

Modern Slavery Statement

Reporting Period

1 July 2023 to 30 June 2024

Introduction

This Modern Slavery Statement (**Statement**) is made by Dr Jones & Partners Group Holdings Pty Ltd (ACN 158 390 802) (**Jones & Partners**) and Jones Holding Co Pty Ltd (**Jones Holding Co**) (**Reporting Entities, Jones Radiology, we, us or our**) pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**). This Statement sets out the actions taken by the Reporting Entities in identifying, assessing and addressing modern slavery risks in their operations and supply chains during the financial year ending 30 June 2024 (**FY24**).

The Reporting Entities submit this Statement as a joint statement pursuant to the Act.

Organisational Structure, Operations and Supply Chains

Who is Jones Radiology?

Jones Radiology operates a medical imaging business in South Australia and Northern Territory.

Jones & Partners is jointly owned by I-MED Radiology Network Limited (I-MED Group) (49%) and Dr Jones & Partners Medical Imaging Equity Holding Pty Ltd (51%). Jones & Partners wholly owns Jones Holding Co. Jones & Partners does not own or control any other entity. Jones Holding Co does not own or control any entities.

Jones Radiology provides medical imaging services including interventional procedures. The services undertaken by Jones Radiology includes X-Ray, PET, CT, MRI, nuclear medicine, ultrasound, mammography and interventional procedures. Jones Radiology has been providing medical imaging services within Australia for over 95 years and performs around 755,000 patient procedures every year.

Jones Radiology's focus is on delivering high quality services with compassion and respect to its customers – being its patients and referring health practitioners (including individuals, groups, and hospitals). Jones Radiology's vision is to be the provider of choice for all referrers and patients in our communities. Our purpose is to improve patient health care through empathic and innovative imaging. This is at the core of everything that Jones Radiology does in its activities and informs all aspects of our operations.

Jones Radiology provides its medical imaging services in both outpatient clinics and in private and public hospital settings. It operates in South Australia (28 clinics) and Northern Territory (2 clinics), in both metropolitan and regional communities. These sites provide services across a mix of standalone community sites, fully outsourced hospital radiology departments and hospital and other service provider reporting contracts. The Reporting Entities, as at 30 June 2024, employed approximately 712 employees.

Structure and governance across Jones Radiology

The minority shareholder of Jones & Partners, I-MED Group, provides Jones Radiology with shared corporate services including procurement, finance, payroll, human resources, IT infrastructure, knowledge and resources in support of the delivery of Jones Radiology's operations.

Jones Radiology's operations and corporate governance are monitored and overseen by its Board of Directors of each of the Reporting Entities. The Chief Executive Officer and Chief Financial Officer are not directors of either Reporting Entity, but attend Board meetings and are responsible for, together with the broader management team, promoting a risk aware culture and ensuring that there is a systematic process to identify, analyse, evaluate and treat modern slavery risks.

Our Modern Slavery Statement sets out the actions taken in assessing modern slavery risks in our operations and supply chains, as well as the actions we have taken to address, monitor and prevent these. We have established responsibility for managing modern slavery risks and implementing relevant policies and mitigation initiatives.

The Board is responsible for overseeing modern slavery risk management, strategy development and implementation.

Jones Radiology's vision and values

Jones Radiology's vision is to be the provider of choice for all referrers and patients in our communities. Our purpose is to improve patient health care through empathic and innovative imaging. As part of this vision, we are a trusted provider not only by providing exceptional service, but by our commitment to operating in a lawful, ethical, and socially responsible manner. A commitment to upholding fundamental human rights is integral to the ethos of our business and intertwined in the Jones Radiology values.

These include that:

- We strive for excellence
- We are patient-focused
- We are quality driven
- We work as a team
- We invest in our people

In order to sustain those high standards, we recognise that our staff are at the core of who we are, what we do and how we deliver our services to the community. We have zero-tolerance to modern slavery practices, human trafficking and other unethical practices. We treat our colleagues as we treat our patients and referrers – with respect, dignity and consideration at all times. To remain true to our own vision, we take reasonable steps to ensure we engage suppliers who are aligned to our vision and values and who uphold our ethical and socially responsible standards.

Our Supply chain

Jones Radiology operations are supported by the procurement of an array of goods and services, which are necessary for the delivery of medical imaging services. The supply chain for Jones Radiology largely consists of sourcing specialised medical equipment and its servicing, medical contract labour, property services and technology and telecommunications services and products. Despite this extensive supply chain, a large portion of spend is sourced locally, from suppliers predominantly headquartered in countries with a low risk of modern slavery.

The majority of suppliers that Jones Radiology engaged with during this reporting period were Australian based. In addition, most of our largest suppliers by spend are reporting entities in their own right under the Act. Being reporting entities in their own right helps to lower the risk of incidences of modern slavery, as our suppliers are working independently and with us to lower such risk.

To maintain Jones Radiology's reputation for quality, safety and service excellence, we place great emphasis on the focused and professional management of our supply chain.

We expect all of our major suppliers, service providers and any other agents or contracted third parties to adopt an approach to ethical business practices and sustainability that is consistent with the Group's high standards. Suppliers are also expected to promote the same standards in their own supply chains.

Supply categories

During the reporting period, the majority of externally procured goods and services included:

Goods

- Medical imaging and IT equipment
- Medical consumables and supplies
- Nuclear medicine, contrast, and pharmaceuticals
- Uniforms
- Print
- Film
- Office supplies

Services

- Medical imaging equipment servicing
- IT and telecommunications services
- Staff training and education services
- Property leasing (including clinics and office space), utilities and facilities management
- Linen and laundry services
- Medical consultancy (e.g. specialist cardiologists, radiologists)
- External advisory (e.g. WH&S, legal, tax advisory, recruitment services)
- Labour hire services
- Insurance services
- Travel services
- Building and Construction Services

Of these goods and services, an overwhelming majority of the Group's external procurement is health care related – namely, the purchase of medical and IT equipment, medical consumables, nuclear medicine, and contrast. In addition, the provision of property (leased premises) comprises a large portion of the Group's external procurement spend.

The spend is predominately managed through contractual arrangements, ranging from, but not limited to:

- Multi-year standing arrangements governed by I-MED precedent agreements such as longterm Product or Services Master Supply Agreements.
- Bespoke agreements for the procurement of complex and high value goods, including for products such as clinical software, radiology booking platforms and dose radiation management.
- Purchase orders governed by master agreement terms and conditions, such as agreements for professional services or supply of goods.

Risks of modern slavery in our operations and supply chain

Jones Radiology has considered the risks of modern slavery in its operations and supply chain and will continue to do so.

Jones Radiology has identified the following key areas of risk in its operations and supply chain during the reporting period:

- (a) workforce recruitment;
- (b) the suppliers of our local suppliers; and
- (c) property services including cleaning and maintenance services.

Jones Radiology procures the following through the I-MED Group, and which the I-MED Group have also identified as areas of risk:

- (d) Medical equipment, IT hardware;
- (e) Medical goods.

Jones radiology does procure some medical equipment, IT hardware and medical goods directly.

Based on our most recent assessment of its exposure to modern slavery risks, we consider the risk of modern slavery within our operations and supply chain during the reporting period to be low for the following key reasons:

- (a) the location of all operations of Jones Radiology is Australia, and almost every direct supplier we deal with is located in Australia;
- (b) our material suppliers are themselves reporting entities under the Act, and we understand them to have robust policies and procedures in place to identify, address and remediate modern slavery incidents and risks should they arise;
- (c) our employees consist of skilled professionals, and are not from groups of people where modern slavery is a key risk.
- (d) all of our employment and consultancy arrangements are in compliance with all legislative and award-based requirements; and
- (e) our domestic suppliers are reputable and well-established, local, and we have a long standing relationship with those parties.

Actions taken to assess and address these risks (including due diligence and remediation activities)

Procurement framework and governance

During FY24, Jones Radiology took the following actions to, among other objectives, identify, assess and address / remediate any modern slavery risks in our operations and supply chains. The following actions and policies assist Jones Radiology in addressing and further limiting the risk of any modern slavery in our operations and supply chains.

Jones Radiology procurement is supported by the I-MED Group procurement team. Therefore, a number of actions set out below connected to actions we have undertaken in collaboration with the I-MED Group.

The following outlines our priorities during the reporting period.

Spend under Management

Jones Radiology procurement is supported as a service by the I-MED Group procurement team. To the extent that Jones Radiology procures goods and services from the I-MED Group, the I-MED Group have implemented comprehensive modern slavery assessment and management programs which Jones Radiology receives the benefit of as part of the supply chain.

The I-MED Group's procurement team managed the majority of Jones Radiology's external procurement spend. This procurement was subject to the I-MED Group's separate Modern Slavery Statement and policies. Of the

remaining procurement balance, the majority was locally sourced building construction and facility management services.

Supported by I-MED Group's Procurement team, this comprises a number of designated category managers who are specialists in their supply classes. The Procurement team is responsible for conducting the due diligence of third-party suppliers as a means of identifying and preventing modern slavery risks to people in our business and supply chains.

Additionally, suppliers forming a key part of the I-MED Group's supply chains undergo a vetting process that is undertaken by the Group's procurement team are subject to contractual obligations and standardised audit, reporting and performance monitoring procedures. The I-MED Group has also incorporated modern slavery due diligence into its tender processes, including a risk assessment explicitly in connection with modern slavery, for all major new supplier acquisitions.

When engaging these suppliers, the I-MED Group administers its standard 'Supplier Information Pack' which is available publicly on its website and contains the Supplier Code of Conduct, Human Rights Policy, and Supplier Terms and Conditions.

As part of these, the Supplier Code of Conduct explicitly sets out the I-MED Group's expectations for its suppliers to have a similar approach to treating all individuals with whom they interact, including employees and customers, with respect and dignity in accordance with the I-MED Group Human Rights Policy. The I-MED Group and Jones Radiology expect their suppliers to comply with these policy documents which set out expectations in relation to their compliance with relevant modern slavery legislation, and not using any form of bonded, slave or child labour. As Jones Radiology is supported by the procurement activities of the I-MED Group, and we utilise the I-MED Group's suppliers, the above actions mitigate the risks of modern slavery in our supply chain.

I-MED and Jones Radiology expect all suppliers to provide a safe, healthy and comfortable workplace, including compliance with all relevant workplace health and safety laws and regulations as well as the Group's safety principles. Suppliers are expected to only employ those individuals with a legal right to work in the relevant jurisdiction, comply with all minimum legal entitlements and conditions of work, and to provide and support freedom of association for individuals to join trade unions and other employee representative groups.

Key suppliers are required by the I-MED Group to report on their corporate social responsibility annually and undertake a specific risk assessment directly in relation to modern slavery and human trafficking mitigation strategies. In addition, major suppliers undergo formal annual performance reviews encompassing a number of matters, including their compliance with ethical practices and laws.

An action plan may arise out of these reviews which assigns various responsibilities across the I-MED Group and relevant supplier, and its implementation is monitored by the I-MED Group's Procurement team. Where non-compliance is identified, collaborative remedial action is taken – such as sharing knowledge in relation to the types of conduct prohibited by the Act, discussing approaches to ethical and lawful practices, and where necessary, escalation to the Legal team. The I-MED Group also reserves a right of audit with its suppliers to monitor their commitments under their contractual obligations and support them to achieve any remedial actions which are required.

The I-MED Group reserves the right to audit its suppliers to monitor their commitments under their contractual obligations and support them to achieve any remedial actions which are required. The I-MED Group conducted an audit of its suppliers in FY23, with a very high response rate. The areas of risk which were identified included the outsourced procurement and supply chains with overseas links. Jones Radiology has implemented the above steps to mitigate these risks.

Strengthened governance of internal operations

Jones Radiology Human Resources and Payroll teams, in conjunction with I-MED counterparts, monitor updates and amendments to the employment laws applicable to the practice, including but not limited to the Fair Work Act and applicable modern awards.

Expanded supplier due diligence and review practices

In previous years, I-MED Group procurement focused on strengthening the supplier performance reviews and Corporate Social Responsibility program. In particular, rolling out a Corporate Social Responsibility survey to a significantly higher number of suppliers including those suppliers who were identified as higher risk. This included increased due diligence on major suppliers.

In addition, the I-MED Group focused on suppliers of goods or services sourced in industries considered inherently high risk – such as cleaning services, uniforms and laundry services. In particular, the Group acknowledges that in certain industries, a higher proportion of vulnerable workers (e.g. non-English speaking workers, low-skilled workers) are engaged and this may create an opportunity for evasion of proper legal entitlements.

All such suppliers were required to complete the survey on their compliance with the I-MED Group's Human Rights Policy, relevant laws and ethical practices. In addition, the I-MED Group undertook a comprehensive supplier review, as discussed above, which involved external consultants assessing and managing the modern slavery risk.

Employment compliance measures

The Group has several processes in place to ensure it appropriately manages these challenges and maintains compliance with its obligations under employment laws, including:

- The establishment of robust individual employment or engagement contracts. The terms of these agreements act to minimise the risks of modern slavery in internal operations – including by ensuring that Jones Radiology's work conditions are consistent with laws and clearly set out the rights of staff and workplace entitlements. This is described further below.
- Jones Radiology's Human Resources team provides advice to business stakeholders in relation to the interpretation of, and compliance with, employment contracts, and applicable modern awards.
- The automation of pay rules for industrial instruments are set up in Jones Radiology's workforce management system – which acts to limit the ability for staff to override award requirements and minimise human error in the administration of pay entitlements.
- The regular review of Jones Radiology's payroll processes and pay rules to ensure staff are paid in accordance with the contractual terms and, where applicable, the industrial instruments that apply to their engagement.

Labour force

- Employees: All employees are directly engaged under individual contracts of employment. The terms and conditions of employment are set out in each of those agreements.
- Labour hire and temporary workers: We will occasionally engage a small number of personnel (<2%) via labour hire arrangements who are generally highly skilled medical staff. Such engagements of labour hire providers are done through contractual arrangements solely with providers who hold appropriate licences. Ensuring labour hire and temporary workers receive their proper entitlements was a focus for I-MED in FY23. Jones Radiology has continued to ensure this compliance during this reporting period.

- University student placements: We have several arrangements with universities to provide placements in clinics for their students as part of the students' university courses (subject to supervision) and to enable them to further their studies. These arrangements are negotiated directly with the relevant university and implemented in accordance with a written contract. Generally, students are not engaged as employees as these arrangements are for the benefit of the students and required as part of their university courses. In circumstances where university students undertake substantive work for the benefit Jones Radiology, they may be offered employment subject to an employment contract.

Employment practices

All employees are employed pursuant to a written common law employment contract which contains their terms and conditions of employment. This ensures that all entitlements and prescribed conditions of employment under relevant laws, regulations and other instruments are appropriately implemented and accounted for.

The terms and conditions of employment for employees of Jones Radiology are governed by the National Employment Standards (**NES**) contained in the *Fair Work Act 2009* (Cth) (**Fair Work Act**), individual common law employment contracts, and where applicable, industrial instruments including enterprise agreements or modern awards.

Jones Radiology People and Culture team has robust recruitment processes, including the development of position descriptions and job advertisements which accurately reflect the role requirements. The conditions of employment including the pay rate are designed to ensure employees are paid above minimum rates outlined in industrial instruments, and in some cases market and candidate expectations, and are outlined with the job offer. Where recruitment agencies are engaged by Jones Radiology, these are reputable agencies engaged on standard terms of business.

Jones Radiology People and Culture and Payroll teams are responsible for ensuring ongoing compliance with the agreed terms and conditions of employment including remuneration and other entitlements as well as compliance with industrial instruments, relevant laws, regulations and other requirements related to employment. The specialists in these teams provide advice and guidance to business stakeholders on interpretation and compliance with employment terms and conditions, including those under relevant modern awards and enterprise agreements.

The rates, terms and conditions under which our workforce is engaged is benchmarked and reviewed regularly to ensure compliance with minimum terms and conditions required under the Fair Work Act 2009 (Cth), individual contracts and other applicable industrial instruments where relevant. Pay rules and award interpretation are established and monitored in the workforce management system and systematically checked by the internal teams and reviewed to ensure ongoing compliance. Updates, changes and amendments to relevant labour laws are also continuously monitored and implemented as required.

Diversity and inclusion

We believe in cultivating a culture of diversity and inclusion, where everyone feels valued, respected, and empowered. Our policies prohibit discrimination and promote equal opportunities, regardless of gender, ethnicity, religion, disability, or other protected characteristics.

We monitor information on diversity including in compliance with the Workplace Gender Equality Agency requirements, to ensure we are continually striving for fairness and equality.

Group Policies

Jones Radiology staff have access to the I-MED Group staff portal, with relevant I-MED policies and procedures communicated to Jones Radiology staff in the Jones Workplace Policies Handbook and as part of onboarding and regular

training. Jones Radiology staff are subject to a mix of I-MED Group and Jones Radiology specific policies and procedures which guide staff to embody Jones Radiology expected behaviours and values in their practices.

Core policies are detailed in the Workplace Policies Handbook and include, amongst others:

- Code of Conduct
- Code of Ethics
- Whistleblowing
- Workplace Health and Safety (WHS) Policy
- Diversity Policy
- Workplace Behaviours and Equal Opportunity Policy
- Privacy Policy

Each of these policies allocates responsibility to senior levels of management for their proper implementation, administration, and oversight. Their ultimate purpose is to improve the quality of care provided by Jones Radiology and ensure that we remain a best practice organisation that embodies our core organisational vision and values. As referenced above, Jones Radiology, supported by the I-MED Group, has in place a number of policies aimed at helping to assess and address the risk of modern slavery and unethical practices in both its operations and supply chains. All staff of Jones Radiology are expected to be familiar with and comply with its Code of Conduct and Code of Ethics which establish Jones Radiology core values and principles for how the Group deals with its employees, contractors, customers, suppliers and stakeholders.

In addition to the core policies, Jones Radiology is committed to continually working towards instilling principles guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

In particular:

- **Forced labour and human trafficking:** We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking.
- **Child labour:** We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.
- **Work hours, wages and benefits:** We compensate employees competitively relative to the industry and local labour market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.
- **Safe and healthy workplace:** The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace.
- **Workplace security:** We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.
- **Freedom of association and collective bargaining:** We respect our employees' right to join, form or not to join a labour union without fear of reprisal, intimidation, or harassment. Where employees are represented by a

legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. Jones Radiology is committed to bargaining in good faith with such representatives.

- **Guidance and reporting for employees:** We strive to create workplaces in which open and honest communications among all employees are valued and respected. Jones Radiology is committed to comply with applicable labour and employment laws wherever we operate. Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, can raise questions and concerns with local management or the Human Resources team. Employees can also report suspected policy violations by following the relevant process set out in the Workplace Policies Handbook.

All staff are expected to familiarise themselves with these workplace policies and procedures and receive training on these upon commencing work with Jones Radiology. This training includes, amongst others:

- **Welcome to Jones Radiology** – an overview of our vision, purpose and values, employment and benefits information.
- **Workplace policies and procedures** – maintaining a positive work environment, awareness of ethical obligations and all core workplace policies such as the Code of Conduct and Code of Ethics, Whistleblowing, etc.
- **Work health and safety induction** – developing an awareness of the WHS requirements and working in a safe manner to protect staff and others from work related injuries or illness.
- **Equal Employment Opportunity training** – relevant legislation, staff responsibilities, discrimination, harassment, bullying and other unacceptable workplace behaviour.

Training on core policies is delivered on commencement with Jones Radiology, and as updated, to ensure these principles remain a key priority for staff. In addition, the Group's Whistleblower Policy seeks to promote a culture of integrity by reinforcing the right of all staff to raise any concerns with its operations and supply chains with senior management or Board officeholders.

Remediation

To date, Jones Radiology has not encountered any modern slavery incidents or issues in its operations or supply chain that have required remediation. However, we have processes in place to ensure that any issues are dealt with and remediated appropriately and expeditiously. Should a modern slavery incident arise, it would be escalated to management and addressed promptly. This may include termination of a supplier or implementing processes to educate a supplier to reduce the risk of modern slavery moving forward.

Measuring the effectiveness of the actions taken

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we are committed to developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

Other relevant information and future priorities

Going forward, Jones Radiology will continue to review and monitor its risks of modern slavery and human trafficking practices in its supply chains and its compliance with these matters. With the vast majority of external procurement supported by the I-MED Group procurement team, Jones Radiology's future priorities align with the I-MED Group procurement team and will be on:

1. Continued supplier due diligence: continue to refine the approach to supplier due diligence, risk assessment and monitoring compliance.
2. Continued improvement of governance and policy framework: continue to reduce material risks and maximise opportunities, including risks relating to modern slavery, are escalated to the Board, in support of the broader governance framework.
3. Focus on review of suppliers with complex supply chains and offshore operations: ensure a heightened level of assessment is applied to suppliers with operations which have a significant presence in countries that have typically increased exposure to practices which may not be aligned to the Group's. The Group will be guided by the results of the modern slavery risk assessment, as discussed above.
4. Better document a clear remediation and response plan for identification of practices that do not meet Jones Radiology or the I-MED Group's standards and/or for which a high modern slavery risk is present. The processes should clearly describe ways in which the Jones Radiology and the I-MED Group will respond and 'make good' any harm, prevent and mitigate any potential harms. The framework will also look at assigning responsibility for leading and managing remediation.
5. Internal team training: Jones Radiology is committed to implementing team training for teams responsible for sourcing, supplier selection and supplier management.
6. Raising awareness for modern slavery issues: Jones Radiology is committed to undertaking activities to raising awareness of modern slavery across the Group.

Consultation across the Group

This Statement has been prepared in consultation with and with the input of key stakeholders of each Reporting Entity.

This Statement has been reviewed and approved by Jones & Partners' Board of Directors, which is identical to the Board of Directors of Jones Holding Co. Jones & Partners' Board of Directors have approved this Statement on behalf of each of Jones & Partners and Jones Holding Co.



Mitchell Raeside
Director / Chair