

# Modern Slavery Policy

Version 1.0 – October 2025

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## Document Control

Name	Modern Slavery Policy		
Person Responsible	Head of Procurement & Property		
Authorised by	Board of Directors		
Adopted by	Board of Directors		
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1.0	Modern Slavery Policy	12/11/2025	12/11/2025

This document was current at the time of issue (October 2025). Readers should refer to the electronic version posted to the I-MED intranet for future updates.



## 1. Purpose

This policy outlines I-MED Radiology Network (“I-MED”) commitment to identifying, preventing, and addressing modern slavery and human trafficking risks within our operations and supply chains. We recognise our responsibility to respect human rights and act ethically and with integrity in all business dealings across Australia and New Zealand.

## 2. Scope

This policy applies to all:

- Employees, contractors, and directors of I-MED; and
- Suppliers, consultants, and business partners operating on behalf of I-MED.

## 3. Policy Statement

I-MED is committed to:

- Conducting business in accordance with the **Modern Slavery Act 2018 (Cth)** and relevant **New Zealand human rights legislation**;
- Maintaining fair and safe working conditions;
- Identifying and mitigating modern slavery risks in procurement, clinical services, and support operations; and
- Taking immediate and appropriate action where modern slavery is suspected or identified.

## 4. Definition of Modern Slavery

Modern slavery includes situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, deception, or abuse of power. This includes slavery, servitude, forced labour, debt bondage, human trafficking, and child labour.

## 5. Responsibilities

- **Board of Directors:** Oversight of modern slavery risk management and annual reporting obligations.
- **Procurement & Supply Chain Teams:** Conduct supplier risk assessments, ensure contractual clauses include modern slavery provisions, and maintain supplier due diligence records.
- **Managers and Staff:** Report any suspected cases of modern slavery and complete mandatory training on ethical sourcing and human rights.
- **Suppliers and Partners:** Must comply with this policy and demonstrate efforts to prevent modern slavery within their own operations, supply chains, sub-contractors and franchisees.

## 6. Risk Areas

Key areas of potential exposure for a radiology group include:

- Procurement of medical equipment, IT hardware, uniforms, Medical Consumables and cleaning services;
- Outsourced or offshore services (e.g., teleradiology reporting, data processing); and



- Recruitment and labour hire arrangements, particularly for temporary or contracted staff.

## 7. Due Diligence and Risk Assessment

I-MED will:

- Conduct annual supplier risk assessments focusing on geography, sector, and product category;
- Incorporate modern slavery criteria into procurement evaluations;
- Require completion of supplier questionnaires and declarations; and
- Review supplier performance and remediation efforts where non-compliance is identified.

## 8. Training and Awareness

All employees involved in procurement, contract management, and supplier engagement will receive regular training to identify and respond to modern slavery risks. Awareness campaigns will be delivered through internal communications and onboarding programs.

## 9. Reporting breaches of this policy

I-MED is committed to limiting the risk of modern slavery occurring within our own business, infiltrating our supply chains or through any other business relationship. Thus:

- We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery-like practices, human trafficking and child labour.
- We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.

Any modern slavery breach is an incident that must be notified through [companysecretary@i-med.com.au](mailto:companysecretary@i-med.com.au)

If a staff member is unsure whether the incident is a modern slavery breach, they must consult the Head of Procurement & Property to clarify the classification of the incident.

## 10. Remediation Plan

If modern slavery practices are identified within I-MED's operations or supply chain, the following remediation process will apply:

### a. Immediate Response

- **Protect affected individuals:** Prioritise safety and wellbeing of the impacted person(s).
- **Cease harmful activity:** Consult the Legal team to suspend relevant supplier contracts or operations as appropriate.
- **Confidential reporting:** Engage internal or external whistleblower channels to collect and verify information.

### b. Investigation

- Conduct a prompt, fair, and confidential investigation involving relevant internal teams and, where necessary, independent experts.
- Document findings and assess the root cause.



## c. Corrective Actions

Depending on the circumstances, corrective actions may include:

- Requiring the supplier to implement a corrective action plan within a defined timeframe;
- Providing support to affected individuals, including referral to victim support services, NGOs, or local authorities;
- Training and capability-building for suppliers to prevent recurrence; or
- Termination of contracts where remediation is not achieved or cooperation is lacking.

## d. Monitoring and Review

- All remediation cases will be tracked and reviewed by the Chief Legal & Corporate Affairs Officer. Outcomes and lessons learned will be incorporated into future due diligence, supplier onboarding, and training programs.

# 11. Roles & Responsibilities

The responsibility for implementing a remediation plan and conducting investigations will sit across several key roles.

Principally, Procurement retains operational responsibility for identifying and managing supplier risks, leading initial investigations into potential modern slavery concerns in the supply chain and working with suppliers to implement remediation actions such as corrective action plans, training, or supplier replacement if needed. The ESG Committee acts as the central forum to monitor investigations, remediation progress, and policy compliance, as well as to review high-risk cases and endorse major corrective actions.

Function / Role	Key Responsibilities
I-MED Board of Directors	Approve policy, oversee overall response
ESG Committee	Monitor cases and remediation outcomes
Procurement / Supply Chain	Identify and manage supplier risks; lead investigations
Compliance / Legal	Oversee investigations and ensure due process
HR	Manage internal cases and employee remediation
External Experts (where relevant)	May include <b>third-party auditors, NGOs, or independent investigators</b> who provide impartial assessments and support remediation for victims.

# 12. Collaboration and Transparency

Where possible, I-MED will collaborate with industry peers, government bodies, and non-profit organisations to support effective remediation and broader systemic change.



## 13. Reporting and Disclosure

A modern slavery statement is a mandatory public report for large organisations in countries like Australia that outlines the steps they are taking to identify, assess, and address modern slavery risks in their operations and supply chains. These statements are required by laws like the *Australian Modern Slavery Act 2018* and must cover the organisation's structure, risks, actions taken, and how the effectiveness of those actions is assessed. The goal is to promote transparency and accountability in combating serious exploitation like human trafficking, forced labour, and forced marriage.

I-MED will report annually under the *Australian Modern Slavery Act 2018* and disclose progress toward identifying and mitigating modern slavery risks, including remediation outcomes and future actions.

## 14. Review

This policy will be reviewed annually or as required to reflect legislative or operational changes.

## 15. Contacting the Procurement Team and Links

The I-MED Procurement team is able to provide guidance for high-value purchases, vendor engagements, and contract negotiations. Engaging the procurement team early ensures compliance, risk mitigation, and optimal supplier selection.

We are contactable via these methods below

SharePoint site	<a href="#">Procurement &amp; Property</a>
Email address	<a href="mailto:procurement@i-med.com.au">procurement@i-med.com.au</a>