



Gamma Investments Holdco Pty Ltd
Gamma Investments Midco Pty Ltd
Gamma Investments Bidco Pty Ltd
New Vanguard Pty Ltd
PerthRadClinic Limited
Oceanic Molecular Pty Ltd
Perth Radiological Clinic Partnership

Modern Slavery Statement – Financial Year-end 30 June 2021

Who we are

The Perth Radiological Clinic Group of companies (PRC) is made up of the following entities:

- Gamma Investments Holdco Pty Ltd – ultimate holding company
- Gamma Investments Midco Pty Ltd
- Gamma Investments Bidco Pty Ltd
- New Vanguard Pty Ltd
- PerthRadClinic Limited
- Oceanic Molecular Pty Ltd
- Perth Radiological Clinic Partnership – separate to the corporate group

Our operations

PRC comprises of a partnership of radiologists, and a service company which provides staff, premises and equipment, as well as other non-operating group companies. PRC provides medical imaging services in Perth, Western Australia, across 20 clinics, employing approximately 1,000 people.

Our supply chain

PRC procures a range of goods and services necessary to support its business of medical imaging. The main categories of purchases (by dollar value and number of suppliers) are:

- Equipment – medical imaging and office equipment, including software, mainly from global companies with a public commitment to the Australian Modern Slavery Act.
- Medical supplies – as above
- Rent/property outgoings – from Australian hospitals and substantial private companies or family trusts. The properties are often managed by large property management companies with a public commitment to the Australian Modern Slavery Act.

Identifying the risks of modern slavery

PRC is committed to operating our business lawfully and ethically. This involves only working with suppliers that are aligned to that commitment. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, and staff inclusion and diversity.

We have a relatively simple supply chain that includes the purchase of products and services needed for the day-to-day operations of the business. Almost all supplies are sourced from suppliers in Australia or through Australian offices of overseas based companies.

We undertook risk assessments of modern slavery risks in our operations and supply chains over the reporting period to consider the risk that we are causing, contributing, or directly linked to modern slavery practices. Our lowest risks include our own operations, which are run by staff directly employed by us. The labour market in Australia is highly regulated, and strict regulations apply to medical imaging services. Our Whistle Blower Policy details processes and communication pathways for employees and suppliers to disclose misconduct in our business and supply chain without recrimination.

Currently our highest risk is cleaning contractors, who clean our clinics daily. In FY21, a cleaning tender was issued and part of the response required by tenderers was to confirm compliance with the Modern Slavery Act. We also purchase uniforms from a subsidiary of a large public Australian company, whose Modern Slavery Statement has been rated highly.

After performing the risk assessment, PRC is of the view that due to the geographic location of suppliers, types of products purchased, sectors in the supply chain and the reputation of entities we deal with, the risk of slavery in the supply chain is small. However, PRC must continue to be diligent.

Our governance framework

PRC will continue to:

- Publish our Modern Slavery Policy
- Review the risk assessment of the potential modern slavery risks in our operations and supply chains with an emphasis on high-risk geographical locations, types of goods or services purchased and the reputation of entities we deal with;
- Conduct due diligence when selecting new suppliers to PRC;
- Allow only a small number of senior employees who understand the requirements of the Act, to approve new suppliers;
- Have a Whistleblower Policy and escalation policy for staff and suppliers to use; and
- Monitor existing suppliers for any red flags.

In FY22, PRC undertakes to provide a Supplier Questionnaire to its top 20 suppliers by value and new suppliers, in a version similar to that provided by the Government's Modern Slavery Register¹ resources. PRC has also requested that all staff involved in procurement complete the elearning provided by the Modern Slavery Register² by 31 January 2022, so they better understand their obligations and are able to identify key risks.

Monitoring effectiveness

We are monitoring the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles. We will continue to report progress to PRC's Audit & Risk Committee. The key KPIs for FY22 are:

- Request top 20 suppliers by value to complete a Suppliers Questionnaire;
- Request all new suppliers to complete a Suppliers Questionnaire;
- All staff involved in procurement to complete an elearning on Modern Slavery;
- Update the risk register.

Consultation with group entities

The directors of all companies in the PRC group are the same. Only one PRC group company employs staff. Therefore, no consultation between group companies was required.

This Modern Slavery Statement was approved by the Gamma Investments Holdco Pty Ltd Board on 23 December 2021.

Martin Blake
Chairman



¹ <https://modernslaveryregister.gov.au/resources/>

²