

# Modern Slavery Statement

Reporting period 1 July 2019 to 30 June 2020

## 1. Reporting entity and organisational structure

This Modern Slavery Statement (**Statement**) is the first Statement made by Image Holdco Pty Ltd (ACN 623 028 740) (**Reporting Entity**) pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**).

The Reporting Entity is the ultimate holding company of a larger consolidated group encompassing a number of wholly owned subsidiaries (the **I-MED Group** or **Group**).

The Reporting Entity submits this Statement as a joint statement on behalf of all 'reporting entities' in the Group.

## 2. Operations and supply chains

The I-MED Group provides medical imaging services including related interventional procedures in both outpatient clinics and in private and public hospital settings. It operates predominantly in Australia and comprises around 240 clinics nationwide. The Group also performs teleradiology services from the UK.

The I-MED Group collectively engages more than 4,000 staff nationwide. This includes radiologists, 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 operations of the I-MED Group can be divided into (1) its core medical imaging services; and (2) its corporate activities undertaken in support of the delivery of the Group's core operations.

Whilst the I-MED Group comprises several corporate entities, it operates as a fully integrated business with shared corporate services, staff, equipment, clinics, knowledge and resources.

All corporate departments are centralised functions which service the entirety of the I-MED Group. Together with the Group's Board and executive, these corporate departments set and manage all policies and procedures which apply equally across the Group.

The I-MED CEO and CFO are directors of each I-MED Group subsidiary entity and the operations of those entities ultimately report to the same CEO and leadership team.

The Group's corporate governance is administered by the Reporting Entity's Board, supported by committees including an Audit & Risk Committee and People & Remuneration Committee. These Committees monitor and review various activities across the I-MED Group – including the Group's internal controls, risk, compliance with the Act, remuneration setting and ethical codes of conduct.

### Supply chains

The I-MED Group's operations are supported by the procurement of various goods and services, for example – medical imaging equipment and medical consumables; IT equipment, software and services; telecommunications services; utilities; the engagement and training of staff; leasing of clinic and office space; uniforms, linen and laundry services; print, film and office supplies; and external advisory.



The majority of the Group's procurement of goods and services by spend are purchased in connection with national arrangements and are supported by the Procurement team. Around 70% of the Group's procurement is undertaken from 50 suppliers, and 57% from 20 suppliers. Approximately 80% of all procurement spend is undertaken under contracts.

### 3. Risks of modern slavery practices in operations and supply chains

The I-MED Group is dedicated to operating its business in a responsible, lawful and ethical manner.

As a prominent healthcare provider, the Group's focus is on delivering high quality services with compassion and respect to its customers. A commitment to upholding fundamental human rights is integral to the ethos of its business.

The I-MED Group operates in a highly regulated healthcare framework. It is committed to delivering high quality services to its patients in a safe and responsible manner compliant with the legal framework in which it operates.

The I-MED Group has a zero-tolerance approach to all modern slavery practices and it expects the same high standards and commitments from the suppliers which it engages.

Nevertheless, the I-MED Group recognises that its suppliers may have multi-faceted tiers of supply chains which have the potential to give rise to a degree of uncertainty. For example, whilst many of the Group's prominent suppliers operate within Australia, many are headquartered internationally and may be subject to foreign laws.

The Group has undertaken the actions specified below as part of its modern slavery due diligence and risk mitigation strategy.

### 4. Actions taken to assess and address risk

The I-MED Group applies a proactive and systematic approach to risk management. The Board has approved a dynamic action and compliance plan which sets out the Group's key priorities in connection with the mitigation of modern slavery risks.

In 2019-20 the I-MED Group has actioned those priorities as follows:

#### ➤ **Reviewed and adapted governance systems and policies**

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 and contractors of the I-MED Group are expected to be familiar with and comply with its Code of Conduct and Code of Ethics. These Codes establish the Group's core values and principles for how the Group deals with its employees, contractors, customers, suppliers and stakeholders. These include issues like access to quality health services in the community, diversity and inclusion in its workforce and people the Group works with, freedom of association in its workforce and the health, safety and security of its staff.

In 2019-20, the Group has implemented a Human Rights Policy which establishes the fundamental principles around its commitment to protecting the rights of its employees, communities in which it operates, those who may be impacted by its operations, its customers and those within its supply chains – specifically in relation to modern slavery and human trafficking practices. This Policy is administered by the Group's Human Resources team and approved by the Board.

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.



Several other policies exist to support these fundamental principles and include the Group's Workplace Policies Handbook, Risk Management Policy and relevant Board and Committee charters.

Each of these policies allocates responsibility to senior levels of management for their proper administration and implementation.

➤ **Due diligence and procurement practices**

The Group has also established key processes around supplier due diligence and in 2019-20, focused on strengthening its procurement practices.

Due diligence is used to identify and prevent human rights risks in the Group's supply chains. 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.

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

All suppliers are required to comply with the obligations contained in those documents which include (amongst others) that suppliers must:

- adhere to all relevant laws and regulations in relation to human rights, employment conditions and entitlements, and ethical practices (both with internal and external stakeholders);
- ensure that they have a program to map and address any risks of modern slavery in their operations and supply chains,
- implement an audit plan to monitor performance of such programs, and
- enact remediation action where non-compliance is identified.

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. This process seeks to assess the supplier's understanding of, and commitment to, labour standards, their risk exposure and any specific approaches they have to address modern slavery risks.

➤ **Training of staff**

All staff receive training on the policies expressed in this Statement upon commencing work with the I-MED Group. Training is delivered at least once annually thereafter to ensure these principles remain a key priority for staff.

In 2019-20, the I-MED Group's Board and the Audit & Risk Committee received briefings on modern slavery awareness and the Group's obligations under the Act.

Relevant staff also received externally facilitated ethical supply chain training to understand supply chain risk exposures. This training will also continue to be delivered on an annual basis to all relevant staff.

## 5. Monitoring effectiveness of actions

In preparing for its first annual modern slavery Statement, the Group's Human Resources, Procurement and Legal teams worked together to assess its compliance with the Act.

In connection with this, the Human Resources team undertake regular assessments of internal operations to ensure compliance with all labour laws and employment conditions. In 2019-20, there were no identified incidences of modern slavery in the Group's internal operations.



In addition, the Procurement team undertook detailed risk assessments with all major suppliers as part of its annual business and performance reviews. Suppliers are required to report on their corporate social responsibility and undertake a specific risk assessment directly in relation to modern slavery and human trafficking mitigation strategies.

An action plan may also arise out of these reviews which has responsibilities assigned 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, escalated 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.

## 6. Process of consultation across I-MED Group

As identified in sections 2 and 3 above, the I-MED Group's governance and corporate functions are centralised through its corporate offices and all policies and procedures are set and administered centrally such that the Group operates in a consolidated way.

The governing bodies and procedures identified in section 2 above apply to all reporting entities covered under this joint Statement.

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

## 7. Other relevant information

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.

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

Dr Shrey Viranna  
I-MED Group CEO and Director