



MEDHEALTH

EW Pacific Pty Ltd (the Australian Holding Company of the MedHealth Group of Companies) on behalf of its Reporting Entities

Modern Slavery Statement

For the financial year ended 31 December 2023

Introduction

As an Australian leader in healthcare, specialist medical, wellbeing, healthtech, rehabilitation and employment services we recognise that we have a responsibility to conduct our business in a socially responsible manner. We believe that addressing modern slavery risks is important to operate as a safe, responsible and professional business. We are committed to conducting our business activities lawfully and ethically and to building a deeper understanding of modern slavery risks within our own businesses and in our community. Our expectation is that our suppliers will also comply with all relevant employment laws and will address modern slavery risks in their own operations and supply chains.

This statement under the *Modern Slavery Act 2018* (Cth) (**Act**) for our financial year ended 31 December 2023, sets out our efforts to address modern slavery risks in our operations and supply chains, including in all entities that we control.

The Act requires certain large entities to publish annual modern slavery statements on an online register which is publicly available. Under the Act, modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation which are trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. While modern slavery is distinct from substandard working conditions or underpayment of workers, the existence of these practices is also illegal and harmful and may also exist where there is modern slavery occurring.

References in this statement to “Our” or “We” are to EW Pacific Pty Ltd (ACN 160 098 162) and its controlled entities (collectively referred to as **MedHealth**). Each of the headings below in this statement corresponds with a mandatory criterion of the Act.

The Board of Directors of EW Pacific Pty Ltd approved this modern slavery statement on 13 June 2024.

This statement is signed by Timothy John Morphy in his role as Director of EW Pacific Pty Ltd on 14 June 2024.



Timothy John Morphy

DIRECTOR

EW PACIFIC PTY LTD

14 June 2024

1. Reporting Entities

This is a joint modern slavery statement for the financial year ended 31 December 2023 by EW Pacific Pty Ltd (ACN 160 098 162) on behalf of the group entities which are reporting entities under the Act and also covers the activities of entities controlled by EW Pacific Pty Ltd which are listed in section 2. The reporting entities under the Act are:

- EW Pacific Pty Ltd (ACN 160 098 162)
- MedHealth Holdings Pty Limited (ACN 141 218 215)
- MedHealth Pty Limited (ACN 141 219 785)
- Work Health Group Pty Ltd (ACN 606 846 137)
- Work Health Investments Pty Ltd (ACN 606 853 338)
- The WorkFocus Group Pty Ltd (ACN 166 308 765)
- atWork Australia Pty Ltd (ACN 009 452 153)

All reporting entities covered by this statement have a 31 December financial year end.

2. Our structure, operations and supply chains

About MedHealth

MedHealth is a purpose-built collection of industry leading health, medical and employment brands. Our unique and diverse capabilities come together to get the best possible life, health and employment outcomes for the people and customers we support.

MedHealth provides services in the following key areas:

- independent medical examinations and opinions;
- medical and disability management advisory;
- transcription and peer review;
- injury management and prevention;
- workplace rehabilitation and return to work;
- job seeking assistance and employment services;
- medical case management;
- medical information exchange;
- provider procurement and booking network;
- health screening services; and
- clinical therapeutic supports and disability assessment services.

MedHealth is part of the ExamWorks global network which includes Australia, the United States of America, Canada and the United Kingdom (see Figure 1 below), delivering over 2 million medical opinion and case management services annually.

United States 

Australia  **Board of Directors**

MedHealth operates in all states and territories in Australia, with the head office located in Melbourne, Victoria. We employ over 3,500 employees and engage approximately 1,200 independent medical professionals.

EW Pacific Pty Ltd is the registered holding company in Australia of MedHealth. EW Pacific Pty Ltd is wholly owned by ExamWorks AP, Inc which, in turn is wholly owned by ExamWorks Group, Inc, both of which are registered US companies.

Our legal entities

Below is a list of subsidiaries of EW Pacific Pty Ltd (current as at 31 December 2023):

- MedHealth Holdings Pty Limited
- MedHealth Pty Limited
- Next Health Pty Ltd
- CaseWorks Australia Pty Ltd
- ASSESS Medical Group Pty Ltd
- Medilaw Holdings Pty Ltd
- Medilaw Victoria Pty Ltd
- Medilaw Pty Ltd
- Australian Medico-Legal Group Pty Ltd
- Advicor Pty Limited
- Work Health Group Pty Ltd
- Work Health Investments Pty Ltd
- atWork Australia Pty Ltd
- Cogent Advisory Pty Ltd
- IPAR Rehabilitation Pty Ltd
- Kairros Pty Ltd
- SIS Rehab Group Pty Ltd
- Step 1 Group Pty Ltd
- WorkFocus Australia Pty Ltd
- UHG Pty Ltd
- Medico-Legal Opinions Pty Ltd
- Unified Healthcare Group Pty Ltd
- medEbridge Pty Ltd
- The WorkFocus Group Pty Ltd
- Total Workfit Solutions Pty Ltd
- medEbridge Solutions Pty Ltd
- Benchmark OT Pty Ltd
- Ability Action Australia Pty Ltd
- Outcomes Connect Australia Pty Ltd
- Lex Medicus Pty Ltd*

*Acquired in August 2023

Our businesses

The businesses through which our legal entities deliver services are grouped into four business divisions and provide the services as set out below:

What we do		MEDHEALTH
Health and business solutions	Health platform and business services	UHG medEbridge mi Job Access
	Incident / injury prevention and management services	Cogent thinking
Personal injury	Independent medical specialist / expert assessments and advice	mlcoa ML NH MINDSENSE
	Legal services (assessments and business services for law firms)	ASSESS GROUP advicor OT MedicoLegal SIS
	Rehabilitation and return to work services	ipar WORKFOCUS AUSTRALIA KAIRROS benchmark AccessPsych TWS LEAMEDICUS
Employment services	Disability Employment Services, Workforce Australia, ParentsNext	atWork
NDIS services	Therapeutic, positive behaviour and employment supports	Ability Action outcomes connect SIM Living to the Max HANBAHAN HEALTH

The diagram below shows how our businesses focus on getting the best possible life, health and employment outcomes for our customers and the people they support:



Note: The above diagrams relating to our businesses do not include the Real Therapy Solutions brand that was acquired outside the reporting period in February 2024.

Our supply chains

Our supply chains consist of the products and services needed for day-to-day operations of our various businesses, including:

- domestic labour through use of specialist medical, allied health professional and other professional consultants;
- overseas labour through our outsourced service providers;
- commercial leasing and associated property management services and building services;
- information technology infrastructure;
- utilities and telephone services;
- legal, financial, insurance, corporate advisory, education and training and other professional services;
- marketing and communications services, promotional merchandise and sponsorship benefits;
- site and office consumables (including stationery, amenities and kitchen consumables) and catering;
- medical consumables (including personal protective equipment);
- postage and courier services;
- accommodation and travel services;
- corporate clothing; and
- exercise, rehabilitation and occupational therapy equipment used by our medical and allied health services brands.

Suppliers are assessed in accordance with our Procurement Policy and are expected to adhere to our Supplier Code of Conduct, which was launched in 2022.

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

In 2020, we undertook a scoping exercise to identify parts of our operations and supply chains which may contain modern slavery risks. Our assessment framework is based on Commonwealth guidelines¹ regarding key modern slavery risk factors including high risk sectors and industries, high risk products and services, high risk geographic locations and high risk entities.

As we do not operate in any industries that are recognised globally as high risk for modern slavery and we comply with applicable Australian workplace laws, we have assessed our risk of modern slavery within our core business operations to be low. To our knowledge, in respect of our employees, we comply with all Australian laws that cover pay and entitlements, superannuation, record-keeping, workplace health and safety requirements, workers' compensation, anti-discrimination and equal opportunity.

However, we have identified the following potential modern slavery risks in our direct and indirect supply chains.

Outsourced labour force



Through our Australian-based offshoring service provider, AS White Global, we have established offshore teams to manage some of our administrative, marketing support, accounts receivable, quality assurance, business intelligence development, recruitment support and information technology functions. These teams are located in Malaysia, the Philippines and Vietnam.

Through our business arrangements with Ansell and Aquity, we share dedicated teams in India with our global ExamWorks group to perform medical transcription, records management, peer review and quality assurance activities.

Our offshore teams are located in countries which are known to have a higher modern slavery risk compared to Australia. However, we believe that modern slavery risks associated with our offshore teams are low as we have processes and controls in place to manage any elevated risk of modern slavery, to ensure good working conditions and the safety and wellbeing of our offshore team members. Two of our key offshoring service providers have provided us with modern slavery commitments and we will ensure any other new or existing key providers provide us with modern slavery commitments at the time of new engagement or contract renewal. Further information is included in section 4 of this statement.

Commercial leasing and associated property management services and building services



We occupy numerous sites across all states and territories in Australia. Our property management service provider, CBRE, delivers lease database management services from the Philippines, which is a country that attracts a higher modern slavery risk than Australia. CBRE's commitment to addressing modern slavery risks is contained in its Australian modern slavery statement.

Our supply chains associated with our commercial leasing activities include sectors such as cleaning, security and maintenance services. Those sectors may be at greater risk of modern slavery as those services may be performed by more vulnerable populations and involve lower wages and manual labour.

We are aware that modern slavery risks may also be present in our supply chains relating to office fit out and refurbishment.

¹ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

Information technology infrastructure and systems



We are aware that modern slavery risks may be present deep in our supply chain for the procurement of information technology infrastructure and systems including through extraction of raw minerals (which is recognised as a high risk industry) through to manufacturing.

Sponsorship, marketing and communications



Modern slavery may occur deep within the supply chain for our promotional merchandise which may be manufactured in countries with higher modern slavery risks.

From time-to-time our entities sponsor sporting teams which may wear uniforms or sporting equipment with our brands' logos. These goods have an elevated risk of modern slavery occurring in their production, including child labour.

Office supplies and catering



Modern slavery risks associated with food production, packaging and distribution may be present deep in our supply chains for office supplies (e.g. tea and coffee) and catering services. Those sectors and products are known to have higher modern slavery risks globally.

Further, the catering services industry is associated with higher modern slavery risk as those services can be delivered by more vulnerable populations.

Corporate clothing



Some of our brands wear branded corporate clothing or source work clothing and footwear for employment services clients that are or may be manufactured in countries which are known to have higher modern slavery risks. Further, the textiles industry is recognised as a high risk industry globally.

Products and equipment used by our medical and allied health services businesses (including PPE and consumables)



Examination gloves are used by our various medical and health brands. The manufacture of examination gloves is known to involve higher modern slavery risks. Our businesses use different suppliers and examination glove brands from time-to-time. We note that large suppliers Mun and Ansell have issued Australian modern slavery statements.

There may also be modern slavery risks relating to the extraction of raw materials for other protective equipment and consumables, such as face masks, temperature sensors, virus screen barriers, hand sanitiser and surface sprays. For example, we are aware that in some countries, there is a higher modern slavery risk associated with the production of sugar cane, which in turn is used to produce ethanol, the key ingredient in the production of hand sanitiser.

Further, there may be modern slavery risks deep in our supply chains relating to the extraction of raw materials for the production of exercise, rehabilitation and occupational therapy equipment used by our medical and allied health services businesses.

4. Our actions to assess and address risks, including due diligence and remediation processes

Oversight by the Risk and Compliance Steering Committee

Our commitment to corporate social responsibility issues (including our commitment to human rights and our stance against modern slavery) is overseen by MedHealth's Risk and Compliance Steering Committee which is chaired by the Group Chief Financial Officer (who is also a Company Secretary for all MedHealth entities). The Committee meets quarterly and discusses risks across the various businesses. The meeting is attended by representatives from our Executive Leadership Team, business leaders, in-house legal team, information technology team, our governance, privacy and risk experts and our external auditors. Any modern slavery risks that are identified will be reviewed and responded to at these meetings.

Policies and processes

We have various policies and processes in place to support our operations and to reduce the risk of modern slavery in our operations and supply chains. These policies and processes are continually reviewed to ensure compliance with legislation and to incorporate best practice. Our policies and processes that address modern slavery risks are:

ExamWorks Code of Conduct and Ethics for Employees, Officers and Directors

Our codes of conduct reflect our commitment to maintaining the highest standards of business conduct and ethics. ExamWorks Inc. requires all employees, officers and directors across their global network to read and acknowledge the ExamWorks Code of Conduct, which includes (among other things) a requirement for the person to certify they will deal honestly and ethically on ExamWorks' behalf in all matters. Every MedHealth team member is required to read and acknowledge that they will comply with the ExamWorks Code of Conduct upon commencement, and every three years thereafter. The ExamWorks Code of Conduct includes a pledge to a workplace and a supply chain free of modern slavery and provides examples of prohibited conduct.

MedHealth Code of Conduct

Whistleblower Policy

Our Whistleblower Policy provides a channel for reporting and investigating modern slavery incidents. It refers to human rights breaches (including modern slavery) as an example of reportable conduct under the policy.

Procurement Policy

Our Procurement Policy ensures that we maintain efficient and effective purchasing practices whilst achieving key social procurement goals. One of our key social procurement goals is to ensure we manage risks associated with modern slavery in our supply chain. The policy explains that a detailed risk assessment is undertaken for any procurement that potentially involves medium to high modern slavery risks. The risk assessment may require the supplier to complete a questionnaire and/or to provide information on its management of modern slavery risks. The contract that is then awarded to the supplier will generally include modern slavery contract clauses that are proportionate to the modern slavery risks of the procurement. We will continuously monitor the supplier or the term of the contract for any new risks or issues that may arise in that time. The Procurement Policy also sets out our response to a modern slavery incident or risk that is identified in our supplier's operations. If this occurs, we will work with the supplier to develop better practices to address modern slavery, or, where appropriate, we will consider exercising any right of termination that the contract may provide.

Supplier Code of Conduct

In FY2022, we commenced a rollout of our Supplier Code of Conduct. Our Supplier Code of Conduct describes how we expect our suppliers to conduct business, outlining the minimum social, environmental and governance standards expected, including in relation to the prevention of modern slavery. All new key suppliers and key suppliers who will be renewing their contractual arrangements will be expected to sign this code of conduct and to act in accordance with it.

Our Supplier Code of Conduct states that we expect all suppliers who work with or for MedHealth to:

- comply with all relevant modern slavery laws and regulations;
 - proactively identify, address and, where required by legislation, report on the risks of modern slavery practices in their business operations and supply chains;
 - not use modern slavery practices in their operations and supply chains;
 - immediately inform MedHealth if they identify, are informed of, or become aware of instances or allegations of modern slavery or human rights abuses in their operations and supply chains and work to provide just remediation; and
 - comply with modern slavery obligations set out in their contracts with MedHealth.
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Request for Tender Process

Our Request for Tender process and associated documentation defines minimum standards for our suppliers, including commitment to MedHealth's social procurement goals.

Human Rights Policy

Our commitment to upholding human rights is set out in our Human Rights Policy. Our policy is guided by international human rights standards.

We recognise that modern slavery risks are more likely to exist where human rights are not respected.

MedHealth Diversity and Inclusion Action Plan 2023–2028

We acknowledge that people from diverse backgrounds may be more vulnerable to modern slavery risks. An achievement from our previous Diversity and Inclusion Action Plan (2020 – 2023) was to ensure our key suppliers were aligned with our diversity principles. Our commitment to diversity was made clear in our procurement policy and Supplier Code of Conduct.

A key initiative of our Diversity and Inclusion Action Plan for 2023 – 2028 is to require active reporting from key suppliers against our Supplier Code of Conduct.

Child Safe Policy and Reporting Child Abuse and Neglect Procedure

Our Child Safe Policy sets out our commitment to creating an environment and culture where the safety, wellbeing and rights of children and young people are upheld and sets out how we protect children and young people.

Our Reporting Child Abuse and Neglect Procedure is underpinned by the National Principles for Child Safe Organisations and provides the framework and process for team members to report allegations of child abuse and neglect to relevant authorities. While child abuse and neglect are distinct from modern slavery, it may also exist where there is modern slavery occurring involving children and young people. Our procedure defines the requirements and pathway for our employees and contractors to report child safety concerns.

We will continually review the risk of modern slavery within our operations and supply chains and will make any necessary changes to our practices if required.

Where modern slavery risks lie deep within our supply chains, we may have limited ability to identify suppliers who engage in modern slavery practices and limited ability to change their behaviour. However, we aim to build leverage by building awareness of modern slavery issues within the broader community which will in turn influence business action globally.

FY2023 actions to address modern slavery risks

In FY2023, we did not identify any instances of modern slavery in our direct operations (including any concerns about our offshore teams). Further, no modern slavery concerns were raised under the Whistleblower Policy or other channels.

Actions that were taken in FY2023 to address the risk of modern slavery in our operations and supply chains were:

(a) Consultation, oversight and review

- continuing to assess modern slavery risks in our supply chains;
- continued oversight of corporate social responsibility issues by the Risk and Compliance Steering Committee;
- review and updates to key policies to ensure compliance with legislation and to incorporate best practice; and
- consideration of modern slavery risks as part of due diligence on target companies for acquisition.

(b) Modern slavery information

- continuing to encourage team members who lead offshore teams or who are involved in procurement to undertake the online modern slavery training course included on the staff intranet.

(c) Procurement

- continuing our engagement with suppliers who provide our offshore workforce in relation to modern slavery issues;
- inclusion, where necessary, contractual obligations relating to modern slavery in contracts with our suppliers and sponsored organisations;
- continued rollout of our Supplier Code of Conduct;
- development of a supplier evaluation tip sheet with references to the Procurement Policy and Supplier Code of Conduct to support regular supplier evaluations; and
- development of a questionnaire for assessment of modern slavery risks in potential suppliers.

(d) Offshore Operations

- monitoring practices have included regular and direct interaction with offshore team members and, in some cases, direct involvement in recruitment;
- visiting Ansell and Aquity in May 2023 located in India in which working conditions for our offshore team members were observed and no issues were found to be of concern; and
- visiting AS White's Vietnam offices in May 2023 and September 2023 in which working conditions for our offshore team members were observed and no issues were found to be of concern.

5. How we assess the effectiveness of our actions

We will assess the effectiveness of our actions to identify and address modern slavery practices in any part of our operations and supply chains by:

- undertaking periodic reviews of our internal governance procedures and modern slavery risk assessment framework including policies;
- working towards implementing key performance metrics;
- tracking our actions to address modern slavery and outcomes;
- working towards building modern slavery awareness via our intranet resources and our employee training as part of broader training initiatives on diversity and human rights and tracking training completion rates;
- working with suppliers to check they are progressing actions that they have put in place to address modern slavery incidents or risks;
- continued roll out and reporting on our suppliers who have signed our Supplier Code of Conduct;
- reviewing any incidents reported through whistleblower or other reporting mechanisms and considering any trends;
- ongoing consideration of modern slavery issues at MedHealth's Risk and Compliance Steering Committee meetings;
- connecting with other organisations to share learnings and to address modern slavery issues across corporate Australia; and
- discussing our modern slavery approach with external advisors, as necessary.

6. Consultation with owned or controlled entities

As all entities within MedHealth (as detailed in section 2 above) have the same Company Officers (Directors and Company Secretaries), are managed and governed by the same Executive Leadership Team, and are subject to oversight by MedHealth's Risk and Compliance Steering Committee, all reporting entities and their controlled entities have been appropriately consulted in the preparation of this modern slavery statement. Relevant information, materials and updates were also provided to team members from legal, governance and organisational excellence divisions who support all of the reporting entities and who were involved in the preparation of this statement.

7. Provide any other relevant information

We recognise that there is always more we can do to assess and address risks of modern slavery in MedHealth's operations and supply chains and are committed to continuous improvement. Going forward, we aim to continue to build awareness of modern slavery issues within our businesses as part of broader training initiatives on diversity and human rights. We will also continue to work with our suppliers to gain information on the supply chains over which we have less visibility and to seek ways in which we can increase our ability to influence change. The continued rollout of the Supplier Code of Conduct which commenced in FY2022 will enable us to set higher expectations of our supply chains, and facilitate a process for monitoring compliance and enabling audit of our suppliers if we have any concerns about their operations.

Through delivery of our services, we have contact with vulnerable communities and people in Australia including Aboriginal and Torres Strait Islander peoples, our migrant community, base-skilled workers and people with disability. These communities may be at higher risk of modern slavery. Over time, we aspire to build the capability of our people to recognise the warning signs of modern slavery and to respond to and report any suspected incidents of harm.

We look forward to sharing our progress with you in future modern slavery statements.