

PRP Diagnostic Imaging

Modern Slavery Statement 2024

1 - Introduction & description of the reporting entity

This statement covers the activities of The Trustee for PRP Investment Trust trading as PRP Diagnostic Imaging (ACN 129 790 174) to understand and implement actions to minimise the risk of modern slavery and human trafficking in our services, operations, and supply chain.

The purpose of this Statement is to adhere to requirements of the Modern Slavery Act and provide information about the actions taken by PRP to address identified risks in the relevant reporting period.

The decision to prepare this statement is also consistent with our organisational values:

<p>We are COURAGEOUS</p> <ul style="list-style-type: none"> • We embrace change & support continuous learning • We strive for constant improvement • We take action when faced with a challenge 	<p>We are ACCOUNTABLE</p> <ul style="list-style-type: none"> • We are serious about patient privacy • We treat patients as family • We strive to exceed expectations • We show integrity & take ownership
<p>Our REPUTATION is important to us</p> <ul style="list-style-type: none"> • We build meaningful relationships • We care for our environment & community • We are proud to work for PRP 	<p>We trust and EMPOWER each other</p> <ul style="list-style-type: none"> • We provide opportunities for growth • We embrace individuality • We show respect & empathy • We support each other & celebrate success

2 – Description of PRP’s activities

Our services

PRP Diagnostic Imaging is an Australian owned private company, providing Medical Diagnostic Imaging Services in NSW across a network of 33 private medical imaging practices.

Our staff and specializations

All of our subspecialty radiologists have advanced fellowship training in areas including Advanced Body Imaging Neuro-radiology, Head and Neck, Women’s Imaging, Magnetic Resonance Imaging, Vascular, Interventional Musculoskeletal & Sports Medicine Imaging, Paediatrics, Nuclear Medicine, PET, CT, and Cardiac CT. This unique depth of subspecialty expertise allows for valuable second opinion and expert consultation within the group.

Compliance

Diagnostic Imaging remains a highly regulated industry complying with Medicare rules around radiation, accreditation and APHRA requirements. Our PRP Diagnostic Imaging Doctors meet the rigorous standards of major medical and residency training programs, and all are fully CPD certified and APHRA registered. Our radiologists and nuclear medicine physicians are respected within their fields and frequently publish in peer reviewed literature, some have authored papers and continue to actively lecture at local and international meetings and hold positions as senior VMO's at leading Australian Hospitals.

As an employer, we strive to ensure all clinical staff maintain their registrations and help to support employees through training and education as required.

- PRP Diagnostic Imaging supports its doctors in their active involvement with the Royal Australian and New Zealand College of Radiologists (RANZCR) and the affiliation to the Australian Diagnostic Imaging Association (ADIA).
- Beyond our PRP Doctors we ensure all technical Radiographers, Sonographers and Nuclear Medicine technicians are accredited and are committed to the requirements of the association for CPD accreditation.

Values

Respect for human rights is fundamental to our values and the long-term stability of our business and to the wellbeing of the communities in which we operate. At PRP Diagnostic Imaging, this means doing business in a way that acknowledges and respects the rights of our people, community, and service providers to be free from practices of modern slavery, including forced labour, human trafficking, and child labour.

PRP Diagnostic Imaging is committed to complying with the labour rights standards, legislation, and statutory requirements in Australia. Furthermore, PRP Diagnostic Imaging is committed to acting ethically and with integrity in all business dealings, and to ensuring its service providers and suppliers comply with the labour rights standards, legislation, and statutory requirements in the countries in which they operate.

Structure

Board: PRP Diagnostic Imaging's Board is made up of six members: four directors nominated by IFM Investors and 2 Directors nominated by PRP Diagnostic Imaging.

Doctors Management Committee: PRP Diagnostic Imaging Doctors Management Committee (DMC) was established to provide oversight to the doctor group and administer various initiatives. The DMC is governed by a charter which is board reviewed periodically. The Doctors Management Committee is made up of no fewer than 7 and no more than 8 voting doctor members and one member appointed by IFM Investors, all doctor members are nominated by the Doctor shareholders and meet fortnightly.

Sub-committees: PRP Diagnostic Imaging created sub-committees to deal with all areas of the company's management and to further offer clinical expertise. These sub- committees make recommendations to the DMC for implementation into workflows, better clinical outcomes, and patient care. PRP Diagnostic Imaging employs approximately 1100 (permanent / casual) staff across 33 practices.

Supply Chain

Our key operations and the associated supply chains are as follows:

Main Operations	Supply Chain
Finance	Cloud based financial software
Information Technology	IT Technology (hardware, software, and cloud services)
Operations	Equipment Vendors and Consumable Suppliers
Human Resources	Uniform suppliers, Employment Agencies
Marketing	Digital design platforms, printing suppliers

Our policies and procedures

We have formal policies and procedures in place aimed at fostering ethical and legally compliant business conduct. This includes:

- We have implemented the PRP Diagnostic Imaging Modern Slavery Policy, ensuring all key operations and employees are well-informed about reporting channels in the event of discovery of practices that do not align with our policy. Regular assessments are integrated into the continuous review of business risks.
- Within our comprehensive learning and development program we have introduced a training video designed to provide new employees with an overview on slavery practices, underscoring our unwavering commitment to zero tolerance for such activities.
- In 2021, subsequent to the submission of our inaugural Modern Slavery Statement, the team responsible for Modern Slavery within PRP undertook a holistic review of internal policies and further introduced a Risk Assessment Questionnaire. This questionnaire is now distributed to all suppliers identified as medium to high risk.

3 – Risk assessment

Process

We have a Modern Slavery summary ‘smartsheet’ which is continuously updated and reviewed quarterly. The responses to the Risk Assessment Questionnaire we conduct to our suppliers are held in this location.

PRP requests all new suppliers and vendors to supply a copy of their Modern Slavery Statement. As they are received, responses are logged and contact details are recorded to ensure ongoing monitoring can be maintained. This process has been in place since 2018, when we commenced a review of potential risks of modern slavery practices across our operations and supply chains.

Output

During the assessment process, we considered risks that may possibly contribute or be directly linked to modern slavery practices. Through this journey we also considered other risk factors such as the sector, industry, types of products and services, geographic locations, and business models.

PRP Diagnostic Imaging has been able to identify areas with no or low risks. This includes:

- All operational activities that are directly undertaken by PRP Diagnostic Imaging employees and covered by our internal processes are low risk based on the controls and policies in place and being located in Australia.
- Domestic suppliers, and some of our larger international suppliers with strong controls in low-risk geographies

Through this process we reviewed possible medium risks with supply chains in our Asia-Pacific markets. The table below illustrates some of the low and medium risks identified.

An initial assessment of PRP Diagnostic Imaging's main risks in relation to Modern Slavery relate to the procurement of IT equipment, medical consumables, and printing. PRP Diagnostic Imaging has identified these risks and has requested a copy of all companies Modern Slavery Statement which is stored in a secure location on PRP Diagnostic Imaging – Modern Slavery Smartsheet.

Summary of risks (suppliers de-identified)

Main Operations	Service provider(s)	Risk Evaluation	Reason
Finance	Global software services	Medium Risk	Companies have offices located outside of Australia.
Information Technology	Global IT technology hardware provider	Low Risk	Activity performed fully in Australia where Modern Slavery risks are low.
Operations - Consumables	Various consumable operators	Medium Risk	Wide range of suppliers with majority from Asia. Our recent survey of our suppliers indicates 20% of these do not have a current Modern Slavery policy.
Human Resources	Uniform provider	Medium Risk	Most of the uniforms from this company are made in Asia.
Marketing	Marketing provider	Medium Risk	Supply chain is in Australia; however, products are made overseas.

4 – Actions

Addressing the risk of modern slavery practices

PRP Diagnostic Imaging has incorporated an approach to address the various risks of modern slavery practices in our corporate governance processes e.g. procurement and risk management processes.

In 2022 PRP completed the future commitments outline in the Modern Slavery Statement 2022:

- Finalizing and ongoing assessment of our modern slavery supply chain risks; (Low, Medium, and High) – 2022 (*completed and ongoing*).
- Incorporating requirements into existing assurance processes – Updated policies (*completed and ongoing*).
- Ensuring all new employees are introduced to the training video and have access to Modern Slavery policy on the learning hub (*completed*).
- Continuing to update the Smartsheet as more statements from our supply chains are made available (*completed and ongoing*).
- Abiding by the Federal Governments Modern Slavery Act; and
- Continuing to report and register through the portal annually (*completed and ongoing*).

In 2023 PRP's Future commitments will include:

- Selecting suppliers who are identified as a high or medium risk to complete a risk assessment questionnaire with the supplier. Results to be reviewed by the Modern Slavery Statement team and implement change as required.
- Enacting our ongoing assessment of our modern slavery supply chain risks; (Low, Medium, and High).
- Incorporating requirements into existing assurance processes – Update policies.
- Continuing to update the Smartsheet as more statements from our supply chains are made available.
- Continuing to report in line with the Modern Slavery Act.

5 - Assessing the effectiveness of the actions taken

PRP will continue to assess the effectiveness of its actions through:

- Regularly reviewing supplier compliance with Modern Slavery Policy.
- Monitoring the number and range of suppliers who have been issued and have completed the assessment.
- Reviewing all 'whistle-blower' feedback from staff.

The effectiveness of these actions will become more evident as we continue to measuring the outcomes of the actions identified in Section 4 in FY23-24 and beyond.

6 - Consultation

Senior Management and Directors are actively involved across the business, all are innately aware of the risks of Modern Slavery and have been consulted in the preparation of this Modern Slavery Statement.

This statement is made pursuant to the Act and constitutes PRP's Modern Slavery statement in respect of the 30 June 2023 Financial Year and is approved by the principal governing body of PRP Diagnostic Imaging, being its Board of Directors.

A handwritten signature in black ink, appearing to be 'R. Sabharwal', with a long horizontal line extending from the end of the signature.

Dr Rohan Sabharwal
Company Director
Date 18/12/2023