



Modern Slavery Policy

Mach7 Technologies Limited

ACN 007 817 192

Contents

1	Introduction	3
2	Scope.....	3
3	Purpose.....	4
4	Modern Slavery Act	4
5	Our supply chain.....	4
6	Risk in our operations and supply chain.....	5
7	How will be embed the Policy in practice?.....	6
8	Policy administration	6
9	Training and awareness.....	7
10	Definitions.....	7
11	Document History	7



1 Introduction

- 1.1. Mach7 Technologies Limited (referred to as “**Mach7**”, the “**Company**”, “**we**”, “**our**”, “**us**”) is committed to preventing modern slavery and human trafficking within our operations and supply chains.
- 1.2. We provide a safe work environment that aims for equality of opportunity for all and where the dignity of every individual is respected.
- 1.3. This policy outlines our commitment to identifying, preventing, and mitigating the risks of modern slavery and sets out the actions we will take to ensure compliance with relevant laws and regulations, including the **Modern Slavery Act 2018 (Cth)** of Australia and the **UK Modern Slavery Act 2015**.
- 1.4. We recognise that modern slavery is a significant worldwide problem, and we are committed to improving our systems and practices to identify and avoid complicity with potential modern slavery and human rights violations across our operations and supply chain.

2 Scope

- 2.1. The Company requires all Personnel and any other person associated with Mach7 Technologies Limited to comply with this Policy and with the laws and regulations of the jurisdictions in which the Company operates.
- 2.2. This Policy applies to all its entities;
 - (a) Mach7 Technologies, Limited;
 - (b) Mach7 Technologies International Pty;
 - (c) Mach7 Technologies UK Ltd;
 - (d) Mach7 Technologies, Inc;
 - (e) Mach7 Technologies Canada, Inc; and
 - (f) Mach7 Technologies, Pte Ltd.
- 2.3. All Mach7 entities operate in the same industry sector, i.e. provider of medical imaging software and services for the healthcare industry.
- 2.4. This Policy also does not preclude the Company from compliance with the following standards or legislation;
 - (a) ISO 13485;
 - (b) FDA QSR 21CFR Part 820;
 - (c) MDD 93/42/EEC;
 - (d) TGA;
 - (e) UK Medical Devices Regulations 2002; and
 - (f) Canada Medical Devices Regulations

3 Purpose

- 3.1. The purpose of the Modern Slavery Policy (the “**Policy**”) is to identify and mitigate the risks associated with any act of modern slavery within our business and supply chain.
- 3.2. We expect all who have, or seek to have, a business relationship with us to familiarise themselves with this Policy and to act in a way that is consistent with our value. We will only do business with organisations who fully comply with this Policy, or those who are taking verifiable steps towards compliance.

4 Modern Slavery Act

- 4.1. The Act came into force on 1 January 2019 and established a mandatory reporting regime for entities:
 - (a) with consolidated revenue of at least A\$100 million in the reporting period; and
 - (b) who is either an Australian entity or a foreign entity carrying on business in Australia.
- 4.2. The Act requires reporting through an Annual Modern Slavery Statement (the “**Statement**”).
- 4.3. The Statement will identify and address the risks of modern slavery in our global and domestic operations and supply chains, and actions taken to address those risks.
- 4.4. To demonstrate our commitment to compliance with the Act and creating transparency, we will be providing a Modern Slavery Statement on a voluntary basis on our website.

5 Our supply chain

- 5.1. As a technology business, Mach7’s supply chain comprises the following categories:

Category	Description and Scope	Examples
A	Finished Devices	Finished medical device software that Mach7 resells or relabels, and outsourced third-party development services
B	Materials and components or services	Outsourced third-party raw material testing suppliers
C	Other services	Translation Services, Software Tools, Certification Agencies, Consulting, AR Services, Advertising and marketing services, recruitment agencies, and contact centre support services.
D	Facilities and Consumables	Office operations such as cleaning, security, repairs and maintenance, and office consumables. Transportation- Airlines and couriers.

6 Risk in our operations and supply chain

- 6.1. Modern slavery instances are often complex and hard to detect, especially those we may be connected to through activities of our suppliers and their supply chain.
- 6.2. Identifying these risks is the first step to minimizing them and increasing our ability to detect modern slavery practices through our governance practices
- 6.3. The risk that our operations include modern slavery is **low**, for the following reasons;

People

- (a) We treat our Personnel with the utmost dignity and respect and uphold the highest standards of human rights.
- (b) We take steps to ensure that none of our Personnel, suppliers or business partners impose or knowingly facilitate forced or compulsory labour for our ultimate benefit. All applicable laws and regulations relating to work, payment of wages and compensation and working hours are complied with.
- (c) We have taken the following measures considering our workforce and employment practices:
 - Our on-boarding process and employment contractual documentation will incorporate specific prohibition against slavery and servitude, the use of forced, compulsory and trafficked labour, and the use of child labour.
 - As a technology company, most of our Personnel are tertiary educated professionals.
 - Our employment conditions adhere to the legislation relevant to the jurisdiction in which the Personnel work.
 - Our **Diversity, Equity and Inclusion Charter** is committed to fostering an inclusive and respectful work environment, regardless of a person's gender, age, race, ethnicity, sexual orientation, physical ability or socioeconomic background.
 - We provide adequate training and awareness programs for our Personnel.
 - Our compensation packages are competitive and consistent with the laws that regulate minimum wage and overtime.
 - Our **Code of Conduct Policy** and **Employee Handbook** defines the ethical standards we will follow to ensure we conduct our business with integrity and in compliance with all laws.
 - We have an open-door policy and encourage our Personnel to raise concerns or feedback especially those of a legal and ethical nature. Personnel may also raise their concerns through any of the reporting channels outlined in our **Whistleblower Policy**.

Supplier Due Diligence

- (a) Mach7 does not manufacture or supply physical products and neither does it rely on raw materials or products. Our supply chain is relatively short, uncomplicated, and comprised of mostly large established hardware and software suppliers, as well as professional services providers in the development and support of software products.
- (b) Our due diligence measures include;
 - We will undertake due diligence to identify and assess modern slavery risks within Mach7's supply chains.

- Our supply engagements generally consist of supply chains between Mach7 and the end-supplier; we have limited supply chains and supplier engagements with one or more contractor or sub-contractors within that supply chain.
- Our supply chain largely consists of professional services and products that support the delivery of Mach7's products and services.
- We consider sector and industry risks, product and services risks, and geographic risks associated with modern slavery when undertaking our due diligence.
- We seek to include provisions specific anti-slavery wording in our contractual documentation with suppliers/ third parties to provide us with appropriate comfort that the relevant counterparty conducts their business and operations in a manner that is consistent with all applicable modern slavery laws, statutes, and regulations in force from time to time.

7 How will be embed the Policy in practice?

- 7.1. Our people are our first line of defence in relation to mitigating the modern slavery risks. We have introduced reporting mechanisms for continuous monitoring of our compliance with this Policy and the Act.
- 7.2. The management will review and increase awareness of our policies and procedures about modern slavery.
- 7.3. The Board will receive a report at least annually on the assessment undertaken, the statuses of the identified KPIs for the year, controls, and strategies taken to mitigate, remediate, or eliminate the risk or exposure to modern slavery practices.
- 7.4. We have mechanics to foster whistleblowing and incident reporting within our business which includes monitoring for any reported incidents of modern slavery within our organization and supply chain.
- 7.5. Our supplier due diligence assessment includes the identification of suppliers who perpetrate or are at high risk of perpetrating modern slavery offenses.
- 7.6. Roll out our **Supplier Due Diligence Form** and **Supplier Code of Conduct** to our first-tier suppliers under Category A, B and C, which will enable us to determine the supplier's risk classification based on several factors our expectations in areas such as modern slavery, human rights, labour, environment, health and safety, and anti-bribery and corruption for suppliers providing goods and services to Mach7.

8 Policy administration

- 8.1. The Board is responsible for the overall compliance of this Policy.
- 8.2. The Board and the CEO will monitor the implementation of this Policy and will review it at least once every 2 years or as may be required to ensure it is operating effectively. Any recommended changes must be approved by the Board.
- 8.3. The Company will ensure any updates to this Policy following a review will be disseminated to, and easily accessible by, Personnel covered by this Policy and all other relevant parties deemed appropriate from time to time.

9 Training and awareness

- 9.1. All Personnel are required to understand and comply with this Policy, attend all relevant training and follow the reporting requirements set out in this Policy.
- 9.2. To this end, regular and appropriate training on how to comply with this Policy will be provided to all senior managers and all relevant Personnel. However, it is the responsibility of all Personnel to ensure that they read, understand and comply with this Policy.
- 9.3. All Third Parties are required to be made aware of this Policy and to undertake to comply with this Policy in relation to any of their dealings with, for or on behalf of the Company.

10 Definitions

In this Policy the following words or phrases mean the following:

Company means Mach7 Technologies Limited ACN 007 817 192 and all of its subsidiaries.

Personnel means all persons acting (whether authorised or unauthorised) on behalf of the Company at all levels, including officers, directors, temporary staff, contractors, consultants and employees of the Company.

QMS means Quality Management System.

First-tier suppliers means those suppliers whom we have direct dealings with, where the agreement is between Mach7 and the supplier.

11 Document History

Version	Summary of Amendments	Approved by	Approval date
1.0	New Modern Slavery Policy	Board	26 July 2024