



IMAGING ASSOCIATES PTY. LTD.

MODERN SLAVERY STATEMENT

Financial Year-end 30 June 2025

Imaging Associates’ purpose:

Uniting exceptional care with a people-centred approach, our purpose is to deliver world-class radiology services that enhance every patient’s healthcare journey.

Introduction

Imaging Associates is committed to upholding the highest standards of ethical conduct and human rights. We recognise the responsibility to prevent modern slavery and human trafficking in all forms within our operations and supply chains.

This Modern Slavery Statement is made by Imaging Associates Australia Pty Ltd (ABN 20 653 117 009) and its associated entities, in accordance with the Modern Slavery Act 2018 (Cth). This Statement sets out the actions taken by Imaging Associates during the financial year ending 30 June 2025 to identify, assess, and address risks of modern slavery in our operations and supply chains.

Our commitment

At Imaging Associates, we believe all individuals have the right to live and work free from slavery, forced labour, and human trafficking. We are committed to protecting human rights and prohibiting all acts of human trafficking, slavery, servitude, forced marriage, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, and child labour throughout the organisation, its business and supply chain. We recognise that addressing modern slavery requires ongoing effort and collaboration, and we are committed to working with our employees, suppliers, and partners to achieve this goal.

Who we are

Imaging Associates is a privately owned Australian radiology group offering comprehensive services including MRI, CT, ultrasound, X-ray, and interventional radiology. Services are delivered across both public hospitals and private clinics, ensuring accessible, high-quality care for a wide range of patients. The organisation is known for its commitment to clinical excellence, patient-centred care, and strong partnerships with referrers and healthcare providers.

Our operations

Our operations encompass:

- Provision of medical imaging services, including MRI, CT, X-ray, ultrasound, and nuclear medicine.
- Employment of clinical and administrative staff across multiple clinic locations.
- Engagement with referring healthcare providers and patients to facilitate diagnostic services.

Figure 1 : IA in FY25



Our supply chain

Imaging Associates is committed to ensuring that modern slavery and human trafficking are not present in our supply chain. Our supply chain includes the sourcing of equipment, consumables, and services necessary for our operations.

Imaging Associates operates with a predominantly domestic supply chain. The majority of goods and services are sourced either from within Australia or via the Australian branches of international firms. We strive to maintain strong relationships with our direct (Tier 1) suppliers. We do not have direct engagement with the suppliers of our suppliers.

Products provided by suppliers

- Procurement of medical imaging equipment and related technologies.
- Purchase of consumables required for patient care and diagnostic imaging.
- Purchase of non-medical assets such as telecommunications systems, IT infrastructure, furnishings and stationery.

Services provided by suppliers

- Engaging service providers for premises management, including cleaning and maintenance.
- Hiring contractors and consultants for clinic construction and fit-outs.
- Maintaining medical equipment through service contracts.
- Securing utilities like electricity, gas, and water, as well as laundry and linen services.
- Engaging professional services in areas such as legal, finance and insurance.

Modern Slavery Risks

Imaging Associates recognises that modern slavery risks may arise in various aspects of our operations and supply chains.

During the reporting period, Imaging Associates has undertaken the following measures:

- Policy Development: Implemented a Modern Slavery Policy outlining our commitment to ethical practices and compliance with relevant legislation.
- Training and Awareness: Provided training to key staff members to raise awareness of modern slavery issues and reporting mechanisms.
- Risk Assessment: Conducted preliminary risk assessments of our operations and supply chains to identify areas of potential vulnerability (captured in Table 1).
- Supplier Engagement: Engaged with our supplier base to understand their potential modern slavery risks.

Operations and People

Operational risk for Imaging Associates relates to recruitment and employment. Imaging Associates employees are employed directly. This gives us direct visibility of employment terms and conditions, which are set out in employment contracts and are regulated by industry standards. We consider the risk of modern slavery in our direct teams to be low given the regions we work in, the human resources and payroll controls we have in place and the transparency we have over our operations. Our robust recruitment process includes reference checks, police checks, and Working with Children Checks.

A further approach to mitigating these risks is through creating awareness. We have robust policies and procedures in place to ensure a safe, impartial and supportive working environment for our staff. Some of these are:

- Whistleblower policy
- Employee code of conduct
- Equality and Diversity policy
- Grievance Procedure

We will maintain a confidential reporting mechanism that allows employees to report any concerns they may have regarding modern slavery. We will investigate all reports promptly and take appropriate action.

Supply Chain

Imaging Associates operates within a relatively streamlined supply chain structure, with supplies sourced from suppliers in Australia or through Australian offices of overseas-based companies. We recognise that some of our suppliers have their own complex and diverse supply chains for manufactured goods and raw materials that can expand beyond the borders in which we operate. This expanded supply chain is a potential risk area for modern slavery. We have identified a moderate risk, particularly in:

- Manufacturing processes of medical equipment and consumables, which may involve overseas suppliers.
- Labour practices within third-party service providers, including cleaning and maintenance.

Specialised medical equipment and supplies represent the majority of Imaging Associates' supply chain expenditure. As such, these suppliers have been the primary focus of our compliance reviews in relation to human rights and modern slavery legislation. We have identified our key suppliers and engaged with them directly to request their Modern Slavery Statements and associated policies or documented principles. This engagement has focused on understanding their approaches to modern slavery risk management and ethical sourcing practices.

We are committed to ensuring that our supply chain upholds the highest standards of ethical conduct and does not tolerate any form of modern slavery or human trafficking.

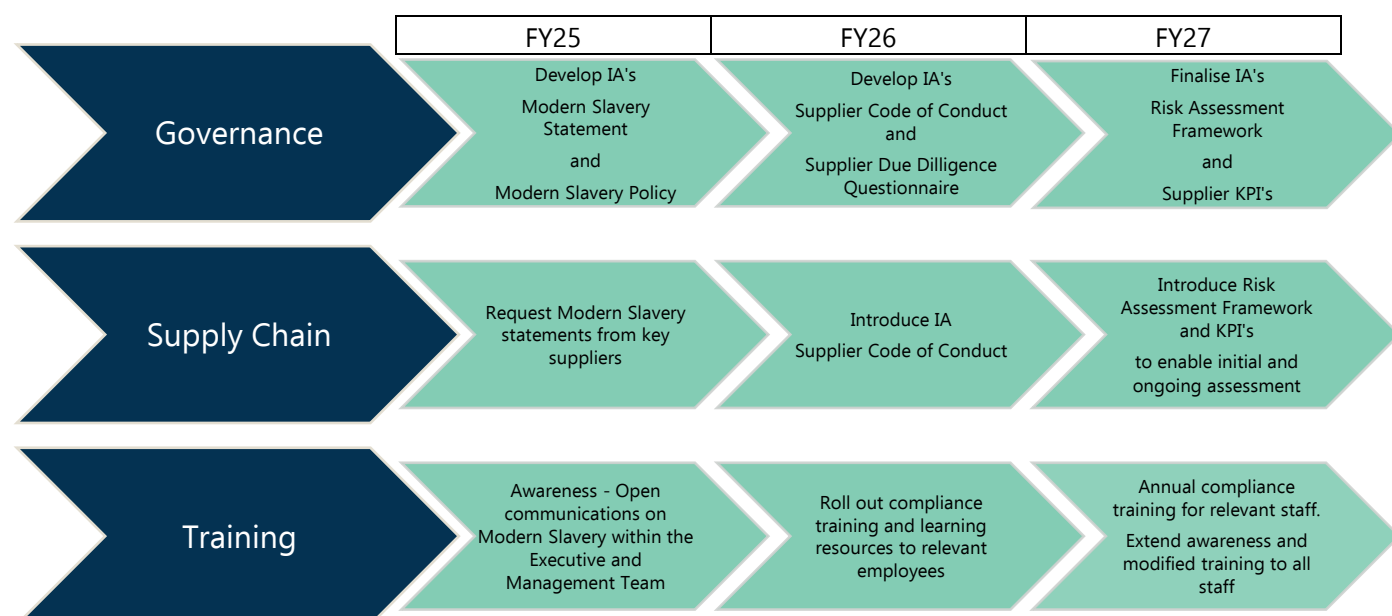
Effectiveness Assessment and Continuous Improvement

We are in the early stages of developing our modern slavery risk management framework and will develop key performance indicators (KPIs) to assess the effectiveness of our actions in future reporting periods.

In FY26, Imaging Associates intends to establish a Supplier Code of Conduct. Imaging Associates will communicate this code to all suppliers and request a confirmation that they comply with the code, including compliance with the Act. Where a documented commitment to the Australian Modern Slavery Act cannot be produced by moderate to high risk suppliers, a due diligence questionnaire will also be developed and introduced in FY26.

Imaging Associates is dedicated to continuous improvement in combating modern slavery. We recognise that this will take time and we are committed to learning and improving our processes year on year, regularly reviewing and updating our policies and practices to enhance their effectiveness.

Figure 1: Our Road Map



Consultation and Collaboration

This statement has been prepared in consultation with relevant stakeholders across Imaging Associates, including management, procurement, and human resources teams. We are committed to ongoing collaboration with our suppliers to promote ethical practices and address modern slavery risks.

Approval

This policy statement has been approved by the Board of Directors of Imaging Associates and will be reviewed annually to ensure its relevance and effectiveness.

[Signed] 

[Name] Dr Chris Holden

[Position] Chairman

Table 1: Modern Slavery risk assessment

Type of supplier	Modern Slavery risk rating	Rationale
Clinical and non-clinical staff	Low	IA employees are employed directly giving us direct visibility of employment terms and conditions.
Medical imaging equipment procurement (and service contracts)	Moderate	Moderate risk of a direct connection, as the manufacture of electronics is considered a high-risk industry on a global scale. IA purchases equipment and resulting service contracts from the Australian base of international companies, with a documented commitment to the Australian Modern Slavery Act.
Medical consumables	Moderate	Moderate risk of a direct connection, as the manufacture of medical consumables is considered a high-risk industry on a global scale. IA purchases medical consumables from companies with an Australian base and a documented commitment to the Australian Modern Slavery Act.
IT hardware, software and services	Moderate	Moderate risk of a direct connection, as the manufacture of electronics is considered a high-risk industry on a global scale. IA purchases IT equipment from large multinational suppliers with a documented commitment to the Australian Modern Slavery Act.

Service providers for premises management, including cleaning and maintenance.	Moderate	Moderate risk of a direct connection as IA engages services from local business that may engage migrant labour. Not all suppliers are able to produce a documented commitment to the Australian Modern Slavery Act.
Contractors and consultants for clinic construction and fit-outs.	Moderate	Moderate risk of a direct connection as IA engages services from local business that may engage migrant labour.
Utilities (electricity, natural gas and water)	Low	Low risk as IA engages large public companies with a documented commitment to the Australian Modern Slavery Act.
Professional Services in areas such as legal, finance and insurance.	Low	Low risk as IA engages reputable Australian based companies with a documented commitment to the Australian Modern Slavery Act.