

***MODERN SLAVERY & HUMAN TRAFFICKING 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 FY2019 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 480 hospitals and day surgery facilities across the United Kingdom, Australia, France, Sweden, Norway, Denmark, Germany, 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. The Group employs over 77,000 staff across many countries and treats almost 8.5 million patients each year.

Structure

This statement relates to the responsibilities of Ramsay Health Care Limited (the ‘Company’) and all of its UK subsidiaries under the Modern Slavery Act (UK) 2015 (which, together with the Company, constitute the ‘Group’) ensuring that the Group follows similar policies and procedures to undertake effective steps to identify and root out contemporary slavery.

UK subsidiaries of Ramsay Health Care Limited (‘Ramsay UK’)

The following companies make up Ramsay UK:

Ramsay Health Care (UK) Limited;
Ramsay Health Care (UK) No. 1 Limited;
Ramsay Health Care Holdings UK Limited
Ramsay Health Care Operations (UK) Limited;
Westbourne Centre Birmingham Limited;
Clifton Park Hospital Limited;
Exeter Medical Limited; and
Independent British Healthcare (Doncaster) Limited.

There is a strong emphasis on adhering to and upholding the Ramsay Way within Ramsay UK. Leadership levels are required to ensure that staff are committed to integrity, ownership, positive spirit, innovation and team work strengthening Ramsay's holistic management of human rights and position against Modern Slavery.

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.

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 Group. The Code of Conduct sets out the Group's expectations of how all representatives should behave towards everybody that the Group's representatives come into contact with.

One of the principles of the Ramsay Code of Conduct for Employees is that Ramsay Health Care'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 Group'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) in which the Group operates, should they not feel comfortable in raising concerns with their manager or another senior person.

Ramsay UK has a broad range of Human Resource policies which act as continuing guidelines for managing employees. Ramsay UK held meetings with staff throughout the year at all of their facilities, reminding them of the key principles of the Ramsay Way.

Human Rights & Labour Policy

In FY2016, the Board of Ramsay Health Care adopted the [Ramsay Global Human Rights & Labour Policy](#). This Policy was updated in FY2019 and 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.

Ramsay UK's Equality and Human Rights policy promotes the understanding that human rights should be at the centre of everything Ramsay does and implements the practices required by Ramsay Global Human Rights & Labour Policy.

Code of Conduct for Agents, Manufacturers and Suppliers

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

The following Ramsay UK procurement policies demonstrate Ramsay's commitment to fair and ethical business practices:

- Company Representatives Policy
- Trial and Evaluation of Medical Equipment Policy
- Commercial Confidentiality Policy
- Supply of Goods Policy

Dealing with suppliers

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

The Group has a Supplier Due Diligence Programme that is used to 'on-board' new suppliers which includes obtaining copies of the supplier's codes of conduct. Among other things, this Programme includes questions that focus on the supplier's modern slavery policies and practices. This way, the Group 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 Group will, as a first step, endeavour to work with the supplier to help them

improve their practices in this area. If there is unwillingness from the supplier to engage with the Group on this issue in good faith or there is a lack of objective steps taken towards compliance, the Group will seek to sever ties with that particular supplier.

Ramsay UK updated its Gifts & Entertainment policy during the year, which entails a robust approval process for all staff containing clear guidance on accepting and/or offering gifts and entertainment and the potential consequences for non-compliance. It is believed that the policy assists with ensuring that suppliers are held at arm's length and governance processes are active.

Risk Areas and Training

All of the Ramsay Group's senior management should be aware of the Group'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 Group's suppliers (on the basis that the Group can only control its own actions). Training on modern slavery has been undertaken for the Group's procurement business units in previous years and will again be performed in FY2020. Among other things, the training sessions emphasise the importance of partnering with the Group'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.

Modern Slavery is specifically covered in Ramsay UK's mandatory Safeguarding training. Human rights training is covered in the mandatory e-learning 'Equality, Discrimination and Human Rights'. These trainings are updated and required on a yearly basis.

The Group will continue to undertake regular training on modern slavery, which will have regard to the Group's obligations under the newly passed *Modern Slavery Act 2018 (NSW)* as well as the *Modern Slavery Act 2018 (Cth)* in addition to the requirements of the *Modern Slavery Act 2015 (UK)*. Ramsay Health Care will issue its first Modern Slavery Statement under Australian law with respect to FY2020.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 (UK) and represents the Group's statement on modern slavery for the financial year ended 30 June 2019. It was approved by the Board of Ramsay Health Care Limited on 27 August 2019 and the Board of Ramsay Health Care (UK) Limited on 19 July 2019.



Craig McNally
CEO and Managing Director
Ramsay Health Care Limited
27 August 2019



Dr Andy Jones
CEO and Director
Ramsay Health Care (UK) Limited
19 July 2019