

Modern Slavery Statement

Mach7 Technologies Limited

ACN 007 817 192

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About this Statement

The Board of Directors (the “**Board**”) of Mach7 Technologies Limited (the “**Company**” or “**Mach7**”) is responsible for addressing Modern Slavery risk across the Company and our controlled entities (the “**Group**”).

At Mach7, we are committed to conducting all aspects of our business in keeping with the highest ethical standards and expect all employees and other persons acting on our behalf as well as our suppliers and subcontractors to uphold this commitment.

In accordance with this commitment, Mach7 is dedicated to carrying out its business responsibly and to ensure that slavery and human trafficking do not take place in our business, including any part of our supply chain. In addition, we recognize the importance of encouraging our suppliers to take steps to adopt responsible supply chain processes.

To demonstrate our commitment to compliance with the Modern Slavery Act and creating transparency, we will be providing a Modern Slavery Statement on a voluntary basis. This Modern Slavery Statement (the “**Statement**”) has been prepared in respect of the financial year 1 July 2023 to 30 June 2024 (**FY24**), and is made as a joint Modern Slavery Statement under the **UK Modern Slavery Act 2015** (“**UK Act**”) and the **Australia Modern Slavery Act 2018 (Cth)** (“**Australian Act**”).

This Statement outlines the steps we have taken to identify, prevent, and address the risks of modern slavery within our organization and supply chains. We believe that a proactive approach is essential to fostering a fair and equitable working environment for all, and we are committed to continuous improvement in this vital area.

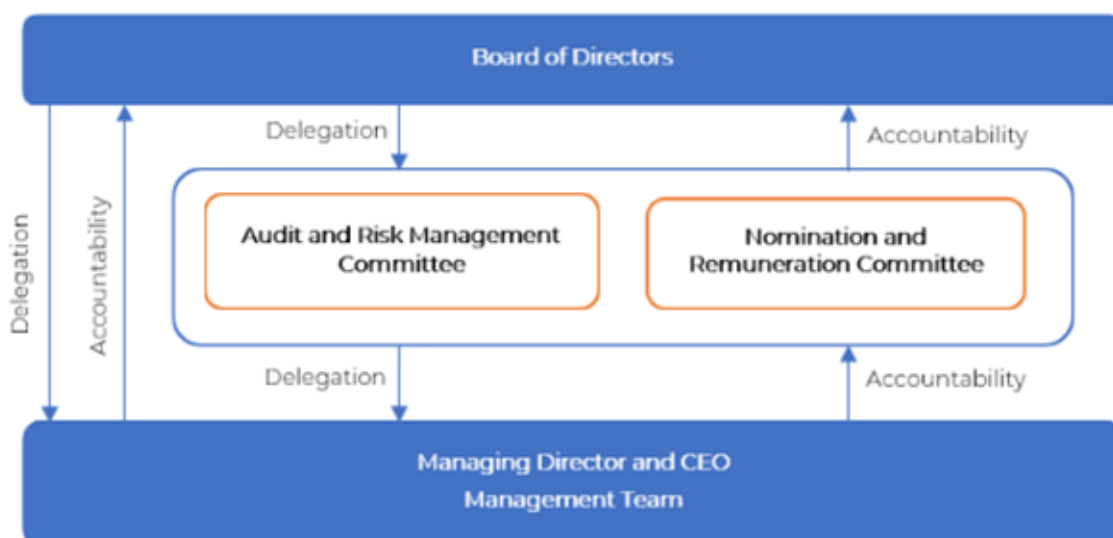
1 Our Structure, operations, and supply chains

1.1. Our Structure

- 1.1.1. Mach7 Technologies Limited is one of the leading providers of medical imaging software and services for the healthcare industry operating in Canada, the United States of America, and the Asia Pacific Region.
- 1.1.2. Mach7 is an Australian public listed company (ASX: M7T) listed on the Australian Stock Exchange (ASX).
- 1.1.3. Mach7 is headquartered in Burlington, Vermont and the Group consists of the following entities at the time of this Statement:
 - Mach7 Technologies, Limited
 - Mach7 Technologies International Pty
 - Mach7 Technologies UK Ltd
 - Mach7 Technologies, Inc
 - Mach7 Technologies Canada, Inc
 - Mach7 Technologies, Pte Ltd

1.2. Our Structure

- 1.2.1. The Board is responsible for overseeing the performance and operations of Mach7, sets the Group’s values and governance framework, and monitors the Company’s culture and compliance in accordance with our Code of Conduct. The Board is assisted by the Board Committees and the Management team in discharging its responsibilities.



1.3. Our Supply Chain

1.3.1. As a software service provider, Mach7’s global supply chain is relatively short and comprises of procurement of software, hardware, and services, as well as partnerships with suppliers and vendors located in North America, Europe, UK, and the Asia Pacific region.

1.3.2. In FY24, our supply chain covered the following categories;

Category	Description and Scope	Examples	Percentage of Suppliers
A	Finished Devices	Finished medical device software that Mach7 resells or relabels, and outsourced third-party development services	5%
B	Materials and components or services	Outsourced third-party raw material testing suppliers	0%
C	Other services	Translation Services, Software Tools, Certification Agencies, Consulting, AR Services, Advertising and marketing services (merchandise suppliers and conference providers), banks, recruitment agencies, and contact centre support services.	90%
D	Facilities and Consumables	Office operations such as cleaning, security, repairs and maintenance, and office consumables. Transportation- Airlines and couriers.	5%

1.3.3. Mach7 acknowledges and recognises that modern slavery risks in our supply chain will extend beyond the suppliers with whom we directly contract. Our suppliers are expected to manage their business and supply chain in line with our Supplier Code of Conduct and in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

1.3.4. Suppliers are also expected to ensure that all employees and contractors are legally entitled to work and that no bonded, forced, or involuntary labour, child labour, human trafficking, or other forms of slavery is employed in the delivery of their products or services to Mach7.

1.4. Our Workplace

1.4.1. Mach7 respects human rights and strives to offer proper conditions for all employees who shall be treated with dignity and respect, in accordance with their intrinsic rights and freedoms.

1.4.2. We are committed to compliance with relevant local and national laws, community expectations, and ethical standards related to modern slavery and human rights in respect to our employees, our contractors, and our business operations.

- 1.4.3. We ensure fair remuneration and benefit and will not tolerate, under any circumstance, forced labour, human trafficking, child labour, slavery or any other human rights violation. This standard applies to Mach7 workforce as well as to contractors, consultants, suppliers and anyone authorized to act on Mach7's behalf.
- 1.4.4. Mach7 is committed to building and maintaining a safe and inclusive workplace, treating everyone fairly and with respect, and to providing a workplace free of discrimination and harassment by co-workers, supervisors, managers, customers, suppliers or visitors. Mach7 strictly prohibits threats, acts of violence and physical and psychological intimidation.
- 1.4.5. Through Mach7's **Diversity and Inclusion Policy**, Mach7 is committed to fostering an inclusive and respectful work environment, regardless of a person's gender, age, race, ethnicity, sexual orientation, physical ability or socioeconomic background

1.5. Our policies and governance framework

- 1.5.1. Mach7 is committed to high standards of corporate governance. Our Board and Board Committees provide the necessary leadership to implement strong corporate governance across the Group so that our decisions and actions are based on transparency, integrity, responsibility, and performance, which promotes the long-term sustainability and ongoing success of our business. Mach7 has group policies in key areas, including
 - Corporate Governance Statement,
 - Risk Management Policy,
 - Corporate Code of Conduct,
 - Anti-Bribery & Corruption Policy,
 - Whistleblower Policy, and
 - Diversity Policy.
- 1.5.2. Our employees are encouraged to report genuine concerns about any conduct or activity they believe is unethical, illegal, fraudulent, undesirable, or corrupt and we offer a variety of channels for them to do so.

2. Modern Slavery Risks in Our Operations and Supply Chains

Potential risks in our operations

- 2.1.1. Mach7 could potentially be exposed to modern slavery risk as an employer. However, we consider the risk that our direct employee workforce could be subject to modern slavery to be negligible and **low**.
- 2.1.2. We have made this assessment on the basis that our direct employees are highly skilled, working within mature regulatory environment and undertaking largely office-based roles.
- 2.1.3. Our direct employees are provided with contracts that comply with relevant employment legislations and are supported by established, embedded employment-related policies and processes with a particular focus on an individual's right to work in the relevant country in which they will be engaged.

2.2. Potential risks in our supply chain

- 2.2.1. Mach7 does not manufacture or supply physical products and neither do we rely on raw materials or products. Our supply chain is relatively short, uncomplicated, and comprised of mostly large established hardware and software suppliers, as well as professional services providers in the development and support of software products.
- 2.2.2. Modern slavery risks could also arise in other areas of our supply chain that may not be as material with respect to our spend, i.e. marketing, cleaning services, transport, largely to support the delivery of Mach7's products and services. Our supply engagements generally consist of supply chains between Mach7 and the end-supplier; we have limited supply chains and supplier engagements with one or more contractor or sub-contractors within that supply chain.

3. Actions taken to Assess and Address Modern Slavery

Risks Mach7 has implemented the following steps to mitigate modern slavery risks in our operations and supply chain:

3.1.1. **Supplier assessments**

- We conduct due diligence on suppliers, including risk assessments, supplier audits, and requiring adherence to our **Supplier Code of Conduct**.
- Through our Supplier Master List and our periodic evaluations of all our suppliers. We consider sector and industry risks, product and services risks, and geographic risks associated with modern slavery when undertaking our due diligence
- Mach7 intends to identify suppliers that pose a significant risk for slavery and human trafficking based on the products and/or services those suppliers provide to Mach7, as well as the locations of those supplier.
- Mach7 does not engage any supplier knowingly involved in modern slavery and/or human trafficking and/or who does not pay their employees the minimum wage where applicable.

3.1.2. **Contracts and policies:**

- We include provisions specific anti-slavery wording in our contractual documentation with suppliers/ third parties to provide us with appropriate comfort that the relevant counterparty conducts their business and operations in a manner that is consistent with all applicable modern slavery laws, statutes, and regulations in force from time to time.
- We enforce that our policies - Code of Conduct, Employee Handbook, Diversity Policy, are complied with.

3.1.3. **People**

- We ensure all legal obligations are complied with in the recruitment and on-boarding process;
- An appropriate level of due diligence is conducted on prospective employees prior to them joining Mach7, including a robust selection process, background checks and employment references.
- Mach7 recruits, promotes and develops its employees on the grounds of merit and capability and have a well-developed culture of diversity and inclusion;

3.1.4. Grievance mechanisms

- We have an open-door policy and encourage our employees to raise concerns or feedback especially those of a legal and ethical nature. They may also raise their concerns through any of the reporting channels outlined in our **Whistleblower Policy**.







4. Monitoring and Continuous Improvement

4.1. At Mach7, our approach to addressing modern slavery will continue to evolve, focusing on continuous improvement.

4.2. We recognise that consistency and capability building is key to facilitating the effective implementation and continuous improvement of a modern slavery reporting model.

4.3. Our objective is to embed modern slavery and human trafficking risk management into our standard processes and as such, we plan to incorporate risk management practices into our business culture, processes, behaviours, and operating frameworks.

4.4. In the coming year, our focus will be on delivering against our FY24 Modern Slavery commitments;

Commitment	Status	Comments
Modern Slavery Policy and Framework		Develop and finalise Mach7's Modern Slavery Policy and Framework.
Modern Slavery & Human Rights Awareness Sessions		Deploy targeted Modern Slavery training and awareness sessions on current and emerging modern slavery risks and indicators for directors, executive leadership team, and relevant employees
Supplier Assessment Questionnaire (SAQ)		SAQ issued to medium/ high risk suppliers, with responses evaluated and presented to the Management and Board for consideration.
Supplier Code of Conduct		Embed the Supplier Code of Conduct into our supplier agreements to better capture our commitment to managing Modern Slavery risks.
Acquisition/ New Business Practices		Focus on anti-slavery and human trafficking as part of our due diligence process for new businesses and in our process of expansion.
Supplier Relationship Management		Identify and use opportunities for closer collaboration – with suppliers to verify and help eradicate Modern Slavery, creating a “slave-free” supply chain.

 : Complete

 : On-Going or Partly Complete

 : New

5. Consultation

5.1. In preparing this Statement, Mach7 has consulted with relevant stakeholders, to ensure a comprehensive understanding of modern slavery risks and best practices in addressing them.

6. Approval

6.1. This Modern Slavery Act Statement was approved by the Board of Directors on 22 November 2024 and is signed on its behalf by the Chair of the Board.

6.2. This Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth).

A handwritten signature in black ink, appearing to read 'Rob Bazzani'.

Rob Bazzani

Chair of the Board

22 November 2024