

<b>POLICY</b>	Modern Slavery	<b>CREATED ON</b>	29/08/2023
<b>APPROVED BY</b>	Chief Operating Officer	<b>UPDATED ON</b>	20/02/2024

# Modern Slavery Policy

## 1.0 Purpose & Approach

Qscan Group is committed to acting ethically and with integrity in all of its dealings and relationships, relating to patients and corporate operations. We are committed to ensuring transparency and to the management of Modern Slavery risks within its operations and external supply chain. Qscan Group will take proactive steps to mitigate and address the risk of modern slavery in our supply chains and operations, and we expect all entities we engage with to do the same.

Qscan Group acknowledges its effort to-date to assess risks of Modern Slavery practices within its operations and external supply chain and we continue to regularly assess, monitor, and address all Modern Slavery risks in accordance with the *Modern Slavery Act 2018 (Cth)*.

For context, the ‘risks of Modern Slavery practices’ means the potential for Qscan to cause, contribute to, or be directly linked to modern slavery through our operations or external supply chains.

## 2.0 Staff Training

All Qscan Group staff complete a mandatory induction whereby all related Policies and Procedures are to be read and acknowledged through a Group-wide dedicated learning platform (“Q-Riosity”).

All management and C-Suite are responsible for abiding by this policy and be aware of the process to address any concerns raised by an Employee(s) or external supply chain party.

## 3.0 Reporting

Qscan Group is required to provide a Modern Slavery Statement (*Modern Slavery Statement | Qscan Group Holdings Newco Pty Ltd*) annually to the Australian Border Force, which is published to an online public register. <https://modernslaveryregister.gov.au/>

This Policy is to be read in conjunction to the annual Modern Slavery Statement, which outlines the following mandatory criteria:

- Reporting Entity’s structure, operations and external supply chains;
- Risks of Modern Slavery practices in the operations and external supply chain of the reporting entity (including subsidiary entities);
- Actions taken (including subsidiary entities) to assess and address those Modern Slavery risks, including due diligence and remediation;
- How the reporting entity assesses the effectiveness of actions; and
- Any other information that the reporting entity, or the entity giving the statement, considers relevant, which could include issues arising out of the COVID-19 pandemic.

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### 3.1 Internal Reporting

Should a Qscan Group employee or Qscan supply chain party become aware of a breach of the Modern Slavery Act 2018 (Cth), this Policy or any relating documents, an incident report will be required to be lodged via the Qscan Group’s Whistleblower Protection Officer ([wpo@qscan.com.au](mailto:wpo@qscan.com.au)). Any disclosure directly to the WPO qualifies for protection as a whistleblower under the Corporations Act (or the Taxation Administration Act, where relevant). The incident will be managed accordingly following appropriate procedures by management.

In the event of a Qscan Group Employee breaching any of the Qscan Policies and Procedures and found negligent, their misconduct will be managed following appropriate procedures and may include termination.

### 3.2 External Reporting

Qscan Group are committed to acting ethically and we expect our suppliers to make the same commitments, making sure that these principles are followed throughout their supply chains. As part of this commitment, we expect our suppliers to take reasonable steps to make sure that their employees, related entities, suppliers, and subcontractors know about, understand, and follow the Code. They should also take reasonable steps to deal with any violations of the Policy, including violations by their employees, related entities, suppliers, and subcontractors, and assist us in conducting third-party audits, due diligence checks or investigations with respect to compliance with the Code.

In the event of a supplier or vendor notifying a Qscan Group Employee of a modern slavery risk or breach, the notified Employee will be required to lodge an incident via the Qscan Group’s Whistleblower Protection Officer ([wpo@qscan.com.au](mailto:wpo@qscan.com.au)). The supplier or vendor may also notify the WPO directly. Any disclosure directly to the WPO qualifies for protection as a whistleblower under the Corporations Act (or the Taxation Administration Act, where relevant). The incident will be managed accordingly following appropriate procedures by management.

Qscan Group will assess whether it is appropriate for it to continue its business association with the vendor or supplier.

### 4.0 Related Policies and Legislation

Qscan Group Code of Conduct Policy Directive  
 Qscan Group Whistleblower Policy Directive  
 Modern Slavery Statement (Qscan Group Holdings Newco Pty Ltd)  
 Modern Slavery Act 2018 (Cth)

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**Definitions:**

**Modern Slavery Act:** The Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018

**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. The Act defines modern slavery as including eight types of serious exploitation:

- 1. Trafficking in persons:** the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs
- 2. Slavery:** when a person exercises powers of ownership over another.
- 3. Servitude:** situations where the victim’s personal freedom is significantly restricted, and they are not free to stop working or leave their place of work
- 4. Forced marriage:** situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
- 5. Forced labour:** situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
- 6. Debt bondage:** situations where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
- 7. Deceptive recruiting for labour or services:** situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
- 8. Worst forms of child labour:** situations where children are subjected to slavery or similar practices, including for sexual exploitation, or engaged in hazardous work which may harm their health, safety or

**Supply chains:** the products and services (including labour) that contribute to Qscan Group’s own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers. morals, or used to produce or traffic drugs.