



MEDHEALTH

EW Pacific Pty Ltd (the Australian Holding Company of the MedHealth Group of Companies) on behalf of its Reporting Entities

Modern Slavery Statement

For the financial year ended 31 December 2021

Introduction

As an Australian leader in healthcare, specialist medical, wellbeing, healthtech, rehabilitation and employment services we recognise that we have a responsibility to conduct our business in a socially responsible manner. We believe that addressing modern slavery risks is important to operate as a safe, responsible and professional business. We are committed to conducting our business activities lawfully and ethically and to building a deeper understanding of modern slavery risks within our own businesses and in our community. Our expectation is that our suppliers will also comply with all relevant employment laws and will address modern slavery risks in their own operations and supply chains.

This statement under the *Modern Slavery Act 2018* (Cth) (**Act**) sets out our efforts to address modern slavery risks in our operations and supply chains, including in all entities that we control. As our report demonstrates, we have continued these efforts despite the continuing global challenges associated with COVID-19.

The Act requires certain large entities to publish annual modern slavery statements on an online register which is publicly available. Under the Act, modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation which are trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. While modern slavery is distinct from substandard working conditions or underpayment of workers, the existence of these practices is also illegal and harmful and may also exist where there is modern slavery occurring.

References in this statement to “Our” or “We” are to EW Pacific Pty Ltd (ACN 160 098 162) and its controlled entities (collectively referred to as **MedHealth**). Each of the headings below in this statement corresponds with a mandatory criterion of the Act.

The Board of Directors of EW Pacific Pty Ltd approved this modern slavery statement on 14 June 2022.

This statement is signed by Timothy John Morphy in his role as Director of EW Pacific Pty Ltd on 14 June 2022.



Timothy John Morphy
DIRECTOR
EW PACIFIC PTY LTD

14 June 2022

1. Reporting Entities

This is a joint modern slavery statement for the financial year ended 31 December 2021 by EW Pacific Pty Ltd (ACN 160 098 162) on behalf of the group entities which are reporting entities under the Act and also covers the activities of entities controlled by EW Pacific Pty Ltd which are listed in paragraph 2. The reporting entities under the Act are:

- EW Pacific Pty Ltd (ACN 160 098 162)
- MedHealth Holdings Pty Limited (ACN 141 218 215)
- MedHealth Pty Limited (ACN 141 219 785)
- Work Health Group Pty Ltd (ACN 606 846 137)
- Work Health Investments Pty Ltd (ACN 606 853 338)
- The WorkFocus Group Pty Ltd (ACN 166 308 765)
- atWork Australia Pty Ltd (ACN 009 452 153)

All reporting entities covered by this statement have a 31 December financial year end.

2. Our structure, operations and supply chains

MedHealth is a purpose-built collection of industry leading health, medical and employment brands. Our unique and diverse capabilities come together to get the best possible health and employment outcomes for the people and customers we support.

MedHealth provides services in the following key areas:

- independent medical examinations and opinions;
- medical and disability management advisory;
- transcription and peer review;
- injury management and prevention;
- workplace rehabilitation and return to work;
- job seeking assistance and employment services;
- medical case management;
- medical information exchange;
- provider procurement and booking network;
- health screening services; and
- clinical therapeutic supports and disability assessment services.

MedHealth is part of the ExamWorks global network which includes Australia, the United States of America, Canada and the United Kingdom (see Figure 1 below), delivering over 2 million medical opinion and case management services annually.

United States



Australia



MEDHEALTH

Board of Directors

MedHealth operates in all states and territories in Australia, with the head office located in Melbourne, Victoria. MedHealth incorporates the following business brands:



EW Pacific Pty Ltd is the registered holding company in Australia of MedHealth. EW Pacific Pty Ltd is wholly owned by ExamWorks AP, Inc which, in turn is wholly owned by ExamWorks Group, Inc, both of which are registered US companies.

Below is a list of subsidiaries of EW Pacific Pty Ltd:

- MedHealth Holdings Pty Limited
- MedHealth Pty Limited
- Next Health Pty Ltd
- CaseWorks Australia Pty Ltd
- ASSESS Medical Group Pty Ltd
- Medilaw Holdings Pty Ltd
- Medilaw Victoria Pty Ltd
- Medilaw Pty Ltd
- Australian Medico-Legal Group Pty Ltd
- Advicor Pty Limited
- Work Health Group Pty Ltd
- Work Health Investments Pty Ltd
- atWork Australia Pty Ltd
- Cogent Advisory Pty Ltd
- IPAR Rehabilitation Pty Ltd
- Kairros Pty Ltd
- SIS Rehab Group Pty Ltd
- Step 1 Group Pty Ltd
- WorkFocus Australia Pty Ltd
- UHG Pty Ltd
- Medico-Legal Opinions Pty Ltd
- Unified Healthcare Group Pty Ltd
- medEbridge Pty Ltd
- The WorkFocus Group Pty Ltd
- Total Workfit Solutions Pty Ltd
- medEbridge Solutions Pty Ltd
- Benchmark OT Pty Ltd
- Ability Action Australia Pty Ltd
- Outcomes Connect Australia Pty Ltd

Our supply chains consist of the products and services needed for day-to-day operations of our various businesses, including:

- domestic labour through use of specialist medical, allied health professional and other professional consultants;
- overseas labour through our outsourced service providers;
- commercial leasing and associated property management services and building services;
- information technology infrastructure;
- utilities and telephone services;
- legal, financial, insurance, corporate advisory, education and training and other professional services;
- marketing and communications services, promotional merchandise and sponsorship benefits;
- site and office consumables (including stationery, amenities and kitchen consumables) and catering;
- postage and courier services;
- accommodation and travel services;
- corporate clothing; and
- exercise, rehabilitation and occupational therapy equipment used by our medical and allied health services brands.

3. Risks of modern slavery practices in our operations and supply chains

In 2020, we undertook a scoping exercise to identify parts of our operations and supply chains which may contain modern slavery risks. Our assessment framework is based on Commonwealth guidelines¹ regarding key modern slavery risk factors including high risk sectors and industries, high risk products and services, high risk geographic locations and high risk entities.

As we do not operate in any industries that are recognised globally as high risk for modern slavery and we comply with applicable Australian workplace laws, we have assessed our risk of modern slavery within our core business operations to be low. To our knowledge, in respect of our employees, we comply with all Australian laws that cover pay and entitlements, superannuation, record-keeping, workplace health and safety requirements, workers' compensation, anti-discrimination and equal opportunity.

However, we have identified the following potential modern slavery risks in our direct and indirect supply chains.

Outsourced labour force



Through our Australian-based offshoring service provider, AS White Global, we have established offshore teams to manage some of our administrative, quality assurance, business intelligence development, recruitment support and information technology functions.

These teams are located in Malaysia, the Philippines and Vietnam.

Through our business arrangements with Ansell and Aquity, we share dedicated teams in India with our global ExamWorks group to perform medical transcription, records management, peer review and quality assurance activities.

Our offshore teams are located in countries which are known to have a higher modern slavery risk compared to Australia. However, we believe that modern slavery risks associated with our offshore teams are low as we have processes and controls in place to manage any elevated risk of modern slavery, to ensure good working conditions and the safety and wellbeing of our offshore team members. Our offshoring service providers have also provided us with modern slavery commitments. Further information is included in Section 4 of this statement.

Commercial leasing and associated property management services and building services



We lease over 300 sites Australia-wide. Our property management service provider, CBRE, delivers lease database management services from the Philippines, which is a country that attracts a higher modern slavery risk than Australia. CBRE's commitment to addressing modern slavery risks is contained in its Australian modern slavery statement.

Our supply chains associated with our commercial leasing activities include sectors such as cleaning, security and maintenance services. Those sectors may be at greater risk of modern slavery as those services may be performed by more vulnerable populations and involve lower wages and manual labour.

We are aware that modern slavery risks may also be present in our supply chains relating to office fit out and refurbishment.

¹ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

Information technology infrastructure and systems



We are aware that modern slavery risks may be present deep in our supply chain for the procurement of information technology infrastructure and systems including through extraction of raw minerals (which is an industry recognised as a high risk industry) through to manufacturing.

Sponsorship, marketing and communications



Modern slavery may occur deep within the supply chain for our promotional merchandise which may be manufactured in countries with higher modern slavery risks.

From time-to-time our entities sponsor sporting teams which may wear uniforms or sporting equipment with our brands' logos. These goods have an elevated risk of modern slavery occurring in their production, including child labour.

Office supplies and catering



Modern slavery risks associated with food production, packaging and distribution may be present deep in our supply chains for office supplies (e.g. tea and coffee) and catering services. Those sectors and products are known to have higher modern slavery risks globally.

Further, the catering services industry is associated with higher modern slavery risk as those services can be delivered by more vulnerable populations.

Corporate clothing



Some of our brands wear branded corporate clothing manufactured in countries which are known to have higher modern slavery risks. Further, the textiles industry is recognised as a high risk industry globally.

Products and equipment used by our medical and allied health services businesses



Examination gloves are used by our various medical and health brands. The manufacture of examination gloves is known to involve higher modern slavery risks. Our businesses use different suppliers and examination glove brands from time-to-time. We note that large suppliers Mun and Ansell have issued Australian modern slavery statements.

Further, there may be modern slavery risks deep in our supply chains relating to the extraction of raw materials for the production of exercise, rehabilitation and occupational therapy equipment used by our medical and allied health services businesses.

PPE and consumables in response to COVID-19



To protect our team members and our clients during the COVID-19 pandemic we have implemented measures at various sites such as supplying face masks, installing temperature sensing machines and/or using hand-held temperature sensors, installing virus barrier screens, providing hand sanitiser (automatic dispensing machines and manual pumps) and providing surface sprays. There may be modern slavery risks relating to the extraction of raw materials for these products or in their production. For example, we are aware that in some countries, there is a higher modern slavery risk associated with the production of sugar cane, which in turn is used to produce ethanol, the key ingredient in the production of hand sanitiser.

4. Our actions to assess and address risks, including due diligence and remediation processes

We have various policies and governance structures in place to support our operations and to reduce the risk of modern slavery in our operations and supply chains. These are:

ExamWorks Code of Conduct and Ethics for Employees, Officers and Directors

MedHealth Code of Conduct

Our codes of conduct reflect our commitment to maintaining the highest standards of business conduct and ethics. ExamWorks Inc. requires all employees, officers and directors across their global network to read and acknowledge the ExamWorks Code of Conduct, which includes (among other things) a requirement for the person to certify they will deal honestly and ethically on ExamWorks' behalf in all matters. Every MedHealth team member is required to read and acknowledge that they will comply with the ExamWorks Code of Conduct upon commencement, and every three years thereafter.

Although the updated version was issued to MedHealth after the end of the reporting year, the ExamWorks Code of Conduct has been updated to include a pledge to a workplace and a supply chain free of modern slavery and provides examples of prohibited conduct.

Whistleblower Policy

Our Whistleblower Policy provides a channel for reporting and investigating modern slavery incidents. It refers to human rights breaches (including modern slavery) as an example of reportable conduct under the policy.

Procurement Policy

Our Procurement Policy includes modern slavery as a procurement consideration. The policy explains that a detailed risk assessment is undertaken for any procurement that potentially involves medium to high modern slavery risks. The risk assessment may require the supplier to complete a questionnaire and/or to provide information on its management of modern slavery risks. The contract that is then awarded to the supplier will generally include modern slavery contract clauses that are proportionate to the modern slavery risks of the procurement. We will continuously monitor the supplier or the term of the contract for any new risks or issues that may arise in that time. The Procurement Policy also sets out our response to a modern slavery incident or risk that is identified in our supplier's operations. If this occurs, we will work with the supplier to develop better practices to address modern slavery, or, where appropriate, we will consider exercising any right of termination that the contract may provide.

Supplier Code of Conduct

Although work commenced after the end of the reporting year, a supplier code of conduct was finalised in April 2022, which will be required for suppliers that are identified as potentially involving medium to high modern slavery risks.

Request for Tender Process

Although work commenced after the end of the reporting year, a Request for Tender process and associated documentation is currently being developed that define minimum standards for our suppliers, including commitment to MedHealth's social procurement goals.

Human Rights Policy

Our commitment to upholding human rights is set out in our Human Rights Policy. Our policy is guided by international human rights standards. We recognise that modern slavery risks are more likely to exist where human rights are not respected.

MedHealth Diversity and Inclusion Action Plan 2020 – 2023

A key focus and objective of our Diversity and Inclusion Action Plan 2020-2023 is to be a diversity leader and educator. One of the ways we intend to achieve this is by ensuring our key suppliers are aligned with our diversity principles. In working towards this goal, we have developed a Procurement Policy (described above) which includes both supplier inclusion and diversity commitments and modern slavery as a procurement consideration. We acknowledge that people from diverse backgrounds may be more vulnerable to modern slavery risks. In accordance with our Procurement Policy we will, where appropriate, monitor our suppliers who employ or engage with diverse communities to ensure the suppliers have practices to address modern slavery risks.

Risk and Compliance Steering Committee

MedHealth's Risk and Compliance Steering Committee is chaired by the Group Chief Financial Officer (who is also a Company Secretary for all MedHealth entities). The Committee meets quarterly and discusses risks across the various businesses. The meeting is attended by representatives from our Executive Leadership Team, business leaders, in-house legal team, information technology team, our governance, privacy and risk experts and our external auditors. Any modern slavery risks that are identified will be reviewed and responded to at these meetings.

We will continually review the risk of modern slavery within our operations and supply chains and will make any necessary changes to our practices if required.

Where modern slavery risks lie deep within our supply chains, we may have limited ability to identify suppliers who engage in modern slavery practices and limited ability to change their behaviour. However, we aim to build leverage by building awareness of modern slavery issues within the broader community which will in turn influence business action globally.

Actions we have taken in FY2021 to address the risk of modern slavery in our operations and supply chains are:

- continuing to assess modern slavery risks in our supply chains;
- internal assessment of modern slavery risks associated with our offshore teams and potential impact of COVID-19 to assess these risks;
- review of offshore provider AS White's COVID-safe plan;
- intranet content about modern slavery added which includes the most recent modern slavery statement and a link to an online modern slavery training course;
- the legal team published a news bulletin on the staff intranet to raise awareness of modern slavery and available intranet resources;
- provided information about modern slavery and MedHealth's modern slavery risks to targeted team members being our offshore team managers, organisational excellence leaders, property management leaders, and IT procurement team members and encouraged those team members to undertake the online modern slavery training course included on the staff intranet;
- provided information about MedHealth's modern slavery risks to our external procurement advisor, Procurement Alliance;
- continual oversight of any corporate social responsibility issues (including modern slavery) raised by MedHealth's Risk and Compliance Steering Committee;
- continued our engagement with suppliers who provide our offshore workforce in relation to modern slavery issues;
- included, where necessary, contractual obligations relating to modern slavery in contracts with our suppliers and sponsored organisations;
- worked towards making it easier for staff members to suggest how we can address modern slavery issues (a modern slavery suggestion box was created on the staff intranet after the end of the reporting year); and
- updated relevant policies and governance documents to address modern slavery risks:
 - updated our Whistleblower Policy to improve reporting channels and investigation procedures for whistleblower reports and to include modern slavery as a specific example of reportable conduct;
 - although work commenced after the end of the reporting year, a Request for Tender process and associated documentation is currently being developed that define minimum standards for our suppliers, including commitment to MedHealth's social procurement goals;
 - although work commenced after the end of the reporting year, a supplier code of conduct was finalised in April 2022, which will be required for suppliers that are identified as medium to high risk (as referenced above); and
 - although the updated version was issued to MedHealth after the end of the reporting year, the ExamWorks Code of Conduct has been updated to include a pledge to a workplace and a supply chain free of modern slavery and provides examples of prohibited conduct.

In FY2021, we did not identify any instances of modern slavery in our direct operations. Further, no modern slavery concerns were raised under the Whistleblower Policy or other channels.

COVID-19 and protection of our offshore teams

The COVID-19 pandemic may have increased the vulnerability of workers in our global supply chains to modern slavery and other forms of exploitation. Reasons for increased vulnerability may include fear of loss of income, fear of COVID-19 infection or changes in purchasing practices and supply chains.

In consultation with the leaders of our offshore teams and our offshore providers, we have protected and supported our workers by continuously monitoring team member work conditions and practices in line with procedures in place pre-COVID-19. These processes and systems include regular and direct interaction with offshore team members and, in some cases, involvement in recruitment. We have confirmed with our offshore providers that there are arrangements in place to protect workers from COVID-19 including practices in relation to personal protective equipment, access to leave arrangements and working from home arrangements. While we consider that we have been monitoring working conditions and any modern slavery risks adequately from Australia, travel restrictions have prevented us from visiting our offshore teams during the COVID-19 pandemic. We hope to recommence these visits in the next reporting period.

5. How we assess the effectiveness of our actions

We will assess the effectiveness of our actions to identify and address modern slavery practices in any part of our operations and supply chains by:

- undertaking periodic reviews of our internal governance procedures and modern slavery risk assessment framework including policies
- working towards implementing key performance metrics;
- tracking our actions to address modern slavery and outcomes;
- working towards building modern slavery awareness via our intranet resources and our employee training as part of broader training initiatives on diversity and human rights and tracking training completion rates;
- working with suppliers to check they are progressing actions that they have put in place to address modern slavery incidents or risks;
- rolling out and reporting on our suppliers who have signed our Supplier Code of Conduct;
- reviewing any incidents reported through whistleblower or other reporting mechanisms and considering any trends;
- considering modern slavery issues at MedHealth's Risk and Compliance Steering Committee meetings; and
- discussing our modern slavery approach with external advisors, as necessary.

6. Consultation with owned or controlled entities

As all entities within MedHealth (as detailed in section 2 above) have the same Company Officers (Directors and Company Secretaries), are managed and governed by the same Executive Leadership Team, and are subject to oversight by MedHealth's Risk and Compliance Steering Committee, all reporting entities and their controlled entities have been appropriately consulted in the preparation of this modern slavery statement. Relevant information, materials and updates were also provided to team members from legal, governance and organisational excellence divisions who support all of the reporting entities and who were involved in the preparation of this statement.

7. Provide any other relevant information

We recognise that there is always more we can do to assess and address risks of modern slavery in MedHealth's operations and supply chains and are committed to continuous improvement. Going forward, we aim to continue to build awareness of modern slavery issues within our businesses as part of broader training initiatives on diversity and human rights. We will also continue to work with our suppliers to gain information on the supply chains over which we have less visibility and to seek ways in which we can increase our ability to influence change. The rollout of the Supplier Code of Conduct in FY2022 will enable us to set higher expectations of our supply chains, and facilitate a process for monitoring compliance and enabling audit of our suppliers if we have any concerns about their operations.

Through delivery of our services, we have contact with vulnerable communities and people in Australia including Aboriginal and Torres Strait Islander peoples, our migrant community, base-skilled workers and people with disability. These communities may be at higher risk of modern slavery. Over time, we aspire to build the capability of our people to recognise the warning signs of modern slavery and to respond to and report any suspected incidents of harm.

We look forward to sharing our progress with you in future modern slavery statements.