



# Modern Slavery Statement

2023



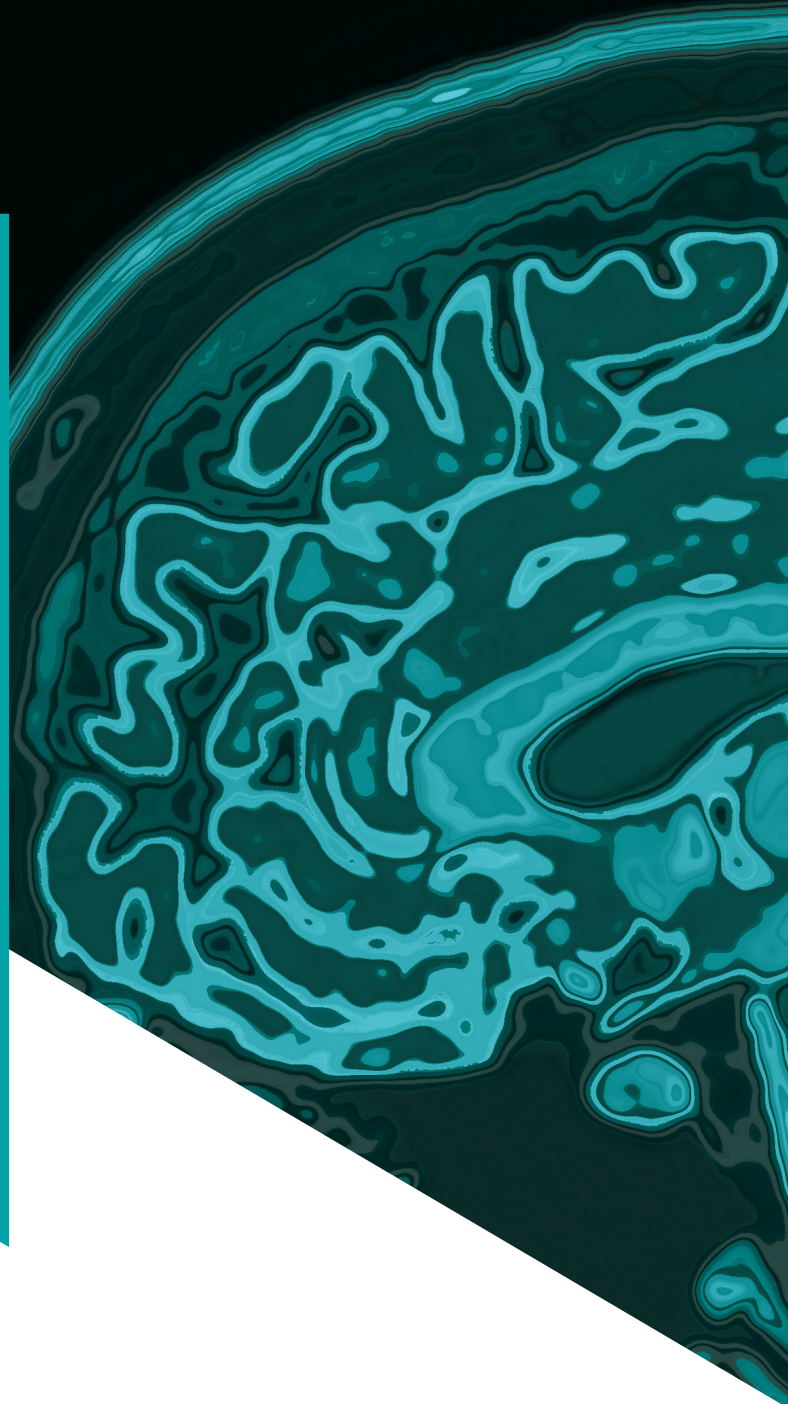
## Acknowledgement of Country

Integral Diagnostics (IDX) 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.



OUR  
**VISION**  
a healthier world

OUR  
**PURPOSE**  
deliver the best health outcomes for our patients

OUR  
**VALUES**



**patients first**  
PATIENTS ARE AT THE HEART  
OF EVERYTHING WE DO



**medical leadership**  
IMPROVING OUTCOMES WITH  
EVIDENCE BASED CARE



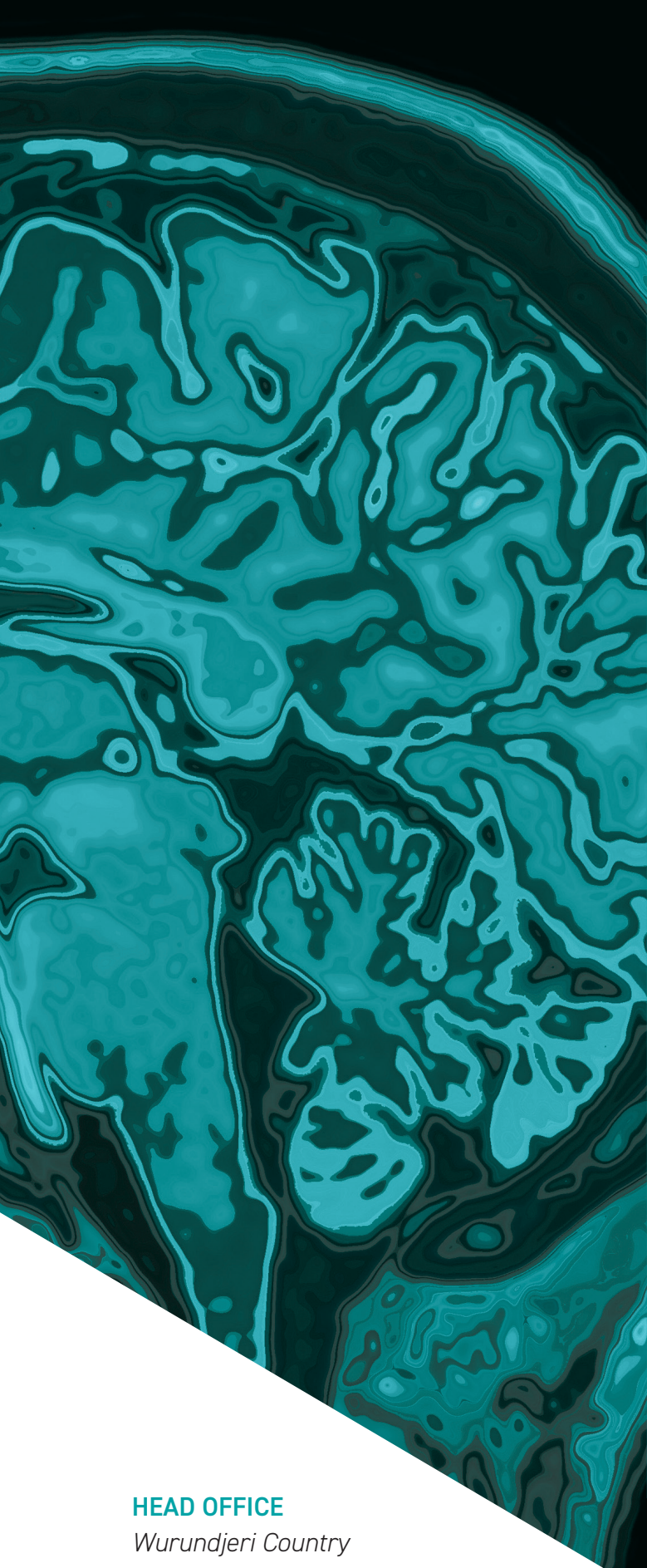
**everyone counts**  
WE WORK SAFELY, INCLUSIVELY  
AND RESPECT EACH OTHER



**create value**  
DELIVER SUSTAINABLE VALUE  
TO ALL STAKEHOLDERS



**embrace change**  
STRIVE FOR EXCELLENCE,  
HAVE THE COURAGE TO INNOVATE



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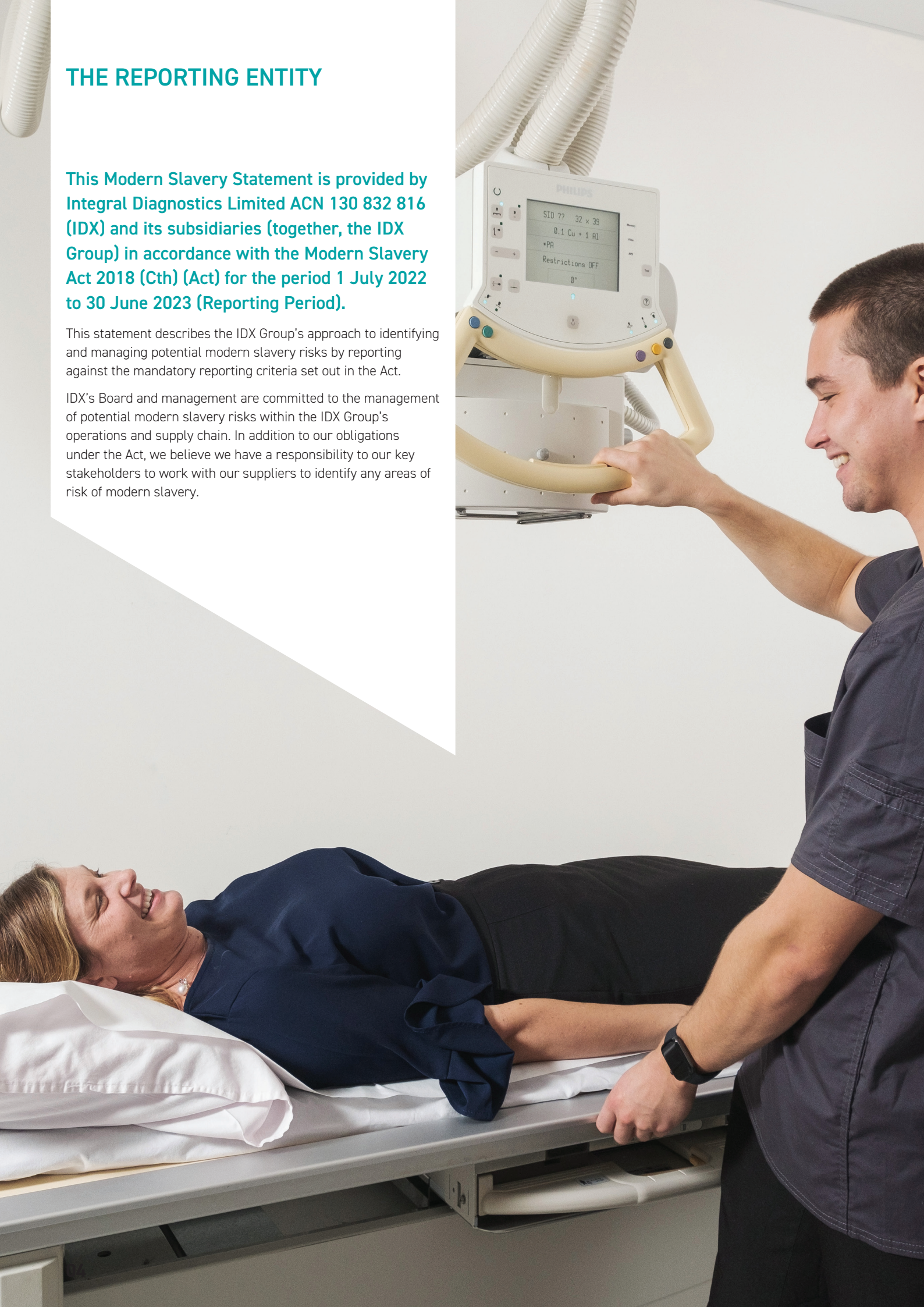
ABN 55 130 832 816

## THE REPORTING ENTITY

**This Modern Slavery Statement is provided by Integral Diagnostics Limited ACN 130 832 816 (IDX) and its subsidiaries (together, the IDX Group) in accordance with the Modern Slavery Act 2018 (Cth) (Act) for the period 1 July 2022 to 30 June 2023 (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 any areas of risk of modern slavery.



# STRUCTURE & OPERATIONS

**IDX is an Australian public company, limited by shares and listed on the Australian Stock Exchange with the code IDX.**

The IDX Group operates as a single economic entity, but has a number of Australian and New Zealand wholly - owned subsidiaries through which it operates, as described in the next section.

The IDX Group is headquartered in Melbourne, Australia, at Suite 9.02, Level 9, 45 William Street. 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

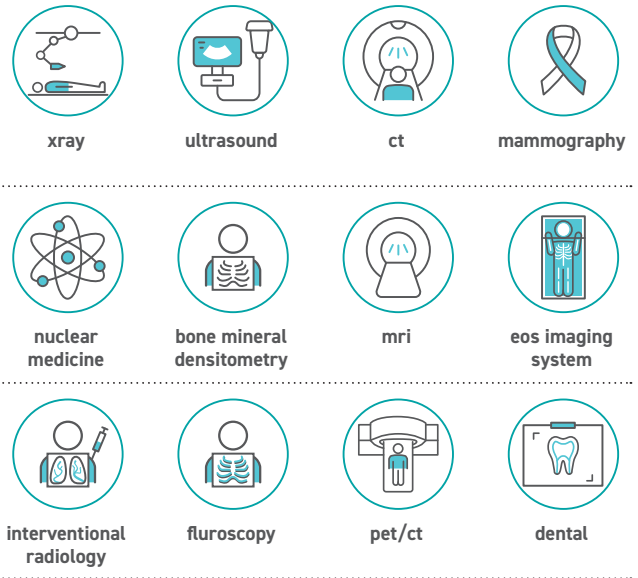
The IDX Group is a healthcare group providing diagnostic imaging services across Australia and New Zealand to patients and referrers including general practitioners, medical specialists and allied health professionals.

Our business is comprised of five operational business units that employ and contract healthcare professionals to provide services through a network of clinics, including multiple hospital sites, operating under various brands in different geographic areas. IDX also owns and operates a teleradiology business, IDXt, which is an overflow and after-hours teleradiology provider. IDXt offers teleradiology services to hospitals and radiology clinics across Australia and New Zealand.

IDX also has a Shared Services function, which is comprised of IT, People & Culture, Finance, Legal, Risk, Quality & Safety, Marketing and Commercial teams, to provide complementary and support services to our operational business units. Our Shared Services function has enabled the centralisation

of key vendor relationships and associated procurement activities. This ensures consistent relationships 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.

During the Reporting Period, we engaged with 54,000 referrers and saw over one million patients. Our combined clinical group is one of the largest radiology providers across Australia and New Zealand. Our team of approximately 2,010 radiologists and qualified technical, nursing and support staff is committed to providing the highest level of diagnostic imaging and patient care.



## Group Structure



<b>Core Markets</b>	Australia and New Zealand		
<b>Sites</b>	91	<b>Comprehensive sites<sup>1</sup></b>	35
<b>MRI machines</b>	37	<b>Full MRI licences</b>	16
		<b>Partial MRI licences</b>	7
<b>PET scanners</b>	6		
<b>Employed Radiologists<sup>2,3</sup></b>	165	<b>Number of Employees<sup>4</sup></b>	1,843

# STRUCTURE & OPERATIONS

## Queensland



### Imaging Queensland

Established in 2011 on the Sunshine Coast and has since expanded across South East Queensland. Imaging Queensland provides diagnostic imaging services at 16 branches, with a network that comprises:

- Sunshine Coast Radiology
- Central Queensland Radiology
- IQ Radiology

**Core Markets** Sunshine Coast, Rockhampton and Gladstone

<b>Sites</b>	16	<b>Comprehensive sites<sup>1</sup></b>	7
		<b>Full MRI licences</b>	3
		<b>Partial MRI licences</b>	2
<b>MRI machines</b>	6		
<b>PET scanners</b>	-		
<b>Employed Radiologists<sup>2</sup></b>	26	<b>Number of Employees<sup>4</sup></b>	328



### X-Ray & Imaging (Peloton Radiology)

A local diagnostic imaging provider based on the Sunshine Coast. X-Ray & Imaging (Peloton Radiology) provides services at nine sites with a network that comprises:

- CitiScan Radiology
- Lime Radiology and
- Diagnostic Imaging for Women

**Core Markets** Brisbane and Sunshine Coast

<b>Sites</b>	9	<b>Comprehensive sites<sup>1</sup></b>	3
		<b>Full MRI licences</b>	-
		<b>Partial MRI licences</b>	3
<b>MRI machines</b>	3		
<b>PET scanners</b>	-		
<b>Employed Radiologists<sup>2</sup></b>	6	<b>Number of Employees<sup>4</sup></b>	180



### South Coast Radiology

South Coast Radiology (SCR) has provided radiology services on the Gold Coast since 1967. It now provides medical imaging services to the Tweed, Gold Coast, Darling Downs and Mackay communities.

**Core Markets** Gold Coast, Toowoomba and Mackay

<b>Sites</b>	17	<b>Comprehensive sites<sup>1</sup></b>	8
		<b>Full MRI licences</b>	5
		<b>Partial MRI licences</b>	2
<b>MRI machines</b>	9		
<b>PET scanners</b>	2		
<b>Employed Radiologists<sup>2</sup></b>	38	<b>Number of Employees<sup>4</sup></b>	430

## Western Australia



### Apex Radiology

Established in 1996, Apex Radiology provides patients in rural and regional communities in Western Australia access to diagnostic imaging services. Apex Radiology recently opened in the Perth metro area, and also provides Radiology and Teleradiology services to the Western Australia Country Health Service (WACHS).

**Core Markets** South West Western Australia

<b>Sites</b>	6	<b>Comprehensive sites<sup>1</sup></b>	4
		<b>Full MRI licences</b>	2
		<b>Partial MRI licences</b>	-
<b>MRI machines</b>	3		
<b>PET scanners</b>	1		
<b>Employed Radiologists<sup>2</sup></b>	13	<b>Number of Employees<sup>4</sup></b>	199

## Victoria



### Lake Imaging

Lake Imaging has been offering radiology services to patients throughout Geelong, Central and Western Victoria for over 20 years. It currently operates 18 clinics in Ballarat, Geelong, Warrnambool, North Melbourne and outer western areas of Melbourne

**Core Markets** Ballarat, Geelong, Warrnambool and outer western areas of Melbourne

<b>Sites</b>	18	<b>Comprehensive sites<sup>1</sup></b>	6
		<b>Full MRI licences</b>	4
		<b>Partial MRI licences</b>	-
<b>MRI machines</b>	8		
<b>PET scanners</b>	2		
<b>Employed Radiologists<sup>2</sup></b>	43	<b>Number of Employees<sup>4</sup></b>	391



### The X-Ray Group

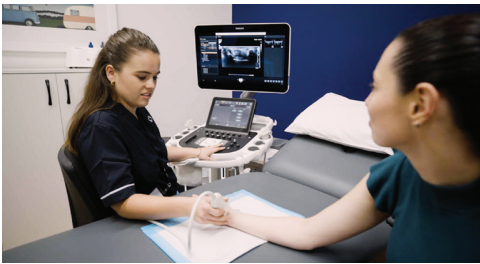
Since 2007, The X-Ray Group has delivered diagnostic medical imaging services to the local communities of Albury, Wodonga, Wangaratta, Yarrawonga and Lavington.

**Core Markets** Albury, Wodonga, Wangaratta, Yarrawonga and Lavington

<b>Sites</b>	5	<b>Comprehensive sites<sup>1</sup></b>	2
		<b>Full MRI licences</b>	2
		<b>Partial MRI licences</b>	-
<b>MRI machines</b>	2		
<b>PET scanners</b>	-		
<b>Employed Radiologists<sup>2</sup></b>	4	<b>Number of Employees<sup>4</sup></b>	71

# STRUCTURE & OPERATIONS

## New Zealand



### Astra, SRG and Horizon Radiology | Trinity MRI

IDX New Zealand brands located in Auckland provide patients with radiology services across all diagnostic imaging modalities; MRI, CT, PET CT ultrasound, digital breast tomosynthesis and plain x-rays.

Trinity MRI is a diagnostics imaging facility dedicated to Brain, Spine and Neurovascular imaging.

**Core Markets** Auckland

<b>Sites</b>	20	<b>Comprehensive sites<sup>1</sup></b>	5
<b>MRI machines</b>	6	<b>Full MRI licences</b>	NA
		<b>Partial MRI licences</b>	NA
<b>PET scanners</b>	1		
<b>Employed Radiologists<sup>3</sup></b>	35	<b>Number of Employees<sup>4</sup></b>	244



## Teleradiology



### IDXt

IDXt is an overflow and after-hours teleradiology provider.

IDXt offers teleradiology services to hospitals and radiology clinics across Australia and New Zealand.

Supported by RANZCR accredited radiologists, IDXt offers urgent, routine and overflow teleradiology services.



These tables reflect data current at 30 June 2023.

<sup>1</sup> Comprehensive sites include a range of radiology equipment including MRIs and CTs and are located with or near major specialist referrers.

<sup>2</sup> Relates to employed radiologists only. In addition, IDX has had 83 contractor radiologists providing services.

<sup>3</sup> 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.

<sup>4</sup> 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 167 employees in the corporate office (including IDXt) totalling 2,010 employees in the IDX Group.



## SUPPLY CHAINS

**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 - 97%
- North America - 1%
- Other countries - 2%

### Products procured by the IDX Group

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; and
- electronic equipment other than medical equipment, such as computers and equipment for office staff, network infrastructure, office furniture and stationery.

### Services procured by the IDX Group

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; and
- cleaning services.



# 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. IDX's direct workforce has been assessed as being of low modern slavery risk, due to 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.

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:

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

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

The IDX Group's greatest risk of involvement in modern slavery is therefore indirectly linked through our supplier relationships. As such, our modern slavery risk mitigation program has primarily focused on the IDX Group's supply chain.




During FY23, a working group with representatives from the Legal & Risk and Commercial teams met quarterly to discuss and assess our modern slavery risks and controls. This working group applies an established process of approaching identified vendors to proactively seek assurances and engage in discussions on how they manage the risk of modern slavery within their own supply chains. In considering our risks, IDX Group's largest suppliers are broken down 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; and
- the distance from the risk or control that IDX can have over the supply chain.

# VENDOR RISKS

The IDX Group's analysis of the risks against each vendor category determined that the 14 vendor categories with the highest risk of modern slavery issues 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, health & 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, health & 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, health & safety, and governance in the overseas supply chain of chemical, plastic and metal products.
	Freight	Lower skilled labour vulnerable to exploitation.
	Medical Equipment	Labour rights, health & 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, health & 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 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.

Action	Summary
<b>Consolidating supplier database</b>	<p>Consolidating and reducing the number of key suppliers we engage to ensure we can better monitor our supply chain.</p> <p>During FY23 we commenced a process of analysing our key supplier database and consolidating suppliers where possible. This work will continue during FY24.</p>
<b>Collaborative work with suppliers</b>	<p>IDX continues to engage with its largest and high risk suppliers, 91% of which have responded with either the completed attestation or a copy of their own Modern Slavery Statement. We will continue to engage with suppliers that have not yet responded, and over time consider non-responses in our assessment of risk and potential future actions.</p> <p>Each of these suppliers have been asked to sign and return to the IDX Group:</p> <ul style="list-style-type: none"> <li>● 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.</li> <li>● A survey to better understand the modern slavery risks that exist within their operations and supply chains, including whether they: <ul style="list-style-type: none"> <li>- Have a modern slavery policy or process;</li> <li>- Have someone with direct responsibility within their organisation for modern slavery;</li> <li>- Screen suppliers for modern slavery risks;</li> <li>- Have a written process for dealing with modern slavery risks or incidents as they arise;</li> <li>- Undertake any other due diligence with respect to modern slavery;</li> <li>- Provide training to their staff on modern slavery;</li> <li>- Undertake checks to ensure child labour is not being used within their organisation or by suppliers;</li> <li>- 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;</li> <li>- Take any other steps to combat modern slavery not covered by the survey; and</li> <li>- Have ever been found to have breached modern slavery legislation.</li> </ul> </li> </ul> <p>This attestation and survey process has allowed the IDX Group to continue to reinforce its expectations of suppliers, while also gaining a clearer picture of the strength of controls that exist within its supply chain.</p> <p>IDX Group is committed to working with suppliers, and educating them about our requirement to improve their processes if any gaps or issues are found.</p> <p>During FY23 we reassessed our supplier database and obtained signed attestations from any new very large or high risk suppliers.</p>
<b>Maintaining a consistent supplier base</b>	<p>In FY20 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's key supplier base is consistent, which means we have a strong relationship and 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, focusing on the appropriateness of the supplier when considering broader ESG factors.</p>
<b>Focus on engaging with direct onshore suppliers</b>	<p>We have engaged a property management and facilities company to assist us with, among other things, organising cleaners and tradespeople for maintenance services required at one of our Victorian business units. This trial is still ongoing, and if successful, we intend to roll it out across all our other business units. The rationale is to centralise and mature our maintenance procurement by engaging known service providers that have adequate modern slavery assessment processes in place.</p>

Action	Summary
Staff training	<p>The IDX Group has sourced and provided training and education for all staff members on the IDX Group's modern slavery obligations, and their own role in mitigating modern slavery risks.</p> <p>Continued training and guidance for staff, including requiring 100% training compliance for senior managers, senior leadership, people &amp; culture staff and procurement staff.</p>
Incident management platform	<p>We have implemented a new risk and incident management system (CAMMS), in which we log supplier attestations and any risks identified in the business. We are also looking to mature our existing supplier information systems through the use of Workday in future, in order to better monitor our supply chain.</p>
ESG Committee	<p>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.</p> <p>The IDX Group's ESG Statement can be found via the IDX website (<a href="https://www.integraldiagnostics.com.au/environment-social-and-governance-esg/">https://www.integraldiagnostics.com.au/environment-social-and-governance-esg/</a>).</p> <p>During the Reporting Period, the Committee was responsible for overseeing the IDX Group-wide effort to reduce modern slavery risks and integrate 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.</p>
Complaint and Greivance Mechanisms	<p>The IDX Group's Modern Slavery Action Plan 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.</p> <p>Key policies which are directly relevant to our Modern Slavery Action Plan include:</p> <ul style="list-style-type: none"> <li>• Our <b>Ethical Supply Chain Policy</b>, which was reviewed during the Reporting Period. This policy affirms the IDX Group's commitment to an ethical supply chain, including management of the risks of modern slavery. The policy also outlines how employees or other stakeholders can report modern slavery concerns.</li> <li>• Our <b>Code of Conduct</b>, 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.</li> <li>• Our <b>Whistleblower Policy</b>, 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, Stoline. Staff are required to undertake Whistleblowing training, which explains their rights in regards to reporting potential misconduct.</li> <li>• Our <b>Anti-Bribery, Fraud &amp; Corruption Policy</b>, 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.</li> </ul> <p>The IDX Group's core governance policies are made available on our website and can be accessed here: <a href="https://www.integraldiagnostics.com.au/corporate-governance/">https://www.integraldiagnostics.com.au/corporate-governance/</a></p>

## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Action	Summary
<b>Governance and policies</b>	<p>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 is further supported by the engagement of independent human resources and labour law experts, as well as professional internal and external audit providers. During the Reporting Period, policy reviews were undertaken in relation to:</p> <ul style="list-style-type: none"><li>• Licensing and accreditation;</li><li>• Anti-bribery fraud and corruption;</li><li>• Cyber security maturity;</li><li>• Payroll; and</li><li>• Prescription medication.</li></ul>



# 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; and
- 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 is as follows:



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

## GROUP CONSULTATION

During the Reporting Period, IDX built on the broad consultation undertaken in previous years to inform the Group's longer-term approach to modern slavery. We consulted with our 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.

## LOOKING FORWARD

As part of the IDX Group's continual improvement activities for modern slavery, a number of key initiatives have been identified for FY24 and beyond. The IDX Group is committed to building the maturity of our modern slavery and ethical supply chain activities by:

1. continuing to consolidate and reduce the number of our suppliers to ensure we can better monitor our supply chain;
2. 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;
3. continued training and guidance for staff, with 100% training compliance required for senior managers, senior leadership, people & culture staff and procurement staff;
4. further improvements to our vendor assurance and approval processes by integrating our new supplier management software, Workday, into our procurement and supply chain management;
5. implementing a Supplier Code of Conduct; and
6. reviewing and updating IDX's procurement policy to ensure it aligns with our Modern Slavery Action Plan.

Performance against our Modern Slavery Action Plan will be continually monitored and 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 12 December 2023.

**Toby Hall**

Board Chair

Integral Diagnostics Limited

12 December 2023

