and Inclusion Policy](#), [Workplace Gender Equality Agency \(WGEA\) reporting](#), Workplace Behaviour Policy – outlining our commitment to create a safe, respectful and inclusive environment that values and celebrates diversity.
- [Business Rules of Conduct \(BROC\)](#) and [Director's Code of Conduct](#)– outlining the standards of behaviour expected of our employees, contractors and directors.
- [Anti-Bribery and Anti-Corruption Policy](#) – outlining our expectations for employees on observing and upholding our position on bribery and corruption and providing information and guidance on how to deal with issues that may arise.

**Focus area 2: Platinum – corporate supply chains:** The Platinum Group [Modern Slavery Statement](#) and [Modern Slavery Policy](#) provide details of Platinum's approach, policies and plans to continuously improve and strengthen its commitment to ensuring respect for human rights and freedom from modern slavery.

**Focus area 3: Platinum – investment operations (investment portfolios):** We address ESG (including human rights and modern slavery) as part of our responsible investing approach as detailed within our [Responsible Investing Policy](#).

## 5. Whistleblower Protections Policy

Platinum's [Whistleblower Protections Policy](#) enables eligible persons to raise concerns regarding illegal or improper conduct in relation to the Group without fear of reprisal or detrimental treatment.

It operates alongside other policies listed in section 4 above which contribute to the identification, assessment and mitigation of human rights and modern slavery risks that we may be exposed to.

## 6. Governance & oversight

This Policy has been approved by the board of directors of each Platinum entity. The Head of Stewardship is the owner of this Policy.

## 7. Commitment to ongoing improvement

Platinum commits to continuous improvement of our approach to human rights issues. This policy will be reviewed annually.

