



I-MED Radiology  
Network

Comprehensive care. Uncompromising quality.

# Modern Slavery Statement



Reporting Period  
1 July 2022 to 30 June 2023

[i-med.com.au](http://i-med.com.au)

# Reporting entity and organisational structure

## Overview

This Modern Slavery Statement (**Statement**) is made by Image Holdco Pty Ltd (ACN 623 028 740) (the **Reporting Entity**) pursuant to the Modern Slavery Act 2018 (Cth) (**Act**). This Statement is submitted by the Reporting Entity as a joint statement on behalf of its wholly-owned subsidiaries (together, referred to as the **I-MED Group** or **I-MED**).

This Statement sets out the actions taken by the I-MED Group in assessing modern slavery risks in its operations and supply chains, and the actions it has taken to address, monitor and prevent these, in the period 1 July 2022 to 30 June 2023 (**Reporting Period**).

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



## Who is the I-MED Group?

The I-MED Group is a privately-owned and operated medical imaging and teleradiology provider. The Group has been providing medical imaging services in Australia for over 60 years and performs more than 6 million patient examinations per year.

The I-MED Group operates primarily in Australia and comprises around 240 clinics across all Australian states and territories, in both metropolitan and regional communities. These sites provide services across a mix of standalone community sites, fully outsourced hospital radiology departments, private and public hospital settings and remotely for various other health-related services.





## Vision and values

The I-MED Group's vision is to be the most respected and trusted medical imaging specialists in the world. Its purpose is to help save lives and reduce uncertainty by delivering high quality services with compassion and respect to its customers. This is at the core of everything that the I-MED Group does and informs all aspects of its operations.



We deliver the highest quality



We work together



We innovate and adapt



We are compassionate



We connect and communicate

# I-MED Group operations and supply chains

## Internal operations

Whilst the I-MED Group comprises several corporate entities it operates as a fully integrated business with shared knowledge, resources, staff, IT and corporate services in support of the delivery of the Group's operations.

## Board of Directors

The Group's operations and corporate governance are monitored and overseen by the Board of Directors of the Reporting Entity. The Board meets regularly to discuss, plan and oversee the management of the Group. It is supported by key committees which assist in its governance oversight role. In addition to the Group's robust internal governance framework, I-MED operates within a highly regulated healthcare landscape.

Implementation of the Board's direction and strategy is executed by the Group's executive and senior leadership team. Together, they are responsible for promoting a risk aware and responsible culture and ensuring that there is a systematic process to identify, analyse, evaluate and treat risk, including in anti-slavery practices.

As such the Group has established responsibility for managing modern slavery risks and implementing relevant policies. Roles have been assigned at the Board level to oversee modern slavery risk management, strategy development and implementation. In addition, a working group comprising Procurement, Legal and HR functions oversees the implementation of this strategy which includes the policy framework, risk mapping, due diligence and remediation.





## I-MED Group workforce

The I-MED Group collectively engages a team of more than 300 highly skilled radiologists, supported by almost 5,000 staff nation-wide.

Over 99% of the Group's workers are directly engaged under individual contracts or through one of the Group's sixteen enterprise agreements, depending on the nature of their engagement. The terms and conditions of their engagement are set out in each of those agreement types. Such persons are engaged on either a full-time, part-time or casual basis.

A very small number of personnel (<1%) are engaged via labour hire arrangements with providers who hold appropriate licences. Such persons are usually for specific short term assignments, highly skilled medical staff, or for providing overflow support for certain corporate functions.

The Group's Human Resources and Payroll teams are insourced and are tasked with ensuring that staff entitlements, prescribed conditions of employment and compliance with relevant laws, regulations and other instruments are met. Those teams also monitor relevant updates and amendments to the labour laws applicable to the I-MED Group's workforce, including but not limited to the Fair Work Act 2009 (Cth) and applicable modern awards.

In support of these, the Group has several processes in place to ensure compliance with its obligations under relevant labour laws, including:

- I-MED's Human Resources, Payroll and Legal teams provide advice to business stakeholders in relation to the interpretation of, and compliance with, employment contracts, applicable enterprise agreements and applicable modern awards.
- Pay rules for each industrial instrument are set up in the Group's workforce management system.
- The Group undertakes audits of its payroll processes and pay rules to ensure employees are paid in accordance with the contractual terms and, where applicable, the industrial instruments that apply to their employment.
- Internal compliance teams meet regularly to review and create more efficient processes for ensuring compliance with employment terms and conditions.

## Workplace policies and procedures

As referenced above, the I-MED Group has in place a number of policies aimed at ensuring that I-MED remains a best practice organisation that embodies its vision and values. All staff of the I-MED Group are expected to be familiar with and comply with its Code of Conduct and Code of Ethics which establish the Group's core values and principles for how the Group deals with its employees, contractors, customers, suppliers and stakeholders.

In addition, the Group has a number of workplace policies and procedures which guide its staff to embody its values in their practices and set out the expected standards of staff behaviour.

These include the following core policies:

- Risk Management Framework
- Human Rights Policy
- Whistleblower Policy
- Workplace Health and Safety (WHS) Policy
- Diversity and Inclusion Policy
- Workplace Behaviours and Equal Opportunity Policy

Each of these policies allocate responsibility to senior levels of management for their proper implementation, administration and oversight. All staff are expected to familiarise themselves with these workplace policies and procedures and receive training on these upon commencing work with the I-MED Group and periodically thereafter.

The Group is committed to continually working towards instilling the principles of its Human Rights Policy across its people and operations. This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.



In particular:

- **Forced labour and human trafficking:** I-MED prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking.
- **Child labour:** I-MED prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.
- **Work hours, wages and benefits:** I-MED compensates employees competitively relative to the industry and local labour market, and in accordance with terms of any applicable collective bargaining agreements. I-MED works to ensure full compliance with applicable wage, work hours, overtime and benefits laws.
- **Safe and healthy workplace:** The safety and health of the Group's staff is of paramount importance. Its policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. I-MED works to provide and maintain a safe, healthy and productive workplace.
- **Workplace security:** I-MED is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.
- **Freedom of association and collective bargaining:** I-MED respects its employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, I-MED is committed to establishing a constructive dialogue with their freely chosen representatives. I-MED is committed to bargaining in good faith with such representatives.
- **Guidance and reporting for employees:** I-MED strives to create workplaces in which open and honest communications among all employees are valued and respected. I-MED is committed to comply with applicable labour and employment laws wherever I-MED operates. I-MED also ensures employees are aware of the Human Rights Policy through training and an annual certification process. Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where they work, or who has questions about this policy or would like to confidentially report a potential violation of policy, can raise questions and concerns with local management or the HR team. Employees can also report suspected policy violations by following the process set out in the Workplace Behaviours and Equal Opportunity Policy or the Whistleblower Policy.







The Group encourages the reporting of behaviour, conduct or affairs that are inconsistent with I-MED's values, expected standards of conduct and ethical behaviour. The Workplace Behaviours and Equal Opportunity Policy contains guidelines for staff about appropriate workplace behaviour and conduct, including information on how to raise a grievance in relation to workplace complaints and assurance of how complaints are handled by the Group. In addition, the Whistleblower Policy was revised and re-distributed in the Reporting Period, with a focus on improved transparency and accessibility of the protections available to staff and third parties (e.g. suppliers and their staff) in making a whistleblower disclosure.



## Supply chains and procurement

The I-MED Group's operations are supported by the procurement of goods and services from third parties. Externally procured goods and services include the following main categories:

### Goods

- Medical imaging and IT equipment
- Medical consumables and supplies
- Nuclear medicine, contrast and pharmaceuticals
- Uniforms
- Print
- Film
- Office supplies

### Services

- Medical imaging equipment servicing
- IT and telecommunications services
- Property leasing (including clinics and office space), utilities and facilities management
- Linen and laundry services
- Medical consultancy (e.g. specialist cardiologists, radiologists)
- Labour hire services
- Travel services

In maintaining its reputation for quality, safety and service excellence, I-MED’s responsibility extends to the proper oversight and management of its supply chain.

I-MED expects all of its major suppliers, service providers and any other agents or contracted third parties to adopt an approach to ethical business practices and sustainability that is consistent with the Group’s high standards. Suppliers are also expected to promote the same standards in their own supply chains.

### Supply categories and spend under management

I-MED expects all of its major suppliers, service providers and any other agents or contracted third parties to adopt an approach to ethical business practices and sustainability that is consistent with the Group’s high standards. Suppliers are also expected to promote the same standards in their own supply chains.

**Externally procured goods and services include the following main categories:**

Category	Spend under management ( FY23)
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- |                               |  |
|-------------------------------|--|
| • Contrast                    | • 100%                                   |
| • Film                        | • 99% (down from 100% previous year)     |
| • Travel                      | • 100%                                   |
| • Medical equipment           | • 99%                                    |
| • Uniforms                    | • 99%                                    |
| • Printing and stationery     | • 96%                                    |
| • Medical consumables         | • 94%                                    |
| • Nuclear medical consumables | • 91%                                    |
| • Office supplies             | • 94%                                    |
| • Laundry                     | • 85% (up from 83% in the previous year) |
| • IT and Telecommunications   | • 92% (up from 90% in the previous year) |
| • Facilities management       | • 65% (up from 61% in the previous year) |
| • Printers                    | • 97% (up from 95% in the previous year) |





## Procurement framework and governance

The I-MED Group undertakes a large majority of its procurement of goods and services centrally through a national Procurement Team. The I-MED Group's Procurement Team is comprised of designated category managers who are specialists in their supply classes and have a deep knowledge of the nuances of their supply categories. Each category manager is responsible for the day-to-day sourcing and management of the Group's material third party procurement for that category.

As part of this, the Team is also responsible for conducting due diligence of third-party suppliers as part of its supplier risk assessment, including with relation to modern slavery risk. The Group recognises that the procurement of goods or services from third parties implicitly involves a level of risk given the low visibility of multi-tiered supply chains which cross into other sectors and may be located in other geographies, which is particularly prevalent with medical goods (Australian Human Rights Commission (AHRC) and KPMG, Modern Slavery in the Health Services Sector 2021, p.14).

Suppliers who are a major contributor in the I-MED Group's supply chain are usually subject to contractual obligations with regards to modern slavery risk, which include obligations regarding ethical procurement and supplier due diligence. Suppliers are also expected to comply with I-MED's Supplier Code of Conduct and Human Rights Policy which explicitly set out the Group's expectations in relation to their compliance with relevant modern slavery legislation, including not to use any form of bonded, slave or child labour – and to comply with the Human Rights Policy.

In addition, I-MED expects that all suppliers provide a safe, healthy and comfortable workplace, including that they comply with all relevant workplace health and safety laws and regulations as well as the Group's safety principles. I-MED also expects suppliers to only employ those individuals with a legal right to work in the relevant jurisdiction, comply with all minimum legal entitlements and conditions of work, and to provide and support freedom of association for employees to join trade unions and other employee representative groups.



# Risks of modern slavery and actions taken

In the Reporting Period, key stakeholders in I-MED's national corporate services teams collaborated to assess and manage the risks to ensure that the Group can remain aligned to its values and dynamic in managing modern slavery risks. Based on a mapping of the Group's internal operations and supply chain, it identified that the procurement of health care supplies, medical equipment and technology, and medical consumables, as well as building and facility services (e.g. cleaning) represent the areas of highest potential modern slavery risk to the Group.

Specifically:

- **The procurement of medical goods** – including disposable and low cost items like gloves, masks, disposable gowns – may be produced in manufacturing industries offshore and/or which source and use raw materials. Both of these factors are known to carry significant modern slavery risks – either as a result of high risk geographies from when they are sourced, the transparency of arrangements in place to procure them from multi-tiered supply chains, the vulnerable populations involved in their production, or a combination of those.
- **Cleaning and maintenance services** – are thought to carry base-skill labour risks and may be again linked to vulnerable populations.



In addition to the diligence measures noted earlier, I-MED suppliers are required to report on their corporate social responsibility assessments on relevant suppliers annually via the Group's Corporate Social Responsibility survey. This includes, amongst others, undertaking a risk assessment directly in relation to modern slavery and human trafficking mitigation strategies. This survey seeks to assess the suppliers' understanding of, and commitment to, labour standards, their risk exposure and any specific approaches they have to address modern slavery risks.

An action plan may arise out of these reviews which assigns various responsibilities across the Group and relevant supplier, and its implementation is then 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 Group's Legal Team for further consultation. The Group also reserves the right to audit its suppliers to monitor their commitments under their contractual obligations and support them to achieve any remedial actions which are required.

The survey is currently undertaken for major vendors in each of its procurement categories. In the Reporting Period, the Group carried out an assessment of 40 suppliers, representing over half of all of its third party procurement. It received a response rate of 85% as at the preparation date of this report.





Through the results of these audits, the Group identified the following areas of risk:

### **Outsourced procurement and supply chain**

The overwhelming majority of the Group's largest suppliers have significant modern slavery mitigation strategies both within their own operations and supply chains.

Of the responses received:

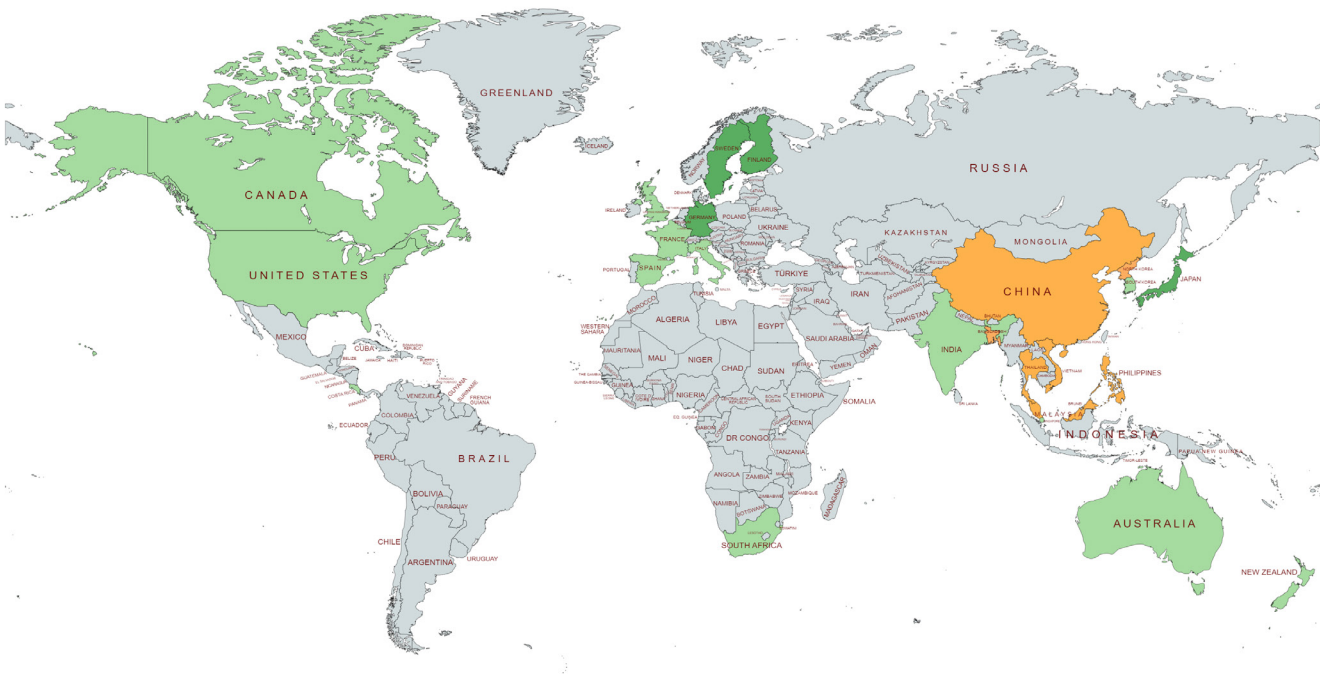
- 80% of respondents were required to and had submitted their own Modern Slavery Statement pursuant to the Act, in the previous financial year and a higher number of suppliers themselves conduct due diligence through their own supply chains;
- More than half of respondents work with independent third parties to assess and report on modern slavery risks in their supply chain;
- Approximately 80% of respondents reported having appropriate outcomes in place with their own suppliers for non-compliance with anti-slavery practices and had a program to remediate such infractions;
- Approximately 85% of respondents had an avenue for whistleblowing disclosures to be received and investigated;
- All suppliers reported not having received any notice of violation in connection with non-compliance within the last 3 years.

In summary – the Group identified that a reasonably significant element of risk remains throughout suppliers' supply chains, with visibility of the supply chain diminishing at each level in multi-tier supply chains. The Group therefore determined the overall risk rating as medium.



## Supply chains with overseas links

Whilst the Group's immediate supply chain is all based in Australia, through the results of its supplier audits, the Group identified that its suppliers themselves have supply chains in several overseas locations. The following diagram maps the countries disclosed to the Group in which its suppliers predominantly have operations.



Those highlighted dark green are countries which have the lowest global prevalence of modern slavery risk, according to the current 'Global Slavery Index, 2023' which is measured across 75 countries and published by organisation Walk Free (Walk Free, 2023). Those highlighted light green are those countries which have a low prevalence, of less than 4% of the population estimated to be experiencing modern slavery per 1000 population (Walk Free, 2023). Those highlighted amber had a prevalence of 4% to 8.0%, being China, Vietnam, Thailand, Malaysia, Philippines, Bangladesh and India. None of the countries disclosed appear to operate in countries with the highest prevalence of modern slavery risk.

Amongst others, it is thought that some of these countries have higher risks of modern slavery due to governance or rule of law issues, conflicts, migration flows and other socioeconomic factors, as well as product, services, sector and industry risks.

In summary, whilst most supply chains were located in countries that had a relatively low prevalence of modern slavery risk, some suppliers have operations in countries with relatively higher prevalence. It is unclear however the extent to which the supply chains are concentrated in either the lower or higher prevalence jurisdictions, and accordingly the overall risk in the multi-tiered supply chain was assessed as medium to high.



## Suppliers' limited analysis of risks and supply chain

In addition to the above, the supplier audit identified a lack of detail by some suppliers, of the risks in their supply chain. Most notably, some suppliers included an assessment of their supply chain risk as 'no risk identified' or simply did not contain a robust level of detail as to the risk identification process leading to such assessments. Some suppliers were not able to clearly demonstrate adequate awareness, policy or other measures for driving it modern slavery risk out of their supply chains. Most demonstrated a satisfactory understanding and detail in their own supply chains and a robust framework for ensuring that internal operations did not include modern slavery practices.

It was unclear therefore if such suppliers had a lack of process or awareness around modern slavery risk management, or whether their disclosure to the I-MED Group was not adequately described. For that reason, overall risk in this area was assessed as medium.

## Limited visibility over smaller suppliers

The Group acknowledges that the carrying out of supplier assessments is an ongoing process which it can continue to develop. The Group applies a reasonably practical approach to selection of key suppliers to undertake assessment, based on the proportion of procurement undertaken through that supplier. However this approach does not effectively enable the Group to monitor suppliers that comprise a smaller proportion of supply but who may present a high risk in their own right. For example, suppliers in certain higher risk industries (e.g. with lower skilled, or other vulnerable workers), or geographies (e.g. those who have supply operations offshore and who may be subject to less favourable laws and working conditions).

In summary – the Group identified that its ability to effectively assess the majority of its supply chain is reasonably achieved. However the Group acknowledges its challenges in conducting an independent audit of its suppliers, and deploying its supplier audit across a wider range of its suppliers. The Group therefore determined the overall risk rating as medium.



# Next steps and other relevant information

In the next 12 to 24 months, the Group's priorities with regards to modern slavery risk mitigation will include as follows:

- **Strengthened due diligence processes:** The Group will undertake an assessment of its supplier engagement process with a view to proactively managing modern slavery risk. In particular, it will seek to introduce a more detailed framework of supplier due diligence in the engagement phase to understand modern slavery risk and have a strengthened approach to managing suppliers with higher risk factors.
- **Focus on review of suppliers with complex supply chains and offshore operations:** As part of its review of supplier due diligence, the Group will be guided by the results of the 2023 Global Slavery Index in prioritising focus on suppliers with a supply chain in countries with higher prevalence and modern slavery vulnerability. It will seek to better collate data on such supply chains and understand the risk factors to work with its direct suppliers in mitigating risks.
- **High risk industries and procurement categories:** In addition to the above country risk assessment, the Group will seek to better understand and manage the risks in its smaller supply categories and supply chains based on sector and industry risks with higher vulnerability. As risk management in this area evolves, the Group will become better equipped at managing the supply chain more broadly and thoroughly with an improved focus across all suppliers.
- **Remediation and response:** Lastly, the Group will seek to better document a clear remediation and response plan for identification of practices that do not meet our standards, and/or for which a high modern slavery risk is present. Such processes should clearly describe ways in which the Group will respond and 'make good' any harm, and prevent and mitigate any potential harms. The framework must also assign responsibility for leading and managing remediation and ongoing assessment of the effectiveness of any remediation plans.





# Consultation across the Group

This Statement has been prepared by the Reporting Entity in consultation across the I-MED Group, including engaging stakeholders in areas such as Legal, Procurement and Human Resources. It has been reviewed and approved by the Reporting Entity and Group's Board of Directors.

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

Dr Shrey Viranna  
Image Holdco Pty Ltd CEO and Director



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