

# **Modern Slavery Statement**

**Mach7 Technologies Limited**

**ACN 007 817 192**

## Contents

---

About this Statement.....	3
1 Our Structure, operations, and supply chains .....	4
1.1. Our Structure.....	4
1.2. Our Operations.....	4
1.3. Our Supply Chain .....	4
1.4. Our Workplace.....	5
1.5. Our policies and governance framework .....	6
2. Modern Slavery Risks in Our Operations and Supply Chains .....	6
2.1. Potential risks in our operations.....	6
2.2. Potential risks in our supply chain.....	6
3. Actions taken to Assess and Address Modern Slavery Risks .....	7
3.1 Supplier assessments.....	7
3.2 Contracts and policies: .....	7
3.3 People (Employees and Contractors) .....	8
3.4 Grievance mechanisms.....	8
4. Assessing Effectiveness .....	8
4.1 Metrics and Monitoring.....	8
4.2 Annual Effectiveness Review.....	8
5. Monitoring and Continuous Improvement .....	9
5.1 Continuous Improvement Framework.....	9
5.2 FY25 Commitments and Status.....	9
5.3 Monitoring and Reporting .....	10
5.4 Forward Looking Focus .....	10
6. Consultation .....	10
7. Approval.....	10

## About this Statement

---

The Board of Directors (the **Board**) of Mach7 Technologies Limited (the “**Company**” or “**Mach7**”) is responsible for overseeing the management of modern slavery risks across the Company and its controlled entities (together, the **Group**).

Mach7 is committed to operating with integrity, transparency, and in accordance with the highest standards of ethical conduct. We expect all employees, contractors, and representatives acting on our behalf as well as our suppliers and business partners to uphold these same standards and to respect human rights in all business dealings.

We are dedicated to ensuring that modern slavery, human trafficking, and other forms of forced, bonded, or exploitative labour have no place within our operations or supply chains. Mach7 recognises the importance of collaboration with suppliers and other stakeholders to promote responsible and transparent business practices and to embed respect for human rights throughout our value chain.

This Modern Slavery Statement (the “**Statement**”) has been voluntarily prepared in accordance with section 16 of the **Australian Modern Slavery Act 2018 (Cth)** and covers the reporting period **1 July 2024 to 30 June 2025 (FY25)**. It describes:

- the risks of modern slavery practices in Mach7’s operations and supply chains;
- the actions taken to assess and address those risks, including due diligence and remediation processes; and
- the measures adopted to assess the effectiveness of those actions.

This Statement also constitutes a **joint Modern Slavery Statement** under the **UK Modern Slavery Act 2015** and the **Australian Modern Slavery Act 2018 (Cth)**. It outlines the steps Mach7 has taken to identify, mitigate, and prevent modern slavery risks and demonstrates our ongoing commitment to continuous improvement, transparency, and accountability in upholding ethical business conduct and respect for human rights.

# 1 Our Structure, operations, and supply chains

## 1.1. Our Structure

- 1.1.1. Mach7 Technologies Limited is a leading provider of medical imaging software and services for the healthcare industry operating in Canada, North America, and the Asia Pacific Region.
- 1.1.2. Mach7 is an Australian is listed on the Australian Securities Exchange (ASX: M7T).
- 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 Operations

- 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.
- 1.2.2. As at FY25, Mach7 employed approximately **94 full-time employees** across **6 countries** and operates predominantly through office-based roles focused on software development, technical support, and professional services

## 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. Our supply base consists of approximately **27 suppliers**, with the majority based in North America and none located in regions with elevated modern slavery risk according to the Global Slavery Index 2023.
- 1.3.3. In FY25, 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	0%

Category	Description and Scope	Examples	Percentage of Suppliers
<b>B</b>	Materials and components or services	Outsourced third-party raw material testing suppliers	< 1%
<b>C</b>	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.	95%
<b>D</b>	Facilities and Consumables	Office operations such as cleaning, security, repairs and maintenance, and office consumables.  Transportation- Airlines and couriers.	5%

- 1.3.4. 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**.
- 1.3.5. 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 the highest standards of corporate governance. Our Board and Committees provide leadership and oversight to ensure that decisions and actions reflect transparency, integrity, accountability, and sustainability, thereby supporting Mach7's long-term success.
- 1.5.2. Key Group-wide policies include:
- Corporate Governance Statement,
  - Risk Management Policy,
  - Corporate Code of Conduct,
  - Anti-Bribery & Corruption Policy,
  - Whistleblower Policy, and
  - Diversity and Inclusion Policy.
- 1.5.3. Employees are encouraged to report any concerns about unethical or illegal conduct through the channels outlined in our Whistleblower Policy. Mach7 ensures such concerns are taken seriously and investigated promptly and confidentially.

## 2. Modern Slavery Risks in Our Operations and Supply Chains

### 2.1. 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 **low to negligible**.
- 2.1.2. This assessment reflects the nature of our operations, which involve a highly skilled workforce operating in mature regulatory environments and performing predominantly professional, office-based roles.
- 2.1.3. All employees are engaged under contracts that comply with applicable employment legislation and are supported by comprehensive policies and procedures designed to protect human rights and fair working conditions. Mach7 verifies each employee's legal right to work in the relevant jurisdiction as part of its recruitment and onboarding processes.

### 2.2. Potential risks in our supply chain

- 2.2.1. In FY25, Mach7 undertook a review of its supplier base to identify any categories or regions with potential exposure to modern slavery risk. This review confirmed that none of Mach7's suppliers were assessed as medium or critical risk for modern slavery concerns.
- 2.2.2. The assessment highlighted limited potential exposure in ancillary service categories, such as marketing merchandise, office cleaning, and courier services. However, these suppliers represent a small portion of total expenditure (about 1%) and are located mainly in North America assessed as low risk under the Global Slavery Index 2023.

- 2.2.3. As Mach7 does not manufacture or source raw materials, our supply chain remains short, direct, and predominantly composed of established technology, hardware, and professional services providers.
- 2.2.4. While we recognise that modern slavery risks can extend beyond our immediate suppliers, Mach7's review found no indicators of elevated risk. The Group continues to integrate modern slavery and human rights considerations into procurement processes to ensure early identification and mitigation of any potential future risks.

### 3. Actions taken to Assess and Address Modern Slavery Risks

---

Mach7 has implemented a range of measures to identify, assess, mitigate, and monitor modern slavery risks in its operations and supply chains. These are embedded into procurement, contract management, and governance processes to ensure ongoing vigilance and compliance.

#### 3.1 Supplier assessments

- 3.1.1. We conduct robust due diligence on suppliers, including risk assessments, supplier audits, and requiring adherence to our Supplier **Code of Conduct**.
- 3.1.2. Supplier risk assessments consider the sector, industry, product/service type, and geographic location, in line with the latest Global Slavery Index and guidance issued by the Attorney-General's Department (AGD).
- 3.1.3. Based on our FY25 review, Mach7 did not identify any suppliers that met the threshold for medium or high modern slavery risk. As such, no Supplier Assessment Questionnaires (SAQs) were issued to legacy suppliers during the reporting period.
- 3.1.4. Mach7 has, however, incorporated modern slavery risk assessment questions into its supplier onboarding and procurement processes. This ensures that, in future, if a supplier is assessed as having higher risk characteristics, the Supplier Assessment Questionnaire and enhanced due diligence process will be activated.
- 3.1.5. Mach7 does not knowingly engage any supplier involved in modern slavery or human trafficking or who fails to comply with minimum wage or labor law obligations in their operating jurisdictions.
- 3.1.6. Where instances or indicators of modern slavery are identified in the future, suppliers will be required to implement corrective action plans within agreed timeframes. Any findings will be documented and escalated to Management and, where material, reported to the Board.

#### 3.2 Contracts and policies:

- 3.2.1. The Company will review supplier and third-party contracts to incorporate appropriate anti-slavery clauses that ensure compliance with applicable modern slavery laws and regulations. New or renewed supplier relationships will be used to pilot these clauses and assess supplier readiness before broader implementation.
- 3.2.2. Mach7 enforces compliance with its Code of Conduct, Employee Handbook, Diversity and Inclusion Policy, and Supplier Code of Conduct.

### 3.3 People (Employees and Contractors)

- 3.3.1. All legal obligations are met during recruitment and onboarding, including verification of right to work, employment references, and background checks.
- 3.3.2. Mach7 recruits, promotes, and develops employees based on merit, capability, and potential, embedding a culture of diversity, inclusion, and respect for human rights throughout the workforce.

### 3.4 Grievance mechanisms

- 3.4.1. Mach7 encourages an open-door culture, enabling employees to raise concerns, particularly those of a legal or ethical nature.
- 3.4.2. Employees, contractors, and relevant third parties may raise issues via formal reporting channels, including those outlined in the Whistleblower Policy.

## 4. Assessing Effectiveness

---

Mach7 monitors and evaluates the effectiveness of its modern slavery risk management framework using both **quantitative and qualitative measures** to ensure continuous improvement and compliance with Australian and UK Modern Slavery Acts.

### 4.1 Metrics and Monitoring

- 4.1.1. Tracking supplier engagement: Monitoring completion rates of Supplier Assessment Questionnaires (SAQs) and follow-ups for critical -risk suppliers and Cat B and C suppliers.
- 4.1.2. Monitoring of supplier compliance with the Supplier Code of Conduct.
- 4.1.3. Ongoing review of procurement processes to ensure appropriate triggers for enhanced due diligence where higher-risk suppliers are identified.
- 4.1.4. Training and awareness: Tracking completion of modern slavery and human rights training for all relevant employees, directors, and contractors.
- 4.1.5. Internal reporting: Regular reporting of modern slavery risk assessments, supplier audits, and remediation outcomes to the Management team and Audit & Risk Committee, ensuring visibility and accountability at the board level.
- 4.1.6. Policy reviews: Periodic evaluation and refinement of policies, contracts, and governance frameworks to align with emerging risks and best practices.

### 4.2 Annual Effectiveness Review

- 4.2.1. In FY25, Mach7 will implement a formal annual review of modern slavery risk management effectiveness, focusing on:
  - Supplier engagement outcomes and corrective actions taken;
  - Identification of emerging risks in operations and supply chains;
  - Compliance with legal and regulatory obligations;
  - Effectiveness of training and awareness programs;

- Feedback from internal stakeholders and, where relevant, suppliers.

4.2.2. Findings from the annual review will be documented and presented to the Board, along with recommendations for continuous improvement.

## 5. Monitoring and Continuous Improvement

### 5.1 Continuous Improvement Framework

5.1.1. Mach7 is committed to an **evolving and proactive approach** to addressing modern slavery risks, ensuring that our operations and supply chains remain **transparent, ethical, and compliant** with relevant legislation.

5.1.2. Mach7 maintains a continuous improvement approach to modern slavery risk management, embedding learnings from internal and external reviews into our processes.

5.1.3. We prioritise capability-building, training, and consistent application of policies across all entities to strengthen risk mitigation and compliance.

5.1.4. Our objective is to integrate modern slavery and human rights risk management into day-to-day operations, corporate culture, and decision-making, ensuring it is part of the strategic and operational framework of the Group.

### 5.2 FY25 Commitments and Status

Commitment	Status	Comments
<b>Modern Slavery Policy and Framework</b>	●	Policy and framework finalised, communicated to all relevant stakeholders, and incorporated into the governance framework.
<b>Modern Slavery &amp; Human Rights Awareness Sessions</b>	●	Targeted training delivered to directors, executive leadership, and key employees; follow-up refresher sessions planned.
<b>Supplier Assessment Questionnaire (SAQ)</b>	●	SAQ issued to critical risk suppliers, with responses evaluated and presented to the Management and Board for consideration. Non-compliance addressed through corrective action plans
<b>Supplier Code of Conduct</b>	●	Embedded into supplier agreements; compliance monitored through supplier audits and reporting.
<b>Acquisition/ New Business Practices</b>	●	Anti-slavery due diligence integrated into new business assessment processes
<b>Supplier Relationship Management</b>	●	Opportunities for closer collaboration with suppliers to verify and mitigate modern slavery risks, promoting a “slave-free” supply chain.

● : Complete

● : On-Going or Partly Complete

● : New

## 5.3 Monitoring and Reporting

5.3.1. Mach7 monitors progress against FY25 commitments via:

- Regular review of supplier assessments and SAQs;
- Tracking training completion and effectiveness;
- Recording and reviewing remediation outcomes;
- Internal reporting to Management and the Audit & Risk Committee for governance oversight;
- Annual review of emerging risks, mitigation strategies, and policy updates.

5.3.2. Findings and improvement actions are documented, escalated, and approved at the Board level, ensuring accountability and transparency.

## 5.4 Forward Looking Focus

5.4.1. Enhance supplier engagement, particularly in medium/high-risk categories, to verify compliance and promote ethical practices.

5.4.2. Continue embedding human rights and anti-slavery considerations into corporate policies, contracts, and procurement processes.

5.4.3. Strengthen training, awareness, and capability for all relevant employees and contractors to identify and mitigate modern slavery risks effectively.

5.4.4. Expand reporting and assessment metrics, incorporating both qualitative and quantitative indicators to measure effectiveness and progress.

## 6. Consultation

---

6.1. In preparing this Statement, Mach7 conducted consultations across all entities within the Group. Management teams of each subsidiary were engaged to review operational activities, supplier relationships, and modern slavery risk assessments. Feedback from these consultations informed the content and disclosures in this Statement.

6.2. Regular cross-functional meetings including Legal, Risk, Finance, Procurement, and Engineering teams were held to support the identification, mitigation, and ongoing monitoring of modern slavery risks across operations and supply chains.

6.3. Consultation demonstrates a collaborative approach, ensuring that policies and practices reflect both local operational realities and Group-wide standards for human rights and anti-slavery compliance.

## 7. Approval

---

7.1. This Modern Slavery Statement was reviewed and approved by the Board of Directors on 28 November 2025 and is signed on its behalf by the Chair of the Board.

7.2. This Statement is made in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) and the UK Modern Slavery Act 2015 and reflects Mach7's commitment to ethical business conduct, transparency, and continuous improvement in addressing modern slavery risks.

7.3. The Board maintains oversight of all actions outlined in this Statement and will ensure that future Statements continue to demonstrate compliance, effectiveness, and accountability in managing modern slavery risks.

A handwritten signature in black ink, appearing to read 'Rob Bazzani', written over a horizontal line.

Rob Bazzani

Chair of the Board

28 November 2025