

## MODERN SLAVERY POLICY

19 March 2024 | Version 1.2

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### 1. Modern Slavery

#### 1.1 Our commitment

At Pro Medicus, we are committed to high ethical and behavioural standards. This includes upholding human rights and striving to ensure that modern slavery or human trafficking has no place in our business or supply chain.

This policy sets out the Group's commitment to complying with all applicable laws and regulations relating to Modern Slavery, including the Australian *Modern Slavery Act 2018* (Cth), as well as mitigating the risks of modern slavery in our operations and supply chain.

#### 1.2 Who this policy applies to

This policy applies to all directors of the Board, as well as all other officers, employees, contractors, consultants and associates of the Group (**employees**). It also applies to direct suppliers of the Group.

#### 1.3 Implementation

The Board is responsible for overseeing the implementation of this policy. Refer to paragraph 5 for further information.

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### 2. What is Modern Slavery?

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. This includes slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or engaged in hazardous work.

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### 3. Combatting Modern Slavery

The risk that the Pro Medicus Group or our supply chain would cause, contribute to or be directly linked to modern slavery is considered low. This is because the Group operates in a highly regulated environment in terms of industry, product and geographies. However, we are committed to mitigating the risks of modern slavery occurring within our business, and expect the same from all of the contractors, suppliers and partners (**suppliers**) in scope of our responsibility.

We will do this by:

- raising awareness of modern slavery amongst our employees and direct suppliers;

- investigating and remediating any incidents, near misses or concerns about modern slavery in our operations; and
- requiring our direct suppliers to adopt a proactive approach to identifying and addressing modern slavery risks in their operations and supply chains.

Where we are not satisfied that a supplier is complying with all local labour laws, international treaties and standards of fair work, we will not engage them.

If we identify modern slavery occurring within a supplier's operation we will take appropriate action, including education, remediation and/or alerting the relevant authorities.

We may also suspend or terminate our agreement with any supplier who breaches this policy.

If an employee breaches this policy, they may be subject to disciplinary action up to and including termination of employment as far as admissible under applicable employment laws.

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## 4. Roles and responsibilities

### 4.1 Employees

- To the extent it is within their area of responsibility and line of work, help ensure Pro Medicus complies with all applicable laws and regulations relating to modern slavery in any jurisdiction where it operates, including the *Modern Slavery Act 2018* (Cth);
- Comply with all policies and procedures in relation to engaging with suppliers;
- Undertake modern slavery training as required by Pro Medicus; and
- Report any modern slavery incidents, near misses or material risks within our operations and supply chains that come to their attention in a timely manner.

### 4.2 Direct Suppliers

- Ensure they comply with all applicable laws and regulations relating to modern slavery (including the *Modern Slavery Act (Cth)*) in any jurisdiction where they operate;
- Use best endeavours to ensure there is no demonstrated modern slavery in their supply chains and operations;
- Engage in their own due diligence, as well as participate in any due diligence reasonably requested by Pro Medicus;
- Have a process in place to enable workers in their operations and supply chains to raise concerns about their work conditions;
- Notify Pro Medicus within five business days' of becoming aware of any material risk of modern slavery in their operations or supply chain; and

- Use best endeavours to address any material risk of modern slavery identified and prevent the recurrence of the conditions or circumstances which gave rise to the material risk in an effective and timely manner.

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## **5. Review and publication of the policy and reporting**

The Audit, Risk and Compliance Committee will review this policy every three years to ensure it remains appropriate for the Group, and report to the Board any changes it considers should be made. This policy may be amended by resolution of the Board.