



MEDHEALTH

EW Pacific Pty Ltd and its controlled entities (MedHealth)

Modern Slavery Statement

For the financial year ended 31 December 2020

Introduction

We are pleased to share with you our first statement under the Modern Slavery Act 2018 (Cth) (Act) which sets out our efforts to address modern slavery risks in our operations and supply chains, including in all entities that we control. We support the purpose of the Act, which aligns with our commitment to protecting human rights.

We are committed to working towards identifying and removing any instances of modern slavery in our supply chain by our business partners. We will not knowingly support or deal with any business involved in modern slavery. Our values reflect what is important to us and how we go about business. As our report demonstrates, we have implemented risk mitigation measures to reflect our commitment to acting with integrity and to ensure that over time, any potential risks in relation to modern slavery are identified and are addressed.

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 24 June 2021

Signed on behalf of EW Pacific Pty Ltd



Timothy John Morphy

DIRECTOR

EW PACIFIC PTY LTD

1. Identify the Reporting Entity

This modern slavery statement for the financial year ended 31 December 2020 has been made by EW Pacific Pty Ltd (ACN 160 098 162) and prepared as a joint statement on behalf of all of its controlled entities which are reporting entities, as prescribed by the Act. All reporting entities covered by this statement have a 31 December financial year end. The reporting entities under the Act to which this statement applies are outlined in Section 2 of this statement.

2. Describe the reporting entity's structure, operations and supply chains

MedHealth comprises the Australian subsidiaries of global medical services provider ExamWorks.

Through our brands, we are a key provider of services in the following 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.

Headquartered in Melbourne, we have over 2,000 employees and 2,000 contractors working across more than 300 locations nationally. Our key brands are Ability Action Australia, Advicor, ASSESS Group, atWork Australia, Australian Medico-Legal Group, Be Active Health Solutions, Cogent Thinking, IPAR, Kairros, mlcoa, Medico-Legal Opinions, MedHealth, Medilaw, mi-Support, Next Health, SIS Rehabilitation, UHG and WorkFocus Australia.



EW Pacific Pty Ltd is the ultimate Australian holding company of MedHealth. Its immediate parent company, located in the United States of America, is ExamWorks AP, Inc and its ultimate parent company is ExamWorks Group, Inc. The material subsidiaries in MedHealth are set out in financial reports for EW Pacific Pty Ltd, which may be obtained from the Australian Securities and Investments Commission (ASIC). At the time of publishing this modern slavery statement, the most recent financial report that is publicly available is for the financial year ended 31 December 2020.

The entities within MedHealth that are 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)

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 and software;
- telephone services;
- legal, financial, insurance, corporate advisory, education and training and other professional services;
- marketing and communications services, promotional merchandise and sponsorship benefits;
- office supplies and catering;
- postage and courier services;
- accommodation and travel services;
- corporate clothing used by our atWork Australia and Ability Action Australia brands; and
- exercise, rehabilitation and occupational therapy equipment used by our medical and allied health services brands.

3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

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 considered 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 insurance, 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, data analytics 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 who 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 has published a statement in compliance with UK modern slavery laws and its global efforts to address the risk of modern slavery and human trafficking in its supply chain.

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

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 we sponsor sporting teams which may wear atWork Australia branded uniforms or use atWork Australia branded sporting equipment. 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 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.

Corporate Clothing



Our atWork Australia and Ability Action Australia brands wear branded corporate clothing manufactured in countries which have higher modern slavery risks. Further, the textiles industry is recognised as a high risk industry globally.

Our clothing suppliers have published or have provided us with their modern slavery commitments or the commitments of suppliers they use to fulfil our orders.

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 released Australian modern slavery statements.

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

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. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these 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 Our codes of conduct reflect our commitment to maintaining the highest standards of business conduct and ethics.

MedHealth Code of 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.

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.

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 our 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 auditors. Any modern slavery risks that are identified will be reviewed and responded to at these meetings. In FY 2020, information about modern slavery was provided to Committee members.

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 FY2020 to address the risk of modern slavery in our operations and supply chains are:

- performed a due diligence exercise to map our operations and supply chains and to assess modern slavery risks;
- provided tailored information about modern slavery risks has to team members who manage offshore teams and engaged with those team leaders about modern slavery risks, including the potential for increased risk associated with the COVID-19 pandemic;
- extended the role of MedHealth's Risk and Compliance Steering Committee to oversee our response to any modern slavery issues raised;
- commenced active engagement with suppliers who provide our offshore workforce in relation to modern slavery issues;
- inserted template clauses to address modern slavery in template supplier contracts;
- included, where necessary, contractual obligations relating to modern slavery in contracts with our suppliers and sponsored organisations;

- updated relevant policies to address modern slavery risks:
 - introduced a new Procurement Policy that includes modern slavery and other social goals as procurement considerations; and
 - worked towards updating 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; this updated policy was published after the reporting year;
- discussed approaches to addressing modern slavery and modern slavery reporting requirements with ExamWorks UK, who produce an annual Modern Slavery and Human Trafficking Statement under UK modern slavery laws; and
- discussed our modern slavery approach with the KPMG Human Rights & Social Impact team following advice from the KPMG audit team.

In FY2020, 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. Describe how the reporting entity assesses the effectiveness of these actions

We will assess the effectiveness of our actions by:

- undertaking periodic reviews of our modern slavery risk assessment framework including policies;
- 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;
- 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. Describe the process of consultation with any entities the reporting entity owns or controls

As all entities within MedHealth have the same Board members, are managed and governed by the same Executive Leadership Team and MedHealth's Risk and Compliance Steering Committee, all reporting entities and their controlled entities have been appropriately consulted in the preparation of this report.

7. Provide any other relevant information

We believe that addressing modern slavery risks is important to running a safe, responsible and profitable business. We are committed to operating our business 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. Going forward, we aim to build awareness of modern slavery issues within our own 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.

Through delivery of our services, we have contact with vulnerable communities and people in Australia including Aboriginal and Torres Strait Islander people, 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.

While we have made good progress to date, we are committed to improving our modern slavery response. We look forward to sharing our progress with you in future modern slavery statements.