

# Pro Medicus Limited

ABN 25 006 194 752

# MODERN SLAVERY STATEMENT

FOR THE YEAR ENDED 30 JUNE 2024



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## INTRODUCTION

At Pro Medicus, our vision is to be the leading provider of best-in-class medical imaging software, 'moving the needle' on clinical outcomes. In pursuit of that goal, we are committed to the highest ethical and behavioural standards. This includes upholding human rights and striving to ensure that modern slavery or human trafficking has no place in any aspect of our business or supply chain.

The *Modern Slavery Act 2018 (Cth)* ('the **Act**') requires that an Australian entity or an entity that carries on business in Australia with a minimum consolidated revenue of \$100 million submit a Modern Slavery Statement ('**Statement**') for that financial year outlining the steps taken to identify, manage and mitigate the risks of modern slavery and human trafficking in the entity's operation and supply chain.

This Statement is published by Pro Medicus Limited (ABN 25 006 194 752), an Australian Public Company, registered at 450 Swan Street, Richmond VIC 3121 ('**Pro Medicus**', '**we**', '**our**') in relation to our business activities during the financial year ending 30 June 2024 ('**Reporting Period**').

It is the second Statement for Pro Medicus under the Act.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### Corporate Structure

Pro Medicus is an Australian incorporated and domiciled company, publicly listed on the Australian Stock Exchange with wholly owned subsidiaries in Europe (Visage Imaging GmbH, Germany) and North America (Visage Imaging Inc, USA).

**Number of Employees - 120**

### Nature of Operations and Principal Activities

The principal activities of Pro Medicus are the development and supply of healthcare imaging software, Radiology Information System (RIS) software and services to hospitals, diagnostic imaging groups and other related health entities in Australia, North America and Europe. We have offices in Melbourne (Australia), San Diego (United States) and Berlin (Germany).

We work only with recognised, reputable and credit-worthy third parties and have long standing relationships with our suppliers that last several years or more. We currently do not have any joint venture arrangements and have minimal change in our supplier listing from year-to-year, both domestically and in our overseas subsidiaries.

### Supply Chain

Our suppliers are located in the same country and regions that our offices are located, and we generally do not go outside these regions for supplier requirements. Our German subsidiary uses predominantly German suppliers, although occasionally use other suppliers from nearby European countries, such as Ireland and Finland, as well as the United States. Our North American subsidiary uses predominately US suppliers,

although occasionally uses Canadian suppliers and our Australian entity uses predominately Australian suppliers.

The main source of goods and services that the company procures is IT consulting services, statutory compliance services, utilities and tax and legal services. Pro Medicus has a very low supplier requirement, and the main expense of the business is employee headcount. Pro Medicus does not supply inventory or hardware and, as such, does not require any manufacturing or transport-related services.

## **THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN**

Pro Medicus operates in highly regulated environment in terms of:

- **Industry.** The healthcare technology sector consists of mostly skilled labour. At Pro Medicus, all employees are highly skilled white-collar professionals with the qualifications, knowledge and competencies appropriate for their role.
- **Products and services.** All our product research and development is completed inhouse. As it is considered a medical device, our Visage 7 product is approved by the relevant authorities in Germany and the US.
- **Geography.** There are strict labour laws and a low prevalence of modern slavery in the countries where we operate.
- **Entity.** As a public company, Pro Medicus has a strong governance structure combined with a strong human rights record.

Our supply chain is comprised mostly of organisations who are also highly regulated and governed, with a white-collar workforce. There are a small number who operate in an industry (e.g., cleaning) or geographies (e.g., China and the Philippines) as part of a global organisation where the risk of modern slavery would be considered higher than ours.

Overall, however, the risk that Pro Medicus or our supply chain would cause, contribute to or be directly linked to modern slavery is considered low.

## **ACTIONS WE HAVE TAKEN TO ASSESS AND ADDRESS THE RISKS**

Pro Medicus has a framework for responsible and sustainable governance. This includes a series of policies and strategies to guide the Board, management and staff in ensuring we operate in an ethical and responsible manner, including upholding human rights. Key policies include our Code of Conduct, Diversity, Equity and Inclusion Policy and Whistleblower Policy. During the reporting period, staff completed an attestation to comply with these policies.

In addition, Pro Medicus completed all the actions we committed to undertaking in our first Statement, namely:

- **Policies and procedures.** We developed a Modern Slavery Policy, outlining the expectations of the Company, our employees and suppliers in helping prevent, identify and mitigate modern slavery. A copy of the Policy was provided to employees and our suppliers.
- **Staff awareness.** We educated employees on what modern slavery is, the signs to look for and what to do if they suspect it is occurring.
- **Supplier engagement.** Where possible, we identified the appropriate contact at our suppliers and requested information in survey form from a representative sample on both their human rights practices and those of their supply chain, focusing on suppliers who were considered as having a comparatively higher risk of modern slavery.

## HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS

We have monitored the effectiveness of our actions in identifying, managing and mitigating modern slavery risks by:

- **Checking our risk assessment.** We kept our risk assessment up-to-date, particularly in relation to new suppliers, and have maintained a low-risk rating.
- **Reviewing the actions we took.** We conducted a review of our actions in addressing modern slavery and met all the commitments in our first Statement.
- **Level of engagement with suppliers.** Through increasing engagement, we improved our survey response rate four-fold, resulting in greater transparency of our supply chain. In addition, we assessed and compared the results of completed supplier surveys. There were no “red flags”.
- **Level of understanding amongst staff.** All staff now have an understanding of modern slavery and their role in identifying and reporting it.

In the next reporting period, our focus will be on ensuring that all new suppliers and staff are made aware of our expectations, as well as working with our suppliers on an increasingly collaborative basis.

## CONSULTATION PROCESS

During the Reporting Period and in preparation of this Statement, we consulted with all Pro Medicus wholly-owned subsidiaries. We discussed details of the reporting requirements under the Act, information regarding the actions we intend to take to address these requirements and provided all entities with materials relevant to this Statement.

## **APPROVAL**

This Statement was approved by the Pro Medicus Board of Directors on 22 July 2024 and signed on their behalf by:

A handwritten signature in blue ink, appearing to read "Sam Hupert", written in a cursive style.

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**Dr Sam Hupert**  
CEO  
22 July 2024