

## Modern Slavery Statement

For period 1 April 2026 to 31 March 2027

### 1. Introduction

Everlight Radiology is committed to ensuring that modern slavery, human trafficking, forced labour, child labour, servitude, and related exploitation do not occur in any part of our operations or supply chain. This statement outlines the steps taken across our Australian, New Zealand and South African operations to assess, address, and mitigate modern slavery risks.

This statement relates only to Everlight Radiology and its controlled entities within these jurisdictions. References to “our people” include all individuals working on behalf of Everlight Radiology, whether employees, contractors or engaged radiologists.

This statement is prepared to meet the **reporting criteria under Section 16 of the Australian Modern Slavery Act 2018**, while also acknowledging obligations and expectations arising under:

- **New Zealand:**
  - *Crimes Act 1961* (human trafficking provisions),
  - *Immigration Act 2009*,
  - and government procurement guidance on ethical supply chains.
- **South Africa:**
  - *Prevention and Combating of Trafficking in Persons Act (PACOTIP) 2013*
  - *Constitution of the Republic of South Africa (1996)* – rights to dignity, equality, freedom and security of person.
  - *Basic Conditions of Employment Act (BCEA) 1997* – minimum conditions of employment and protection against exploitation.

### 2. About Everlight Radiology Pty Limited

Everlight Radiology is a global teleradiology provider delivering urgent and routine reporting services, including CT, MRI, US and X-ray reporting, to more than 350 hospitals internationally.

Across Australia, New Zealand and South Africa, Everlight reports over **1 million studies per year** (with over 2.6million globally), contributing significantly to public and private healthcare systems.

Everlight operates 9 global offices, with operational hubs and reporting centres across Australia, New Zealand, South Africa, the UK and other jurisdictions.

Our radiologists operate across all major time zones, enabling high-quality daytime reporting and reducing clinical risk associated with fatigue. Everlight engages over 850 specialist radiologists worldwide, who hold FRANZCR, MCNZ, HPCSA, GMC, FRCR, or equivalent specialist qualifications for their applicable reporting regions.

### 3. Everlight Structure, Operations and Supply Chain

6<sup>th</sup> Floor West  
350 Euston Road  
Regent's Place  
London, NW1 3AX

www.everlightradiology.com  
info@everlightradiology.com  
0300 400 1111

United Kingdom  
Ireland  
Australia  
New Zealand  
South Africa

Everlight directly employs and contracts specialist radiologists globally. Our clinicians perform remote teleradiology reporting for hospitals and health services across Australia, New Zealand, South Africa, United Kingdom and Ireland.

Everlight employs administrative and non-clinical leadership staff in Australia, New Zealand, South Africa, United Kingdom, Ireland and in the United Arab Emirates.

Our supply chain primarily involves:

- ICT infrastructure, software, teleradiology platforms and cybersecurity systems
- Professional services including Recruitment, Workflow Planning, People and Culture, Credentialing, and Governance, Risk and Compliance (GRC) services
- Office facilities, telecommunications, and equipment suppliers
- Third-party vendors of medical imaging and reporting technology and security products

Although Everlight does not operate physical production or manufacturing facilities, we recognise that global supply chains for technology equipment, IT hardware, and professional services present potential modern-slavery risks.

We apply due diligence processes when selecting and reviewing suppliers, and we prioritise reputable organisations whose values align with our standards for human rights, ethical labour practices and environmental responsibility.

#### **4. Modern Slavery Risks in Our Operations and Supply Chain**

In line **with Section 16(c) of the Australian Modern Slavery Act 2018**, Everlight has assessed potential risks including:

- Recruitment of clinicians internationally, particularly in jurisdictions with varied labour protections
- Outsourced or offshore administrative service providers and contractors
- ICT and hardware suppliers whose supply chains involve high-risk regions for forced labour, debt bondage and child labour
- Third-party contractors engaged for local operations or business support
- Services involving travel, accommodation or facilities management (in jurisdictions where migrant worker exploitation risk is higher)

These risks are regularly reviewed and monitored.

##### **4.1 Actions Taken to Assess and Address Risks**

(As required under Section 16(d) of the Australian Modern Slavery Act 2018)

Everlight has implemented the following measures:

- - **Supplier Due Diligence**
    - Pre-engagement screening for modern-slavery risks
    - Contractual clauses requiring compliance with applicable modern-slavery, trafficking and labour laws

- Expectations for suppliers to demonstrate ethical sourcing practices, minimum labour standards and transparency
- **Policies and Governance**  
Everlight maintains policies that embed respect for human rights, including:
  - **Code of Conduct:** mandates ethical behaviour, fair and equitable treatment of all staff, respect for individuals, and zero tolerance for exploitation
  - **Whistleblowing and grievance channels:** enabling safe reporting of concerns, including anonymously
  - **Recruitment and credentialing procedures:** to prevent exploitation in the engagement of radiologists and staff
- **Training and Education**
  - Induction and ongoing training for employees and contractors on safeguarding and modern-slavery risks, ethical conduct and escalation pathways
  - Dedicated People & Culture and Radiologist Engagement teams that support wellbeing, monitor compliance, and ensure policy updates
- **Specific Commitments to countries without standalone Modern Slavery Acts**  
Everlight ensures compliance to:
  - **New Zealand**
    - **Crimes Act 1961** and **Immigration Act 2009:** ensuring no coercion, trafficking in persons, or deceptive employment of migrant workers
    - **Employment Relations Act 2000** and **Health and Safety at Work Act 2015:** ensuring safe employment practices and work conditions
    - **Government Procurement Rules (Rule 25: Ethical and Sustainable Procurement):** aligning our employment practices to meet expectations around modern-slavery risk assessments
  - **South Africa** - In South Africa, Everlight ensures compliance with:
    - **PACOTIP 2013:** monitoring for indicators of trafficking or coercion in recruitment and contracting
    - **BCEA 1997:** ensuring lawful working hours, conditions, minimum remuneration and freedom from unfair labour practices
    - **Constitution (1996):** protection of the rights to dignity, equality and freedom from exploitation

## 4.2 Measuring Effectiveness

(Section 16(e)) - Everlight monitors the effectiveness of its actions through:

- Annual reviews of critical supplier data mapping and risk assessments (with non-critical reviewed 3-yearly)

- Audits of recruitment and credentialing records
- Tracking of incidents, complaints or concerns raised
- Periodic review of policies and improvement plans
- Everlight Board and Executive oversight of modern-slavery compliance

#### **4.3 Consultation Across the Business**

(Section 16(f)) - Everlight consults with its operational teams, regional leadership, clinical governance, procurement, People & Culture teams, and local South African representatives to ensure that all controlled entities operate consistently with this statement.

#### **4.4 Continuous Improvement**

Everlight is committed to continual refinement of our modern-slavery response, including:

- Enhancing supplier engagement and transparency
- Annual (supplemented with adhoc) review and update of internal training
- Strengthening regional oversight mechanisms via dedicated committees
- Monitoring emerging risks in technology and offshore professional services

#### **5. Statement Approval**

This statement is made pursuant **to Section 16 of the Australian Modern Slavery Act 2018** and reflects the actions of Everlight Radiology's Australian, New Zealand and South African operations for the financial year ending 31 March 2027.

It has been reviewed and approved by the Everlight Radiology Global Leadership Team.

Approved by:

Wayne Hartmann, Chief Executive Officer

Everlight Radiology Pty Ltd

Date: 01.04.2026