

Modern Slavery Statement

Reporting period
1 July 2020 to 30 June 2021

i-med.com.au



**I-MED Radiology
Network**

Comprehensive care. Uncompromising quality.

Introduction

This Modern Slavery Statement (**Statement**) is made by Image Holdco Pty Ltd (ACN 623 028 740) (**Reporting Entity**) pursuant to the Modern Slavery Act 2018 (Cth) (**Act**). It sets out the actions taken by the Reporting Entity (on its own behalf and for its consolidated group described below) in assessing modern slavery risks in its operations and supply chains, and the actions it has taken to address, monitor and prevent these.

Reporting entity and organisational structure

The Statement is submitted by the Reporting Entity as the ultimate holding company of a larger consolidated group encompassing several wholly-owned subsidiaries. The Reporting Entity submits this Statement as a joint statement on behalf of its wholly-owned subsidiaries (together hereafter referred to as either the **I-MED Group, Group** or **I-MED**).

This Statement has been approved by the Board of the Reporting Entity on behalf of the I-MED Group.



Operations and supply chains

Who is the I-MED Group?

The I-MED Group is a privately owned and operated national medical imaging provider. The I-MED Group provides medical imaging services including interventional procedures. The services undertaken by the Group includes X-Ray, PET, CT, MRI, nuclear medicine, ultrasound, mammography and interventional procedures. The Group has been providing medical imaging services within Australia for over 60 years and performs around 7 million patient examinations every year.

The Group's focus is on delivering high quality services with compassion and respect to its customers – being its patients, referring health practitioners (including individuals, groups, and hospitals). Our purpose is to help save lives and reduce uncertainty. This is at the core of everything that the I-MED Group does in its activities and informs all aspects of our operations.

The I-MED Group provides its medical imaging services in both outpatient clinics and in private and public hospital settings. It operates predominantly in Australia and comprises around 240 clinics across all Australian states and territories, in both metropolitan and regional communities. These sites provide services across a mix of standalone community sites, fully outsourced hospital radiology departments and hospital and other service provider reporting contracts. The Group also provides teleradiology services in the UK, New Zealand and in India.





Structure and governance across the I-MED Group

Whilst the I-MED Group comprises several corporate entities, it operates as a fully integrated business with shared corporate services, staff, IT infrastructure, knowledge and resources in support of the delivery of the Group's operations.

The Group's operations and corporate governance are monitored and overseen by the Board of Directors of the ultimate holding entity. The Board has two committees – the Audit & Risk Committee and People & Remuneration Committee. The Audit & Risk Committee is responsible for monitoring the overall risk management framework, the financial reporting processes, the compliance processes and overseeing the audit program. The People & Remuneration Committee assists the Board in the oversight of engagement, succession, remuneration, bonuses and incentives paid to the CEO and employees of the Group.

The Chief Executive Officer and Chief Financial Officer are directors of each I-MED Group subsidiary. They are responsible for, together with the broader management team, promoting a risk aware culture and ensuring that there is a systematic process to identify, analyse, evaluate and treat risk. This includes a uniform Risk Management Framework which applies across the I-MED Group.

The Risk Management Framework is part of the Group's core policies and procedures which promote our compliance with lawful and ethical operations. To support this Framework, the Group has established a number of workplace policies and procedures which guide its staff to embody its values in their practices.

These include the following core policies, amongst others:

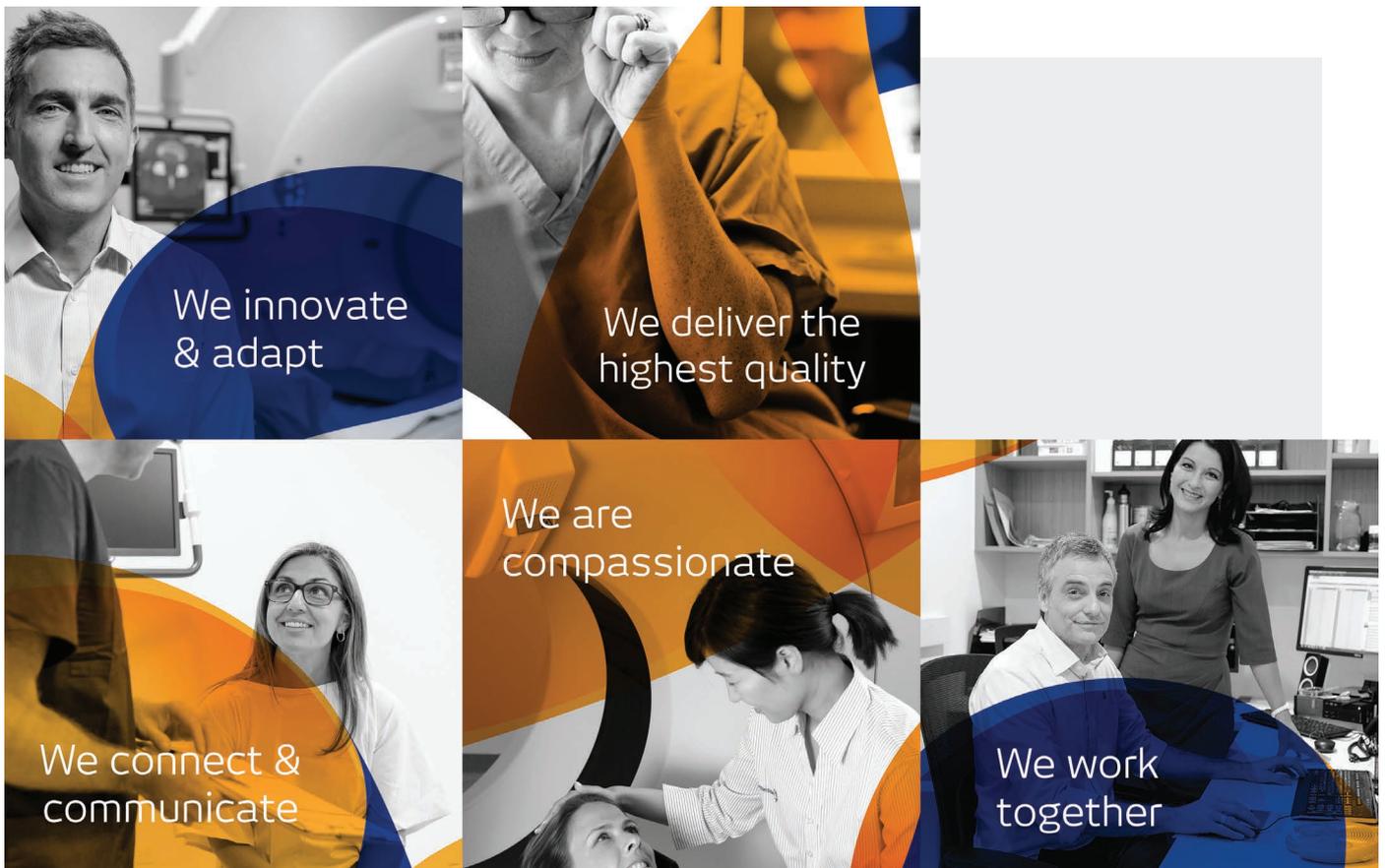
- Code of Conduct
- Code of Ethics
- Human Rights Policy
- Whistleblower Policy
- Workplace Health and Safety (WHS) Policy
- Diversity and Inclusion Policy
- Workplace Behaviours and Equal Opportunity Policy
- Privacy Policy
- People Privacy Policy.

Each of these policies allocates responsibility to senior levels of management for their proper implementation, administration and oversight. Their ultimate purpose is to improve the quality of care provided by the Group, and ensure that we remain a best practice organisation that embodies our core organisational vision and values.

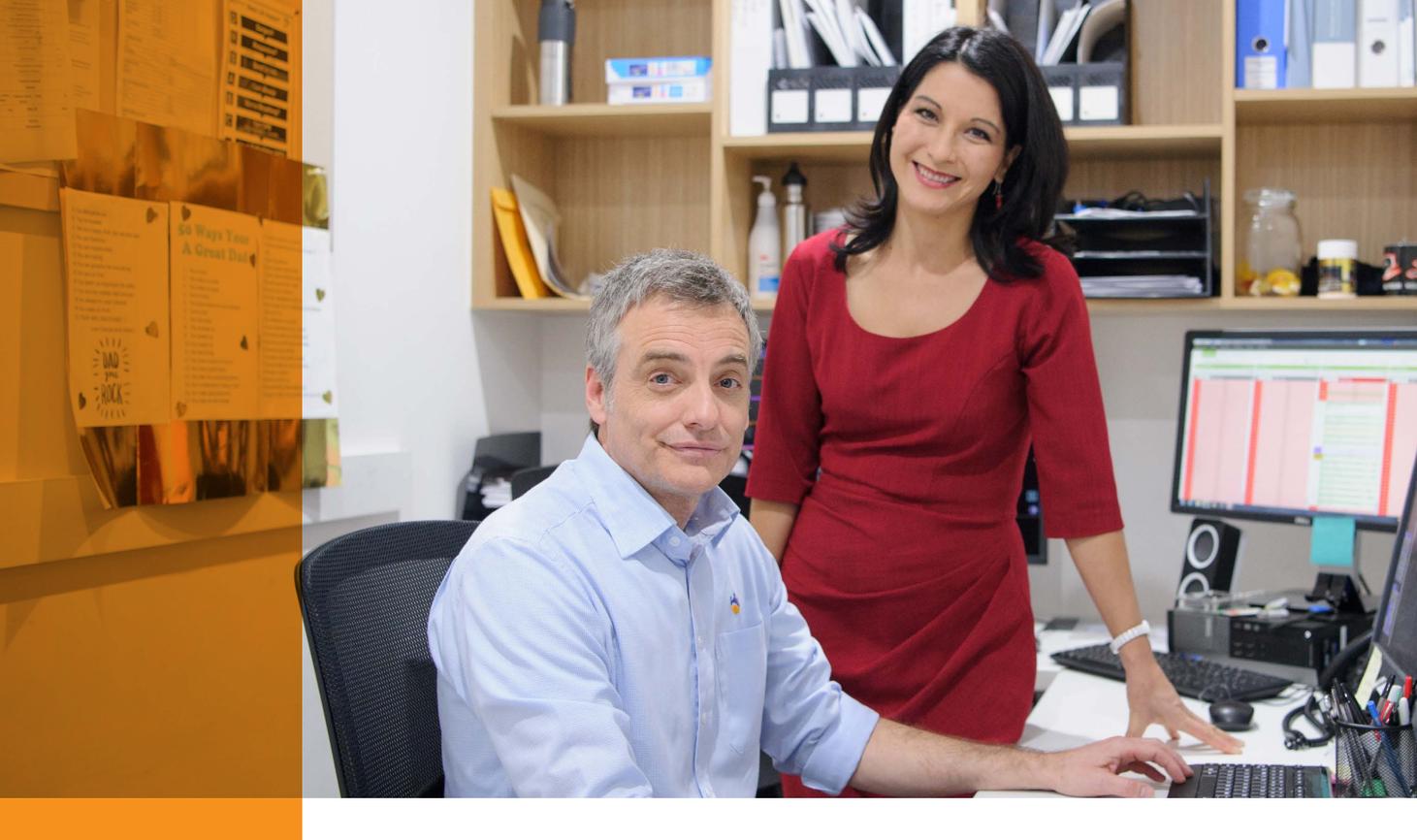
The I-MED Group's vision and values

The I-MED Group has a vision that we can be the most respected and trusted medical imaging specialists in the world. As part of this vision, and as Australia's largest medical imaging provider, the I-MED Group is a trusted provider not only by providing exceptional service, but by our commitment to operating its operations in a lawful, ethical and socially responsible manner.

A commitment to upholding fundamental human rights is integral to the ethos of our business and intertwined in the I-MED Group's values. These include that:



Our motto is "Comprehensive care, uncompromising quality". In order to sustain those high standards, we recognise that our people are at the core of who we are, what we do and how we deliver our services to the community. We have a zero-tolerance to modern slavery practices, human trafficking and other unethical practices. We treat our colleagues as we treat our patients and referrers – with respect, dignity and consideration at all times. To remain true to our own vision, we also engage only suppliers who we believe are aligned to our vision and values and who uphold our same high ethical and socially responsible standards.



Labour force

The I-MED Group collectively engages more than 5,000 staff nationwide. This includes approximately 350 radiologists and 50 nuclear medicine physicians, and clinic and support staff (e.g. radiographers, sonographers and administrative staff) and corporate staff (e.g. executive, business unit and operational managers, finance, procurement, human resources, IT and legal staff).

The Group engages the following different types of workers and non-workers:

- **Employees:** The vast majority of the Group's workers are directly engaged under individual contracts of employment or through one of the Group's fifteen enterprise agreements, depending on the nature of their engagement. The terms and conditions of employment are set out in each of those agreement types.
- **Labour hire and temporary workers:** The Group will occasionally engage a small number of personnel (<1%) via labour hire arrangements who are generally highly skilled medical staff. Such engagements of labour hire providers are done through contractual arrangements solely with providers who hold appropriate licences.
- **University student placements:** The Group has several arrangements with universities to provide placements in I-MED Group clinics for their students as part of the students' university courses (subject to supervision) and to enable them to further their studies. These arrangements are negotiated directly with the relevant university and implemented in accordance with a written contract. Generally, students are not engaged as employees of the Group, as these arrangements are for the benefit of the students and required as part of their university courses. In circumstances where university students who undertake substantive work for the benefit of the Group, they may be offered employment subject to an employment contract.

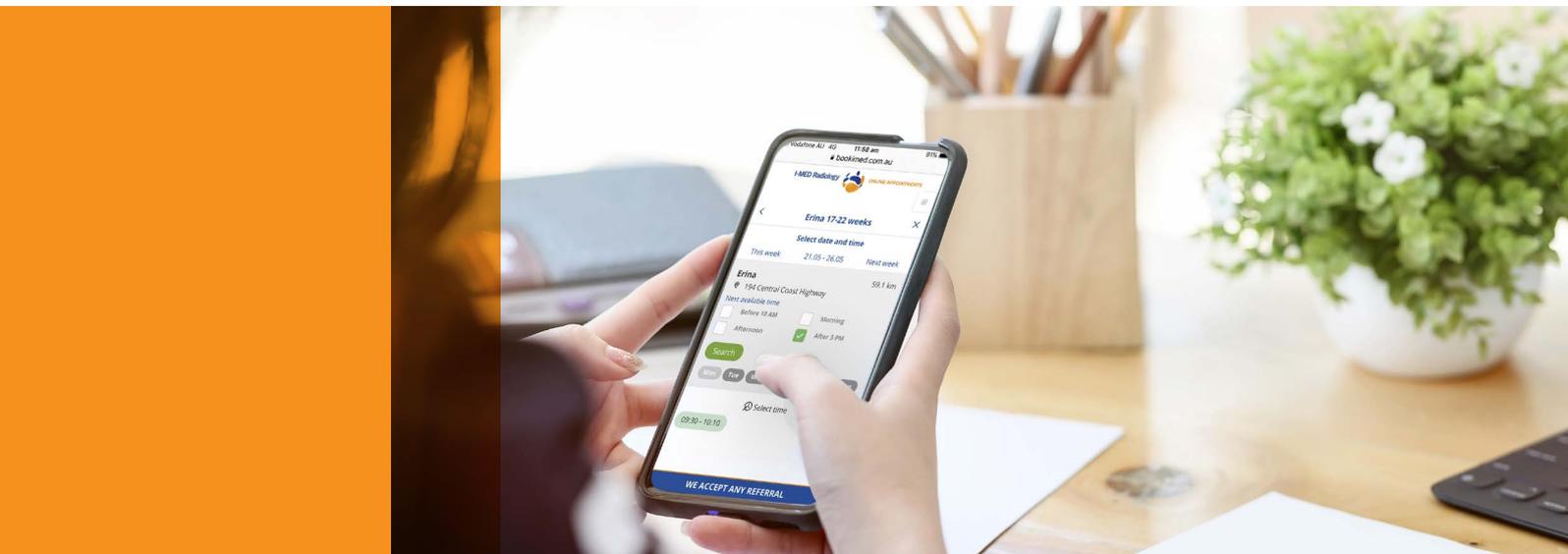
Staff entitlements

All employees of the Group are employed pursuant to a written common law employment contract which contains their terms and conditions of employment. In this way, the Group ensures that all entitlements and prescribed conditions of employment under relevant laws, regulations and other instruments are appropriately implemented and accounted for.

The terms and conditions of employment for employees of the I-MED Group are governed by the National Employment Standards (**NES**) contained in the Fair Work Act 2009 (Cth) (**Fair Work Act**), individual common law employment contracts, and where applicable, industrial instruments including enterprise agreements or modern awards.

These industrial instruments contain a number of further terms and conditions of employment in addition to those contained in the employee's employment contract, including in relation to:

- How employees are classified (e.g. full-time, part-time or casual etc)
- Hours of work, including rostering and breaks
- Wages and allowances, including the payment of these entitlements
- Overtime and penalty rates
- Leave and public holidays
- Consultation in relation to major workplace change and changes to rosters or hours of work
- Dispute resolution mechanisms in relation to matters under the enterprise agreement, modern award or National Employment Standards
- Termination of employment and redundancy
- Individual flexibility arrangements.



The I-MED Group's enterprise agreements contain more beneficial terms and conditions than the minimum standards in the applicable modern awards and NES. The I-MED Group bargains these agreements with employees covered by the agreement and their representatives (including industrial organisations). After bargaining, the proposed enterprise agreement is submitted for review and approval by the Fair Work Commission (**Commission**), Australia's national workplace relations tribunal. Only agreements that are considered 'better off overall' than the applicable modern award and the NES are approved by the Commission.

Workplace policies and procedures

As referenced above, the I-MED Group has in place a number of policies aimed at helping to assess and address the risk of modern slavery and unethical practices in both its operations and supply chains. All staff of the I-MED Group are expected to be familiar with and comply with its Code of Conduct and Code of Ethics which establish the Group's core values and principles for how the Group deals with its employees, contractors, customers, suppliers and stakeholders.

In addition to the core policies, the Group is committed to continually working towards instilling the principles of its Human Rights Policy across its people and operations. This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

In particular:

- **Forced labour and human trafficking:** We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking.
- **Child labour:** We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.
- **Work hours, wages and benefits:** We compensate employees competitively relative to the industry and local labour market, and in accordance with terms of any applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.
- **Safe and healthy workplace:** The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace.
- **Workplace security:** We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.





- **Freedom of association and collective bargaining:** We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. I-MED is committed to bargaining in good faith with such representatives.
- **Guidance and reporting for employees:** We strive to create workplaces in which open and honest communications among all employees are valued and respected. I-MED is committed to comply with applicable labour and employment laws wherever we operate. I-MED also ensures employees are aware of the Human Rights Policy through training and an annual certification process. Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, can raise questions and concerns with local management or the Human Resources team. Employees can also report suspected policy violations by following the relevant process set out in the Workplace Policies Handbook or the Whistleblower Policy.



All staff are expected to familiarise themselves with these workplace policies and procedures and receive training on these upon commencing work with the I-MED Group. This training includes, amongst others:

- **Welcome to I-MED Policy** – an overview of our vision, purpose and values, employment and benefits information and Human Rights Policy;
- **Workplace policies and procedures** – maintaining a positive work environment, awareness of ethical obligations and all core workplace policies such as the Code of Conduct and Code of Ethics, Whistleblower Policy, etc.
- **Work health and safety induction** – developing an awareness of the WHS requirements and working in a safe manner to protect staff and others from work related injuries or illness;
- **Equal Employment Opportunity training** – relevant legislation, staff responsibilities, discrimination, harassment, bullying and other unacceptable workplace behaviour.

Training on core policies is delivered on commencement with I-MED, and at least annually thereafter, to ensure these principles remain a key priority for staff. In addition, the Group's Whistleblower Policy seeks to promote a culture of integrity by reinforcing the right of all staff to raise any concerns with its operations and supply chains with senior management.

Supply chains

The I-MED Group's operations are supported by the procurement of an array of goods and services, which are necessary for the delivery of the Group's medical imaging services. In maintaining our reputation for quality, safety and service excellence, our responsibility extends to the focused and professional management of our supply chain.

We expect all of our major suppliers, service providers and any other agents or contracted third parties to adopt an approach to ethical business practices and sustainability that is consistent with the Group's high standards. Suppliers are also expected to promote the same standards in their own supply chains.

Supply categories

Externally procured goods and services include:

Goods

- Medical imaging and IT equipment
- Medical consumables and supplies
- Nuclear medicine, contrast and pharmaceuticals
- Uniforms
- Print
- Film
- Office supplies

Services

- Medical imaging equipment servicing
- IT and telecommunications services
- Staff training and education services
- Property leasing (including clinics and office space), utilities and facilities management
- Linen and laundry services
- Medical consultancy (e.g. specialist cardiologists, radiologists)
- External advisory (e.g. WH&S, legal, tax advisory, recruitment services)
- Labour hire services
- Insurance services
- Travel services



Of these goods and services, an overwhelming majority of the Group's external procurement is healthcare-related – namely, the purchase of medical and IT equipment, medical consumables, nuclear medicine and contrast. In addition, the provision of property (leased premises) comprises a large portion of the Group's external procurement spend.



Spend under management

The Group is proud of its management of over 86% of all external procurement spend being managed by the Group’s national Procurement team.

By supply category, these are broken down as follows:

Category	Spend under management
Contrast	100%
Film	100%
Travel	100%
Medical equipment	99%
Uniforms	99%
Print	96%
Medical consumables	94%
Nuclear medical consumables	91%
Office supplies	86%
Laundry	83%
IT and Telecommunications	79%
Facilities management	61%

The I-MED Group's Procurement team comprises a number of designated category managers who are specialists in their supply classes. The Procurement team is responsible for conducting the due diligence of third-party suppliers as a means of identifying and preventing human rights risks to people in our business and value chain.

Suppliers forming a key part of the I-MED Group's supply chains undergo a vetting process that is undertaken by the Group's Procurement team – e.g. with the use of template contractual obligations and standardised audit, reporting and performance monitoring procedures. In addition, the Group has incorporated modern slavery due diligence into its tender processes, including a risk assessment explicitly in connection with modern slavery, for all major new supplier acquisitions.

When engaging these suppliers, the I-MED Group administers its standard 'Supplier Information Pack' which is available publicly on its website and contains the Supplier Code of Conduct, Human Rights Policy, and Supplier Terms and Conditions.

As part of these, the Supplier Code of Conduct explicitly sets out the Group's expectations for its suppliers to have a similar approach to treating all individuals with whom they interact, including employees and customers, with respect and dignity. It specifically includes that suppliers must comply with relevant modern slavery legislation, including not to use any form of bonded, slave or child labour – and to comply with the Human Rights Policy (as summarised on page 8 above).



In addition, we expect that all suppliers provide a safe, healthy and comfortable workplace, including that they comply with all relevant workplace health and safety laws and regulations as well as the Group's safety principles.

We also expect suppliers to only employ those individuals with a legal right to work in the relevant jurisdiction, comply with all minimum legal payment rates and conditions of work, and to provide and support freedom of association for employees to join trade unions and other employee representative groups.

Finally, all suppliers are expected to ensure all employee entitlements and prescribed conditions of employment under relevant laws and regulations are adequately implemented and accounted for.

Key suppliers are required to report on their corporate social responsibility annually and undertake a specific risk assessment directly in relation to modern slavery and human trafficking mitigation strategies. In addition, major suppliers undergo formal annual performance reviews encompassing a number of matters, including their compliance with ethical practices and laws.

An action plan may arise out of these reviews which assigns various responsibilities across the Group and relevant supplier, and its implementation monitored by the Group's Procurement team. Where non-compliance is identified, collaborative remedial action is taken – such as sharing knowledge in relation to the types of conduct prohibited by the Act, discussing approaches to ethical and lawful practices, and where necessary, escalation to the Legal team. The Group also reserves a right of audit with its suppliers to monitor their commitments under their contractual obligations and support them to achieve any remedial actions which are required.



Risks and actions taken to address modern slavery

In addition to these robust frameworks, the Group operates in a highly regulated healthcare landscape. This spans all areas of its operations from the accreditation of its staff providing healthcare, to the licensing of its facilities and equipment and the regulation and approval requirements of the consumables it uses.

Together, these make the risk of modern slavery practices in the Group's operations less likely. Notwithstanding that, we recognise that new areas of risk are identified as we change the way we operate, and as the regulatory environment around us changes.

Given our relatively large workforce and the complexities across managing individual contracts, awards and enterprise agreements under different legal and national instruments, the Group must manage the risk of correctly categorising its workforce and administering different employment entitlements.

The Group has several processes in place to ensure it appropriately manages these challenges and maintains compliance with its obligations under employment laws, including:

- The establishment of robust individual employment or engagement contracts. The terms of these agreements act to minimise the risks of modern slavery in internal operations – including by ensuring that the Group's work conditions are consistent with laws and clearly set out the rights of staff and workplace entitlements. This is described further below.
- The Group's Human Resources team provides advice to business stakeholders in relation to the interpretation of, and compliance with, employment contracts, applicable enterprise agreements and applicable modern awards.
- The automation of pay rules for each industrial instrument are set up in the Group's workforce management system – which acts to limit the ability for staff to override award requirements, and minimise human error in the administration of pay entitlements.
- The regular undertaking of audits of the Group's payroll processes and pay rules to ensure staff are paid in accordance with the contractual terms and, where applicable, the industrial instruments that apply to their engagement.



In the 2020-21 year, the Group's modern slavery working group came together to assess the risks in connection with the Group's workforce. It actioned these priority areas as follows:

Increased stakeholder engagement

This year, the Group focused on expanding its working group for the risk assessment of modern slavery in its operation and supply chains. This included consultation with key decision makers across an expanded subset of the business, including the Human Resources, Payroll, Procurement and Level teams. This assisted to better understand the internal operations risks and supply chains, assess the processes and systems in place for collecting relevant information. And ensure the implementation of ongoing systems of control and assessment.

Strengthened governance of internal operations

The I-MED Group's Human Resources and Payroll teams monitor updates and amendments to the employment laws applicable to the I-MED Group's workforce, including but not limited to the Fair Work Act and applicable modern awards.

A key project was the review of award classification to ensure that the Group's staff were appropriately classified under the correct modern award. Training material and user guides were updated to ensure that all relevant staff were aware of the proper award classifications applicable. As part of this, the need to undertake regular audits of pay rules and awards was determined and an action plan put in place around future compliance.



Labour hire arrangements review

The Group undertook a competitive process to establish a panel arrangement of high quality labour hire firms from whom it will uniformly source labour hire workers going forward. The panel arrangement seeks to ensure that consistent terms of engagement are entered into in respect of maintaining compliance with worker entitlements. This includes that all such firms are required to be licensed in accordance with applicable laws, will be required to show evidence of their compliance with all anti-modern slavery laws, and are subject to the Group's key policies and procedures in respect of worker entitlements and protections.

Whilst the process has not yet been completed, the Group looks forward to continuing to standardise its labour hire arrangements.

Expanded supplier due diligence and review practices

This year, we focused on strengthening our supplier performance reviews and Corporate Social Responsibility program. In particular, we rolled out our Corporate Social Responsibility survey to a significantly higher number of suppliers including those suppliers who were identified as higher risk.

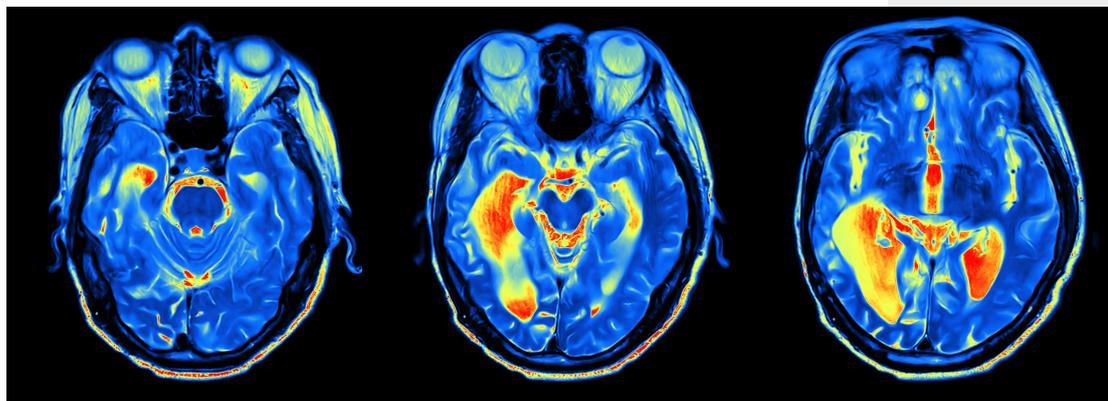
This included increased due diligence on major suppliers – i.e. any external provider from whom the Group purchases goods of more than \$100,000 annually.

In addition, the Group focused on suppliers of goods or services sourced in industries considered inherently high risk – such as cleaning services, uniforms and laundry services. In particular, the Group acknowledges that in certain industries, a higher proportion of vulnerable workers (e.g. non-English speaking workers, low-skilled workers) are engaged and this may create an opportunity for evasion of proper legal entitlements.

All such suppliers were required to complete the survey on their compliance with the Group's Human Rights Policy, relevant laws and ethical practices. In addition, the Group undertook a comprehensive supplier performance review in respect of an additional 15 suppliers compared with the year before.

Focus on IT procurement

Finally, significant new resources (including a dedicated IT procurement category manager) were allocated to ensure that a greater number of IT goods and services procurement were brought under contract. This has greatly increased transparency and accountability with the Group's IT services suppliers.



Other relevant information and future priorities

Going forward, the Reporting Entity and I-MED Group will continue to review and monitor its risks of modern slavery and human trafficking practices in its supply chains and its compliance with these matters.

In the next financial year, the Group's future priorities will be on:

1. *Continued supplier due diligence*: continue to refine our approach to supplier due diligence, risk assessment and monitoring compliance.
2. *Continued focus on IT contracting*: continue focus on increasing IT procurement of services under management and greater scrutiny in performance reviews and Corporate Social Responsibility.
3. *Focus on review of suppliers with significant offshore operations*: ensure a heightened level of assessment is applied to suppliers with operations which have a significant presence in countries that have typically increased exposure to practices which may not be aligned to the Group's.



Consultation across the Group

This Statement is submitted by the Reporting Entity as the ultimate holding company of a larger consolidated group encompassing several wholly-owned subsidiaries – known as the I-MED Radiology Network. This consultation involved engaging core stakeholders in areas such as Legal, Procurement, Human Resources, Tax and Payroll. It has been reviewed and approved by the Reporting Entity and Group's Board of Directors.

Approved by the Reporting Entity's principal governing body on behalf of all reporting entities in the I-MED Group



Dr Shrey Viranna
Chief Executive Officer/ Executive Director
I-MED Group



**I-MED Radiology
Network**

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