



# 2025 Modern Slavery Statement

Lumus Imaging Holdings Pty Limited  
ACN 080 527 699



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This is the Modern Slavery Statement for Lumus Imaging Holdings Pty Limited (**Reporting Entity**) and its subsidiaries (referred to collectively as **Lumus Imaging** or the **Group**) (**Statement**) covering 1 July 2024 to 30 June 2025 (**FY25** or **Reporting Period**), issued under the *Australian Modern Slavery Act 2018 (Cth)*. Lumus Imaging's registered office is Level 4, 12 Help Street, Chatswood NSW 2067, Australia.

This Statement is submitted by the Reporting Entity as a joint statement on behalf of the Group. This Statement has been approved by the Board of the Reporting Entity on behalf of the Group.

This Statement outlines what Lumus Imaging has done to detect and prevent modern slavery and human trafficking risk in its business and supply chains.



**Dr Phil Lucas**

Chief Executive Officer  
Lumus Imaging

## Message from the CEO

I am pleased to present our 2025 Modern Slavery Statement. This is the first Statement we have presented as a standalone Group.

At Lumus Imaging, caring for people at every stage of life is at the heart of everything we do. Our core pillars; Our People, Customer Service, and Quality, guide how we support patients, customers and our employees every day.

We're committed to creating a safe, respectful, and ethical environment both within our organisation and across our broader network. We have a responsibility to ensure that the people behind the services and products we rely on are treated fairly and with dignity.

This Modern Slavery statement outlines the actions Lumus Imaging are taking to understand and address the risks of modern slavery in our operations and supply chains.

We know this is an ongoing journey, and we're committed to continuous learning and improvement.

Approved by the Reporting Entity's principal governing body on behalf of all reporting entities in the Lumus Imaging Group.

A handwritten signature in black ink, appearing to be 'Phil Lucas', written in a cursive style.

Dr Phil Lucas  
19 December 2025

### Consultation across the Group

This Statement has been prepared by the Reporting Entity in consultation with the Group. This consultation involved engaging core stakeholders in areas such as Finance, Legal, Procurement and People and Culture. For further information refer to "Process of consultation" set out on page 14 of this Statement.

This Statement was reviewed and approved by the Reporting Entity and Group's Board of Directors on 19 December 2025 and has been signed by the Chief Executive Officer of Lumus Imaging, who is also a member of the Board.

This Statement is published on the Lumus Imaging website ([www.lumusimaging.com.au](http://www.lumusimaging.com.au)) and lodged with the Australian Government's Modern Slavery Statements Register.

# About Lumus Imaging

Lumus Imaging is a leading network of more than 150 diagnostic imaging sites across Australia, committed to delivering equitable, high-quality medical imaging services to communities nationwide.

Lumus Imaging brings together over 30 years of expertise to provide trusted, patient-centred care with a strong emphasis on advanced technology. Lumus Imaging operates within a framework of integrity, accountability and respect. We recognise our responsibility to uphold human rights and ethical business practices across all aspects of our operations and supply chains.

Our focus on innovation and digital health enables us to enhance the patient experience while maintaining strong governance and compliance standards. Lumus Imaging is committed to identifying, preventing, and addressing risks of modern slavery, ensuring that our people, partners, and communities are protected and respected.

## Our Values

At Lumus Imaging, our values guide how we care for people, make decisions, and operate responsibly across our network. They shape our commitment to integrity, respect, and human rights, and ensure that our actions align with the highest ethical standards in all aspects of our work.



### Better Together

We believe collaboration drives positive outcomes, for our patients, our people and our partners. We work collectively across our sites and supply chains to uphold ethical practices and eliminate modern slavery risks.



### Total Accountability

We take ownership of our actions and decisions. Lumus Imaging holds itself and its partners to the same high standards of integrity, transparency and compliance, ensuring we operate responsibly and lawfully at every level.



### The Right Answers

We are committed to doing what's right, not just what's easy. We make informed, evidence-based decisions that prioritise patient care, safety, and ethical conduct, guided by our responsibility to protect human rights.



### Seek New Possibilities

We embrace innovation to deliver better care and stronger governance. By continuously improving our processes and understanding of modern slavery risks, we ensure that our business evolves responsibly and sustainably.

## Our Pillars

### Customer Experience

A standard of customer service and experience that exceeds the expectations of our patients and referrers.

### Quality

A reliable company that strives for quality and excellence, bringing confidence to our customers.

### Our People

A caring and fulfilling work environment that enables opportunities for our people.



# Structure

This Statement covers the financial year ended 30 June 2025 and has been prepared on a consolidated basis, noting that during the period between 1 July 2024 and 1 May 2025, Lumus Imaging was wholly owned by Healius Limited, a company listed on the Australian Securities Exchange.

This marks Lumus Imaging’s first Modern Slavery Statement as a standalone group, reflecting our ongoing commitment to evolving our assessment processes.

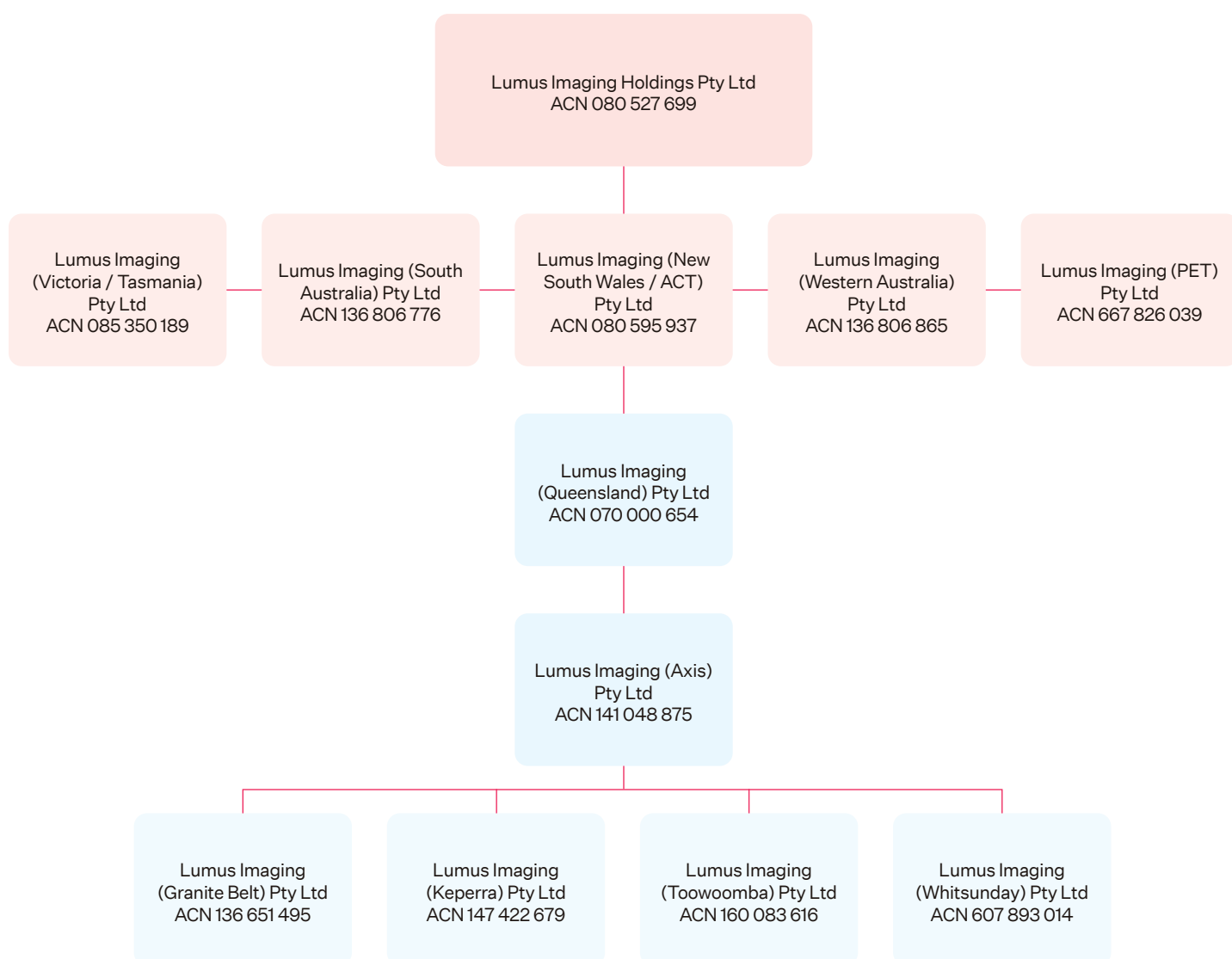
The legal entities covered by this Statement are “Lumus Imaging Holdings Pty Ltd” and its subsidiaries during FY25 – as set out below.

On 30 September 2025, In Focus Radiology Pty Ltd and In Focus Radiology Belmont Pty Ltd (together, the **In Focus entities**) became part of the Group. The In Focus entities will be included in Lumus Imaging’s FY26 Statement.

Lumus Imaging is a leading diagnostic imaging provider in Australia.

Lumus Imaging was previously part of the Healius Limited group of companies.

On 1 May 2025, Lumus Imaging was acquired by funds managed by Affinity Equity Partners.



# Our Australian operations and people

All of Lumus Imaging's operations are in Australia and include salaried staff, employees under collective bargaining arrangements and modern pay awards, temporary contractors and casual employees.

**In FY25 there were 2,423 team members employed by Lumus Imaging.**

Approximately 83% of staff (excluding temporary contractors) are covered by an industrial instrument such as modern awards or enterprise agreements. The terms of these instruments lessen the prospects of conduct within our operations that could deteriorate into modern slavery.

Lumus Imaging's systems aim for continuous improvement in its treatment of employees including compensation, work-life balance, financial and non-financial benefits, support professional development and health and safety.

All Lumus Imaging staff are required to familiarise themselves with workplace policies and procedures, and complete relevant training when they join the organisation.

This induction covers:

- Welcome to Lumus Imaging
- Workplace policies and procedures
- Work Health & Safety (WHS) Induction: Awareness of WHS requirements and safe work practices
- Modern slavery awareness training
- Equal employment opportunity
- Bullying prevention
- Sexual harassment awareness
- Conflict of interest training

This training ensures all staff understand their responsibilities and helps maintain a safe, respectful and inclusive workplace.



## Modern slavery education

All team members are required to complete mandatory Modern Slavery training. This training raises awareness of modern slavery risks, outlines our legal and ethical responsibilities, and explains Lumus Imaging's role in identifying, managing and reporting potential risks.

## Our offshore operations

As well as managing domestic and offshore suppliers, during FY25, Lumus Imaging utilised certain back-office support operations in the Philippines through a global outsourcing organisation.

Lumus Imaging reviewed and is confident in the anti-slavery protections provided by our international outsourced services provider.



# Our supply chains and procurement framework

## Purpose and commitment

Lumus Imaging is committed to ethical sourcing and the elimination of modern slavery practices across its operations and supply chain. Our framework aligns with the *Modern Slavery Act 2018* (Cth) and environmental, social and governance principles, ensuring that procurement governance, supplier engagement and risk management are embedded in all sourcing activities.

## Governance and oversight

Modern slavery risk management is overseen by the Executive Leadership Team, ensuring accountability at the highest level. The centralised Procurement Team leads all sourcing activities and enforces compliance with ethical standards across the supply chain.

Every procurement process is guided by Lumus Imaging's Procurement Policy, Vendor Terms and Conditions and Standards of Behaviour and Conduct Policy embedding responsible practices into our operations.

The risks of modern slavery described in this Statement apply to the operations and supply chains of the Group, including the Reporting Entity and its subsidiaries.

## Supply chain structure

Lumus Imaging's most significant exposure to modern slavery risk comes from our supply chains.

### Our supply chain includes:

- **Goods:** Medical imaging equipment, IT hardware, pharmaceuticals, contrast agents, medical consumables, uniforms and office supplies.
- **Services:** Equipment servicing, IT and telecommunications, property leasing and facilities management (including cleaning and laundry) labour hire and logistics.

## Risk identification and assessment

**High-risk categories:** Based on global benchmarks and industry analysis, the following categories are considered higher risk:

- Medical consumables and low-cost disposables (e.g., gloves, masks, gowns).
- ICT equipment and electronics.
- Utilities and property services.
- Offshore labour hire arrangements.

**Assessment tools:** To manage the risk, we use various assessment tools, including annual supplier risk assessments, leveraging the Global Slavery Index and internal due diligence processes and remediation activities.

**Supplier audits:** Major suppliers must complete a Modern Slavery questionnaire and provide evidence of compliance with relevant legislation.





# Procurement Policy

Lumus Imaging's Procurement Policy ensures that procurement activities are conducted commercially, ethically and sustainability to generate optimum value with a whole of life focus. The Procurement Policy is a key part of our Sustainability Linked Loan which was the first Sustainability Linked Loan structured for acquisition finance in Australia's healthcare sector.

**The Procurement Policy covers the following:**

## Supplier relationships

Lumus Imaging is committed to building a strong reputation with suppliers by demonstrating probity, integrity, impartiality, confidentiality, transparency, accountability and respect by partnering and managing relationships strategically with suppliers.

## Sustainability

Where possible, procurement aligns a positive environment, social and economic impact over the entire lifecycle of a good or service following a risk-based approach.

## Managing risk

The aim of Lumus Imaging is to ensure that all procurement is conducted within a framework in compliance with Group procedures, tools and templates, based on a risk-based approach. Conflicts of interest are considered and managed appropriately.

## Value

Lumus Imaging is committed to obtaining the best overall outcome in terms of value for money, performance and whole-of-life costs by leveraging the full purchasing power of the Lumus Imaging Group.

Value for money is demonstrated through competitive process and/or rigorous benchmarking.

## Labour, human rights and modern slavery

Lumus Imaging is opposed to all forms of slavery and expects its suppliers to respect human rights and ensure that they do not engage in or complicity with human rights abuses.

## Ethics

Lumus Imaging is committed to a culture of corporate compliance and ethical behaviours and expects suppliers to carry out their duties ethically, responsibility and without improper influences, and thereby protect the integrity of the business.

## Health and safety

The aim of Lumus Imaging is to provide a safe and efficient workplace without injuries to staff, contractors and the public. We expect suppliers to be accountable and responsible for managing their health and safety risks.

## Environment

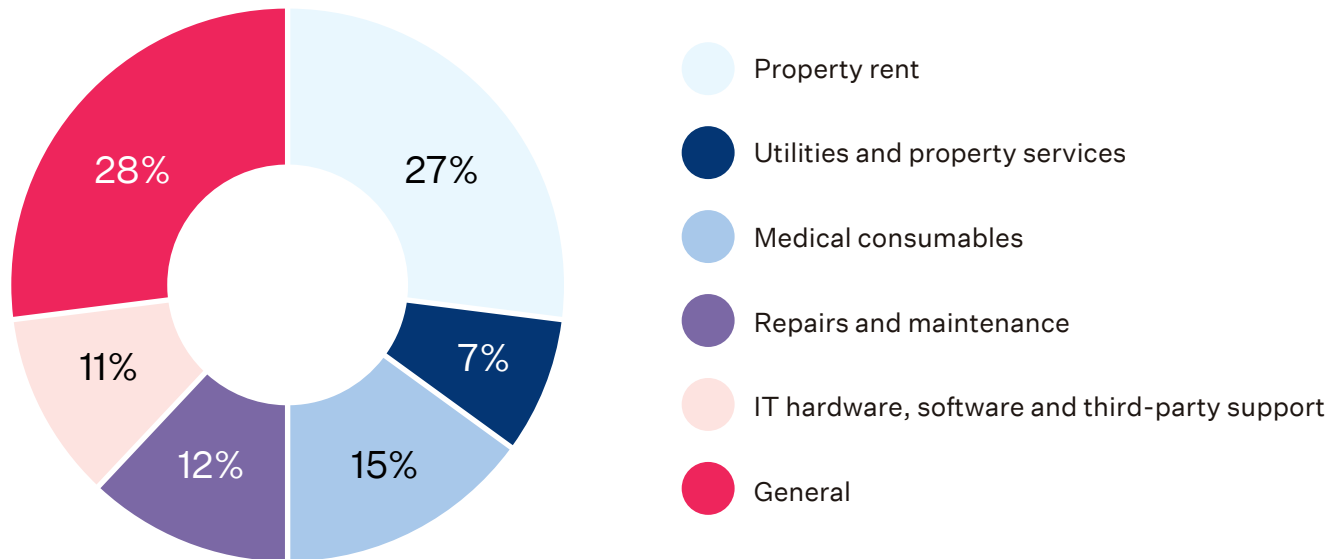
Lumus Imaging is committed to managing operations in an environmentally sustainable manner and expects its suppliers to maximise resource efficiency and reduce the consumption of energy and natural resources and waste.

## Diversity and inclusion

Lumus Imaging recognises that a diverse and inclusive workplace is one in which all individuals, with a broad range of backgrounds, skills, experience and perspectives, contribute to our success. We also expect our suppliers to promote an inclusive and diverse workforce.

## FY25 expense by category<sup>1</sup>

The distribution of external spend in major categories is as follows:



<sup>1</sup> The amounts considered exclude salary and wages, Radiologist costs, capital spend, depreciation and amortisation, financing costs and tax.

There has been an assessment of the risk of modern slavery in our supply chains across all spend categories.

Category	Example Spend	Risk Rating
Property rent	Rent paid to landlords for our clinic locations.	Low
Utilities and property services	Electricity and other inputs into our diagnostic imaging services and clinic operations and costs related to property maintenance.	Medium
Medical consumables	Materials related to the provision of diagnostic imaging including but not limited to contrast, bed rolls.	Medium/High
Repairs and maintenance	Maintenance of our diagnostic imaging equipment.	Low
IT hardware, software and third-party support	Computers and relevant accessories, software and licenses along with external parties who support the provision of IT services to our business.	Medium
General	This category is made up of Insurance costs, equipment operating leases, travel, printing and stationery and other costs.	Low

### Higher risk rated categories:

- Medical Consumables
- IT hardware, software and third-party support

# Our governance and risk framework

Our governance framework is overseen by the Board and Lumus Imaging is committed to maintaining high ethical standards, conducting business with integrity and mitigating risks associated with human rights and modern slavery practices.

Lumus Imaging's Chief Executive Officer and Chief Financial Officer comprise the Executive Directors of the Group. Together with the broader senior leadership team, they are responsible for promoting risk awareness and a robust culture and promoting a systematic process to identify, analyse and evaluate risk. Lumus Imaging's General Counsel acts as a Company Secretary of the Group.

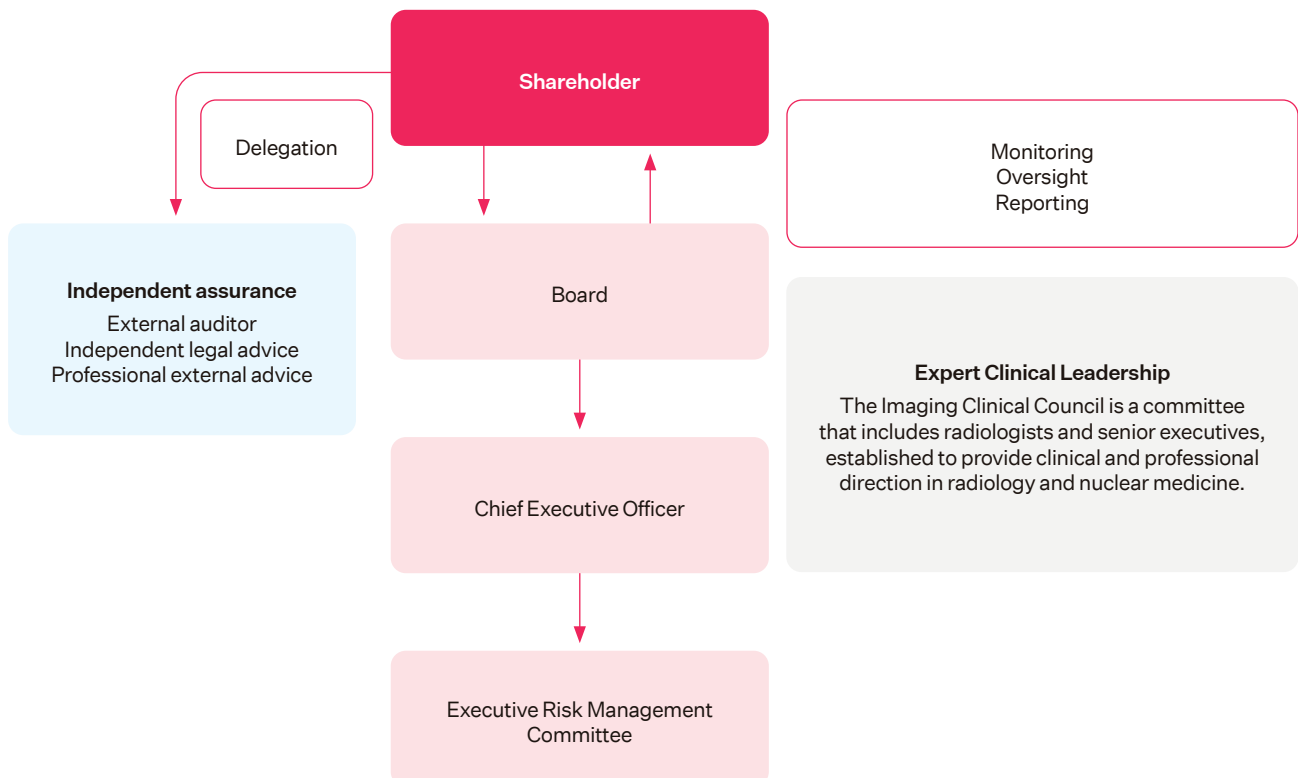
## Governance structure

Lumus Imaging works within an accountable system that includes corporate governance policies and procedures. These are designed to promote and strengthen responsible management.

The Board of Directors of Lumus Imaging are responsible for overseeing and monitoring the Group's operations and corporate governance. The Board meets regularly to discuss, plan and oversee the management of the Group.

Implementation of the Board's direction and strategy is executed by the Group's executive and Senior Leadership Team, led by the Chief Executive Officer. Lumus Imaging's Procurement, Legal and People & Culture functions support the implementation of this approach.

Lumus Imaging works within an accountable system that includes corporate governance policies and practices, and risk management processes. These are designed to promote and strengthen responsible management. As part of its commitment to management the risks, these policies are reviewed from time to time to ensure compliance with law, including modern slavery.



### Relevant policies include:

Standards of Behaviour and Conduct Policy

Procurement Policy

Supplier Code of Conduct

Work Health and Safety Procedures

Whistleblower Protection Policy



## Our FY25 actions and measures to address modern slavery risks

Lumus Imaging has operated as a standalone group since 1 May 2025. For the period between 1 July 2024 and 1 May 2025, Lumus Imaging was a wholly owned subsidiary of Healius Limited.

Since 1 May 2025, to strengthen our commitment to ethical sourcing and modern slavery compliance, Lumus Imaging implemented two significant measures:

- **Supplier onboarding:** New suppliers were required to complete our Modern Slavery Questionnaire during onboarding. This process ensures transparency and alignment with our ethical standards from the outset.
- **Contractual compliance:** It is Lumus Group policy to include a dedicated modern slavery provision. This clause reinforces our commitment to embedding human rights obligations within contractual agreements and holding suppliers accountable.

Lumus Imaging will continue to improve its processes to help mitigate the risks of modern slavery.

Lumus Imaging is committed to continually strengthening its response to modern slavery. We focus on detecting potential risks within our operations and supply chains, implementing mitigation measures, developing tools to assess effectiveness and educating our people. The effectiveness of these actions is evaluated through KPIs, supplier due diligence, contract compliance checks, staff training outcomes, and governance reviews.

# Process of consultation

Since 1 May 2025 when Lumus Imaging changed ownership, Lumus Imaging and its subsidiaries operated as an integrated organisation, with common procurement functions and shared head-office oversight.

During this time, consultation occurred naturally through our unified operating structure, as modern slavery risk management activities were coordinated centrally and applied consistently across all entities.

Our consultation processes included:

- **Centralised procurement coordination:** Because all entities were supported by a common procurement team during this period, supplier engagement, due diligence activities, and risk assessments were conducted collectively on behalf of the Group. This ensured that all subsidiaries contributed to and were covered by the same risk-management practices.
- **Shared governance and oversight:** Key policies, including our modern slavery framework, were developed and approved centrally by Group leadership, with input from management representatives from each controlled entity.
- **Regular cross-entity communication:** Ongoing communication between head-office functions and subsidiary management occurred through leadership meetings, operational reviews, and routine reporting. These interactions ensured that emerging risks, supplier issues, and compliance requirements were discussed collectively.
- **Collaborative statement preparation:** Each subsidiary provided information relevant to its activities for inclusion in this statement. Group-level functions consolidated and reviewed these contributions to ensure alignment in how modern slavery risks and actions were described across the Group.

This integrated structure meant that consultation was built into everyday operations, allowing all entities to meaningfully participate in shaping our modern slavery approach for the reporting period.





## Our next steps

Lumus Imaging will continue to develop and improve our processes to identify, manage and assess the effectiveness of our actions going forward. Our FY26 key actions are as follows...

To continue to strengthen our approach and build on FY25 progress, Lumus Imaging intends to implement the following measures:

- **Top 20 supplier review:** Conduct a comprehensive modern slavery risk review of our top 20 suppliers, including updated questionnaires, evidence checks and targeted engagement.
- **Redraft the modern slavery questionnaire:** Revise and enhance the supplier questionnaire to improve clarity, risk detection and alignment with global best practices.
- **Enhanced risk assessment:** Expand annual supplier risk assessments to include deeper analysis of high-risk categories such as medical consumables, ICT equipment and offshore labour hire.
- **Supplier audits:** Initiate targeted audits for suppliers operating in high-risk geographies or categories, ensuring compliance with contractual obligations.
- **Training and awareness:** Deliver advanced training for procurement and category managers to strengthen capability in identifying and mitigating modern slavery risks.
- **Policy and contractual updates:** Continue embedding modern slavery provisions in all new contracts and review existing agreements for compliance.
- **Reporting and transparency:** Publish progress against these commitments in our 2026 Modern Slavery Statement, including measurable KPIs.

