



People caring for people

STATEMENT IN ACCORDANCE WITH THE *MODERN SLAVERY ACT 2015*

Introduction

Modern slavery, in particular human trafficking, is an international problem and takes a number of forms, including exploitation, forced labour and domestic servitude.

Modern slavery is the antithesis of The Ramsay Way and our entrenched philosophy of “People Caring for People”. We take our responsibility to play our part in eradicating modern slavery extremely seriously, as evidenced in the steps we have taken to combat this issue during FY2018 and as discussed below.

About Us

Ramsay Health Care was established by Paul Ramsay in Sydney, Australia, in 1964 and has grown to become a global hospital group operating over 230 hospitals and day surgery facilities across the United Kingdom, Australia, France, Indonesia and Malaysia. It is one of the top five private hospital operators in the world.

Ramsay Health Care facilities cater for a broad range of health care needs from day surgery procedures to highly complex surgery, as well as psychiatric care and rehabilitation. With circa 25,000 beds, the Company employs over 60,000 staff across five countries and treats almost 3 million patients each year.

Policies

The Company has in place a number of policies aimed at helping us to identify and mitigate the risk of modern slavery in our business and supply chains.

Ramsay Code of Conduct for Employees

The Ramsay Code of Conduct for Employees defines the standards of behaviour which are expected from all of those associated with the Company. The Code of Conduct sets out the Company’s expectations of how all representatives should behave towards everybody that the Company’s representatives come into contact with.

One of the principles of the Ramsay Code of Conduct for Employees is that the Company’s representatives must have “respect for others”, with complying with the laws and principles of human rights a specific example of how this principle is applied.

The Ramsay Code of Conduct for Employees provides that the Company’s representatives are obliged to raise concerns about breaches of the Code, including the “respect for others” principle. Employees are made aware of the policies and procedures available in each country (including whistleblower policies in Australia and the United Kingdom) the Company operates should they not feel comfortable in raising concerns with their manager or another senior person.

Ramsay UK relaunched the Ramsay Way, which has integrity at its core, across its entire business. During 2018 it held meetings with staff at its facilities, reminding them of the key principles of the Ramsay Way, encouraging staff to implement them.

Human Rights & Labour Policy

In FY2016, the Board of Ramsay Health Care adopted the [Ramsay Global Human Rights & Labour Policy](#). This Policy sets out the Company's commitment to operate in accordance with all key universal human and labour rights across each region in which the Company operates. Further, under this Policy, the Company expressly states that it:

- commits to the engagement of workers who have capacity, are of legal age to work and have the free will to consent to work;
- requires each of its regions and suppliers to implement employment/engagement practices to protect all persons who are not of legal age from working in the relevant jurisdiction; and
- requires each of its regions and suppliers to implement employment/engagement practices to protect the rights of every worker to voluntarily work under the terms and conditions offered, free of compulsion or coercion, and which, at a minimum, conform to universal human and labour rights and legislated employment standards in the relevant jurisdiction.

Code of Conduct for Agents, Manufacturers and Suppliers

Similar requirements are also expressed under the terms of the Company's [Code of Conduct for Agents, Manufacturers and Suppliers](#).

Dealing with suppliers

The Company has a zero tolerance approach to slavery and human trafficking from its suppliers. It makes clear its expectations of suppliers, including adherence to the Company's policies outlined above irrespective of whether it is an explicit contractual term. Nevertheless, the Company's general contracting policy is to always seek appropriate additional contractual provisions regarding compliance with the Company's policies and modern slavery laws.

The Company has a Supplier Due Diligence Programme that is used to 'on-board' new suppliers. Among other things, this Programme includes questions that focus on the supplier's modern slavery policies and practices. This way, the Company can ascertain what actions suppliers take to ensure that slavery and human trafficking do not occur in their businesses or supply chains.

Where suppliers are not able to satisfy us as to their compliance with our policies on modern slavery, the Company will, as a first step, endeavour to work with the supplier to help them improve their practices in this area. If there is an unwillingness from the supplier to engage with the Company on this issue in good faith or there is a lack of objective steps taken towards compliance, the Company will seek to sever ties with that particular supplier.

Linear Healthcare Group

In addition to owning and operating private hospital and health care facilities, the Company has a business, the Linear Healthcare Group, which supplies Linear branded medical device consumables. These products are principally manufactured in China and Taiwan.

Prior to the Linear Healthcare Group engaging a manufacturer to produce its products, appropriate due diligence is undertaken on the proposed manufacturer. Such due diligence includes site visits in order to gain an understanding of the conditions in which the Linear Healthcare Group's products are manufactured. All manufacturers are routinely inspected by representatives of the Linear Healthcare Group as part of its Manufacturer Audit Programme. Further, as with the Company's suppliers generally, the Linear Healthcare Group makes known Ramsay's zero tolerance approach to slavery and human trafficking to all of its manufacturers.

Risk Areas and Training

All of the Company's senior management are aware of the Company's policies relevant to the eradication of modern slavery, including the Ramsay Human Rights & Labour Policy and the Code of Conduct for Agents, Manufacturers and Suppliers.

The greatest risk within our business is in relation to the Company's suppliers (on the basis that the Company can only control its own actions). Training on modern slavery for the Linear Healthcare Group was undertaken in FY2018 while training was undertaken for the Company's procurement business units in FY2017 and will again be performed in FY2019. Among other things, the training sessions emphasise the importance of partnering with the Company's suppliers and manufacturers on the eradication of modern slavery, how purchasing practices can influence supplier actions, the need to look at second tier suppliers and what to do should slavery or human trafficking be suspected.

The Company will continue to undertake regular training on modern slavery, which will have regard to the Company's obligations under the newly passed *Modern Slavery Act 2018 (NSW)* as well as the proposed *Modern Slavery Bill (Cth)*, which is likely to become law during FY2019.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 (UK) and represents the Company's statement on modern slavery for the financial year ended 30 June 2018. It was approved by the Board of Ramsay Health Care Limited on 27 August 2018 and the Board of Ramsay Health Care (UK) Limited on 28 August 2018.



Craig McNally
CEO and Managing Director
Ramsay Health Care Limited
27 August 2018



Dr Andy Jones
CEO and Director
Ramsay Health Care (UK) Limited
28 August 2018