

Modern Slavery Act

FY '23 Report

1. Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires businesses to state the actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour in their operations and supply chains. This is a report for EFW Radiology (“EFW”), which is obligated to publish a report under the Act. This report refers to the 2023 fiscal year-end, December 31, 2023.

At EFW, our vision is to deliver exceptional medical care with compassion and trust, earning the confidence of our community while providing careers with meaning. We acknowledge our duty to protect the human rights of all individuals connected to our clinics, including migrant and temporary workers in our supply chain.

EFW is committed to preventing and reducing the risk of forced and child labour practices that apply beyond our clinics. In alignment with our Supplier Code of Conduct, EFW has a zero-tolerance policy for suppliers engaging in forced and child labour practices.

2. Steps taken to prevent and reduce the risk of forced labour or child labour

In 2023, EFW has taken the following steps to prevent and reduce the risk that forced labour and child labour are used in any step of our supply chain:

Governance and Training

In November 2023, EFW implemented a new Policy Management application called Policy Tech, a one-stop shop for accessing policies, procedures, and onboarding content. This change arose from the need to find an application that has room for growth, is easy for our staff to access everyday content, and meets Accreditation requirements for quality management.

Supply Chain and Human Rights Assessments

EFW regularly reviews the approved list of suppliers to ensure they meet our Supplier Code of Conduct. This includes interviewing supplier representatives and, when able, visiting the supplier's facility. *EFW sourced goods from approximately three (3) factories/suppliers in the United States of America and no (0) factories/suppliers from other countries.*

3. Structure, activities and supply chain management

Structure

EFW is a physician-owned private diagnostic imaging community medical company (the “Partnership”) founded in 1969. Its head office is 312, 3883 Front Street, Calgary, Alberta, Canada, T3M 2J6.

Activities

EFW's mission is to provide exceptional care. EFW specializes in MRI, spine and pain management, nuclear medicine, X-ray, pediatric ultrasound, maternal-fetal medicine, mammography, liver imaging, and general ultrasound. EFW operates 11 clinics across Calgary and the surrounding area, with over 600,000 annual imaging procedures, consultations, and studies.

Governance

EFW is governed by our Board of Directors and managed by the executive leadership team. The partnership is comprised of 61 physicians who actively practice within EFW.

Supply Chain

EFW sources medical supplies, devices, and other products primarily from the United States of America and, on rare occasions, globally.

4. Company policies and due diligence process in relation to forced labour and child labour

Through codes of conduct and behaviour for employees and suppliers, EFW strives to uphold the rights of patients, employees, and workers, including migrant and temporary labourers, across its supply chain.

Employee Conduct and Behaviour

Consistency and understanding of acceptable workplace conduct and behaviour provide EFW with the ability to offer our patients the highest level of care. This policy sets out general expectations regarding workplace conduct and behaviour. It is not meant to be exhaustive or provide specific rules to govern every situation an employee may encounter at work and is subject to change at the discretion of EFW.

Employee Code of Conduct

EFW's Code of Conduct helps employees act in ways that demonstrate our values and respect for each other and the patients we serve. It builds a safe and respectful workplace for everyone, protects our community reputation, and strengthens our vision to deliver healthcare with compassion, earn the trust of referring physicians, and provide careers with meaning. The code of conduct is reviewed annually and updated when necessary.

Supplier Code of Conduct

EFW maintains supplier relationships in accordance with the Supplier Code of Conduct. Suppliers accept the terms of the Supplier Code of Conduct and confirm their compliance by entering standard terms and conditions or other contractual arrangements with EFW. EFW keeps a record of all contractual arrangements.

5. Risk of forced labour or child labour being used and steps we have taken to assess and manage that risk

Based on EFW's historical ordering practices and existing vendor relationships, our current supply chains don't pose high risk of utilizing forced or child labour. However, in order to mitigate future risk, all international vendors must be first interviewed prior to completing business transactions. The purpose of the interview is to determine if the supplier is compliant with the following:

- Labour is voluntary;
- Workers are fairly compensated;
- Workers are not exploited;
- Managers comply with applicable employment standards;
- Employees are not below the legal minimum working age;
- Working hours are consistent with local laws and standards;
- When appropriate, overtime policies are followed;
- Work environment is clean, healthy and safe in accordance with local laws and regulations

6. Remediation of any forced labour or child labour

To date, there have been no identified or reported instances of suppliers engaging in illegal practices, including the use of forced labour or child labour.

7. Remediation of loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

To date, there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

8. Training Provided to employees on forced labour and child labour

The Employee and Supplier Code of Conduct, which is reviewed and updated annually, is part of EFW's annual training program on Policy Tech. Employees must familiarize themselves with the Supplier Code and ensure suppliers understand expectations when working directly with them.

9. Effectiveness assessments to ensure that forced labour and child labour are not being used in our business and supply chains

EFW reduces and prevents the risk of forced and child labour by limiting the number of approved international suppliers within our supply chain. We assess the effectiveness of our strategies through regular supplier check-ins and verifying the Supplier Code of Conduct is being adhered to. To date, no violations have been identified.

Attestation Statement

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for EFW Radiology. Based on my knowledge and have exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purpose of the Act, for the reporting year January 1, 2023 – December 31, 2023.

*I have the authority to bind
EFW Radiology*

EFW Radiology

Per:  _____

Name: Dr. David Lautner

Title: Managing Partner

Date: May 31, 2024