

Modern Slavery Statement

Reporting Period

1 July 2021 to 30 June 2022

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 2022 (**FY22**).

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 (27 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 2022, employed approximately 615 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 risk.

Jones Radiology operates in a highly regulated healthcare landscape, and ensures it employs strong internal governance measures within this environment.

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. In maintaining our reputation for quality, safety and service excellence, our responsibility extends to 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 significant majority of suppliers that Jones Radiology dealt with during the reporting period were located in Australia. In addition, most of our largest suppliers by spend are reporting entities in their own right under the Act.

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; and
- (b) the suppliers of our local suppliers.

Regarding the suppliers of Jones Radiology's suppliers, the Group recognises that the procurement of goods or services from third parties implicitly involves reduced control and oversight of third party operations, in contrast with tightly held internal operations.

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)

During FY22, 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.

Procurement framework

Jones Radiology procurement is supported as a service by the I-MED Group procurement team. The I-MED Group's procurement team is a centralised business unit comprising of designated category managers who are specialists in their supply classes and have a deep knowledge of the nuances of their supply categories. The I-MED Group's 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. Whilst such due diligence is tailored for category-specific requirements, the I-MED Group's procurement team uses standardised documents and procedures to ensure a consistent approach across its supplier assessments.

The I-MED procurement team managed a significant proportion of Jones Radiology's external procurement spend during the reporting period. This procurement was subject to the I-MED Group's separate Modern Slavery Statement and policies. Of the remaining procurement balance, the majority involved locally sourced building construction and facility management services.

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 – e.g. with the use of template contractual obligations and standardised audit, reporting and performance monitoring procedures. In addition, the I-MED Group has 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.

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.

Strengthened governance of internal operations

The relatively large workforce employed by Jones Radiology comes with complexity around keeping abreast of all relevant changes and developments to employment laws. During this reporting period, it has been a priority of Jones Radiology's Human Resources and Payroll teams, in conjunction with I-MED counterparts, to monitor any updates and amendments to the employment laws applicable to the practice, including but not limited to the Fair Work Act and applicable modern awards.

A key project was the review of clerical staff award classification to ensure that the Group's staff were appropriately classified under the correct modern award. Training material and user guides were updated to ensure that all relevant staff were aware of the proper award classifications applicable.

Expanded supplier due diligence and review practices

This year, 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. The Corporate Social Responsibility survey includes undertaking a risk assessment directly in relation to modern slavery and human trafficking mitigation strategies. This helps the I-MED Group and Jones Radiology gain a better understanding of the supplier's understanding of, and commitment to, labour standards, their risk exposure and any specific approaches that supplier has towards mitigating modern slavery in their business.

An outcome of a supplier's Corporate Social Responsibility survey may include the implementation of an action plan which assigns various responsibilities across the Group and the supplier. Implementation of that action plan is then monitored by the I-MED Group procurement team. If the procurement team identifies non-compliance, collaborative remedial action is taken. This may include sharing knowledge, discussing approaches to ethical and lawful practices and if necessary, escalating the noncompliance to the I-MED Group's legal team.

Expanded supplier due diligence also includes increased due diligence on major suppliers. Major suppliers are also subject to annual performance reviews with a focus on compliance with ethical practices and laws.

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.

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 performance review in respect of an additional 15 suppliers compared with the year before.

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.
- The Group complies with its obligations under the superannuation guarantee legislation. Superannuation contributions are routinely paid prior to the quarterly due date.

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. During this FY22, the I-MED Group focussed on utilising the expertise of a working group across HR, Payroll and Tax Teams and specialist consultants to manage any risk in categorising the workforce and ensuring employees receive the appropriate entitlements.
- **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. In this reporting period, the I-MED Group facilitated regular meetings for the appropriate HR and management-level staff to understand the volume of labour hire and temporary workers, the lengths of their assignments and to ensure compliance with employment and other relevant laws. These measures helped the I-MED Group and Jones Radiology to better manage the potential small risk posed by labour hire and temporary workers being inconsistent with I-MED's usual internal practices.
- **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.

Staff entitlements

All employees are employed pursuant to a written common law employment contract which contains their terms and conditions of employment, which are specifically drafted to ensure legal compliance depending on their role. 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.

These industrial instruments contain a number of further terms and conditions of employment in addition to those contained in the employee's employment contract, including in relation to:

- How employees are classified (e.g. full-time, part-time or casual etc)
- Hours of work, including rostering and breaks
- Wages and allowances, including the payment of these entitlements
- Overtime and penalty rates
- Leave and public holidays
- Consultation in relation to major workplace change and changes to rosters or hours of work
- Dispute resolution mechanisms in relation to matters under the enterprise agreement, modern award or National Employment Standards
- Termination of employment and redundancy

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. During this reporting period, the I-MED Group refined its WHS induction and onboard process to focus on better preparedness for attendees in its workplaces.
- **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.

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. Review of due diligence processes: the Group will undertake an assessment of its modern slavery mitigation processes since the commencement of the Act, and review and refine its approach accordingly. This may include assessing our "transition out" processes for non-compliant suppliers.
3. Focus on review of suppliers with significant 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.
4. Standardising assessment, management and effectiveness of actions: the I-MED Group have indicated it will introduce clear risk matrices into its regular risk reporting framework, which Jones Radiology will use to effect a standardised approach to modern slavery risks in line with other risks in its organisation.

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