

CG Medical NSW Pty Ltd

Modern Slavery Policy

CG Medical Group — Modern Slavery & Ethical Sourcing Policy

Field	Detail
Document Number	CG-MSP-001
Version	1.0
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Next Review Date	6 July 2027
Policy Owner	Director / Service Manager — C. Glasgow
Approved By	Director — CG Medical NSW Pty Ltd
Applies To	All CG Medical personnel, subcontractors, suppliers and business partners
Legislative Basis	Modern Slavery Act 2018 (Cth); Modern Slavery Act 2021 (NSW)

CG Medical NSW Pty Ltd

Trading as: CG Medical Group

ABN: 64 231 066 431 | 100% Indigenous Owned | Supply Nation Certified

www.cgmedical.com.au | clint@cgmedical.com.au | 1300 154 583

1. Policy Statement

CG Medical NSW Pty Ltd (trading as CG Medical Group) is committed to conducting its business ethically and with respect for human rights. We have a zero-tolerance approach to modern slavery in all its forms — including slavery, servitude, forced and compulsory labour, deceptive recruitment, debt bondage, child labour, and human trafficking — within our own operations and our supply chains.

As a 100% Indigenous-owned Australian business and a Supply Nation Certified supplier, we recognise our responsibility to uphold the dignity and rights of all people. We are committed to acting professionally, fairly, and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

2. Purpose

The purpose of this Policy is to:

- Set out CG Medical's commitment to identifying, preventing, and mitigating the risks of modern slavery in our operations and supply chains
- Outline the principles, procedures, and responsibilities that underpin our approach
- Demonstrate compliance with the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2021 (NSW)
- Provide guidance to our personnel, subcontractors, and suppliers on expected standards of conduct
- Support transparency and continuous improvement in our ethical sourcing and labour practices

3. Scope

This Policy applies to all CG Medical NSW Pty Ltd directors, employees, contractors, subcontractors, suppliers, and business partners, wherever they operate. It applies to all activities associated with the delivery of our services — including medical gas pipeline systems, biomedical equipment servicing, mechanical and mobility equipment, procurement of spare parts and equipment, and the engagement of subcontracted labour.

4. Definitions

For the purposes of this Policy, "modern slavery" has the meaning given in the Modern Slavery Act 2018 (Cth) and includes:

Term	Meaning
Slavery	The status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.
Servitude	The condition of a person who, while not a slave, provides labour or services under coercion and cannot leave.
Forced / Compulsory Labour	All work or service exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Deceptive Recruitment	Recruiting a person using deception or coercion, including about the nature of the work, conditions, or location.

Term	Meaning
Debt Bondage	A person's labour is pledged as security for a debt, where the debt is excessive or the terms unfair, effectively preventing repayment.
Child Labour	Work that deprives children of their childhood, potential, and dignity, and that is harmful to their physical or mental development.
Human Trafficking	The recruitment, transportation, transfer, harbouring, or receipt of persons by threat or use of force, coercion, or deception for exploitation.
Supply Chain	The network of organisations, people, activities, information, and resources involved in creating and delivering our products and services.

5. Our Structure, Operations & Supply Chains

CG Medical NSW Pty Ltd (ABN 64 231 066 431) is an Australian-registered company, headquartered in New South Wales, operating across NSW, Queensland, and Victoria. We are a 100% Indigenous-owned business and a Supply Nation Certified supplier of medical gas pipeline systems, biomedical and mechanical equipment servicing, and clinical asset management services to public and private hospitals, aged care facilities, dental clinics, and government facilities.

Our operations are predominantly service-based and delivered by Australian-based personnel and subcontractors. Our key supply chain categories include:

#	Supply Chain Category	Description
1	Medical gas equipment & components	Copper fittings, valves, manifolds, outlets, alarm panels, gas-specific probes (sourced from Australian distributors and OEMs)
2	Biomedical & mechanical equipment	Medical devices, dental equipment, spare parts (OEM and distributor supplied)
3	Consumables & PPE	Personal protective equipment, infection control consumables, tools and hardware
4	Subcontracted labour	Licensed tradespeople engaged for specialist installation or surge capacity
5	Logistics & freight	Delivery of equipment, cylinders, and parts (domestic carriers)
6	Facilities & professional services	IT, accounting, legal, insurance, and administrative support

6. Risk Assessment

CG Medical recognises that the risk of modern slavery is generally higher in supply chains involving overseas manufacturing, lower-skilled or migrant labour, and sectors with complex or opaque supply networks. Based on our assessment of our operations and supply chains, we have identified the following areas of elevated risk:

#	Risk Area	Risk Level	Rationale
1	Manufactured medical gas components & equipment (potential overseas manufacture)	Medium	Medical gas fittings, valves, and electronic equipment may be manufactured overseas where labour standards and oversight differ from Australia.
2	PPE, consumables & textiles (gloves, gowns, masks)	Medium	These categories have documented global modern slavery risk, particularly where manufactured in high-risk regions.

#	Risk Area	Risk Level	Rationale
3	Subcontracted labour (licensed trades)	Low–Medium	Predominantly Australian-licensed personnel; risk relates to on-hire arrangements and payment practices of third-party labour providers.
4	Direct employees	Low	Australian workforce engaged under Australian workplace law with formal employment agreements and fair pay.
5	Professional services (IT, accounting, legal)	Low	Australian-based, regulated professional service providers.

Overall, CG Medical's direct operations present a low risk of modern slavery. The principal residual risk lies in our goods supply chain (manufactured medical gas and biomedical components and consumables) where first-tier suppliers source from international manufacturers. Our focus is therefore on supplier due diligence, transparency, and preference for Australian and reputable international suppliers with robust ethical sourcing practices.

7. Due Diligence & Risk Management

CG Medical will take the following steps to identify, prevent, and mitigate modern slavery risks in our operations and supply chains:

#	Action	Responsibility
1	Maintain a register of approved suppliers and subcontractors, capturing country of origin, certifications, and modern slavery commitments	Procurement / Management
2	Prefer suppliers that demonstrate ethical sourcing practices, hold relevant certifications (e.g. ISO 27001, AS/NZS ISO 9001), and have their own modern slavery / ethical sourcing statements	Procurement
3	Include modern slavery clauses in supplier and subcontractor agreements, requiring compliance with this Policy and Australian modern slavery law	Management / Legal
4	Conduct risk-based assessments of new and existing suppliers, prioritising those in higher-risk categories or regions	Procurement / Management
5	Require suppliers to confirm (in writing) that their operations are free of modern slavery and that they uphold fair labour practices	Procurement
6	For overseas-sourced goods, seek supplier information about their supply chain labour standards and audit/assurance practices	Procurement
7	Engage subcontractors only after verifying licences, ABN, insurance, and fair payment arrangements	Management
8	Provide a clear and confidential channel for personnel and suppliers to raise concerns or report suspected modern slavery	Management
9	Respond promptly and proportionately to any identified or suspected instances of modern slavery, including terminating relationships where necessary	Director / Management

8. Roles & Responsibilities

Role	Responsibility
Director / Service Manager (C. Glasgow)	Owns this Policy. Ensures it is approved, communicated, resourced, and reviewed. Approves supplier actions and any response to modern slavery incidents.
Management	Implements this Policy in day-to-day operations. Oversees supplier onboarding, risk assessment, and subcontractor engagement. Reports on compliance.
Procurement / Accounts	Applies ethical sourcing criteria, maintains the supplier register, captures modern slavery commitments from suppliers and subcontractors.
All Personnel	Comply with this Policy, complete any required training, and report suspected modern slavery promptly and confidentially.
Subcontractors & Suppliers	Comply with this Policy and applicable law, uphold fair labour practices, provide requested assurance, and report concerns.

9. Training & Awareness

CG Medical will provide appropriate training and guidance to personnel involved in procurement, supplier management, and on-site operations so they can recognise the signs of modern slavery and understand how to raise concerns. Awareness material will be made available to subcontractors and suppliers as part of our onboarding process. This Policy will be communicated to all existing personnel and incorporated into the onboarding of new personnel, subcontractors, and suppliers.

10. Reporting & Concerns

Any person who suspects that modern slavery is occurring within our operations or supply chain, or who has a concern about our practices, is encouraged and expected to report it. CG Medical will treat all reports in confidence (where possible and consistent with a proper investigation) and will not tolerate retaliation against anyone raising a genuine concern.

Concerns can be raised through any of the following channels:

- Directly to the Director / Service Manager: C. Glasgow — service@cgmedical.com.au or 1300 154 583
- Through a supervisor or manager
- Anonymously in writing to CG Medical NSW Pty Ltd

Suspected criminal conduct, including modern slavery offences, may also be reported to the Australian Federal Police or the Australian Border Force. Where required by law, CG Medical will report suspected modern slavery to the relevant authority.

11. Compliance & Review

CG Medical will monitor the effectiveness of this Policy and the steps we take to address modern slavery risks. This Policy will be reviewed at least annually, or sooner if there is a material change to our operations, supply chains, or the legal/regulatory environment. Where CG Medical is required to report under the Modern Slavery Act 2018 (Cth), a Modern Slavery Statement will be prepared and submitted to the Australian Government's Modern Slavery Register. Even where not legally required to report, we will voluntarily apply the principles of this Policy and the Act as good governance practice.

12. Related Documents

#	Document
1	Code of Conduct
2	Whistleblower / Grievance Policy
3	Supplier & Subcontractor Agreement (with modern slavery clauses)
4	Procurement & Ethical Sourcing Procedure
5	WHS Management Plan

13. Approval

This Modern Slavery Policy is approved by the Director of CG Medical NSW Pty Ltd and takes effect from the issue date noted on the cover page.

Role	Name	Signature	Date
Director / Service Manager	C. Glasgow		6 July 2026

Review Record

Review #	Date	Reviewed By	Changes
1	6 July 2026	C. Glasgow — Director	Initial issue
2			
3			