



**2023**

# **Modern Slavery Statement**

**CAPITOLHEALTH**  
LIMITED

ABN 84 117 391 812

## Reporting Entity

This Modern Slavery Statement is made by Capitol Health Limited (ABN 84 117 391 812) in accordance with the *Modern Slavery Act 2018 (Cth)* for the financial year ended 30 June 2023.

Capitol Health Limited is an ASX listed public company (ASX: CAJ) with its registered office located at Level 2, 288 Victoria Parade, East Melbourne, Victoria, 3002.

## Structure and Operations

Capitol Health Limited and its controlled entities (collectively “Capitol Group” or “the Group”) is a leading provider of diagnostic imaging and related services to the Australian healthcare market. The Capitol Group operates 66 clinics throughout Victoria, Tasmania, South Australia and Western Australia. As a community focused company our facilities are predominantly suburban rather than hospital-based, with priority given to service and minimisation of administrative burdens for healthcare professionals.

Trading under its flagship brands Capital Radiology, Future Medical Imaging Group, Direct Radiology, Fowler Simmons Radiology, Radiology Tasmania, Womens’ Imaging and Imaging @ Olympic Park the Capitol Group conducts more than 1.4 million procedures per annum and employs over 1000 people which includes over 100 specialist radiologists. The operational focus is on delivering a community-based infrastructure for radiologists and related medical practitioners to deliver optimal, efficient, accurate healthcare service outcomes for patients.

### Locations and Brands




# Our Supply Chain

In support of the provision of its medical imaging services the supply chain of the Capitol Group consists of both services and products sourced from within Australia and overseas.

During the year the company engaged over 1000 people and over 850 suppliers with a total spend of more than \$170 million. The majority of the Capitol Group's suppliers are based within Australia and New Zealand.

All our suppliers have been grouped as follows:

	<b>Labour</b>	Employees of the organisation as well as consultants, advisors, labour hire and overseas based typing services.
	<b>Occupancy</b>	Leasing and/or rental of clinic sites, head office and similar facilities. It also includes all occupancy related supplies such as electricity, water, gas, cleaning and maintenance.
	<b>Medical equipment and consumables</b>	Procurement of medical imaging equipment, maintenance or expenses associated with the equipment, as well as medical consumables, medical supplies and protective equipment.
	<b>Information Technology</b>	Information technology hardware and software, telecommunications hardware and network, system support and relevant repairs.
	<b>Investment</b>	Banking, finance, business acquisition supplies such as advisors, legal representatives, accounting services as well as investment related services.
	<b>Other</b>	All remaining suppliers including travel and entertainment, printing, subscriptions, marketing, insurance and compliance costs.

The supply chain involves a mix of commercial arrangements and relationships that can be generally defined as either long-term or short-term in nature. Long-term arrangements typically involve employees, landlords (leasing/rental of clinic and head office sites), medical equipment vendors, providers of IT hardware and software, banking services and finance.

## Risk Assessment of Operations

The provision of diagnostic imaging and related services by the Capitol Group involves the services of highly trained medical professionals and support staff located within Australia and engaged under normal employment and commercial laws.

The company and its controlled entities operate in a heavily regulated industry in terms of the provision of health care services, staff employment or engagement, education and training, and the use of medical equipment. The operations of the Capitol Group are monitored and controlled through good governance, clinical and corporate risk management, mandatory accreditation, compliance programs, and recruitment and remuneration practices.

# Risk Assessment of Supply Chain




Modern slavery practices are a violation of human rights and can take the form of slavery, servitude, forced and compulsory labour, human trafficking, debt bondage, child labour and deceptive recruitment.

Capitol Group's risk assessment process involves evaluation of supplier (product and services) risk, geographic risk, entity risk as well as sector and industry risk. These assessments inform an overall risk rating of low, medium or high across the supply chain. This is to assist in determining which parts of the supply chain are most at risk of perpetrating modern slavery so efforts can be focused on these areas.

Where appropriate, as informed by the risk assessment, the Company engages directly with suppliers to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their business.

The majority of the Capitol Group's suppliers of products and services are based within Australia and New Zealand both by quantity and value of spend representing lower risk of modern slavery. However, the Capitol Group recognises that in some cases these products and services, or components of these, have been sourced or provided from other countries.

The key areas of risk for modern slavery in our supply chain have been identified in relation to the following:

	Labour	Restricted to <b>uniform suppliers</b> and <b>overseas based typing services</b> .
	Occupancy	In relation to <b>cleaning services, maintenance</b> and <b>construction</b>
	Medical consumables	Only related to <b>medical supplies</b> and/or <b>consumables manufactured overseas</b> .

The Capitol Group has addressed the matter of modern slavery with key suppliers in the areas identified by reviewing their publicly available material, completing direct verbal enquiries and in some cases requesting copies of their internal compliance policies/statements and/or requesting the completion of a modern slavery questionnaire.

The assessment of modern slavery risk is considered ongoing.

## Risk Mitigation and Due Diligence

The Capitol Group is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chain or through any other business relationship.

Capitol Group has established a Modern Slavery Policy that applies to all persons working for or on behalf of the Group and expects them to act in a manner consistent with its values. The Group will only do business with organisations who comply with this policy, or those who are taking verifiable steps towards compliance.

## Risk Mitigation and Due Diligence (cont'd)

Over time our contractual documentation will incorporate specific prohibition against slavery and servitude, the use of forced, compulsory and trafficked labour, and the use of child labour in line with this policy. Also, where appropriate, we will make provision for our contracted suppliers to hold their own suppliers to the same standards. We will also reserve the right to terminate any contractual arrangement if there is a breach of this policy. We do have pre-existing contracts that do not yet contain these terms and conditions.

The Capitol Group may set reporting timeframes and deadlines, for example, every six months the Board may receive a report to monitor the implementation of the measures and to be informed whether there were any incidents, and if so, what sort of measures will be taken to mitigate, remediate or eliminate the risk or exposure to the slavery practices.

The Group may allocate the modern slavery reporting responsibilities within the existing Group compliance and safety framework, e.g., establishing a dedicated team and/or involving existing teams within management, legal, risk, compliance, corporate social responsibility, procurement, sourcing, people, and finance.

We will take steps to address any risks or potential modern slavery risks identified and produce risk categorisation of the operations, investments, and supply chains (e.g., by sector, geography, etc). Our corporate strategy includes merger and acquisition of complementary imaging groups. Upon entry to the Group the incoming business is assessed for risk. The recent Capitol Group acquisition of Future Medical Imaging Group (FMIG) did not include the practice of using overseas based typing services.

Implementation of a modern slavery incident reporting and monitoring process (including mechanics to foster whistleblowing and reporting within the business).

Creating a remediation framework to address the management of suppliers who perpetrate, or are at high risk of perpetrating, modern slavery offences.

Implementing regular monitoring of the Group's modern slavery compliance measures.

The Capitol Group will provide specific training to staff in modern slavery requirements.

## Actions

The effectiveness of the actions taken to assess and address the risk of modern slavery will be reviewed regularly through the Capitol Group governance processes including the Audit and Risk Committee with the aim to continuously improve and develop Modern Slavery risk maturity.

Further, we will establish key performance indicators to monitor the effectiveness of the Group's modern slavery and broader human rights strategy.

## Consultation

Capitol Health Limited developed this statement in consultation with each of its controlled entities.

The Group has a single management and shared service team responsible for the activities of the Group. Where entities are either non-trading or held for investment purposes the Capitol Health Limited management group and directors have been able to assist the consultation process.

## Other information

Further information regarding Capitol Health Limited, its controlled entities and operations can be found on our website [www.capitolhealth.com.au](http://www.capitolhealth.com.au) and included in our 2023 Annual Report.

Policies and charters that reflect our values are included in the Corporate Governance section of our website. These include our Modern Slavery Policy, Anti-Bribery and Corruption Policy, Whistleblower Policy, and Diversity and Inclusion policy.

This statement was approved by the Board of Capitol Health Limited on 13 December 2023.



Mr Andrew Demetriou

Chairman

13 December 2023



Capital  
RADIOLOGY

Fowler  
Simmons  
RADIOLOGY

Imaging  
@ Olympic Park

Direct  
Radiology  
Focused on care

women's  
imaging



Radiology Tasmania