



Ramsay
Health Care

Modern Slavery Statement 2025

People
Caring for
People

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Important notice and disclaimer

This document is a joint Modern Slavery Statement (Australia) and Slavery and Human Trafficking Statement (UK) (together, the **Statement**) in relation to the reporting period from 1 July 2024 to 30 June 2025 (**reporting period** or **FY25**).

The Statement reflects the activities of Ramsay Health Care Limited and its subsidiaries. It does not cover entities for which Ramsay does not have operating control, such as our non-operated joint ventures.

Ramsay has prepared this Statement based on information available at the time of preparation. This Statement contains forward-looking statements relating to Ramsay's policies and practices with respect to modern slavery risk management, including statements of current intention and expectation and statements of opinion. Except as required by applicable laws or regulations, Ramsay does not undertake to publicly update or review any forward-looking statements.

Undue reliance should not be put on forward-looking statements and any such statements are not guarantees or predictions of future performance. Certain information contained in this Statement is based on information provided by third parties and Ramsay is not responsible for this third-party material and does not make any representation or warranty that it is accurate, complete, or up to date.

In this Statement, unless otherwise noted, references to:

- **'Ramsay', 'Ramsay Group', 'Group', 'we', 'us', 'our'** and other similar expressions refer to Ramsay Health Care Limited and its subsidiaries;
- **'Ramsay Australia'** means Ramsay Health Care Limited and the other Australian Reporting Entities (defined in Appendix 1);
- **'Ramsay UK'** means Ramsay Health Care (UK) Limited and its subsidiaries, including the Ramsay UK Reporting Entities (defined in Appendix 1);
- **'Elysium Healthcare'** means Ramsay Elysium Holdings Limited and its subsidiaries, including the Elysium Reporting Entities (defined in Appendix 1); and
- **'Ramsay Santé'** means Ramsay Générale de Santé and its subsidiaries.

About this Statement

This joint Statement is made pursuant to section 14(1) of the *Australian Modern Slavery Act 2018* (Cth) (**Australian MSA**) and section 54(1) of the *UK Modern Slavery Act 2015* (**UK MSA**) and details the steps we took during FY25 to identify, assess and address modern slavery risks, including the governance processes and progress in our operations and supply chains.

The table below outlines where in this Statement we have addressed the reporting criteria under the Australian MSA and UK MSA.

Australian MSA mandatory reporting criterion	UK MSA recommended reporting criterion	Section
Identify the reporting entity and describe its structure, operations and supply chains	Organisation's structure, its business and supply chains	'Reporting entities' p 2 , 20 'About Ramsay' p 4 - 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	'Modern slavery risks in our operations and supply chain' p 7 - 9
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff	'Actions to assess and address our modern slavery risks' p 10 - 17
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	'Assessing effectiveness of our actions' p 18
Describe the process of consultation with any entities the reporting entity owns or controls		'Consultation' p 19
Any other relevant information		'Our objectives – progress and future plans' p 19

Reporting entities

This Statement is submitted by Ramsay Health Care Limited (ACN 001 288 768) as the parent entity of the Ramsay Group. The Statement is made on behalf of the entities outlined in Appendix 1, including Ramsay Health Care Limited, which are considered reporting entities under the Australian MSA and UK MSA.

Approvals

This statement was prepared in consultation with each reporting entity and has been approved by the Board of:

- Ramsay Health Care Limited, on behalf of itself and each of the Australian Reporting Entities, on 27 November 2025. Ramsay Health Care Limited's approval was given as the 'higher entity' within the meaning of section 14(2)(d)(ii) of the Australian MSA;
- Ramsay Health Care UK Operations Limited on 27 November 2025; and
- Elysium Healthcare Limited and Elysium Healthcare No.2 Limited on 1 December 2025.



Natalie Davis
Group CEO & Managing Director
Ramsay Health Care Limited
27 November 2025



Nick Costa
Director
Ramsay Health Care UK Operations Limited
9 December 2025



Colin McCready
Director
Elysium Healthcare Limited
Elysium Healthcare No.2 Limited
1 December 2025

Message from our Group CEO & Managing Director



Ramsay Health Care is proud to publish our sixth joint Modern Slavery Statement. Our purpose – *people caring for people* – shapes how we operate, make decisions and partner with others. Caring for people means respecting and protecting the dignity and rights of everyone connected to our organisation, not only our patients and employees but also those within our broader supply chains and communities.

Modern slavery has no place in our operations or supply chains. We recognise the scale and complexity of this challenge, particularly given our reliance on more than 20,000 suppliers across over 40 countries. Many of these relationships are within the healthcare sector, where supply chains for medical devices, equipment and consumables are extensive and global.

Ramsay's role as a leader in healthcare carries both responsibility and influence. We continue to strengthen our approach through improved governance, supplier engagement and cross-sector collaboration. This includes working closely with our industry partners to identify and address risks and to encourage higher standards of transparency and accountability.

Over the past year, we have continued to integrate human rights considerations into our broader sustainability and procurement practices, supported by clear oversight from our Group Executive and Board. Our focus remains on continuous improvement and on sharing insights across our regions to drive consistent global standards.

Modern slavery is a complex and evolving issue but we believe that progress is made through care, commitment and collaboration. By working together, we can have greater impact and help protect the rights of people across our supply chain.

Key highlights in FY25

- Expanded our modern slavery due diligence by launching the FairSupply Modern Slavery Questionnaire as part of our broader Responsible Sourcing Program, adding another tool to assess supplier risk and support compliance with the Australian and UK Modern Slavery Acts
- Reviewed and updated key governance policies, that support our modern slavery management framework, including our Global Responsible Sourcing Policy and Group Whistleblower Policy
- Commenced an external review of our Modern Slavery Statement and refreshing our human rights and modern slavery assessment



About Ramsay

Our structure

Ramsay Health Care Limited (ACN 001 288 768) is the ultimate parent company of the Ramsay Group and is headquartered in Sydney, Australia. Ramsay Health Care Limited is a for-profit company limited by shares, incorporated in Australia and its shares are listed on the Australian Securities Exchange (**ASX**) (ticker: RHC). Ramsay was founded in 1964 by Paul Ramsay AO (1936-2014) and is led by the Board and executive management team.

As at 30 June 2025, the Group had operations across Australia, the United Kingdom and Europe. Ramsay Health Care owns 52.79% of Ramsay Santé which is listed on the European financial markets' platform Euronext. Through its 5 positions on the Ramsay Santé Board, Ramsay seeks to enhance Ramsay Santé's governance processes, including in relation to addressing human rights and modern slavery risks.

Ramsay Santé is supported by its own policies and procedures in relation to human rights, in accordance with the French law on the duty of vigilance. For further information please refer to page 16 and [Ramsay Santé's Universal Registration Document](#).

For a full list of Ramsay's controlled entities, including foreign subsidiaries, see the 'Consolidated Entity Disclosure Statement' in the [2025 Annual Report](#). More information on the Group's organisational structure and governance can also be found in the [2025 Annual Report](#) and [2025 Corporate Governance Statement](#), available on our website.

Portfolio of services

Ramsay is known for its excellent hospitals and clinics, providing for a wide range of integrated health services and outstanding patient care. Acute and sub acute care are the core of our activities.

	Primary Care	Imaging & Diagnostics	Out of hospital		Acute care/Sub-acute ³			Mental Health Care				Pharmacy
	Clinics	Adjacent services in hospital & out of hospital ¹	Home care/residential care	Allied Health ²	Hospital	Day Surgery Centre	Emergency Centre	Rehab Recovery	MH ⁴ Facility	LD ⁵ Complex Care	Neuro	Pharmacy
Australia			●	●	●	●	●	●	●		●	●
UK		●	●		●	●		●	●	●	●	
France	●	●	●	●	●	●	●	●	●			
Sweden	●	●	●	●	●	●	●	●	●			
Norway	●	●		●	●	●	●	●	●			
Denmark	●			●	●	●	●					
Italy					●							

Our people

Ramsay's success is built on the skill, care and commitment of its people. As at 30 June 2025, Ramsay directly employed more than 90,000 people across eight countries. A summary of our workforce is below.

Workforce breakdown as at 30 June 2025

		Total employees as at 30 June 2025
Ramsay Australia	Australia	34,948
Ramsay UK	UK-acute	7,901
	Elysium	9,703
Ramsay Santé	France	28,037
	Nordics	12,241
Group		92,830

Employee distribution by contract type as at 30 June 2025

		Full time	Part time	Casual
Ramsay Australia	Australia	21%	48%	31%
Ramsay UK	UK-acute	56%	19%	25%
	Elysium	75%	13%	12%
Ramsay Santé	France	72%	17%	11%
	Nordics	63%	32%	5%
Group		51%	30%	19%

1. Includes pathology

2. Allied Health includes HealthPlus, psychology Clinics

3. Sub-acute care includes cancer, gastrointestinal, rehabilitation

4. MH: Mental Health

5. LD: Learning Disabilities

Our operations

Ramsay provides high quality healthcare through a multinational network of hospitals and clinics providing clinical practice, teaching and research. Ramsay's operations extend across eight countries, with over 14 million annual admissions and patient visits to facilities in more than 530 locations. A summary of the Ramsay Group's operations is outlined below.

Ramsay Santé

 France	 Norway	 Sweden
 Denmark	 38,000	
 Italy	 488	
	 13,000,000	





Ramsay Santé:

- is a leading private care provider in Europe operating 488 facilities, hospitals, specialised clinics, primary care centres and imaging and radiotherapy centres across five countries in Europe. The imaging services are provided by joint-venture arrangements. In France, Ramsay Santé has a market leading position in acute care and mental health facilities. In Denmark, Norway and Sweden, Ramsay Santé operates facilities including primary care units, specialist clinics and hospitals. Ramsay Santé also operates a 93-bed hospital in Italy. Ramsay Santé treats more than 13 million patients each year and employs more than 38,000 employees.

Ramsay UK

 England
 7,500
 34
 200,000

Elysium

 England & Wales
 9,000
 80
 2,400

Ramsay UK and Elysium:

- Ramsay UK operates 34 acute hospitals and day procedure centres in England providing a comprehensive range of clinical specialties and a diagnostic imaging service. Ramsay UK's services are also primarily delivered through wholly-owned subsidiaries of the Group, with controlled joint venture arrangements operating Clifton Park Hospital. Ramsay UK also has financial interests in non-controlled joint ventures. Ramsay UK cares for over 200,000 patients annually and employs more than 7,500 people.
- Elysium Healthcare is a leading independent provider of specialist mental health and care services across England and Wales. Elysium Healthcare operates more than 80 sites, with approximately 2,400 beds and employing more than 9,000 people.

Ramsay Australia

 Australia
 34,000
 74
 1,000,000

Ramsay Australia:

- Australia's largest private hospital operator, operating 74 hospitals, clinics and day surgeries across Australia, including two public facilities. Beyond its hospital network, Ramsay's Australian business also includes mental health, home health, allied health (Ramsay Health Plus) and pharmacy services. Ramsay Australia admits more than one million patients annually and employs more than 34,000 people nationally.
- operates Linear Medical (**Linear**), supplying Linear branded medical consumables. Linear manages sourcing and suppliers predominantly based in China and Taiwan and distributes Linear consumables within Australia (including to Ramsay Australia's operations).
- services are primarily delivered through wholly-owned subsidiaries of the Group, with controlled joint venture arrangements controlled by Ramsay operating same day surgery and day procedure centres. Ramsay Australia also has financial interests in non-controlled joint ventures that provide complementary health services, for example in radiology units and cancer treatment/services. Ramsay Australia's key non-controlled joint venture is Ramsay Home Health, which offers a range of in-home care services including rehabilitation, hospital care at home and virtual heart failure services.

Our supply chain

Ramsay's supply chain is large, complex and evolving. We rely on our direct suppliers (i.e. Tier 1) to provide a variety of goods and services to Ramsay. In turn, these Tier 1 suppliers source materials, components and products from their suppliers (i.e. our Tier 2 suppliers) which, in turn source materials from their suppliers (i.e. our Tier 3 suppliers), and so on. Moving across the supply chain, visibility of their operations and supply chain becomes progressively more challenging.

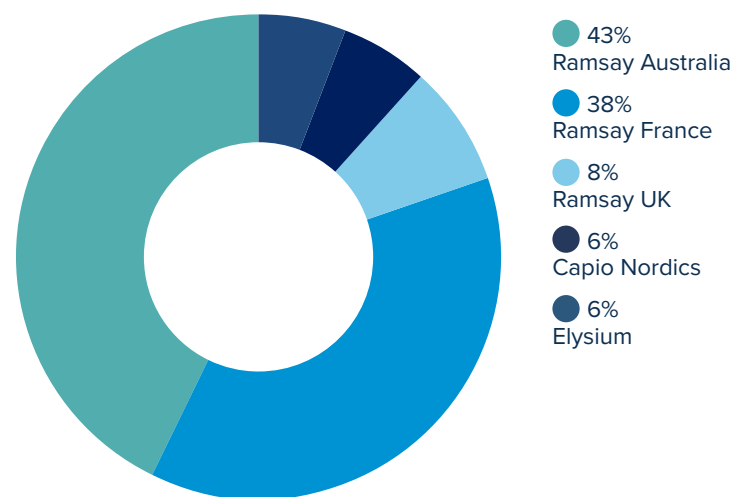
As an end user of goods and services, Ramsay is a downstream company in the supply chain. Most of our engagement and contracting is directly with our Tier 1 suppliers that provide the finished goods and services used every day in our hospitals, clinics and other facilities. These suppliers range from large international corporations to small businesses.

In FY25, the Ramsay Group directly engaged with over 20,000 Tier 1 suppliers which accounted for a global spend of AU\$6.6bn. Underpinning our top 10 Tier 1 clinical and pharmaceutical suppliers were more than 270,000 Tier 2 suppliers.

See page 9 for further detail about Ramsay's supply chain in FY25.

FY25 Ramsay Group supply chain overview

Ramsay spend by business unit



Over
\$6.6bn
spend in FY25

Over
20,000
direct suppliers

Clinical and non-clinical
spend categories

Tier one and tier two sourcing
from over 50 countries

Ramsay Australia
Over 10,000 suppliers

Ramsay France
Over 5,000 suppliers

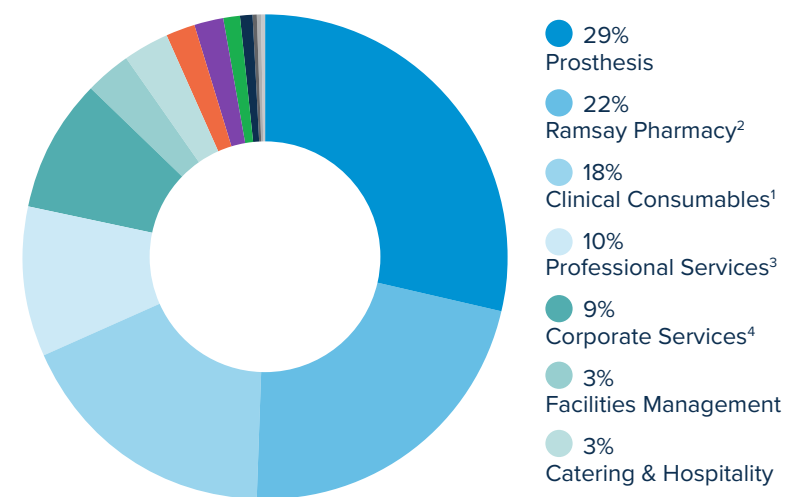
Ramsay UK
Over 2,500 suppliers

Capio Nordics
Over 250 suppliers

Elysium
Over 2,250 suppliers

Deep dive into Ramsay Australia's FY25 supplier spend

Ramsay Australia direct supplier spend by sub-category



Over
\$2.8bn
spend in FY25

Over
10,000
direct suppliers

Clinical and non-clinical
spend categories

Global Supply
Chain

1. Clinical Consumables includes orthopaedic supplies, coronary care & catheters, medical instruments, sutures, intravenous supplies, robotic consumables and general medical supplies.
2. Ramsay Pharmacy relates to pharmaceutical spend within the Ramsay Pharmacy business unit including compounded products, intravenous drugs, oral solid dose, S3 medications, over the counter medications and pharmacy retail items.
3. Professional Services includes spend for construction, builders, architects, planning, project management, furniture and fittings.
4. Corporate Services includes spend for nursing agency, laundry services, cleaning services, office suppliers, medical equipment maintenance, patient transport, uniforms and travel.
5. Hospital Pharmaceuticals spend relates pharmaceutical spend within Ramsay's Australian facilities.

Modern slavery risks in our operations and supply chain

Ramsay is a member of the United Nations Global Compact and our understanding of the modern slavery risks in our operations and supply chain is informed by the United Nations Guiding Principles on Business and Human Rights (**UN Guiding Principles**), including the 'continuum of involvement'¹. This explains that companies may be involved in potential or actual human rights impacts such as modern slavery, by causing, contributing to, or being directly linked to it.

In FY25, the 'cause, contribute and direct lineage' continuum informed our modern slavery risk assessment. Our assessment indicates Ramsay is more likely to be directly linked to modern slavery impacts in our identified risk areas, through our global supply chain and business relationships, rather than causing or contributing to them. This is reflected in 'responsible sourcing' being a material issue for the Group and expectations of our suppliers, articulated through our [Global Responsible Sourcing Policy](#).

However, we acknowledge there is a potential risk we might cause or contribute to modern slavery if the risk management controls outlined in this Statement were not in place.

Within our supply chain, Ramsay's Tier 1 suppliers generally present a lower risk for modern slavery practices as they are typically multinationals headquartered in countries that are considered 'low risk' for modern slavery practices², with strong laws and regulations, including in relation to modern slavery, human rights and/or labour (e.g. Australia, USA, EU, NZ and the UK). Due to this lower-risk profile in our Tier 1 suppliers, we are more likely to be exposed to modern slavery risks through our Tier 2 and beyond suppliers. These main risks are described in the table, with further detail provided in the infographic on page 9.





We have a range of systems that help us monitor modern slavery risks within our operations and supply chain. This includes supply chain and due diligence tools, such as FairSupply, ARCUS and EcoVadis, which help us identify potential modern slavery risks within our suppliers.

Using these tools, in FY25, we applied four key modern slavery risk factors to assess the modern slavery risks to our operations and supply chain:

- **country/region**
- **procurement categories/sectors**
- **business models**
- **vulnerable populations**







We also identified potential modern slavery risks through insights drawn from other supplier due diligence processes (described on pages [14](#) and [15](#)), adverse media, participation in human rights and anti-modern slavery forums and stakeholder (including supplier) engagement.

Ramsay's main modern slavery risks:

Risk area	Why it is a risk area
OPERATIONS	
 Recruitment, agency labour contractors and independent services (such as locums and doctors)	<p>Use of third-party labour hire companies may increase the risk of modern slavery as we have reduced visibility and control over recruitment practices and individuals not directly employed by Ramsay.</p> <p>Potential modern slavery risks identified include: debt-bondage, forced labour and deceptive recruiting.</p>
 Acquisition of health care and allied goods and services businesses	<p>Acquisition of businesses and/or business partnerships may expose Ramsay to modern slavery risks.</p>
SUPPLY CHAIN	
 Medical consumables (e.g. surgical instruments)	<p>Ramsay's Tier 2 and beyond suppliers manufacture or source products from countries³ associated with moderate or higher risks of labour exploitation, hazardous working conditions due to political instability, poor governance, low levels of regulation and poverty. In addition, there may be inherent modern slavery risks associated with these products as they are typically sourced in bulk at low cost and with tight delivery time frames. Manufacturing and production of these products also often relies on low-skilled and migrant workforce.</p> <p>Potential modern slavery risks identified include: child labour, forced labour, debt bondage, substandard or exploitative working condition, excessive overtime, poor governance, low levels of regulation and poverty.</p>
 Medical equipment, devices and medical implants (non-medical consumables)	<p>Ramsay's Tier 1 suppliers have manufacturing facilities in countries⁴ associated with moderate or higher risks of modern slavery. In addition, our Tier 2 and beyond suppliers are also multinationals with facilities (for manufacturing, assembly, distribution or sterilisation) located in high-risk countries⁵.</p> <p>Potential modern slavery risks identified include: child labour, forced labour, debt bondage, substandard or exploitative working condition, excessive overtime, poor governance, low levels of regulation and poverty.</p>

1. Guiding Principle 13 of the UN Guiding Principles.
2. Walk Free 2023, [The Global Slavery Index 2023](#), Minderoo Foundation.

3. Ibid.
4. Ibid.
5. Ibid.

Risk area	Why it is a risk area
 Vaccines and pharmaceuticals	<p>We purchase vaccines and pharmaceuticals in two ways:</p> <ul style="list-style-type: none"> through Tier 1 multinational suppliers which are lower risk for modern slavery practices⁶. However, these multinationals also have manufacturing facilities in countries with a higher risk of modern slavery practices⁷; and through a Tier 1 local distributor that sources from multinational suppliers (i.e. Ramsay's Tier 2 suppliers). Those Tier 2 suppliers are lower risk for modern slavery practices as they are headquartered in countries with modern slavery, human rights and/or labour laws. <p>Potential modern slavery risks identified include: child labour, forced labour, low-skilled and low-wage labour, debt bondage, substandard or exploitative working conditions, excessive overtime and substandard accommodation.</p>
 Uniforms, textiles, branded apparel	<p>Ramsay's Tier 2 and beyond suppliers manufacture or source products from countries⁸ associated with higher risks of modern slavery.</p> <p>Potential modern slavery risks identified include: child labour, forced labour, low-skilled and low-wage labour, excessive overtime, debt bondage and deceptive recruitment.</p>
 IT / Telecommunications	<p>IT / telecommunication productions may be produced by low-skilled and low-wage labour, which may include vulnerable workers. IT product and their components are often manufactured and mined in high-risk countries.</p> <p>Potential modern slavery risks identified include: forced labour, excessive overtime, debt bondage, and deceptive recruitment.</p>
 Facility services and management (utilities, food and catering, security, waste, laundry, cleaning)	<p>This sector remains at higher risk of modern slavery practices due to the involvement of low-skilled and low-wage labour, high reliance on migrant and temporary labour from low-English speaking countries.</p> <p>Potential modern slavery risks identified include: debt bondage, excessive overtime, dangerous or sub-standard working conditions, use of migrant labour, low-skilled workers, international students and temporary workers on short term contracts.</p>
 Building and construction	<p>While our facilities are not built or constructed in countries that are considered 'higher risk' for modern slavery practices⁹, there is an inherent modern slavery risk within the building and construction industry. The construction industry's high reliance on sub-contractors or agency labour, concentration of migrant labour, as well as the raw materials, inputs and cost and time schedule pressures, creates a complex multi-tiered, poorly visible supply chain.</p> <p>Potential modern slavery risks identified include: use of migrant labour, excessive working hours, debt bondage, wages below minimum wage requirements, hazardous working environments and deceptive and dangerous practices.</p>
 Renewable energy projects (e.g. solar panels)	<p>Ramsay's Tier 2 and beyond suppliers are manufacture or source inputs for renewable energy projects from countries considered higher risk for modern slavery practices¹⁰. The manufacturing process for solar panels also poses higher risks of labour exploitation, with inherent risks of forced labour due to the use of raw material polysilicon which is an essential component in the manufacturing process of solar panels.</p> <p>Potential modern slavery risks identified include: forced labour, debt bondage, substandard or exploitative working condition, excessive overtime and substandard accommodation.</p>

6. Ibid 7. Ibid 8. Ibid 9. Ibid 10. Ibid

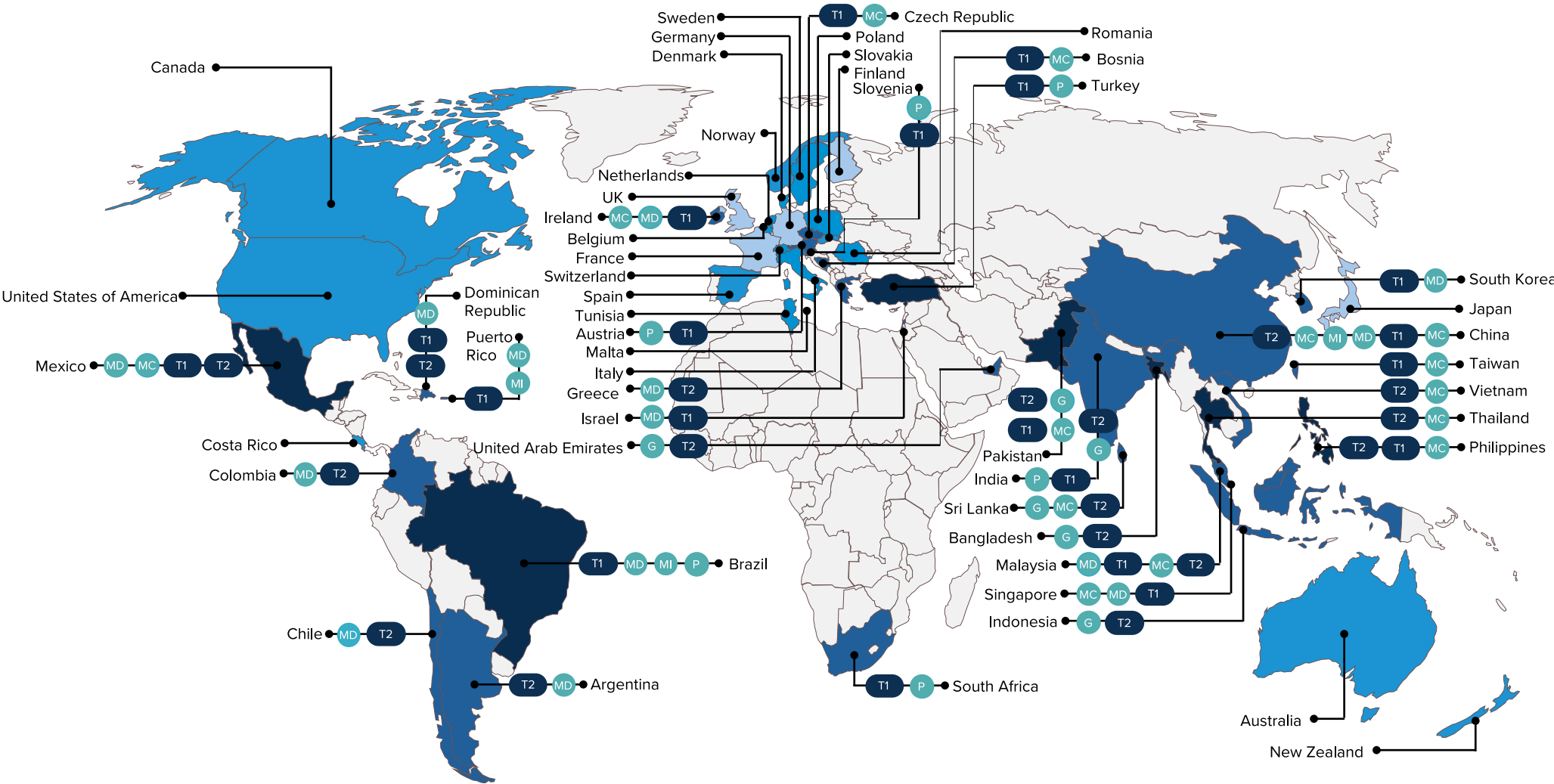
Our role as a healthcare provider

Ramsay recognises the potential for modern slavery risks to be present in our patient and customer population. For example, Ramsay's provision of healthcare services (particularly at our emergency centres or Elysium Healthcare's child and adult eating disorder units) may involve interaction with vulnerable individuals, who could be at risk of modern slavery or other human rights concerns.

Whilst this is considered a lower risk due to the nature of Ramsay's operations in the healthcare sector, Ramsay still assesses modern slavery risks in its role as a healthcare provider through our commitment to patient safety. For example, patient health assessments are conducted on entry to Ramsay Australia facilities and there are mandatory reporting obligations if our employees become aware of child safety related concerns. Similar patient assessments and safeguarding practices are implemented in Ramsay UK and Elysium Healthcare to support the protection of adults and children from harm and maltreatment. Ramsay UK and Elysium Healthcare clinical employees are trained in safeguarding, and incidents are reported to the National Safeguarding Leads. Across the regions, patient rights and safety charters, procedures and policies have also been implemented.

Overview of Ramsay's FY25 global supply chain landscape

Ramsay has a range of tools and systems that help us monitor modern slavery risks within our supply chain, including the EcoVadis IQ risk mapping platform. The map below provides an overview of the countries where Ramsay's FY25 suppliers are located, identifying the key categories of goods Ramsay sourced in this period from Tier 1 and/or Tier 2 suppliers in higher risk areas. Note, all risk ratings are based on the EcoVadis IQ risk mapping platform, except for our suppliers in Vietnam, Tunisia, United Arab Emirates where the risk rating is based on the Walk Free Foundation's Global Slavery Index 2023.



Actions to assess and address our modern slavery risks

Ramsay takes a systematic approach to managing modern slavery and human rights risks in our operations and supply chain. This includes undertaking due diligence to identify and address modern slavery risks across our operations and supply chains, as well as training and reporting. This section outlines our key systems and actions implemented.

Modern slavery risk governance

Ramsay Health Care Board

Ultimately responsible for overseeing performance and operations of the Group, setting the Group's values and governance framework and monitoring Ramsay's culture and compliance in accordance with our Code of Conduct. This includes oversight of our approach to human rights, which includes modern slavery, and approval of our annual Modern Slavery Statement.

Risk Management Committee (RMC)

Assists the Board and has responsibility for overseeing material social risks, including modern slavery and human rights, as well as reviewing the Group's risk management framework.

People and Remuneration Committee (PRC)

Assists the Board and has responsibility for people management. For example, the PRC's responsibilities include monitoring corporate culture and alignment with the Group's purpose and values, including through engagement survey results.



Group Leadership Team (Group Executive)

Meets at regular intervals throughout the year to discuss a broad range of company related topics, including receiving updates on human rights and modern slavery risks from the business. The Group Executive also reviews and endorses the Modern Slavery Statement.



Group Sustainability Committee

Supports the Group Executive, focusing on the delivery of the Ramsay Cares strategy, which includes our commitment to people and community. The Committee consists of the Group Executive People & Sustainability, the Group Sustainability Officer, Regional Sustainability Leads and Group Finance, and Risk and Procurement representatives. Subject matter experts, legal and strategy-level leads are invited to Committee meetings as required to inform the Committee about human rights related matters.



Modern Slavery Working Group

Cross-functional group, comprised of representatives of each region and functions including Procurement, Risk, Legal and Sustainability. The Working Group provides a platform for knowledge sharing of human rights related matters across the Group and is responsible for the development of the annual Modern Slavery Statement and helping to manage the Group's modern slavery risks. The Working Group meets periodically (as required). Please see the 'Consultation' section for further details.



Group Functions and Business Units

Responsible for delivery of Ramsay's human rights and modern slavery risk management processes in our operations and supply chains.

Policies and related documents

Ramsay has a framework of Group-wide policies outlining our commitment to human rights, and expectations of our people and suppliers. These documents are supported by a range of other policies, procedures and processes such as our Gifts and Hospitality Policy, Diversity and Inclusion Policy and Risk Management Framework. In addition, Ramsay UK has implemented several other relevant policies, including the New Supplier Creation Policy and its supplier Terms and Conditions require adherence to Ramsay policies and the Supplier Code of Conduct. Elysium Healthcare has also implemented a Procurement Policy and Environmental, Social and Governance Policy. The most relevant Group policies to mitigating risks of modern slavery in our operations and supply chain are outlined below.

Code of Conduct »

PURPOSE

Outlines Ramsay's expectations of our people (including contractors) with regard to behaviour, including ethics, integrity, respecting human rights and reducing risks of modern slavery. The Code also sets out Ramsay's commitment to providing a working environment where everyone receives fair and just treatment and is free from discrimination, bullying and harassment.

IMPLEMENTATION AND MONITORING

- Applies to all our employees, volunteers and Directors. The Code also includes our expectation of contractors, consultants, visiting medical officers and others to follow the Code in connection with their work with us.
- Employees are required to complete annual training (on induction and refresher) on the Code of Conduct, as well as on Appropriate Workplace Behaviour.
- The Code is available on our public website and intranet.
- Material breaches of the Code are reported to the RMC.

Global Human Rights and Labour Policy »

PURPOSE

Outlines Ramsay's commitment to operate in accordance with all key universal human and labour rights across our regions globally. Ramsay expressly prohibits forced labour, child labour and modern slavery.

Our operations

In relation to managing modern slavery risks within our people, the Policy outlines Ramsay's commitments, including regarding:

- **conditions of employment**, including only engaging workers who have capacity, are of legal age to work and have the free will to consent to work;
- **industrial rights**, including respecting the right of workers to freedom of industrial association and collectively bargain their terms and conditions of employment, in accordance with applicable laws; and
- **fair working conditions and labour standards**, including delivering terms and conditions of employment consistent with applicable laws and human and labour rights; as well as monitoring working hours and taking measures to reduce excessive working hours (where identified).

Our supply chain

Ramsay works with our partners and suppliers to reduce the risk of modern slavery and labour-related harm across our operations and supply chain. The Policy articulates Ramsay's expectation that our partners and suppliers share our commitment to upholding universal human and labour rights and reducing the risks of modern slavery.

IMPLEMENTATION AND MONITORING

- Applies to all our employees, Directors, consultants, temporary and agency staff, volunteers, students, suppliers and employees of suppliers.
- The Policy is available on our public website and intranet.
- Ramsay's due diligence processes monitor compliance with this Policy.
- The Policy is reviewed at least every two years by the People and Remuneration Committee and the Board.
- Material breaches of the Policy are reported to the RMC.

Global Responsible Sourcing Policy »

PURPOSE

Outlines Ramsay's commitment to responsible sourcing practices and approach to identifying and managing risks in our global procurement activities, including modern slavery risks.

The Policy sets out the behaviour and standards that we expect all our suppliers to uphold. Ramsay may require its suppliers to complete a corporate social responsibility assessment conducted by an independent third-party such as EcoVadis or FairSupply. Suppliers are expected to implement their own systems, processes and policies to ensure compliance with this Policy as a condition of doing business with Ramsay.

The Policy is a key element of Ramsay's Responsible Sourcing Framework and has been adopted or referenced by Ramsay's regional teams across Australia, the UK and Europe.

Supporting the Global Responsible Sourcing Policy, Ramsay developed a **Procurement Roles and Responsibilities Matrix**. The Matrix defines and cascades responsibilities and accountabilities for human rights and modern slavery risk management throughout the Group at the executive, management and team levels.

IMPLEMENTATION AND MONITORING

- Applies to all our suppliers, including their subcontractors, representatives and agents. The Policy is available on our public website and intranet.
- Compliance with this Policy is monitored through the Ramsay Responsible Sourcing Program.
- The Policy is reviewed at least every two years by the RMC and the Board. The Policy was reviewed during the reporting period and determined to be fit for purpose.
- Material breaches of the Policy are reported to the RMC.

Whistleblower Policy »

PURPOSE

Outlines how people can report concerns at Ramsay about improper conduct, including modern slavery in our operations and supply chains, as well as breaches of Ramsay's policies such as the Code of Conduct and Human Rights and Labour Policy. Reports can be made on an anonymous basis and there are protections available for those who make a report.

IMPLEMENTATION AND MONITORING

- Applies to all current and former employees, Directors, associates, suppliers, and their spouses, relatives and dependents.
- The Policy is reviewed periodically by the RMC and Board. The Policy was reviewed and updated during FY25.
- Key individuals, including Eligible Recipients under the Policy, receive periodic training on the Policy.
- The Policy is available on our public website and intranet. A link to our [whistleblower hotline](#) is also included in other Group policies, such as the Code of Conduct, Global Responsible Sourcing Policy and Global Human Rights and Labour Policy.
- Compliance with this Policy is monitored by the RMC, with the RMC receiving quarterly updates on any significant breaches.

Global Anti-Bribery and Corruption Policy »

PURPOSE

Outlines Ramsay's policy to conduct its business in an open, honest, fair and ethical way and sets out the responsibilities of all employees and associates (including contractors and joint venture partners) in observing and upholding this position. The Ramsay Board and senior management are committed to preventing bribery and corruption and to fostering a robust culture of integrity at Ramsay.

The Policy articulates that Ramsay takes a zero-tolerance approach to all instances of bribery and corruption and requires our people to act professionally, fairly and with integrity at all times.

IMPLEMENTATION AND MONITORING

- Applies to the Group, all employees, associates and controlled entities.
- The Policy is available on our public website and intranet.
- The Policy is reviewed at least every three years by the RMC and the Board.
- Relevant employees are required to complete annual training (on induction and refresher) on this Policy.
- Material breaches of the Policy are reported to the RMC.

Our operations

Our people

We consider that the risk of modern slavery practices occurring within our employee cohort is low, because our workforce is in regions with strong human rights and/or labour laws (e.g. Australia, UK, Europe and the Nordics) and are considered lower risk for modern slavery practices¹¹. In addition, Ramsay has a robust framework of policies, monitoring (including employee engagement surveys), training and grievances mechanism, enabling the risk of modern slavery practices occurring within our workforce to be mitigated. Entities within the Group also have country specific regional policies and procedures, outlining employee rights and practices.

As at 30 June 2025, the Group directly employed more than 90,000 people. This means we have visibility of the employment terms and conditions for those employees, which are set out in contracts of employment and relevant industrial instruments that are regulated by local employment laws. Further, the majority of our workforce is covered by collective bargaining agreements. Under these agreements, our employees are paid rates that are above the mandatory minimum wage for the relevant roles. We do not directly employ people in the areas designated by the Global Slavery Index 2023 as 'high risk' for modern slavery¹².

Non-controlled entities

Ramsay continues to set our expectations for alignment by our partners with our core standards, including ongoing respect for human rights. For entities or joint ventures that are not wholly owned or controlled by Ramsay, we strongly encourage them to establish procedures that are consistent with the principles and commitments to human rights, as outlined in Ramsay policies. For example, through its 5 positions on the Ramsay Santé Board, Ramsay seeks to enhance Ramsay Santé's governance processes, including in relation to addressing human rights and modern slavery risks. Ramsay Santé is supported by its own policies and procedures in relation to human rights, in accordance with the French law on the duty of vigilance. For further information please refer to page 16 and Ramsay Santé's [Universal Registration Document](#).

11. Ibid
12. Ibid

Our supply chain

Ramsay has a robust framework governing how we assess and address risks of modern slavery in our supply chain.

Ramsay's Responsible Sourcing Framework

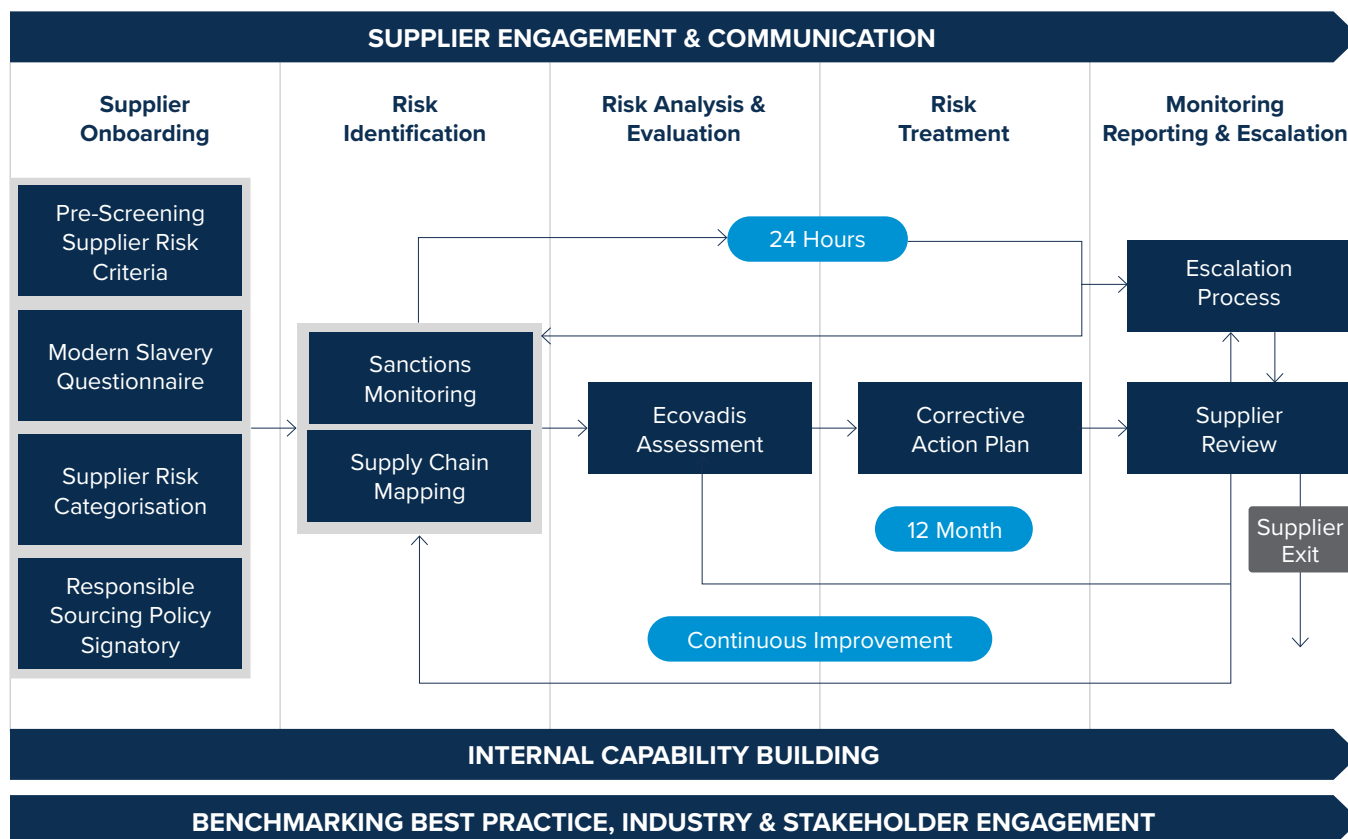
Ramsay's Global Responsible Sourcing Framework applies a risk-based approach to ensuring Ramsay's suppliers minimise risk for Ramsay, including in relation to modern slavery.

Under the Framework, Ramsay must:

- understand the end-to-end supply chain;
- regularly engage with suppliers, focusing on the provenance of what is being purchased; and
- use its supplier network to influence and strengthen supply chain resilience and identify, assess and manage risks (including modern slavery) jointly.

The Global Responsible Sourcing Manager works with business unit Heads of Procurement and procurement teams to lead the development, implementation and review of the Responsible Sourcing Framework and Supplier Risk Management Framework to embed the Framework within the procurement functions.

Ramsay's ability to influence and encourage suppliers to adopt responsible sourcing practices and lower the risk of modern slavery, is dependent on where in the supply chain the supplier sits. Our greatest ability to influence suppliers is with our Tier 1 suppliers.



Responsible Sourcing Supply Chain



Due diligence

Supplier onboarding

Pre-screening supplier risk criteria & Modern Slavery Questionnaire

As part of the supplier onboarding process, Ramsay takes a tailored approach to assessing suppliers for modern slavery risks. Factors that influence how we initially evaluate suppliers include spend amount, supplier category and supplier geographic location.

- For certain suppliers, for example, those operating in high-risk countries for modern slavery¹³ or providing goods or services considered high risk¹⁴, the pre-screening process utilises tools such as EcoVadis. The EcoVadis CSR Assessment involves a questionnaire and the results are evaluated to identify the potential modern slavery and human rights risks of the supplier. However, we recognise that some suppliers will have already completed social compliance audits from alternative third-party providers. In light of this, Ramsay continues to adopt mutual recognition of suppliers that have provided their SMETA Report Version 6.1.4.
- For other suppliers, who do not meet the necessary criteria to participate in an EcoVadis CSR Assessment, Ramsay uses an alternative procurement screening process, for example the FairSupply Modern Slavery Questionnaire. The Questionnaire includes questions that provide information and clarity on the supplier's policies, governance, systems and processes to identify and address modern slavery risks.
- Where suppliers receive a low rating, Ramsay pro-actively engages and seeks to understand why they have received the rating. For example, during FY25, Ramsay continued to engage with suppliers and links to free resources and learning modules, supporting them to build their capability, training and awareness to help to address the risks of modern slavery. After 12 months, Ramsay may request the supplier re-take the FairSupply Modern Slavery Questionnaire to assess progress made.

In addition, Ramsay Santé has also utilised various screening tools including 'Know Your Supplier' assessment software for its largest suppliers. Ramsay's Norwegian operations, Capio Volvat, have also implemented modules into their quality management system to assist with assessing supplier information for compliance with the UN conventions on Human Rights and Labour Rights. These modules assess the risk level of the supplier as low, medium or high and allow Ramsay to decide if deeper investigation into any specific supplier is needed.

Supplier Risk Categorisation

During this onboarding stage, suppliers are also categorised based on whether the good or service offered is considered a high risk for modern slavery. Key high risk business models that Ramsay may have exposure to include third party labour-hire, independent contracting and subcontracting.

Contractual controls

Ramsay implements appropriate contractual provisions with key suppliers (new or renewed contracts, prioritising those with the highest percentage of spend), after taking into consideration their risk categorisation. Ramsay Australia, Ramsay UK and Elysium Healthcare have a range of standard written supply agreements which typically contain contractual provisions requiring compliance with applicable laws including with respect to modern slavery laws. These agreements commonly require suppliers to notify Ramsay of any actual or suspected modern slavery in their supply chain or operations, and allow Ramsay to audit supplier's premises and records. In addition, as part of the ARCUS on-boarding process, new suppliers are required to comply with our Global Responsible Sourcing Policy.

Elysium Healthcare utilises an e-Procurement platform (ARCUS by Trade Interchange) to run due diligence on its suppliers. Elysium suppliers must complete a series of questions and upload, annually where required, all statements and policies relating to Corporate Social Responsibility including Modern Slavery, Equal Opportunities and Human Rights, Environmental, Social and Sustainability issues throughout their supply chain. This process is underpinned by standard contractual terms and conditions with which all suppliers must comply.

In addition to undertaking EcoVadis CSR Assessments of its suppliers, Ramsay Santé's Responsible Procurement and Supplier Relations Policy includes a section on compliance with national and international laws, standards and regulations. Under this Policy, Ramsay Santé's suppliers undertake to act in accordance with the principles defined in the Global Responsible Sourcing Policy.

Deep Dive: Tackling modern slavery risks in nursing agencies

Elysium Healthcare relies on nursing agencies to meet fluctuating demand across its mental health and neurological services. To strengthen responsible sourcing in this high-risk labour hire sector, Elysium partnered with FairSupply, an Australian company that provides advanced tools to map and assess modern slavery risks across global supply chains.

Together they piloted a tailored Modern Slavery Questionnaire (**MSQ**) with more than 100 nursing agencies. The MSQ combined customised questions, supplier benchmarking and FairSupply's risk assessment tools.

Responses were monitored, with low-scoring agencies receiving targeted follow-up and access to training. The initiative has improved visibility of modern slavery risks, built stronger engagement with suppliers and reinforced Ramsay's leadership in responsible sourcing.

13. Ibid
14. Ibid

Risk identification, Risk Analysis & Evaluation

Sanctions monitoring

Ramsay also utilises the Dow Jones third-party risk assessment platform for screening and monitoring of our top 35% of suppliers (by share of spend) against 22,500+ sanctions and watchlists including UN, EU, DFAT, ASIC, ATO, AUSTRAC, Interpol, and various other official government lists. The Dow Jones monitoring is updated every 24 hours which means the risk ratings are dynamic and change based on the latest information.

Supply chain mapping

Ramsay is supported by a large and complex global supply chain of over 20,000 direct, Tier 1, suppliers. In FY25 we maintained 40% of suppliers (by share of spend) that were mapped through direct supplier engagement and utilisation of third-party technology through our partnership with FairSupply and EcoVadis. FairSupply's Integrated Assessment Engine (IAE) leverages Multi-Regional Input-Output (MRIO) modelling to trace supply chains up to ten tiers deep across 190 countries and 42,800 industry sectors. The IAE enables Ramsay to assess inherent supplier risks by linking location and industry classification to global economic inputs, generating modern slavery risk profiles beyond Tier 1.

Complementing this, Ramsay also uses the EcoVadis IQ platform to screen suppliers for inherent risks based on country and sector data. This predictive tool helps identify potential exposure to inherent modern slavery risk and enables the prioritisation of suppliers for deeper assessment through the FairSupply Modern Slavery questionnaire, EcoVadis Corporate Social Responsibility (CSR) Assessment or a SMETA audit.

During FY25, our supply chain mapping remained focused on collaboration with our top medical suppliers. These suppliers are global multinational organisations with complex and geographically diverse operations. While we predominantly focused on Tier 1, Ramsay's supply chain mapping includes Tier 2 and beyond where practicable as we continue looking deeper into our supply chain, particularly for the procurement categories we have identified as high risk. FairSupply has ranked 99.4% of our assessed spend as 'low/moderate-low' risk.

During FY25, we also continued to focus our reviews on suppliers to those in high-risk categories, such as medical consumables such as examination and surgical gloves in high-risk geographies. This is a category where we have competed supply chain mapping beyond Tier 1 and ensure we have transparency and traceability back to the original

manufacture of these medical gloves. We assess medical consumables suppliers using the FairSupply platform and the Dow Jones Risk Centre Third Party Platform, which continues to give us the capability to actively monitor key global watchlists particularly for issues related to modern slavery.

Together, direct supplier engagement, FairSupply and EcoVadis IQ provide a layered, data-driven approach to mapping and managing supply chain risks. As at 30 June 2025, we have assessed and mapped 40% of suppliers by share of spend, with products that are sourced from over 830 supplier facilities located in more than 40 countries.

Independent sustainability assessment

In addition to the above, we undertook independent sustainability assessments of 70% of our suppliers by share of spend. The outcomes of Ramsay's supplier assessments are presented during our annual and biannual supplier review meetings. During these meetings Ramsay and the supplier discuss the outcomes of the assessment and align on corrective actions needed to address identified risks and gaps. These supplier meetings and corrective actions are tracked, including through the EcoVadis Corrective Action Plan tool.

Risk treatment

Corrective action plan

Where a supplier's performance rating is below our minimum standards, we proactively engage with them to use the EcoVadis Corrective Action Plan tools, which allows Ramsay to measure improvements and outcomes of remediation actions through a verified independent third-party process.

During FY25, the EcoVadis Corrective Action Plan tool was utilised by some of our suppliers to complete 183 corrective actions with further 224 corrective actions still in progress through the annual EcoVadis CSR Assessment. For these suppliers, Ramsay was able to work with them and gain greater insight into their business practices, in order to understand the reason for the higher risk rating. This, in turn, improved supplier accountability and resulted in revised CSR Assessment ratings. It should be noted that over 500 suppliers that have completed an EcoVadis CSR assessment over 93% of those suppliers have a rating categorised as "Good", "Advanced" or "Outstanding".

Monitoring Reporting & Escalation

Throughout the supplier relationship, Ramsay monitors compliance with our expectations, policies and the supplier contracts, and there are various modes of reporting and escalating concerns. For example:

- EcoVadis scorecards are routinely reviewed and, as part of the mutual recognition program, Ramsay also reviews submitted SMETA 6.1.4 Pillar Audit reports. For FY25, all instances of non-conformances in the SMETA reports were reviewed and there were not any indicators of modern slavery identified.
- Ramsay has undertaken periodic audits of some of its suppliers in higher risk geographies.
- Linear Medical continues its Manufacturer Audit Program, involving manufacturer due diligence and continual monitoring, in line with Ramsay's Responsible Sourcing Framework. This involves management team interviews and site visits, along with routine inspections by Linear representatives, providing ongoing onsite exposure to worker conditions and the opportunity to ask specific questions about modern slavery risks.
- Ramsay Santé offers the signalement.net whistleblowing system accessible to all internal, external and temporary employees; and Capio Volvat's website contains contact information for the quality department for any queries relating to Norwegian Supply Chain Transparency.

We make clear our expectations of suppliers and, where suppliers are not able to satisfy us as to their compliance or corrective actions, Ramsay will first 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 Ramsay on this issue in good faith or there is a lack of objective steps taken towards compliance and corrective action, Ramsay will take appropriate steps which may include suspending or terminating the supplier.

Training and building awareness

In FY25, our regional training programs continued to support our efforts to address modern slavery risks and build capacity and modern slavery awareness with key internal teams. Training modules are regularly reviewed to ensure they align with our policies and any relevant legislative developments.

Ramsay Australia

An annual modern slavery online training module is mandatory for all Ramsay Australia employees working in or undertaking procurement and purchasing activities. Key learning objectives of the training include understanding:

- our Human Rights and Labour Policy;
- what modern slavery is and how it affects Ramsay;
- how to monitor for breaches of our modern slavery risk management systems; and
- the reporting process of suspected modern slavery instances.

Ramsay UK

All relevant Ramsay UK employees are required to undertake online modern slavery training every two years. Key learning objectives of the training include understanding:

- what modern slavery is and how it affects Ramsay;
- the Modern Slavery Act 2015 UK;
- how to address modern slavery risks in Ramsay UK's business and supply chains; and
- responsibilities as employees of Ramsay UK.

Elysium Healthcare

An online modern slavery and human trafficking training module is available to all Elysium Healthcare employees. Key learning objectives of the training include understanding:

- the background and scale of modern slavery and human trafficking;
- what human trafficking is and its role in modern slavery;
- laws and regulations associated with modern slavery;
- how and when to raise concerns; and
- the advice and guidance for dealing with adult and child victims of modern slavery and human trafficking.

Ramsay Santé

FRANCE: A modern slavery training course is delivered to the Procurement Department, including case studies and a quiz to validate understanding. Key learning objectives of the training include:

- understanding what modern slavery is and how it can impact Ramsay Santé;
- recognising the importance of due diligence measures;
- understanding how to appropriately respond to modern slavery risk situations; and
- identifying the proper channels to contact for guidance or to raise concerns

NORDICS: Ramsay's Norwegian operations, Capio Volvat, provide regular training for Transparency Act implementation team (see further on the right). This training focuses on improving measures for safeguarding human rights and promoting good working conditions, within Volvat's operations and its supply chain.

Ramsay's European operations are also subject to local laws governing human rights issues.

For example:

- **FRANCE:** under the French law on the duty of vigilance (duty of care), Ramsay Santé is required to establish, manage and communicate measures to identify and prevent serious violations of human rights and fundamental freedoms, the health and safety of people, and the environment. In accordance with the law, Ramsay Santé's vigilance plan includes five measures:
 - » risk mapping to identify, analyse and prioritise risks in terms of human rights and fundamental freedoms, health and safety of people and the environment;
 - » procedures for the regular assessment of the situation of its subsidiaries, suppliers or subcontractors;
 - » appropriate actions to mitigate risks or prevent serious harm;
 - » a whistleblowing and alert collection mechanism; and
 - » a system for monitoring the measures implemented and assessing their effectiveness.

In FY25, a common vigilance plan continued to be implemented between Ramsay Santé's Nordic (Sweden, Norway and Denmark) operations. More information about Ramsay Santé's vigilance plan is available in their annual [Universal Registration Document](#), available on their website.

- **NORWAY:** Capio Volvat is also required to annually report under the Norwegian Supply Chain Transparency Act 2022 (**Transparency Act**). Under the Transparency Act, Capio Volvat must conduct human rights and "decent working conditions" due diligence activities on their internal operations and their suppliers. Capio Volvat must also publish an annual report, describing how Capio Volvat works to safeguard human rights and promote good working conditions, both for their employees and employees of their suppliers, business partners and others with whom they interact. All members of management, as well as middle management and medical supervisors within Capio Volvat are informed about the implications of the Transparency Act. Furthermore, the promotion of good working conditions and the safeguarding of human rights is a core component of leadership development at Volvat. The report is signed by the board of Capio Volvat Medisinske Senter AS and published on Capio Volvat's website.

Grievance mechanisms and remediation

Ramsay offers multiple ways to report potential modern slavery concerns in our operations and supply chain. Outlined below are the policies articulating our key modern slavery grievance and remediation mechanisms.



Internal procedures

We are committed to fostering a safe, healthy and secure work environment that is free from inappropriate or unacceptable workplace behaviour including bullying, discrimination, harassment, sexual harassment, and victimisation. Through our Code of Conduct and other supporting Group and regional policies, our people are encouraged to speak up and raise concerns, if they see or suspect something inappropriate or unethical.

All concerns raised are taken seriously and investigated in a sensitive, transparent and consistent manner. Appropriate records and reports are retained and kept on a secure and confidential basis.

Modern Slavery Response Plan Quick Guide

The Modern Slavery Response Plan Quick Guide (the **Guide**) is a simple reference guidance on responding to potential modern slavery concerns. The Guide assists Ramsay's Australian and UK Procurement, Purchasing, Supply and People teams and outlines practical steps to take, stakeholder engagement process and key considerations when faced with potential modern slavery concerns. The Guide has been shared with the Group's regional teams to adopt locally.



Whistleblowing

For each country in which Ramsay operates, we provide our employees, patients and suppliers multiple ways to report potential concerns of modern slavery and human rights, including anonymously through external providers. This service is supported by our Group Whistleblower Policy, as well as regional whistleblower policies and related procedures (including Ramsay Santé's vigilance plans, established in Europe and the Nordics).

The Group Whistleblower Policy applies to all current and former directors, officers, employees, associates and suppliers of the Group (which includes each of the Australian Reporting Entities and the UK Reporting Entities). The Policy is designed to encourage, support and protect people to report issues.

For entities that are not wholly-owned or controlled by Ramsay (e.g. joint venture entities), we strongly encourage them to establish whistleblowing procedures that are consistent with the principles outlined in our Group Whistleblower Policy.



Remediation

Ramsay is committed to providing for or cooperating in the remediation of any human rights or modern slavery impacts, which we have caused or contributed to. If we identify that we are directly linked to modern slavery through our supply chain relationships, we will use any leverage we have to encourage the supplier to remedy the impact and/or take appropriate steps which may include suspending or terminating the supplier.

Assessing the effectiveness of our actions

Ramsay understands the importance of having effective actions to assess and address modern slavery risks.

TOPIC

WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS BY:

Modern Slavery Risk Governance

- Maintaining Board and Committee oversight of modern slavery related issues through reporting on material breaches of the Code of Conduct, Global Human Rights and Labour Policy, Global Responsible Sourcing Policy and Anti-Bribery and Corruption Policy. Reports (including modern slavery concerns within our supply chain or people) made through our grievance mechanisms, are also reported to the RMC.
- Sharing knowledge in relation to human rights and modern slavery, consulting and developing this Statement through the Modern Slavery Working Group, enabling the Group to understand, co-ordinate and learn from our regional responses.

Policies

- Having clear, accessible policies, procedures and other documents articulating Ramsay's commitment to human rights.
- Reviewing these policies periodically to ensure they remain appropriate and relevant.

Risk framework and supplier engagement

- Periodically reviewing our Responsible Sourcing Framework to assess if it is operating effectively.
- Monitoring supplier issues, including tracking the outcome of due diligence measures and modern slavery questionnaires.
- Proactively engaging with suppliers where corrective action plans are established.

Training and building awareness

- Regularly reviewing mandatory training modules to ensure they align with our policies and any relevant legislative developments.
- Monitoring completion rates of mandatory training.

Grievance mechanisms

- Monitoring outcome and feedback received through employee engagement surveys.
- Monitoring the number and types of reports (including those related to human rights violations and/or modern slavery concerns) made through the whistleblower channels.

Industry collaboration

Ramsay also considers our collaboration with other businesses, industry bodies, governments and special interest groups a very important action. In addition to the below, Ramsay regularly shares our experience and improvement journey with other organisations both within the healthcare sector and in other industries via briefings, roundtable discussions or at conferences. In FY25, Ramsay representatives engaged and actively participated in the following groups:

UN Global Compact Network Australia (UNGCA)



- Ramsay is a member of the Modern Slavery Community of Practice, hosted by the UNGCA.
- **This interactive group meets quarterly and its purpose is to:**
 - » connect participating UNGCA members and enable learning and discussion on the opportunities and challenges facing Australian businesses relating to identifying, managing and communicating modern slavery risks.
 - » identify and share leading modern slavery interventions to enable members and other Australian-based organisations to improve their modern slavery risk management program, in line with the principle of continuous improvement.
 - » support members in preparing for further regulatory movement on modern slavery and human rights due diligence.
- Ramsay also attended the UN Global Compact on Human Rights Due Diligence and Salient Rights.

EcoVadis APAC Round Table



- Ramsay is represented at EcoVadis' APAC Round Table, a forum related to sustainability and corporate social responsibility in the Asia Pacific region.
- At this quarterly forum, industry participants share experience and discuss best practice with regard to sustainability and corporate social responsibility.

Office of the NSW Anti-Slavery Commissioner



- Ramsay is represented on the Steering Committee for the *It's Healthy to Fight Modern Slavery* project, initiated by the Office of the NSW Anti-Slavery Commissioner (OASC). This project aims to improve the identification of, response to and support for people who are in modern slavery, or those at risk of its harms, and who access the NSW health care system.
- The Steering Committee meets regularly to support the *It's Healthy to Fight Modern Slavery* project and comprises of a diverse range of professions (health, community, antislavery advocacy), sectors (public, private and community) and metro and regional/rural areas of NSW.

Our objectives – progress and future plans

Ramsay is focused on continuous improvement and maturity of our modern slavery response.

FY25 Objective	FY25 Progress
OPERATIONS	
Refresh our human rights and modern slavery assessment to ensure salient human rights and modern slavery risks are identified.	In FY25, we commenced a review and refresh of our human rights and modern slavery assessment, with the assistance of an external ESG consultant. The outcome of this review will be discussed in the FY26 Modern Slavery Statement.
SUPPLY CHAIN	
Review our Global Responsible Sourcing Policy and update if necessary.	The Policy was reviewed during the reporting period and determined to be fit for purpose.
Engage with high-risk suppliers to reduce risk exposure including undertaking onsite third-party audits.	In FY25 we continued to focus on third-party risk assessment for the high-risk categories of medical gloves and medical consumables where selected suppliers completed onsite SMETA audits.
Undertake sustainability supplier assessments for 70% of suppliers by global spend by the end of FY25. This is a part of an ongoing KPI to increase supplier assessment target spend to 80% of global spend by end of FY26.	In FY25, we achieved our goal of assessing 70% of suppliers (by share of global spend) by independent services. Ramsay remains on track to increase its supplier assessment to 80% (by share of global spend) by end of FY26.
Work with suppliers to address corrective actions.	To support supplier sustainability performance, we engage suppliers through business reviews to encourage and discuss the implementation of EcoVadis corrective action plans. These reviews serve as a structured forum to discuss assessment outcomes, track progress on improvement areas, and align on next steps for enhancing social and environmental practices. For further information, see page 15 .
Expand the coverage of Tier 2 suppliers with an independent third-party sustainability assessment.	Our EcoVadis network has identified over 4,750 potential Tier 2 suppliers with completed EcoVadis CSR assessments. Impressively, 78% of these suppliers have achieved ratings of “Good”, “Advanced”, or “Outstanding”, reflecting strong sustainability performance across the extended supply chain.
Maintain mapping of 40% of suppliers (by share of global spend), with a focus on high-risk categories.	In FY25, we maintained mapping of 40% of suppliers (by share of spend) through supplier engagement, with a focus on high risk categories and the use of MRIO technology which leverages global trade and industry data to map supply chains across multiple tiers. In high-risk categories such as medical gloves, medical consumables and garments, we actively engage our direct suppliers to confirm that original manufacturer, either Tier 2 or Tier 3 have undergone third-party CSR assessments, including EcoVadis or SMETA audits. We believe this approach strengthens transparency and traceability throughout the multiple tiers of the supply chain.
Continue to embed the use of the modern slavery due diligence toolbox and complementary monitoring processes across the regions (as relevant).	In FY25, we expanded the Responsible Sourcing Program by introducing the FairSupply MSQ as a new assessment tool. This addition was driven by a need to assess suppliers in sectors with limited traditional supply chains such as nursing agencies and contracted cleaning suppliers.

FUTURE PLANS

In FY26 and beyond, Ramsay will continue to build on its modern slavery response framework. This includes continuing to undertake the activities described in this Statement, as well as the objectives outlined above. We also intend to review our modern slavery and human rights related training programs and finalise and implement the outcome of the human rights and modern slavery saliency assessment.

Consultation

Prior to being put to the Boards of Ramsay Health Care Limited, Ramsay Health Care UK Operations Limited, Elysium Healthcare Limited and Elysium Healthcare No.2 Limited for approval, this Statement was prepared in consultation and engagement with each of the Group’s controlled entities, including each of the reporting entities in Appendix 1. This involved:

- periodic meetings of Ramsay’s Modern Slavery Working Group which includes representatives from the reporting entities, Ramsay Australia, Ramsay UK and Elysium Healthcare, Ramsay Santé, as well as our Group Executive Legal and Company Secretariat, Global Responsible Sourcing Manager and Group Sustainability Officer, as well as Group Risk and Legal functions. The Modern Slavery Working Group reviewed and provided input into the drafting of the Statement and engaged functional leads where specialist/targeted feedback was required;
- review and presentation of the draft Statement to the Group Executive, which comprises the functional leads with key responsibility for the day-to-day management of the Ramsay Group, with some Group Executive members also serving as directors of our Australian and UK Reporting Entities. This facilitated Group Executive consultation on and contribution to the development of the Statement; and
- input and feedback from various relevant internal stakeholder groups with responsibility for delivery of Ramsay’s human rights and modern slavery risk management processes in our operations and supply chains (including Procurement, Human Resources, Legal and Risk).

APPENDIX 1 – REPORTING ENTITIES

In addition to Ramsay Health Care Limited (ACN 001 288 768), the other reporting entities covered by this joint Statement are as follows:

AUSTRALIAN REPORTING ENTITIES

Ramsay Health Care Investments Pty Limited (ACN 078 881 473)	The Benchmark Hospital Group Pty Limited (ACN 005 437 169)	Health Care Corporation Pty Limited (ACN 000 392 101)
Ramsay Health Care Australia Pty Limited (ACN 003 184 889)	Benchmark – Surrey Pty Limited (ACN 006 216 048)	Australian Hospital Care Pty Limited (ACN 072 273 931)
North Shore Private Hospital Pty Limited (ACN 059 183 596)	AH Holdings Health Care Pty Limited (ACN 115 549 230)	Australian Hospital Care (Pindara) Pty Limited (ACN 005 288 095)
Ramsay Centauri Pty Limited (ACN 096 070 156)	AHH Holdings Health Care Pty Limited (ACN 115 549 169)	Alpha Pacific Hospitals Pty Limited (ACN 002 907 799)
Alpha Healthcare Pty Limited (ACN 000 727 882)	Affinity Health Pty Limited (ACN 106 722 347)	APL Hospital Holdings Pty Limited (ACN 009 637 781)
Hospital Corporation Australia Pty Limited (ACN 000 935 946)	Australian Medical Enterprises Pty Limited (ACN 053 639 160)	Australian Hospital Care (The Avenue) Pty Ltd (ACN 072 759 338)
Alpha Westmead Private Hospital Pty Limited (ACN 083 874 597)	C&P Hospital Holdings Pty Limited (ACN 106 722 570)	Peninsula Hospital Unit Trust (Trustee: Benchmark – Peninsula Pty Limited)
Benchmark Healthcare Holdings Pty Limited (ACN 084 168 276)	Joondalup Hospital Pty Limited (ACN 106 723 193)	AME Trust (Trustee: AME Hospitals Pty Limited)
Benchmark Healthcare Pty Limited (ACN 058 174 619)	HCoA Hospital Holdings (Australia) Pty Limited (ACN 079 097 528)	AME Property Trust (Trustee: AME Properties Pty Limited)
	HCoA Operations (Australia) Pty Limited (ACN 083 035 661)	

RAMSAY UK REPORTING ENTITIES

Ramsay Health Care UK Operations Limited (Company No. 1532937)

ELYSIUM HEALTHCARE REPORTING ENTITIES

Elysium Healthcare Limited (Company No. 4063391)
Elysium Healthcare No.2 Limited (Company No. 6244878)

This Statement reflects the activities of Ramsay Health Care Limited and its subsidiaries, in relation to steps taken during FY25 to identify, assess, and address modern slavery risks, including the governance processes and progress in our operations and supply chains.

All Ramsay Group entities are covered by this Statement, including our UK and Elysium Healthcare operational entities or joint-venture partnerships (including, The Westbourne Centre, Clifton Park Hospital, Ramsay Diagnostics UK, Exeter Medical Limited and Independent British Healthcare (Doncaster) Limited, Elysium Healthcare No. 3 Limited, Elysium Healthcare No. 4 Limited, Elysium Neurological Services (Badby) Limited, Elysium Neurological Services (Adderley) Limited, Elysium Healthcare (Farndon) Limited, Stanley House Limited, Elysium Healthcare (Acorn Care) Limited, Elysium Healthcare (Phoenix) Limited, Elysium Healthcare (Field House) Limited, Elysium Healthcare (Healthlinc) Limited, Elysium Care Partnerships No.2 Limited, Elysium Healthcare (Ann House) Limited, Elysium Healthcare (Gregory House) Limited, Elysium Care Partnerships Limited, Pendarren Court Limited, St George Healthcare Limited, Elysium Healthcare (St Marys) Limited, Elysium Healthcare (All Saints) Limited, The Chimneys Limited, Regis Healthcare Limited, Darlington Neurological Services Limited, Vivre Care Ltd).

Ramsay Health Care Limited

Suite 18.03, Level 18

126 Phillip Street

Sydney NSW 2000 Australia

Email: enquiry@ramsayhealth.com

Website: ramsayhealth.com

Telephone: +61 2 9220 1000