



**Gamma Investments Group of Companies  
Perth Radiological Clinic Partnership  
(collectively “PRC”)**

# **Modern Slavery Statement**

**Financial Year-end 30 June 2023**

PRC's purpose:

## Guiding trusted outcomes for more people, with technology and humanity.

### Introduction

PRC is comprised of a partnership of radiologists (the Perth Radiological Clinic Partnership), and a service company group (the Gamma Investments Group of Companies, headed by Gamma Investments Holdco Pty Ltd ACN 000 572 823) which provides staff, premises, and equipment, as well as other non-operating group companies.

PRC's purpose is to guide trusted outcomes for more people, with technology and humanity. At the core of this purpose is building trusted relationships with our referrers and patients, unpinning by our technical excellence in diagnostic imaging, high-quality and compassionate patient care, and our commitment to always act honestly and with integrity.

PRC is committed to appropriately managing the risk of modern slavery in its operations and supply chain.

PRC provides this Modern Slavery Statement for the period 1 July 2022 to 30 June 2023, in accordance with the *Modern Slavery Act 2018 (Cth)* (the "Act"). This statement provides an overview of PRC, its operations and supply chain, and its approach to identifying and managing its modern slavery risks.

### Who we are

PRC is made up of the following entities:

- Gamma Investments Holdco Pty Ltd (ultimate holding company)
- Gamma Investments Midco Pty Ltd
- Gamma Investments Bidco Pty Ltd
- New Vanguard Pty Ltd
- PerthRadClinic Limited (main operating entity)
- Oceanic Molecular Pty Ltd
- Perth Radiological Clinic Partnership (separate to the corporate group)

### Our operations

PRC provides medical imaging services in Perth, Western Australia.

Patients are referred to PRC for medical imaging and other radiological services (including image-guided injections, biopsies, and other medical procedures) by General Practitioners and Specialists to assist in the diagnosis and treatment of patients' medical conditions.

Patients attend our clinics located in the Perth Metropolitan Area where medical images are taken by our qualified medical imaging technicians and sonographers using a variety of imaging modalities, including MRI, CT, x-ray, sonography, and mammography (amongst others).

The images are read by our highly-trained sub-specialty radiologists who report their findings back to the referrer.

Figure 1: PRC in FY23



<sup>1</sup> As at 30 June 2023.

Our radiologists also perform image-guided procedures (injections, biopsies, etc.) at our clinics.

### **Our supply chain**

To support its day-to-day operations, PRC acquires products and services through a relatively simple supply chain. Almost all supplies are sourced from suppliers in Australia or through Australian offices of overseas based companies (see figure 2).

#### *Products provided by suppliers*

PRC:

- Purchases medical imaging and ancillary medical equipment;
- Purchases medical consumables (including radiopharmaceuticals, contrasts, and general medical consumables (PPE, syringes, dressings, etc.)); and
- Purchases telecommunications, IT hardware and software, office furniture and other office stationary and ancillary supplies.

#### *Services provided by suppliers*

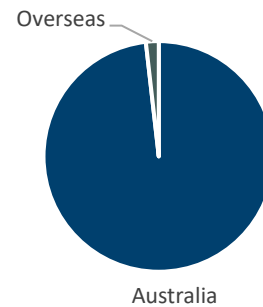
PRC:

- Hires clinical and non-clinical staff (radiologists, medical imaging technicians, sonographers, assistants, medical receptionists, and administration staff);
- Leases premises from which it provides its services, and procures cleaning, repairs and maintenance and other services to maintain the premises;
- Procures construction services to fit out and maintain its clinics and offices;
- Procures service contracts and maintenance services on medical and diagnostic equipment;
- Procures necessary utilities (electricity, water, natural gas, etc.) and other services (laundry, etc.) to operate its clinics; and
- Engages professional services (legal, tax, accounting, insurance, recruitment, training, etc.).

#### *Products and services used in PRC's supply chain*

The main indirect suppliers to PRC are:

*Figure 2: PRC supplier spend by country*



- Electronic component manufacturers whose products are incorporated into diagnostic imaging equipment, IT hardware and other technologies procured by PRC;
- Medical consumables manufacturers (including manufacturers of radiopharmaceuticals, iodised contrast, gloves, gowns, dressings, etc.) whose products which are used by PRC when imaging or treating patients;
- Construction materials manufacturers whose products are used in the construction and fit out of PRC's clinics; and
- Employees of PRC services providers (such as cleaning and laundry services, IT services and support).

#### **Identifying the risks of modern slavery**

PRC is committed to operating lawfully and ethically. This involves only working with suppliers that are aligned to that commitment.

PRC has a Supplier Code of Code which outlines the expectations we place on all our suppliers. This includes the expectation that our suppliers operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery-like practices, human trafficking, and child labour.

PRC values and observes all laws regarding corporate social responsibility, environmental and workplace safety protection, and staff inclusion and diversity.

We have undertaken risk assessments of modern slavery risks in our operations and supply chains to consider the risk that we are causing, contributing, or directly linked to modern slavery practices (summarised in Table 1).

*Risk that PRC directly engages in modern slavery practices*

Our lowest risk activities include our own operations, which are run by staff directly employed by us. PRC operates solely in Australia. The labour market in Australia is highly regulated, and strict regulations apply to medical imaging services. Our Whistle Blower Policy details processes and communication pathways for employees and suppliers to disclose misconduct in our business and supply chain without recrimination.

*Risk that PRC contributes to modern slavery practices*

PRC has assessed that there is a moderate risk that it may be directly contributing to modern slavery through the electronics components, medical consumables manufacturers, and construction materials, used by its suppliers. PRC primarily engages with large multinational, or substantial Australian, companies with public commitments to Modern Slavery compliance.

Another moderate risk area is our clinic services providers (cleaning contractors, laundry providers, etc.). In FY22, a new cleaning tender was issued and all tenders are required to confirmed compliance with the Modern Slavery Act. We also require these suppliers to confirm their ongoing compliance with our Supplier Code of Conduct, including the Modern Slavery Act.

PRC is of the view that, due to the mitigations outlined above, the risk of slavery in the supply chain is small. However, PRC must remain vigilant.

***Our governance framework and actions taken***

The Gamma Investment Holdco Board of Directors is ultimately responsible for governance at PRC.

Risk management and compliance with the Act is delegated to the Audit & Risk Committee (“A&RC”).

With direction from the A&RC, PRC Management will continue to:

- Publish our Modern Slavery Policy;
- Review the risk assessment of the potential modern slavery risks in our operations and supply chains with an emphasis on high-risk geographical locations, types of goods or services purchased, and the reputation of entities we deal with;
- Conduct due diligence when selecting new suppliers to PRC;
- Allow only a small number of senior employees who understand the requirements of the Act, to approve new suppliers;
- Maintain our Whistleblower Policy and escalation policy for staff and suppliers to use; and
- Monitor existing suppliers for any red flags.

In FY22, we reviewed the public Modern Slavery Statements for our top 20 suppliers by value and required those without a published statement to complete a supplier questionnaire, in a version like that provided by the Government’s Modern Slavery Register. None of them were aware of any abuse of human rights in their supply chain and would have carried out investigations to determine whether or not to continue engagement if they became aware of any allegations of modern slavery.

In FY23, PRC established its Supplier Code of Conduct. The code has been communicated to all suppliers and PRC has requested confirmation from all suppliers that they comply with the code, including compliance with the Act.

Table 1: Modern Slavery risk assessment

Type of supplier	Modern Slavery risk rating	Rationale
Clinical and non-clinical staff	Low	PRC engages staff in Australia and subject to Australian employment law and modern awards.
Medical imaging equipment (and service contracts)	Moderate	<p>Moderate risk of direct link due to electronic manufacture being a higher risk industry.</p> <p>PRC sources equipment and service contracts from Australian operations of large multinational companies, or substantial Australian companies, with a public commitment to the Australian Modern Slavery Act.</p>
Property leases and property maintenance services	Low	PRC procures leases from Australian public and private hospitals, substantial private companies, and family trusts. The properties are often managed by large property management companies with a public commitment to the Australian Modern Slavery Act.
Clinic services (cleaning, laundry, construction)	Moderate	<p>PRC procures clinic services from local small businesses that may engage migrant labour.</p> <p>PRC requires these businesses to confirm adherence to PRC's Supplier Code of Conduct, including Modern Slavery requirements.</p>
Utilities (electricity, natural gas, water)	Low	PRC procures utilities from WA State Government trading entities or large public utility companies with a public commitment to the Australian Modern Slavery Act.
Medical consumables	Moderate	<p>Moderate risk of direct link due to medical consumables manufacture being a higher risk industry globally.</p> <p>PRC procures medical consumables from global companies, or substantial Australian companies, with a public commitment to the Australian Modern Slavery Act.</p>
IT hardware, software and services	Moderate	<p>Moderate risk of direct link due to electronic manufacture being a higher risk industry globally.</p> <p>IT equipment and service contracts are sourced from Australian operations of large multinational companies with a public commitment to the Australian Modern Slavery Act.</p>
Professional services	Low	PRC engages reputable firms based in Australia with a public commitment to the Australian Modern Slavery Act.

During the year PRC maintained its policy requiring new staff involved in approving procurement successfully complete the eLearning provided by the Modern Slavery Register to ensure they better understand their obligations and can identify key risks.

### ***Monitoring effectiveness***

In FY24 we will continue to monitor the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles.

PRC also intend to refresh its Employee Code of Conduct, Anti-bribery and Corruption, Conflicts of Interest, and Gifts and Hospitality policies to reinforce its expectations of honest and ethical conduct by its Directors, Partners, Associate Doctors, Executive, Managers, and employees.

The key KPIs for FY24 are:

- Maintain an update-to-date risk register;
- Undertake risk assessments for all new suppliers;
- Require that all new staff involved in procurement approval complete eLearning provided by the Modern Slavery Register; and
- Continue to ensure that only a small number of senior employees who understand the requirements of the Act approve new suppliers.

### ***Consultation with group entities***

The directors of all companies in the PRC group are the same. Only one PRC group company employs staff. Therefore, no consultation between group companies was required.

This Modern Slavery Statement was approved by the Gamma Investments Holdco Pty Ltd Board on 15 December 2023.



**Dr Gavin Chapeikin**  
Chairman