

# Pro Medicus Limited

ABN 25 006 194 752

# MODERN SLAVERY STATEMENT

FOR THE YEAR ENDED 30 JUNE 2023



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## INTRODUCTION

At Pro Medicus, our vision is to be the leading provider of best-in-class medical imaging software, 'moving the needle' on clinical outcomes. In pursuit of that goal, we are committed to the highest ethical and behavioural standards. This includes upholding human rights and striving to ensure that modern slavery or human trafficking has no place in any aspect of our business or supply chain.

The *Modern Slavery Act 2018 (Cth)* ('the **Act**') requires that an Australian entity or an entity that carries on business in Australia with a minimum consolidated revenue of \$100 million submit a Modern Slavery Statement ('**Statement**') for that financial year outlining the steps taken to identify, manage and mitigate the risks of modern slavery and human trafficking in the entity's operation and supply chain.

This Statement is published by Pro Medicus Limited (ABN 25 006 194 752), an Australian Public Company, registered at 450 Swan Street, Richmond VIC 3121 ('**Pro Medicus**', '**we**', '**our**') in relation to our business activities during the financial year ending 30 June 2023 ('**Reporting Period**').

It is the first Statement for Pro Medicus under the Act.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Corporate structure

Pro Medicus is an Australian incorporated and domiciled company, publicly listed on the Australian Stock Exchange with wholly owned subsidiaries in Europe (Visage Imaging GmbH, Germany) and North America (Visage Imaging Inc, USA).

**Number of Employees - 110**

### Nature of Operations and Principal Activities

The principal activities of Pro Medicus are the development and supply of healthcare imaging software, Radiology Information System (RIS) software and services to hospitals, diagnostic imaging groups and other related health entities in Australia, North America and Europe. We have offices in Melbourne (Australia), San Diego (CA, United States) and Berlin (Germany).

We trade only with recognised, reputable and credit-worthy third parties and have long standing relationships with our suppliers that last several years or more. We currently do not have any joint venture arrangements and have minimal change in our supplier listing from year-to-year, both domestically and in our overseas subsidiaries.

### Supply Chain

Our suppliers are located in the same country and regions that our offices are located, and we generally do not go outside these regions for supplier requirements. Our German subsidiary uses predominantly German suppliers, although occasionally use other suppliers from nearby European countries, such as Netherlands and the United Kingdom. Our North American subsidiary uses predominately US suppliers, although

occasionally uses Canadian suppliers and our Australian entity uses predominately Australian suppliers.

The main source of goods and services that the company procures is IT consulting services, statutory compliance services, utilities and tax and legal services. Pro Medicus has a very low supplier requirement, and the main expense of the business is employee headcount. Pro Medicus does not supply inventory or hardware so does not require any manufacturing or transport-related services.

## **THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN**

Pro Medicus operates in highly regulated environment in terms of:

- **Industry:** the healthcare technology sector consists of mostly skilled labour. At Pro Medicus, all employees are highly skilled white-collar professionals with the qualifications, knowledge and competencies appropriate for their role
- **Products and services:** all our product research and development is completed inhouse. As it is considered a medical device, our Visage 7 product is approved by the relevant authorities in Germany and the USA
- **Geography:** there are strict labour laws and a low prevalence of modern slavery in the countries where we operate
- **Entity:** As a public company, Pro Medicus has a strong governance structure combined with a strong human rights record

Our supply chain is comprised mostly of organisations who are also highly regulated and governed, with a white-collar workforce. There are a small number who operate in an industry (e.g., cleaning) or geographies (e.g., Malaysia and the Philippines) as part of a global organisation where the risk of modern slavery would be considered higher than ours.

Overall, however, the risk that Pro Medicus or our supply chain would cause, contribute to or be directly linked to modern slavery is considered low.

## **ACTIONS WE'VE TAKEN TO ASSESS AND ADDRESS THE RISKS**

In preparing our first Statement, we mapped our supply chain and engaged a representative sample of suppliers across industries, products and services and geographies – focusing on those who were considered a higher risk of modern slavery – to conduct due diligence on. This involved requesting information from the supplier via a questionnaire on both their human rights practices and those of their supply chain.

Pro Medicus also completed the questionnaire.

Of the respondents:

- Approximately one third are required to comply with the Act

- All organisations who are required to comply with the Act have
- The majority have a permanent workforce and do not utilise labour hire
- Around half have a modern slavery (or similar) policy and provide training to employees
- Most employees have access to independent whistleblowing and the right to join a trade union
- Employees work in safe conditions, are free from discrimination and are compensated fairly for their work
- Around half have mapped their supply chain and have remediation processes in place
- One organisation was aware of low-skilled migrant workers working in their supply chain

During the Reporting Period, we also added modern slavery as a risk to be monitored in our risk register.

Pro Medicus takes a strict zero-tolerance approach to modern slavery. If we identify modern slavery practices occurring within a supplier's operations, we will take appropriate action, including education, remediation, termination and/or alerting the relevant authorities.

In addition, Pro Medicus has developed the following 12-month action plan to further address modern slavery risks:

- **Policies and procedures:** develop a Modern Slavery Policy and make it publicly available, as well as provide a copy to suppliers
- **Staff awareness:** provide training to all employees in relation to the identification and reporting of modern slavery risks
- **Supplier engagement:** build collaborative relationships with suppliers and clearly communicate our expectations

## HOW WE'LL ASSESS THE EFFECTIVENESS OF OUR ACTIONS

Following the implementation of our action plan, we will monitor the effectiveness of our actions in identifying, managing and mitigating modern slavery risks by:

- **Regularly checking our risk assessment process:** we will ensure that our risk assessment process remains up-to-date as changes occur within our operations and supply chain
- **Regularly reviewing the actions we have taken:** we will conduct an annual review of our actions in reducing modern slavery risk at the Audit and Risk Committee
- **Level of engagement with suppliers:** we will monitor the response rates and transparency of our supply chain in the due diligence for our next Statement, conducting a deeper-dive where required
- **Level of understanding amongst staff:** we will track training completion rates and awareness of modern slavery risk amongst staff

## **CONSULTATION PROCESS**

In preparing this Statement, we consulted the subsidiaries that Pro Medicus owned during the Reporting Period. We discussed details of the reporting requirements under the Act, information regarding the actions we intend to take to address these requirements and provided all entities with materials relevant to this Statement.

## **APPROVAL**

This Statement was approved by the Pro Medicus Board of Directors on 20 July 2023 and signed on their behalf by:



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**Dr Sam Hupert**  
CEO  
20 July 2023