



Whistleblower Policy

1. Purpose of the Whistleblower Policy

I-MED is committed to a culture where people feel safe to raise concerns if they see something that they believe isn't right. Having a channel to raise these concerns helps us identify and address issues early, protect our patients, referrers and people, and strengthens trust with our communities. This supports I-MED's mission to be the most respected and trusted medical imaging specialists in the world.

This Policy sets out the rights and responsibilities of people involved in a whistleblowing report or investigation, and how I-MED will support them throughout the process.

This Policy covers:

- **Who can make a disclosure** – who is eligible to make a disclosure
- **When you can make a disclosure** – the types of concerns that qualify for whistleblower protection.
- **Who you can speak to** – the people and channels available to receive disclosures, both inside and outside I-MED.
- **How disclosures are handled** – the process for assessing, investigating, and resolving concerns fairly and confidentially.
- **Protections and support** – the steps I-MED will take to protect whistleblowers (and those assisting them) from victimisation, and the support available to them.
- **Fair treatment of others** – how I-MED ensures that people involved in a disclosure are treated fairly.
- **Your rights and responsibilities** – what you can expect from I-MED, and what is expected of you, throughout the process.

2. Who this Policy applies to and when

This Policy applies to all parts of the I-MED Radiology Network, including its subsidiaries and any entity it controls (collectively, I-MED) within Australia.

2.1 Am I an Eligible Whistleblower?

If you are a current or former employee, officer, contractor, supplier, business partner, or their relative, you can make certain types of legally protected disclosures. Those disclosures are commonly known as 'whistleblower' disclosures. Even if you do not fall into one of these categories, you are still encouraged to raise a concern under this Policy. I-MED will assess the concern and take appropriate steps. While not every person may qualify for certain legal protections, I-MED is committed to supporting and protecting anyone who raises concerns under this Policy.

3. Reporting Misconduct

3.1 What is Reportable Conduct?

If you become aware of improper or unethical conduct within I-MED's business, you are strongly encouraged to report it. Where you raise concerns about particular types of improper or unethical conduct, you may have certain protections under the law, including protection from retaliation under Part 9.4AAA of the *Corporations Act 2001* (Cth). Those disclosures are referred to in this Policy as a **"Reportable Matter"**.

While we encourage the reporting of concerns as appropriate, not all concerns will be Reportable Matters. This Policy does not usually apply to workplace disagreements (for example, disputes about pay, promotions, or disciplinary outcomes), interpersonal conflicts, or general workplace grievances. To avoid any doubt, this does not mean that those matters should not still be raised – only that they will be managed under different policies and procedures, and not under this Policy.

Examples of Reportable Matters include concerns or suspicions regarding fraud, theft, corruption or bribery, improper or unethical misuse of business funds, serious risks to worker health and safety, misuse of intellectual property or confidential information, deliberate concealment of any of those matters or harming or threatening to harm someone who makes a report under this policy.

We expect that reports made under this Policy are made honestly and on reasonable grounds. This means you do not need to be certain that wrongdoing has occurred, but you must genuinely believe that what you are reporting is true and have a reasonable basis for that belief.



3.2 How to Report Misconduct

You should raise concerns even if you are unsure if your concern is in the nature of a Reportable Matter.

If you see something that doesn't seem right, please **raise your concern as soon as possible**. Even if you don't have all the details, raising your concern helps us act early and protect patients, staff, and our reputation.

When making a report, share as much information as you can (what happened, when, where, who was involved). This helps us look into the matter thoroughly and fairly. The process is set out in **Appendix A**.

3.3 Reporting Options

Option	When to use	How to report
Internal (preferred)	Most situations	Make a report to I-MED's Chief Legal & Corporate Affairs Officer (or another person nominated by I-MED in writing from time to time)
External (if internal isn't suitable)	If you feel uncomfortable reporting internally, or if the matter involves the Chief Legal & Corporate Affairs Officer	Contact our independent provider, WorkDynamic , by email at i-med@workdynamic.com.au

3.4 What happens after you raise concerns

- **Acknowledgement:** We'll let you know when we've received your report.
- **Preliminary review:** We'll first assess the information to decide the best way forward. Not every report will need a full investigation, but every report will be taken seriously.
- **Investigation:** Depending on the nature of what you have reported, we may ask for your permission to disclose your identity in order to conduct a fair and thorough investigation. If an investigation is required, it may be carried out by an appropriate member of I-MED's internal team or by an independent external investigator. It will never be conducted by anyone named in your report.
- **Your role:** You may be asked for more details to help us understand what happened. Please don't try to investigate the matter yourself – that's our job.
- **Updates:** Where possible, we'll keep you informed along the way. This may include:
 - confirming your report has been received;
 - letting you know if an investigation has started;
 - providing progress updates; and
 - advising when the investigation has finished.
- **Outcomes:** Once complete, we'll decide what action is needed to address any proven issues.

Throughout the process, I-MED will protect your confidentiality and ensure you are not treated detrimentally for raising legitimate concerns under this policy. The **Chief Legal & Corporate Affairs Officer** (or another nominated person) is responsible for safeguarding you against any victimisation or detrimental treatment as a result of raising legitimate concerns under this policy.

4. Confidentiality, Protection and Support

4.1 How we protect your identity

- **Choice & protection:** You can make a report anonymously or choose to share your identity. Anonymous reports are still protected, but sometimes it may limit how much we can investigate the matters raised in your report (if appropriate), and also how well we can support you. Either way, you are protected under this Policy.



- **Confidentiality commitment:** If you consent to your identity being shared, I-MED will only share it as is necessary to investigate and/or address the concerns you have reported to it. I-MED will otherwise keep it confidential and only share it with your consent or where the law requires I-MED to do so.
- **Reassurance:** At no point will you be pressured to reveal your identity.
- **Support measures:** I-MED will take reasonable steps to reduce the risk of your identity being identified (for example, restricting internal access to certain types of information, redacting personal details in certain documents, etc).

4.2 How we protect and support you

We are committed to –

- protecting and supporting anyone who speaks up; and
- supporting and treating anyone who is named in a report fairly, under this Policy.

You have made a report

- **No detriment:** You will not be punished or disadvantaged just for raising a concern on reasonable grounds – even if it turns out to be unfounded.
- **Support:** You will have access to I-MED's employee support services, including counselling, if required.
- **Safe at work:** Your role, duties, and treatment at work will not change to your disadvantage. You will not be victimised or treated detrimentally for raising a legitimate concern.
- **Active monitoring:** I-MED will take reasonable steps to protect you from retaliation or victimisation.
- **Confidentiality:** We will take reasonable steps to protect your identity and ensure you are not subject to retaliation.

You have been named in a report

- **Fair treatment:** You may be informed of the allegations at an appropriate time, provided this does not compromise the investigation.
- **Support:** You will have access to I-MED's employee support services, including counselling, if required.
- **Right to respond:** You will have an opportunity to respond to the allegations before any findings are made.
- **No assumption:** A report and / or its investigation is not proof of wrongdoing. Findings will only be made after an appropriate assessment or investigation.
- **Confidentiality:** Information about you will be handled confidentially, in line with this Policy.

4.3 Support Services Available – Free Counselling

I-MED recognises that speaking up — or being the subject of a report — can be stressful. Support is available to both whistleblowers and those named in a report.

You can access free, confidential counselling and wellbeing support through our external provider, **Converge International**:

- **Book online:** via the **Converge Wellbeing app**
- **Call:** 1300 687 327 (Australia)
- **Live Chat:** convergeinternational.com.au

4.4 Further Information

This Policy is designed to give you clear, practical guidance on how to raise concerns safely and how I-MED will support you throughout the process. It will always be accessible via I-MED's intranet platform, and hard copies can also be requested by I-MED's employees as requested. All employees will be trained on how to access I-MED's policies, including this Policy, upon the commencement of their employment.

Some sections of the law that apply to reports made under this Policy are detailed and highly technical. They are not described exhaustively in this Policy, and you may wish to obtain independent legal advice about them.

More generally, if you would like more information about this Policy or its related processes, those questions should be directed to I-MED's Chief Legal & Corporate Affairs Officer.



Appendix A Flowchart for raising concerns





Document Control

Name	Whistleblower Policy		
Owner	Chief Legal and Corporate Affairs Officer		
Version	3.0	Last updated	November 2025