



Modern Slavery Statement

1. Introduction

As a company, Intelera Medical Systems Incorporated (“Intelera”) is committed to conducting all aspects of its business in keeping with the highest ethical standards and expects all employees and other persons acting on its behalf as well as its suppliers and subcontractors to uphold this commitment.

In accordance with this commitment, Intelera is dedicated to carrying out its business responsibly and to ensure that slavery and human trafficking does not take place in our business, including any part of our supply network. In addition, we recognize the importance to encourage our suppliers to take steps to adopt responsible supply network processes.

Intelera, on its behalf and on behalf of its group companies (collectively, “Intelera,” “we” or “our”) makes this joint Modern Slavery Statement under the UK Modern Slavery Act 2015 (UK Act) and the Australia Modern Slavery Act 2018 (Cth) (Australian Act). This statement is intended to provide details of the steps Intelera has taken up to this point and that it intends to continue implementing towards ensuring that slavery and human trafficking are not taking place in our organisation or our supply network.

2. Our Organisation

Intelera is one of the leading providers of medical imaging software and services for the healthcare industry operating in Canada, the United States of America, the United Kingdom, India and Australia.

a. Our Structure and Operations:

Intelera is headquartered in Montreal, Quebec and Raleigh, North Carolina, and the group of companies consist of the following entities at the time of this statement:

- i. Intelera Medical Systems Incorporated
- ii. Intelera Oceania (Pty) Ltd
- iii. Insignia Medical Systems Ltd
- iv. Intelera Holdings USA Ltd
- v. Digisonics, Inc.
- vi. Heart Imaging Technologies, LLC
- vii. Lumedx Corporation
- viii. DICOM Grid, Inc. dba Ambra Health
- ix. PenRad Technologies, Inc.
- x. Life Image, Inc.

In order to prepare this joint Modern Slavery Statement, we engaged and consulted with each of the reporting entities covered by this statement and consulted the entities we own or control.

b. Our Supply Network:

As a software service provider, our supply network is relatively short and comprises predominantly of professional services. These include suppliers of IT and communications equipment and services; property; office cleaning and other facilities management services; transport such as airlines and couriers; marketing, such as merchandise suppliers and conference providers; office equipment and supplies; and professional services such as consultants, auditors, legal counsel, banks, insurers and recruitment agencies.

3. Our Policies

Intelera as a group of companies has several policies and procedures in place to ensure ethical standards and ethical conduct are entrenched in its business.

Intelera’s Global Code of Conduct form part of its Employee Handbook and sets out Intelera’s standards of business conduct, applying in every country where Intelera does business, and applying to all employees, managers and executives, whether full-time or part-time, casual, contractual, permanent or temporary, of Intelera, as well as all controlled subsidiaries and third parties that may act on behalf of Intelera.

As part of Intelrad's Global Code of Conduct, we ensure a fair hiring process based on merit, qualifications and performance. We strive for an inclusive work environment where all ideas, contributions, and perspectives are welcome. Intelrad does not allow or tolerate any discrimination based on, but not limited to: ethnicity, culture, religion, disability, age, gender identity or expression, sexual orientation or political affiliation.

Intelrad respects human rights and strives to offer proper conditions for all employees who shall be treated with dignity and respect, in accordance with their intrinsic rights and freedoms. We are committed to ensure fair remuneration and benefits in constant compliance with all applicable laws, and will not tolerate, under any circumstance, forced labor, human trafficking, child labor, slavery or any other human rights violation. This standard applies to Intelrad's workforce as well as to contractors, consultants, suppliers and anyone authorized to act on Intelrad's behalf.

Intelrad is committed to providing a healthy work environment in which all employees are treated with respect and dignity. In pursuit of this goal, Intelrad does not tolerate acts of discrimination, violence, harassment, or sexual harassment (collectively, "harassment"), from or against any Intelrad employee, supplier or client.

Intelrad is committed to treating everyone fairly and with respect, and to providing a workplace free of discrimination and harassment by co-workers, supervisors, managers, customers, suppliers or visitors. Intelrad strictly prohibits threats, acts of violence and physical and psychological intimidation.

Through Intelrad's Diversity, Equity and Inclusion Charter, Intelrad is committed to fostering an inclusive and respectful work environment, regardless of a person's gender, age, race, ethnicity, sexual orientation, physical ability or socioeconomic background.

4. Our Due Diligence Processes

With regards to Intelrad's employees and contractors, Intelrad ensures that:

- a. the policies set out in the Global Code of Conduct are complied with;
- b. all legal obligations are complied with in the recruitment and on-boarding process with a particular focus on an individual's right to work in the relevant country in which they will be engaged;
- c. it conducts an appropriate level of due diligence on prospective employees prior to them joining Intelrad, including a robust selection process, background checks and employment references;
- d. it recruits, promotes and develops its employees on the grounds of merit and capability and have a well-developed culture of diversity and inclusion;
- e. it conforms to the London Living Wage for its London employees.

With regards to its supply network, Intelrad and its group companies do not manufacture or supply physical products and neither does it rely on raw materials or products. Hence, Intelrad's supply network is relatively short, uncomplicated, and comprised of mostly large established hardware and software suppliers, as well as professional services providers in the development and support of software products.

As part of its procurement process, Intelrad completes a Product and Supplier Requirements Form for each new supplier it intends to add. This form includes various assessments to automatically determine the supplier's risk classification based on several factors and measures. In addition to this preliminary step in its supply network process, Intelrad insists on the inclusion of clauses in its agreements with suppliers in terms of which the supplier warrants and undertakes to comply with all applicable anti-slavery and human trafficking laws, statutes and regulations in place as well as having and maintaining its own policies and procedures to ensure compliance with such legislation.

5. Our Approach to Assessing and Managing Risk

Intelrad conducts regular reviews of all its suppliers, which includes risk assessments with regards to such suppliers. Such ongoing supplier monitoring is performed commensurate with the risk of the product or service the supplier provides.

Apart from ongoing monitoring, Intelrad also performs periodic supplier evaluations commensurate with the risk of the product or service the supplier provides. Furthermore, suppliers that have been inactive for more than three years have to follow the entire process from the start if any further purchases are to be made.

Intelrad does not consider its relationships with professional services suppliers as presenting a material risk in the context of slavery and human trafficking, whereas once-off relationships with certain suppliers and those located in certain regions of the world may pose medium risks, as opposed to Intelrad's ongoing contractual relationships. This risk is managed through only making use of creditable suppliers with well respected reputations, as well as the ongoing monitoring, periodic evaluations.

6. Our Effectiveness in Combating Slavery and Human Trafficking


Through its Supplier Master List and its periodic evaluations of all its suppliers, Intelerad will continue to identify those suppliers that can be classified as high risk based on several risk factors in terms of Intelerad's Risk Management Policy and Intelerad will continue to enhance how it engages with new suppliers. Intelerad's goal continues to be the identification of suppliers that pose a significant risk for slavery and human trafficking based on the products and/or services those suppliers provide to Intelerad, as well as the locations of the corresponding supplier. Intelerad will not engage any supplier knowingly involved in modern slavery and/or human trafficking and/or who does not pay their employees the minimum wage where applicable.

For the current reporting period, we have not identified any modern slavery incidents in our supply networks or in our operations. Nevertheless, we will remain vigilant and continue to strengthen our processes to effectively identify and address any such incidents, should they arise. Furthermore, any grievances, complaints, or consultations regarding the subject matter of this statement can be directed to Intelerad at the following email: legaldepartment@intelerad.com.

Intelerad has been busy with and continues to acquire new businesses and in its process of expansion, Intelerad has made the focus on anti-slavery and human trafficking part of its due diligence process.

Intelerad will continue to strengthen its procurement processes (both the new supplier onboarding process as well as the periodic supplier evaluation process) to increase the focus on anti slavery and human trafficking, by ensuring that new agreements it enters into with suppliers contains provisions in terms of which the supplier warrants and undertakes to comply with all applicable anti-slavery and human trafficking laws, statutes and regulations in place as well as having and maintaining its own policies and procedures to ensure compliance with such legislation. Intelerad's staff is required to review and confirm their abidance with Intelerad's Global Code of Conduct and other policies and the Legal and Compliance Departments will continue to provide advice and support to Intelerad's staff on matters regarding modern slavery as required.

This joint statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and section 54(1) of the UK Modern Slavery Act 2015 and constitutes Intelerad's slavery and human trafficking statement for the financial year ending on 31 July 2023. The development of this statement was led by Intelerad's Legal and Compliance Departments, and it has been approved by the Board of Directors of Intelerad Medical Systems Incorporated and signed by Intelerad's CEO on 17 January 2024.

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Jordan Bazinsky
Chief Executive Officer
Intelerad Medical Systems Incorporated