



Modern Slavery Statement

2022





Acknowledgement of Country

Integral Diagnostics Limited acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia. We proudly recognise Elders past, present and emerging as the Traditional Owners of the lands on which we work and live. We're committed to supporting Indigenous self-determination and envision a future where all Australians embrace Aboriginal and Torres Strait Islander histories, cultures and rights as a central part of our Australian identity.

IDX recognises the status of Māori as Tangata Whenua and embraces the guiding Principles of Te Tiriti o Waitangi. We seek to grow our understanding of Kaupapa Māori, Tikanga Māori and Te Ao Māori in order to uphold our Te Tiriti responsibilities.

This statement covers the activities of Integral Diagnostics Limited ABN 55 130 832 816 and its controlled entities to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

Contents

- 04** THE REPORTING ENTITY
- 05** STRUCTURE, OPERATIONS AND SUPPLY CHAINS
- 07** DESCRIPTION OF RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS
- 09** ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS
- 11** ASSESSMENT, CONSULTATION AND FORWARD ACTIONS

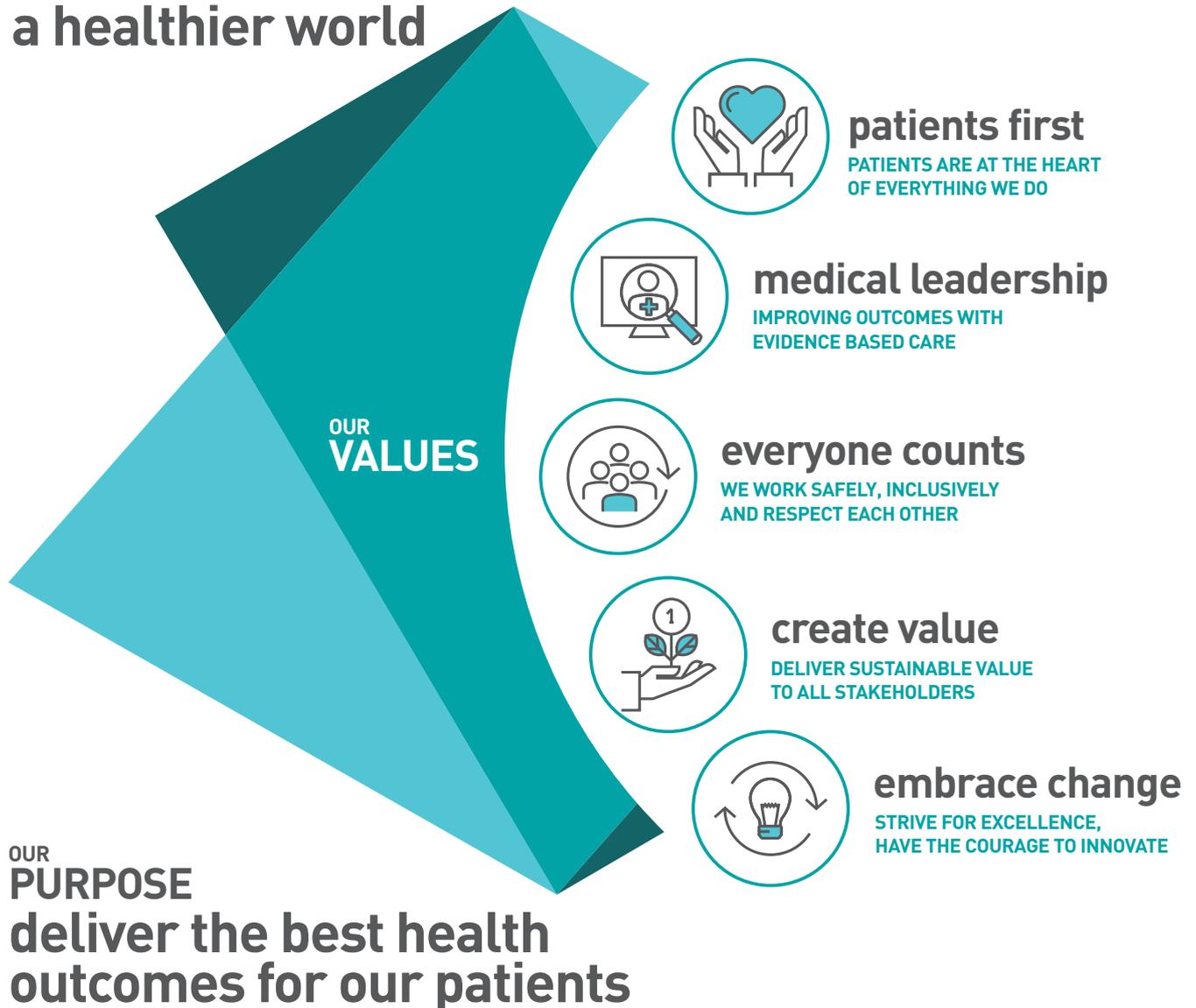
THE REPORTING ENTITY

Introduction

This Modern Slavery Statement is provided by Integral Diagnostics Limited ACN 130 832 816 (IDX) and its subsidiaries (together, IDX Group) in accordance with the *Modern Slavery Act 2018* (Cth) (Act) for the period 1 July 2021 to 30 June 2022 (Reporting Period). This statement describes the IDX Group's approach to identifying and managing potential modern slavery risks by reporting against the mandatory reporting criteria set out in the Act.

IDX's Board and management are committed to the management of potential modern slavery risks within the IDX Group's operations and supply chain. In addition to our obligations under the Act, we believe we have a responsibility to our key stakeholders to work with our suppliers to identify areas of risk of modern slavery.

OUR VISION a healthier world



OUR PURPOSE deliver the best health outcomes for our patients

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Structure

IDX is an Australian public company, limited by shares and listed on the Australian Stock Exchange with the code IDX. It has a number of Australian and New Zealand subsidiaries but operates as a single economic entity.

The IDX Group is headquartered in Melbourne, Australia at Suite 9.02, Level 9, 45 William Street, Melbourne 3000. The Board of IDX is supported by a unified management team that has oversight and management of the operations of the IDX Group. Shareholders have economic and voting rights with respect to the group as a whole.

Operations

The IDX Group is a healthcare group providing diagnostic imaging services to patients and referrers including general practitioners, medical specialists and allied health professionals across Australia and New Zealand. We provide our services through a network of clinics, including multiple hospital

sites, and operate under various brands in the different geographic areas.

As at 30 June 2022, the IDX Group operated across 91 locations in four Australian states and in Auckland, New Zealand.

The IDX Group's operations include the following key areas:

1. The provision of diagnostic imaging services and healthcare to patients in Australia and New Zealand.
2. The direct employment of workers in the provision of healthcare and support functions.

During the Reporting Period, we engaged with 37,000 referrers and saw almost 800,000 patients. Our combined clinical group is one of the largest radiology providers across Australia and New Zealand. Our team of approximately 1,868 radiologists and qualified technical, nursing and support staff are committed to providing the highest level of diagnostic imaging and patient care.

The table below summarises our operations across our major brands for the Reporting Period.

Company	Geographic Market	Core markets	Sites	Comprehensive sites ²	MRI machines	MRI Licences	PET Scanners	Employed Radiologists ³	# of Employees ⁵								
 Lake imaging	Victoria	Ballarat, Geelong, Warrnambool and outer western areas of Melbourne	19	6	8	4 full 0 partial	2	46	368								
	 the x-ray group	Victoria & NSW	Albury, Wodonga, Wangaratta, Yarrawonga and Lavington	5	2	2	1 full 0 partial	-	2	76							
 imaging QUEENSLAND	Queensland	Sunshine Coast, Rockhampton and Gladstone	17	7	6	3 full 2 partial	-	21	320								
	 SOUTH COAST RADIOLOGY	Queensland & NSW	Gold Coast, Toowoomba and Mackay	16	7	8	4 full 2 partial	2	35	415							
	 PELTON RADIOLOGY	Queensland ¹	Brisbane, Sunshine Coast	9	2	3	0 full 3 partial	-	7	162							
 apex RADIOLOGY	WA	Western Australia	6	2	3	2 full 0 partial	1	14	175								
 AstraRadiology  ConeRadiology  HorizonRadiology  SRGRadiology  TrinityMRI	New Zealand	Auckland	19	5	6	N/A	1	37 ⁴	233								
										Total IDX	91	31	36	14 full 7 partial	6	162	1,749

1. Acquisitions completed 1 July 2022

2. Comprehensive sites include a range of radiology equipment including MRI's and CT's and are located with or near major specialist referrers

3. Relates to employed radiologists only. In addition, IDX has had 83 contractor radiologists providing services

4. Consistent with the NZ private radiology model, all doctors work across the public and private sector and meet the criteria to be classified as contractors but are on terms and conditions similar to IDX employed radiologists

5. This number represents the number of employees on employment contracts on either part time or full-time arrangements. It does not represent the number of full-time equivalent employees or individual casual/contract arrangements. In addition, there are 119 employees in the corporate office (including IDX) totalling 1,868 employees

STRUCTURE, OPERATIONS AND SUPPLY CHAINS



The IDX Group's centralised shared services function supports the overall business in areas such as finance, risk, quality, health and safety, legal, privacy, assurance, human resources, technology, commercial development, procurement, governance, strategy and compliance.

In addition, the IDX Group's shared services function has enabled the centralisation of key vendor relationships and associated procurement activities. This ensures a consistent relationship with the key vendors and enables the Group to negotiate better qualitative and quantitative outcomes. These activities cover operational expenditures such as medical consumables and IT equipment and services, as well as our larger capital procurement activities.

Supply Chain

The IDX Group's supply chain includes the provision of goods and services from entities predominantly located in Australia with some located overseas. A breakdown of the IDX Group's suppliers by country as a percentage of total expenditure is as follows:

- Australia & New Zealand 96%
- North America 1%
- Other countries 3%

Products provided to the IDX Group by its suppliers

The IDX Group sources the following key products directly from suppliers:

- Medical/diagnostic imaging equipment such as Positron Emission Tomography (PET), Magnetic Resonance Imaging (MRI), Computed Tomography (CT), Ultrasound and X-ray equipment;
- Medical consumables, including personal protective equipment, cleaning products, needles, syringes, contrast and radiopharmaceuticals;
- Uniforms and patient gowns;
- Electronic equipment other than medical equipment, such as computers and equipment for office staff, network infrastructure, office furniture and stationery.

Services provided to the IDX Group by suppliers

The IDX Group sources the following key services directly from suppliers:

- Repair and maintenance of medical and diagnostic imaging equipment;
- Fit-out, repair and maintenance of our clinics and offices;
- IT support and typing;
- Professional services such as accounting, legal, transactional and other operational advice;
- Cleaning services.

DESCRIPTION OF RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

During the Reporting Period, the IDX Group considered the extent to which it may contribute to or be linked to modern slavery risks in its operations and supply chains.

As part of our modern slavery risk assessment during the FY20 reporting period, we considered the IDX Group's largest suppliers by category and geography in relation to the following procurement aspects:

- The type of goods and services being procured;
- The geographical locations in which those vendors operate;
- The size and volume of transactions with vendors;
- The distance from the risk or control that IDX can have over the supply chain.

We have an established process of approaching identified vendors to proactively seek assurances on how they manage the risk of modern slavery within their own supply chains.



xray



ultrasound



ct



mammography



nuclear medicine



bone mineral densitometry



mri



eos imaging system



interventional radiology



fluroscopy



pet/ct



dental

Following the risk assessment, we identified the IDX Group's direct workforce as being of low modern slavery risk which is largely mitigated by our people and culture policies and practices such as our:

- "everyone counts" company value;
- People and Remuneration Committee Charter;
- Code of Conduct which all IDX Group employees are required to comply with; and
- Diversity and Inclusion Policy.

Accordingly, the IDX Group considers that its greatest risk of involvement in modern slavery is being directly linked through our supplier relationships. Therefore, our modern slavery risk mitigation program has primarily focused on the IDX Group's supply chain.

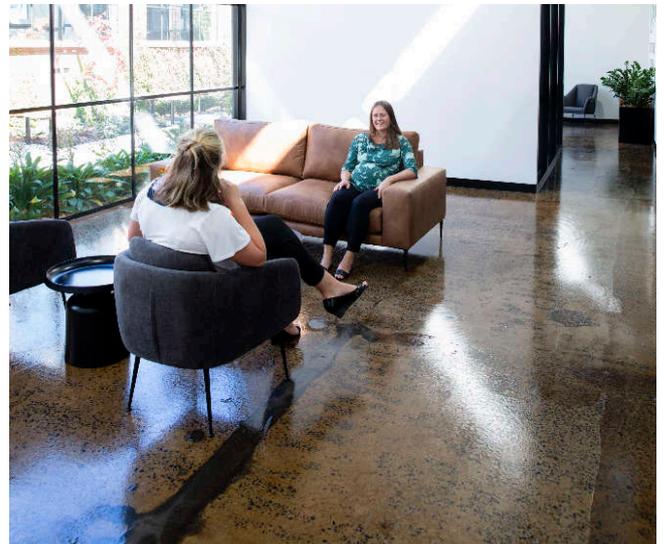
When assessing modern slavery risks, the IDX Group's procurement and supply chain activities were broken down into two broad categories:

1. **Direct onshore and on-site activities:** where the IDX Group's engagement of vendors for goods and services may present risks of labour rights violations.
2. **Supply chain activities:** where the IDX Group's procurement of goods in certain categories are at risk from being sourced from countries or regions with histories of poor labour rights, human rights or legal system issues and corruption.

The inherent risks across those categories, relevant to the IDX Group include:

1. Underpayment and exploitation of migrant workers in service subcontracting.
2. Labour conditions and child labour in the supply chain of manufactured goods.
3. Labour rights in offshored financial and business services.
4. Underpayment, indentured workers and exploitation of migrants in the supply of travel, hospitality and entertainment services.

Without active consideration of these risks in the IDX Group's procurement activities, there exists the risk that the Group may inadvertently incentivise modern slavery practices by making decisions based solely on the lowest cost of goods.



Vendor Risks

The IDX Group's analysis of the risks against each vendor category, using the methodology outlined in the *Actions Taken to Assess and Address Modern Slavery Risks* section below, determined that our 14 vendor categories with the highest likelihood of a link to modern slavery risks are:

DIRECT ONSHORE

Category name	Type of risk
Cleaning	Lower skilled labour using irregular or migrant workers particularly vulnerable to exploitation.
Film Delivery/Couriers	Lower skilled labour using irregular or migrant workers particularly vulnerable to exploitation.
Laundry and Dry Cleaning	Lower skilled labour using irregular or migrant workers particularly vulnerable to exploitation.

SUPPLY CHAIN

Category name	Type of risk
Consumables	Labour rights and governance in the overseas supply chain of chemical products.
Radiopharmaceuticals	Labour rights and health and safety and governance in the overseas supply chain of chemical, plastic and metal products.
Contrast	Labour rights and governance in the overseas supply chain of chemical products.
Needles and Syringes	Labour rights and health and safety and governance in the overseas supply chain of chemical, plastic and metal products.
Pharmaceuticals	Labour rights and governance in the overseas supply chain of chemical products.
Film	Labour rights and health and safety and governance in the overseas supply chain of chemical, plastic and metal products.
Freight	Low skilled labour vulnerable to exploitation.
Medical Equipment	Labour rights and health and safety in electronics and medical equipment supply chains.
Staff gifts	Risks from manufacturing of metal and plastic products and the extraction of raw materials in high likelihood countries.
Contractors/ Labour Supply - Typists	Risk of unfair working conditions for people when operations are outsourced, potentially offshore.
Computer Expenses	Labour rights and health and safety and governance in electronics supply chains.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the Reporting Period, the Group undertook the following actions to better assess and address potential modern slavery risks in its supply chain as well as support and encourage suppliers to improve their downstream modern slavery practices.

THINGS WE SAID WE'D DO LAST YEAR:

Ongoing collaborative work with suppliers to understand and manage modern slavery risks	Completed
Enhanced training and guidance for staff	Completed
Greater focus on engaging with vendors where there is direct onshore supply chain risks such as cleaning	Completed
Further integration of third-party risk assessment and supplier attestations into IDX's risk and incident management platform	Completed
Further enhance incident management, whistleblower and grievance processes to encourage notification of modern slavery issues or concerns	Completed
Further improvements to our vendor assurance and approval processes.	Ongoing

- A survey to better understand the modern slavery risks that exist within their operations and supply chains, including whether they:
 - Have a modern slavery policy or process;
 - Have someone with direct responsibility within their organisation for modern slavery;
 - Screen suppliers for modern slavery risks;
 - Have a written process for dealing with modern slavery risks or incidents as they arise;
 - Undertake any other due diligence with respect to modern slavery;
 - Provide training to their staff on modern slavery;
 - Undertake checks to ensure child labour is not being used within their organisation or suppliers;
 - Have written contracts in place for all employees, including ensuring the contracts are in a language employees understand and clearly state things such as hours of work and wage rates;
 - Take any other steps to combat modern slavery not covered by the survey; and
 - Have ever been found to have breached modern slavery legislation.

This attestation and survey process has allowed the IDX Group to continue to reinforce its expectations of suppliers while also getting a clearer picture of the strength of controls that exist within its supply chain.

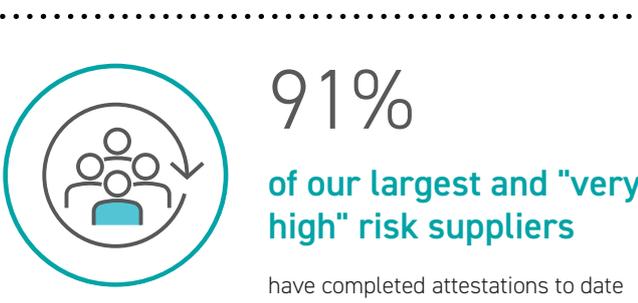
The IDX group is committed to working with suppliers and educating suppliers of its expectations to improve processes where gaps or issues are found.

Enhanced training for Staff

The IDX Group has sourced and provided training for all staff members on the IDX Group's modern slavery obligations, and their own role in managing modern slavery risks. This training is mandatory for all current and new employees and out of 1,954 staff, 1,318 have completed it (67.45%). Further work is underway in FY23 to increase the number of staff who have completed training, including 100% of senior managers, senior leadership, people & culture staff and procurement staff.

Focus on engaging with direct onshore vendors

We have engaged a property management and facilities company who will assist us with, among other things, organising cleaners and tradespeople for maintenance services required at one of our Victorian business units. If successful, we intend to roll out these maintenance service procurement across all other business units. The rationale is to centralise and mature our maintenance procurement by engaging known service providers who have adequate modern slavery assessment processes in place.



Ongoing collaborative work with suppliers

As a result of our supply line assessment in FY20, the IDX Group directly engaged with all vendors that were assessed to have "very high" risks of modern slavery practices, as well as our 10 largest suppliers, to understand how they were managing modern slavery risks within their supply chain. Building on that in FY22, IDX continues to engage with its largest and "very high" risk suppliers, of which 91% have responded with either the completed attestation or a copy of their own Modern Slavery Statement. Where we are yet to receive a response, we will continue to engage with these suppliers and over time consider non-responses in our assessment of risk and potential future actions.

Each of these suppliers have been asked to sign and return to the IDX Group:

- A joint attestation where both parties agree to manage modern slavery risks within their supply chains and notify the other party of any risks or issues that arise.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Integration with incident management platform

We have implemented a new risk and incident management system (CAMMS) in which we log supplier attestations and other risks identified in the business. We are also looking to mature our existing supplier information systems through the use of Workday during FY23 in order to better monitor our supply chain.

Enhance incident management and grievance mechanisms

The IDX Group's modern slavery program is complemented by governance and operational policies applying to the IDX Group, its employees and its contractors. Those policies provide mechanisms for our people to report concerns about suspected or actual improper conduct, including in relation to modern slavery, and for us to remediate the impact of modern slavery in our operations and supply chains.

Key policies which are directly relevant to our modern slavery program include:

- Our **Ethical Supply Chain Policy**, which was reviewed during the Reporting Period. This policy affirms the IDX Group's commitment to an ethical supply chain, including to manage the risks of modern slavery. The policy also outlines how employees or other stakeholders can report modern slavery concerns.
- Our **Code of Conduct**, which enforces our commitment to maintaining a high standard of ethical behaviour in conducting business and for our people to behave with integrity. This includes upholding IDX's values and compliance with any applicable policies, procedures, laws and regulations, including those that deal with modern slavery.
- Our **Whistleblower Policy**, which encourages and enables people (including our employees and suppliers) to speak up if they become aware of potential misconduct, and promotes a workplace environment in which everyone feels safe and supported to do so. Reports may be made anonymously through our third party provider, Stopleveline. Staff are required to undertake Whistleblowing training, which explains their rights in regards to reporting potential misconduct.
- Our **Anti-Bribery, Fraud & Corruption Policy**, which sets out IDX's commitment to a zero-tolerance approach to acts of bribery, fraud or corruption, what constitutes bribery, fraud and corruption, the types of conduct that are prohibited, and how to report violations or suspected conduct.

The IDX Group's core governance policies are made available on our website and can be accessed here: <https://www.integraldiagnostics.com.au/corporate-governance/>

More ways we assessed and addressed modern slavery risks during the Reporting Period.

ESG Committee

The IDX Group has an Environmental, Social and Governance (ESG) Committee to formalise its approach to its ESG responsibilities and subsequent action plans. The Committee comprises an executive, members of the senior management team and operational personnel. The Committee provides strategic oversight of the IDX Group's ESG approach, including on modern slavery. The IDX Group's ESG Statement can be found via the IDX website (<https://www.integraldiagnostics.com.au/environment-social-and-governance-esg/>).

During the Reporting Period, the Committee was responsible for overseeing the IDX Group-wide effort to reduce modern slavery and aligned further activities such as improvements to the IDX Group's broader supply chain management processes, to align with its modern slavery mitigation goals and obligations.

Consistent supplier base

Previously the IDX Group undertook a comprehensive review of supply chain data for its largest suppliers that determined which parts of the business were most exposed to the risk of modern slavery and allowed us to prioritise our efforts. The IDX Group supplier base is consistent, which means we have a strong understanding of the operations and activities of our largest suppliers. As part of the process of maturing our supplier information systems, IDX will continue to review our supplier base, with continual focus on the appropriateness of the supplier when considering broader ESG factors.

Governance and policy

The IDX Group is committed to ensuring that its labour practices are consistent with Australian and New Zealand legislation and regulatory requirements and reviews its policies regularly. The IDX Group's own review of its practices are further supported by the engagement of independent experts on human resources and labour law matters, as well as through the engagement of professional internal and external audit providers. During the Reporting Period, policy reviews were undertaken in relation to:

- Licensing and accreditation;
- Anti-bribery fraud and corruption;
- Cyber security maturity;
- Payroll; and
- Prescription medication.

ASSESSMENT, CONSULTATION AND FORWARD ACTIONS

ASSESSING EFFECTIVENESS OF ACTIONS

The IDX Group is committed to continually improving its modern slavery risk processes and we aim to continue to build on these processes each year by:

- Undertaking an annual review of our supply chain to identify modern slavery risks and practices;
- Performing an annual review of key policies to ensure modern slavery risk management remains appropriate;
- Continuing to work with suppliers to encourage improvement in practices.

Annual Review Cycle

The IDX Group's Annual review cycle for assessing modern slavery practices includes:



The Board will be proactively engaged with any material modern slavery risks or issues.

GROUP CONSULTATION

Building on the broad consultation undertaken in FY20 to inform the IDX Group's longer-term approach to modern slavery, during the Reporting Period, we consulted with its controlled entities, key stakeholders, the ESG Committee and management on our approach to managing modern slavery risks.

Prior to being put to the Board for review and approval, a draft of this Modern Slavery Statement was reviewed by senior management, relevant subject matter experts within the IDX Group and IDX's Audit Risk and Compliance Committee.

ANY OTHER RELEVANT INFORMATION

COVID-19

Like many organisations, the IDX Group faced supply chain interruptions due to the Covid-19 pandemic, particularly in FY20 and FY21. This meant we needed to consider alternative suppliers for items such as Personal Protective Equipment (PPE), Medical Consumables and in some cases its equipment. In FY22, supply chain interruptions and challenges were significantly reduced and the IDX Group has been able to reengage with its preferred and regular suppliers.

LOOKING FORWARD

As part of the IDX Group's continual improvement activities for modern slavery, a number of key initiatives have been identified for FY23 and beyond. The IDX Group is committed to building the maturity of our ESG program including our modern slavery and ethical supply chain activities by:

- Consolidating and reducing the number of suppliers we engage to ensure we can better monitor our supply chain.
- Ongoing collaborative work with suppliers to understand and manage modern slavery risks, including ensuring that all new large and "very high" risk suppliers undertake modern slavery attestations and provide survey responses.
- Continued training and guidance for staff, including 100% training compliance for senior managers, senior leadership, people & culture staff and procurement staff.
- Further improvements to our vendor assurance and approval processes by integrating our new supplier management software, Workday, into our procurement and supply chain management.

Performance against our modern slavery Plan will be continually reviewed to ensure these actions are an integrated way of doing business at IDX.

This Modern Slavery Statement was approved by the Board of IDX on 20 December 2022.

Helen Kurincic

Board Chair

Integral Diagnostics Limited

20 December 2022

