



# Modern Slavery Statement 2022

People caring for people.

## Reporting entities

This statement has been published in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (**Australian MSA**) and the *UK Modern Slavery Act 2015* (**UK MSA**). It sets out the steps taken by Ramsay Health Care Limited ACN 001 288 768 and other relevant Ramsay group companies during the year ended 30 June 2022 to identify and reduce the risks of modern slavery and human trafficking in its business and supply chains.

This statement covers:

- Ramsay Health Care Limited;
- those subsidiaries<sup>1</sup> required to report under the Australian MSA (together, the **Australian Reporting Entities**); and
- those subsidiaries<sup>2</sup> covered by the UK MSA (together, the **UK Reporting Entities**).

In addition, the following capitalised terms used throughout this statement are defined as follows:

- **Ramsay Group** means the Ramsay consolidated group which comprises Ramsay and its subsidiaries;
- **Ramsay Australia** means Ramsay and the Australian Reporting Entities;
- **Ramsay UK** means Ramsay Health Care (UK) Limited and the Ramsay UK Reporting Entities;
- **Elysium Healthcare** means Elysium Healthcare Group Limited and its subsidiaries listed in footnote 2 (Elysium Reporting Entities);
- **Ramsay Santé** means Ramsay Santé SA and its subsidiaries<sup>4</sup>; and
- **Ramsay Sime Darby** means Ramsay Sime Darby Health Care Sdn Bhd and its subsidiaries, being a joint venture between Ramsay and Sime Darby Berhad.<sup>3</sup>

1 This includes all Australian subsidiaries / joint ventures that have consolidated revenue of A\$100 million (together with Ramsay, being the Australian Reporting Entities for the purposes of the Australian MSA), being: Ramsay Health Care Investments Pty Limited ACN 078 881 473, Ramsay Health Care Australia Pty Limited ACN 003 184 889, North Shore Private Hospital Pty Limited ACN 059 183 596, Ramsay Centauri Pty Limited ACN 096 070 156, Alpha Healthcare Pty Limited ACN 000 727 882, Hospital Corporation Australia Pty Limited ACN 000 935 946, Alpha Westmead Private Hospital Pty Limited ACN 083 874 597, Benchmark Healthcare Holdings Pty Limited ACN 084 168 276 Benchmark Healthcare Pty Limited ACN 058 174 619, The Benchmark Hospital Group Pty Limited ACN 005 437 169, Benchmark – Surrey Pty Limited ACN 006 216 048, AH Holdings Health Care Pty Limited ACN 115 549 230, AH Holdings Health Care Pty Limited ACN 115 549 169, Affinity Health Pty Limited ACN 106 722 347, Australian Medical Enterprises Pty Limited ACN 053 639 160, C&P Hospital Holdings Pty Limited ACN 106 722 570, Joondalup Hospital Pty Limited ACN 106 723 193, HCoA Hospital Holdings (Australia) Pty Limited ACN 079 097 528, HCoA Operations (Australia) Pty Limited ACN 083 035 661, Health Care Corporation Pty Limited ACN 000 392 101, Australian Hospital Care Pty Limited ACN 072 273 931, Australian Hospital Care (Pindara) Pty Limited ACN 005 288 095, Ramsay Pharmacy Retail Services Pty Ltd ACN 169 850 131, Peninsula Hospital Unit Trust (Trustee: Benchmark – Peninsula Pty Limited), AME Trust (Trustee: AME Hospitals Pty Limited) and AME Property Trust (Trustee: AME Properties Pty Limited).

2 This statement constitutes the annual modern slavery statement for the following UK entities: 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, Independent British Healthcare (Doncaster) Limited (Ramsay UK Reporting Entities), and Elysium Healthcare Limited, Elysium Healthcare No.2 Limited, Elysium Healthcare No.3 Limited, Elysium Healthcare No.4 Limited, Elysium Neurological Services Limited, Elysium Neurological Services (Badby) Limited, Elysium Neurological Services (Adderley) Limited, Darlington Neurological Care Centre Limited, The Bridge Care Centre Limited, Elysium Healthcare (Farndon) Limited, Stanley House Limited, Lighthouse Healthcare Group Limited, Elysium Healthcare (Lighthouse) Limited, Elysium Healthcare (Acorn Care) Limited, Elysium Healthcare (Phoenix) Limited, Elysium Healthcare (Field House) Limited, Elysium Healthcare (Healthline) Limited, Elysium Care Partnerships No.2 Limited, Elysium Healthcare No. 5 Limited, Elysium Healthcare (Ann House) Limited, Elysium Healthcare No. 6 Limited, Elysium Healthcare (Gregory House) Limited, CareProgress Limited, Elysium Care Partnerships Limited, London Care Partnership Community Care Services Limited, London Care Partnership (Supported Living) Limited, Celtic Resource Management Limited, Pendaren Court Limited, iMeUs Limited, Elysium Healthcare (Ultimate Care) Limited, Focus on Care Recruitment Limited, St George Healthcare Limited, Elysium Healthcare (St Mary's) Limited, Elysium Healthcare (All Saints) Limited, The Chimneys Healthcare Partnership Limited, The Chimneys Limited, Elysium Healthcare Property 1 Limited, Elysium Healthcare Property 2 Limited, Elysium Healthcare Property 3 Limited, Elysium Healthcare Property 4 Limited, Elysium Healthcare Property 5 Limited, Elysium Healthcare Property 6 Limited, Castle Road Homes Limited, Elysium Healthcare Property 7 Limited, Elysium Healthcare Property 8 Limited, Elysium Healthcare LC Limited (Elysium Reporting Entities)

3 Ramsay Sime Darby Health Care is a 50:50 joint venture arrangement with Malaysian multinational conglomerate Sime Darby Berhad and is not controlled by Ramsay.

4 Ramsay Health Care owns 52.79% of Ramsay Santé which is listed on the European financial markets' platform Euronext.

### Important notice and disclaimer

Important notice and disclaimer: This document has been prepared by Ramsay Health Care Limited ACN 001 288 768 and is for informational purposes only. It is based on information available at the time of preparation and which is general in nature and should be read with Ramsay's other periodic reports and disclosures. This is not an offer, solicitation, invitation to apply, recommendation or advice to buy, sell or hold any securities of Ramsay. 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 document 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.

# 1. Introduction

## The Ramsay Way

People are at the heart of our success. As 'people caring for people', there are three key ways we approach our work every day.

### We value strong relationships

Healthy working relationships lead to positive outcomes for all. We look out for the people we work with and we respect and recognise them. Strong healthy relationships are the foundation of our stakeholder loyalty.

### We aim to constantly improve

We do things the right way. We enjoy our work and take pride in our achievements. We are not afraid to challenge the status quo to find better ways.

### We seek to grow sustainably

Maintaining sustainable levels of profitability are only part of our success. We prioritise long term success over short term financial gains because we care about our people, our community and our planet.

### This year's modern slavery statement

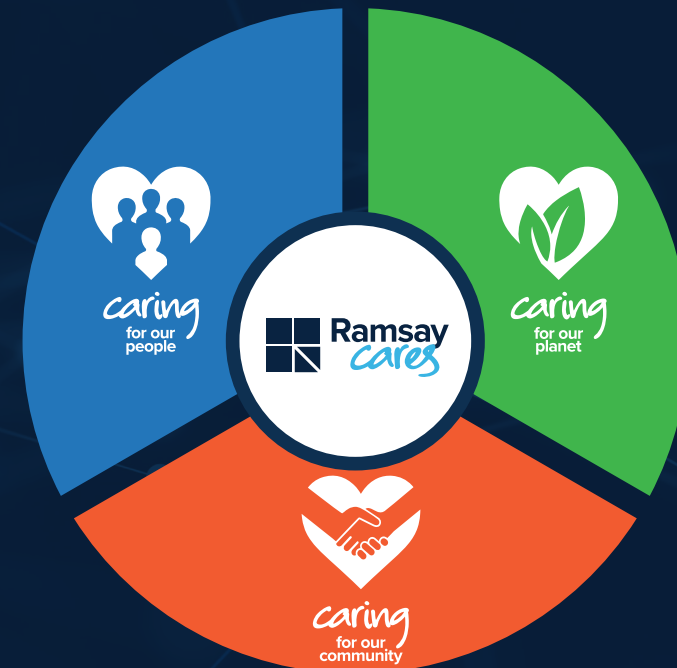
This is the third year that Ramsay's modern slavery statement addresses both the reporting requirements under the UK MSA and the Australian MSA and has been prepared using valuable input from a wide range of internal stakeholders. In January 2022, Ramsay acquired Elysium Healthcare, which provides a range of mental health care in specialist hospitals, residential settings and community-based homes in the UK. This year's modern slavery statement includes Elysium Healthcare and its relevant subsidiaries for the five month period to 30 June 2022.

### Global supply chain impacts

The COVID-19 pandemic continued to have a significant impact globally and presents an ongoing risk to our supply chains. As Ramsay employees and clinicians have worked hard to support the public health campaign against COVID-19, Ramsay has continued our focus on delivering high quality patient care and keeping our people safe by minimising the impacts of COVID-19 risks on medical supplies and equipment. We continue to manage these risks effectively through our global supplier risk management framework, global supply chain and regional network of facilities, while also maintaining our vigilance into identifying and managing modern slavery risks in our operations and supply chain.

## Ramsay Cares

The Ramsay Cares Sustainability Strategy unites our global businesses in a shared vision for sustainability. Ramsay Cares focuses on fostering healthier people, stronger communities and a thriving planet. It reaffirms that we are here to have a positive impact for current and future generations. Ramsay Cares has three sustainability pillars:



Ramsay takes very seriously our responsibility to play our part to eradicate all forms of modern slavery and human trafficking, including exploitation, forced labour, child labour and servitude. This commitment is entrenched in our Ramsay Cares principles. Ramsay understands that one of the keys to eradicating this complex issue is to set clear expectations for our people and suppliers, which will alert us to potential involvement in modern slavery and empower us to take steps to address it and to prevent such involvement in the future.

# Road map snapshot



## Progress to date

### To date, Ramsay has:

- ✓ Developed the Modern Slavery Improvement Plan
- ✓ Developed the Global Responsible Sourcing Framework
- ✓ Appointed the Global Responsible Sourcing Manager
- ✓ Included a supplier assessment target in our Sustainability Linked Loan Facility for Ramsay Australia and Ramsay UK
- ✓ Updated policies to cascade expectations and accountabilities at the regional level
- ✓ Articulated clear grievance and remediation mechanisms through our policies and procedures
- ✓ Delivered new e-learning and training modules on modern slavery risks
- ✓ Continued the roll out of supplier assessment processes and achieved supplier assessments of over 20% of Global spend in FY2022
- ✓ Worked with suppliers with EcoVadis ratings to improve performance on factors relating to modern slavery risk



## Next steps and priorities

### Our next steps and priorities include:

- Develop new Responsible Sourcing Policy
- Continue focus and refinement of procurement due diligence and response plan for managing modern slavery risk
- Continue focus on cascading expectations and accountabilities at a regional level and capacity building
- Continue focus on training globally to cover introduction of new regulatory requirements
- Expand modern slavery due diligence toolbox to include complementary monitoring processes
- Map 30% of global suppliers by share of spend, with a focus on high-risk categories
- Work with suppliers to reduce risk exposure



## Long term goals

### Ramsay's long term vision is:

- 🎯 Continuous improvement through a process of reviewing and improving our due diligence, risk management and training and supplier engagement systems and processes for the effective management and mitigation of modern slavery risks
- 🎯 Ongoing supplier mapping, monitoring and collaboration on process improvements (including beyond Tier 1)
- 🎯 Ongoing review of the effectiveness of actions taken to identify, assess and address modern slavery risks, including through our outcomes-focused key performance indicators



Ramsay has undertaken its second CSR assessment by EcoVadis and in FY2022 we have proudly improved our own rating and were awarded silver status, placing Ramsay in the top 25% of rated companies.

# 2. Organisational Business and Structure, Operations and Supply Chains

## About our business and operations

Ramsay provides quality healthcare through a global network of clinical practice, teaching and research. Ramsay’s global network extends across ten countries, with over eleven million admissions and patient visits to facilities in more than 530 locations. Ramsay was founded in 1964 by Paul Ramsay AO (1936-2014) and has always focused on maintaining the highest standards of quality and safety, being an employer of choice and operating the business based on a culture known as ‘The Ramsay Way’ and our purpose of ‘people caring for people’.

## Ramsay’s organisational structure

Ramsay’s Board is responsible for overseeing performance and operations of the Group, sets the Group’s values and governance framework and monitors Ramsay’s culture and compliance in accordance with our code of conduct. The Board is assisted by the Board Committees in discharging its responsibilities.

Primary responsibility for anti-slavery initiatives sits with the Global Risk Management Committee.



Ramsay’s operations are split across our key regions

### AUSTRALIA

**Ramsay Australia** has 73 private hospitals and day surgery units in Australia and is Australia’s largest private hospital operator. Ramsay operations include mental health facilities as well as the operation of three public facilities. In addition, Ramsay has established the Ramsay Pharmacy retail franchise network which supports 60 community pharmacies. Ramsay Australia admits more than one million patients annually and employs more than 33,000 people. Additionally, Ramsay operates Linear Healthcare Group (Linear), which supplies Linear branded medical consumables. Linear manages sourcing and supplier contracts predominantly based in China and Taiwan and also distributes Linear consumables within Australia (including to Ramsay’s Australian operations).

### UK

**Ramsay UK** has a network of 34 acute hospitals and day procedure centres in England providing a comprehensive range of clinical specialties to private and self-insured patients, as well as patients referred by the NHS. During FY22, Ramsay UK also operated a diagnostic imaging service and provided neurological services through its three neuro-rehabilitation facilities. Ramsay UK cares for over 184,000 patients per year and employs more than 7,000 people.

**Elysium Healthcare** is a leading independent operator of long-term medium and low secure hospitals and complex care homes for individuals with mental health conditions. As at 30 June 2022, Elysium had 80 operational sites across England and Wales. The business employed approximately 6,000 people.

### EUROPE

**Ramsay Santé** is the second largest private care provider in Europe, operating specialist clinics and primary care units in approximately 350 locations across five countries. In France, Ramsay Santé has a market leading position, with 132 acute care and mental health facilities. In Denmark, Norway, Sweden and Italy, Ramsay Santé operates 210 facilities including primary care units, specialist clinics and hospitals, including a 93-bed hospital in Italy. Ramsay Santé employs around 35,000 staff and its facilities treated approximately ten million patients in FY2022. Ramsay Health Care owns 52.79% of Ramsay Santé which is listed on the European financial markets’ platform Euronext.

### ASIA

**Ramsay Sime Darby** is a 50:50 joint venture arrangement with Malaysian multinational conglomerate Sime Darby Berhad and is not controlled by Ramsay. Ramsay Sime Darby operates three hospitals in Indonesia and four hospitals in Malaysia, employing more than 4,000 people.

## Overview of our supply chains

**What we buy:** medical consumable products, implants, medical equipment (including maintenance), food & nutrition, linen services, utilities, agency labour, laboratory & radiology services, vaccines & pharmaceuticals, PPE, textiles, travel, consultancy services, facility management, IT and marketing, among other categories.

**Who we buy from:** In Australia, over 85% of our medical spend is with our top 20 suppliers. In the UK, for Ramsay UK our top 50 suppliers account for 70% of our medical spend and for Elysium 160 active contracts capture the top 80% of spend. Ramsay Australia has over 7,000 suppliers, and Ramsay UK and Elysium Healthcare each have over 2000 suppliers with head offices in Australia, UK, Europe, USA and Asia. For Ramsay Santé, approximately 60% of medical spend in France, and approximately 40% in the Nordics, is with its top 20 suppliers.

### RAMSAY AUSTRALIA

Over 310 active contracts.  
85% of our medical spend with our top 20 suppliers.

7,000+ suppliers, of which 15% have a Head Office in Australia and the remaining 85% have Head Offices in Europe, the UK and the USA.

### RAMSAY UK

Over 230 active contracts. 70% of our medical spend with top 50 suppliers.

2,000 suppliers, of which 20% have a Head Office in the UK and the remaining 80% have Head Offices in Europe, the USA and Asia.

### ELYSIUM HEALTHCARE

Over 160 active contracts capturing 80% of group spend.

2,000+ suppliers, of which 98% have a Head Office in the UK, and the remaining with Head Offices in Europe.

### RAMSAY SANTÉ

Over 500 active contracts and over 125 framework agreements in place.

In France, 60% of our medical spend with our top 20 suppliers, 85% of our non-medical spend with our top 20 suppliers, in the Nordics 40% of our spend is with our top 20 suppliers.

4,000+ suppliers, over 40% of which have a global Head Office in France and the remaining with Head Offices mainly in Europe.


#### Ramsay UK

 United Kingdom

#### Elysium

 United Kingdom

#### Ramsay Santé

 France  Italy

 Denmark  Sweden  Norway

#### Ramsay Sime Darby

 Malaysia  Indonesia

#### Ramsay Australia

 Australia



# 3. Modern Slavery Risks & Mitigating Actions

## Risks of modern slavery practices in Ramsay’s operations and supply chains

The following tables set out operational and supply chain categories which have been identified as giving rise to a risk of modern slavery for the Australian Reporting Entities and the UK Reporting Entities.

| SUPPLY CHAIN CATEGORIES  | OVERVIEW   | MODERN SLAVERY RISKS IDENTIFIED |
|--|--|---------------------------------|
| <b>MEDICAL SPEND CATEGORIES</b>  |  |                                 |
| <b>Medical consumables (including generic &amp; volume based, low cost clinical consumables)</b>               | <ul style="list-style-type: none"> <li>Tier 1* mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (ie Australia, USA, EU and the UK).</li> <li>Tiers 2* and beyond, ongoing supply chain mapping, which has focused on medical gloves to date, has identified suppliers are manufacturing or sourcing from the following countries: China, Taiwan, Malaysia, Sri Lanka, Vietnam and Pakistan.</li> </ul>  |                                 |
| <b>Medical equipment</b>   | <ul style="list-style-type: none"> <li>Tier 1* mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (ie in Australia, USA, EU, New Zealand and the UK). Ongoing engagement with our Tier 1 suppliers has identified these multinationals have facilities (eg. for manufacturing, assembly, distribution or sterilisation) that are located in the following countries: Mexico, Puerto Rico, Costa Rico, Dominican Republic, Brazil, Japan, Singapore, China, India and Israel.</li> </ul> |                                 |
| <b>Medical implants</b>  |  |                                 |
| <b>Pharmaceuticals</b>   | <ul style="list-style-type: none"> <li>Tier 1* mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws.</li> </ul>   |                                 |
| <b>OTHER CATEGORIES (NON-MEDICAL SPEND)</b>  |  |                                 |
| <b>Uniforms</b>  | <ul style="list-style-type: none"> <li>Tier 1* locally based suppliers, subject to local region laws</li> </ul>  |                                 |
| <b>IT/telecommunications</b>   | <ul style="list-style-type: none"> <li>Tier 1* mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws</li> </ul>  |                                 |
| <b>Facility services &amp; management (utilities, food &amp; catering, security, waste, laundry, cleaning)</b> | <ul style="list-style-type: none"> <li>Tier 1* locally based, generally smaller, suppliers, subject to local region laws</li> </ul>  |                                 |
| <b>Building and construction</b>   | <ul style="list-style-type: none"> <li>Tier 1* locally based, large suppliers, subject to local region laws</li> <li>Labour employed through sub-contractors or agents</li> <li>Materials used may have complex multi-tiered supply chains</li> </ul>  |                                 |

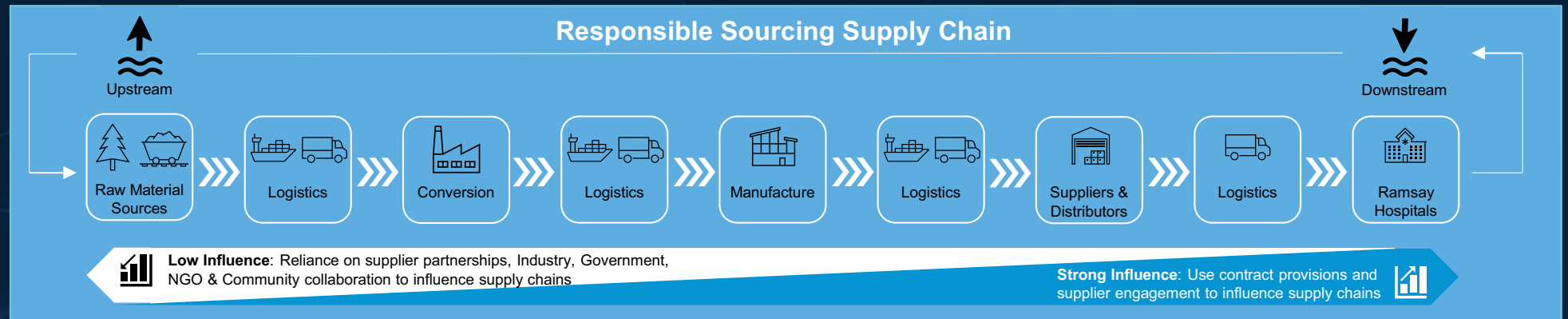
The greatest risk of modern slavery within our business is in relation to the Group’s suppliers (on the basis that the Group can only control its own actions). The majority of our employees are employed directly by Ramsay Group entities – this lowers the risk of modern slavery within our workforce.

| OPERATIONAL CATEGORIES                             | OVERVIEW   | MODERN SLAVERY RISKS IDENTIFIED |
|--|--|---------------------------------|
| <b>Recruitment processes</b>                       | <ul style="list-style-type: none"> <li>Employees covered by local region laws</li> <li>For Ramsay Australia, 89% of employees covered by Enterprise Agreements</li> <li>For Ramsay Santé**, 96% of employees covered by collective bargaining agreements (**France: 100% of employees, and the Nordics: 92% of employees)</li> </ul> |                                 |
| <b>Agency labour contractors</b>                   | <ul style="list-style-type: none"> <li>Tier 1* locally based, generally larger, suppliers subject to local region laws</li> </ul>  |                                 |
| <b>Independent services (e.g. locums, doctors)</b> | <ul style="list-style-type: none"> <li>Services covered by local region laws and (where relevant) credentialing processes</li> </ul>   |                                 |

\* Tier 1 refers to suppliers that are contracted directly to provide goods and services. Tier 1 suppliers in turn sub-contract to or purchase goods and services from third parties that represent 'Tier 2' of the supply chain, and so the supply chain continues into the lower tiers. It is generally deeper into the supply chain, at Tier 2 and beyond, that the risks of modern slavery increase. This is particularly where those lower-level suppliers are based in developing countries where there may be less regulation, oversight and/or enforcement of the issues that lead to increased modern slavery risks.

## How we assess and address those risks: Responsible Sourcing Framework

As an end user of goods and products, 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 products used every day in our Hospitals and Clinics. Ramsay's suppliers source materials, components, and products from suppliers upstream which, in turn, source items from their upstream suppliers. As a result, there are many tiers of suppliers in the chain between Ramsay and the companies that mine, grow, extract and process the raw materials that go into the goods we purchase.



The inherent risks that exist in a large global supply chain and how we identify, assess and manage the risks of modern slavery practices are dependent on a range of factors, including: the supplier tier, location of the supplier, regulation and compliance requirements within the relevant country and industry, exposure to economic, environmental and social issues and Ramsay's ability to influence suppliers.

In our FY2021 Modern Slavery Statement, Ramsay committed to developing the Global Responsible Sourcing Framework as part of its Human Rights Commitment. Under that Framework, Ramsay:



### Provenance:

Must understand the supply chain from end to end and engage suppliers regularly with a focus on the provenance of what is being purchased. This knowledge is key for Ramsay to be assured for any meaningful responsible sourcing reporting.



### Supplier Ecosystem:

Can use its supplier network to strengthen supply chain resilience and identify, assess, and manage risk together.



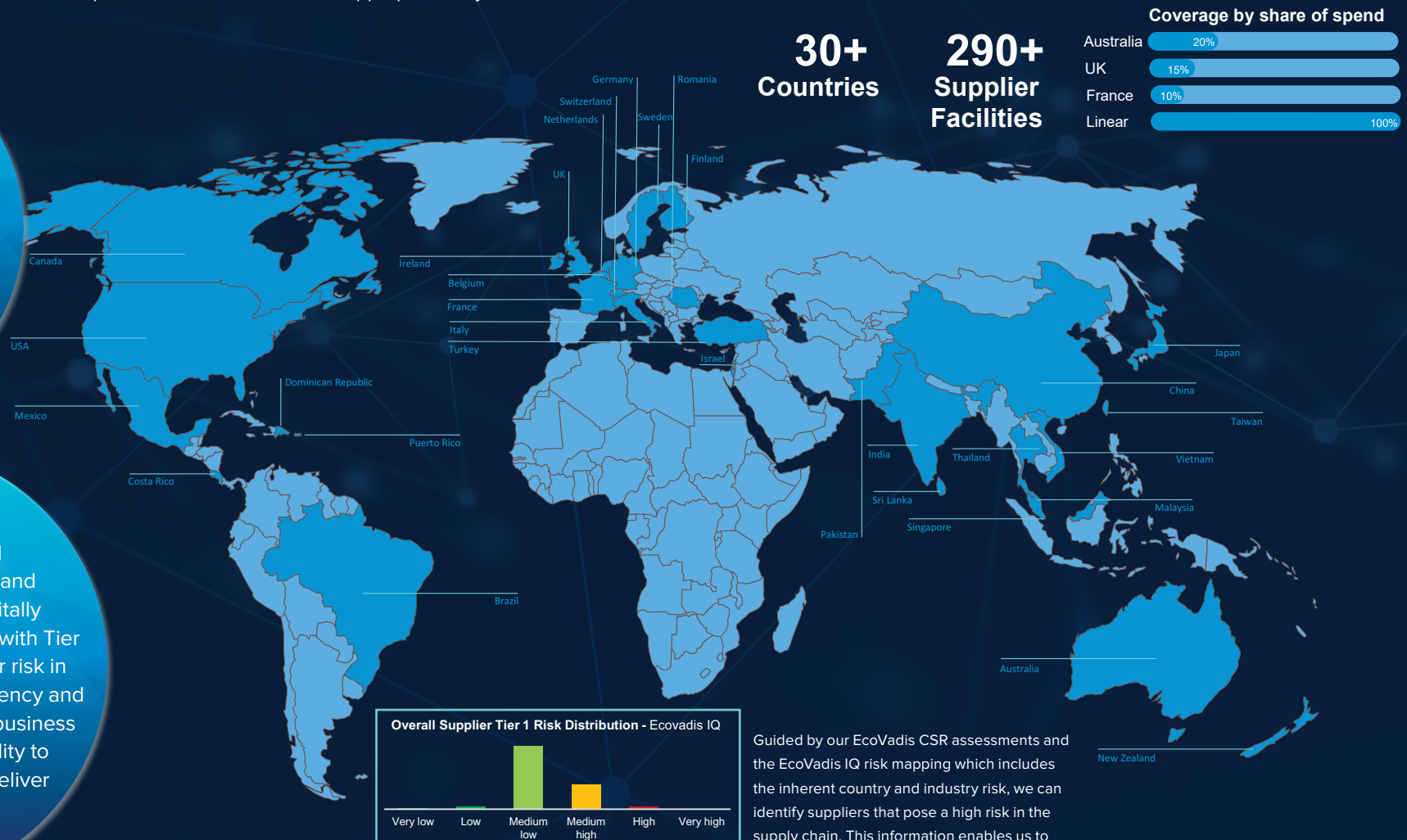
## How we assess and address those risks: Medical Spend Supply Chain Mapping

Our medical spend supply chain is a large proportion of our group spend and is primarily comprised of sourcing medical consumables, equipment, implants and pharmaceuticals. In our FY2021 Modern Slavery Statement, Ramsay outlined one of our long-term goals was ongoing supplier mapping. During FY2022, we engaged and collaborated with our top medical suppliers in mapping our Tier 1 supply chain. These suppliers are global multi-national organisations with complex and geographically diverse operations. As outlined in the diagram below, our ongoing work has identified approximately 20% of our medical products by share of spend are sourced from over 290 supplier facilities located in over 30 countries.

As part of our supplier mapping process, we have used the EcoVadis CSR assessments and the EcoVadis IQ risk mapping platform to assess the inherent country and industry risk of our suppliers. These risk management tools assist us to identify suppliers that pose a potential risk in our supply chain and, once identified, Ramsay is able to engage with our suppliers to address, mitigate and monitor non-compliance issues and risks in an appropriate way.

Our medical spend supplychain mapping has identified that the majority of our suppliers present a medium-low risk, which means that the risks we have identified (outlined on page 7) are inherent in the countries from which we are sourcing.

Our ongoing monitoring of our suppliers through annual EcoVadis CSR assessments and due diligence processes is vitally important. Ramsay aims to work with Tier 1 suppliers that present a higher risk in order to provide greater transparency and insight into our Tier 1 suppliers' business practices, to drive accountability to stated commitments and to deliver effective and verifiable outcomes.



Guided by our EcoVadis CSR assessments and the EcoVadis IQ risk mapping which includes the inherent country and industry risk, we can identify suppliers that pose a high risk in the supply chain. This information enables us to identify, mitigate and monitor risks.

## How we assess and address those risks: Our supplier due diligence processes and contractual controls

Ramsay has a zero tolerance approach to slavery and human trafficking from our suppliers. We make clear our expectations of suppliers, including adherence to the relevant policies outlined below irrespective of whether it is an explicit contractual term. Where suppliers are not able to satisfy us as to their compliance with our policies on modern slavery, Ramsay 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 Ramsay on this issue in good faith or there is a lack of objective steps taken towards compliance, Ramsay will seek to sever ties with that particular supplier. Ramsay has put in place measures in our supplier engagement and contracting to assess and address the modern slavery risks within our business. Some examples of steps Australian Reporting Entities and UK Reporting Entities have taken to seek to minimise the risk of modern slavery are outlined below.

In FY2022, we made significant progress implementing the recommendations outlined in a multi-year Modern Slavery Improvement Plan. A key action was the establishment of a Responsible Sourcing Framework which shapes and informs our supplier due diligence processes in our countries of operation. We continued our ongoing investment in systems and processes to conduct due diligence across the supplier life-cycle in the key areas of human rights and modern slavery. The EcoVadis CSR assessment tool is a key part of this. However, we recognise that not all suppliers will meet the criteria based on spend amount, spend category or geographic location to participate in an EcoVadis assessment. Accordingly, in FY2023 we will continue develop and embed appropriate procurement processes for suppliers that do not undertake the EcoVadis assessment. The procurement processes will consider key inherent modern slavery risks such as high-risk categories, high-risk geographies, vulnerable populations or risk assessment of modern slavery.

In FY2022, legal briefing sessions were conducted on Anti-bribery & Corruption, Modern Slavery and on the Ramsay Global Human Rights and Labour Policy with 89 procurement and supply chain personnel attending from our Australian and UK businesses.

In FY2022, we developed an online Modern Slavery training module for procurement, supply chain and closely associated corporate and administration personnel in our Australian business. The training module was successfully completed by 157 people.

In FY2022, 217 of Ramsay's top suppliers representing over 20% of our global supplier spend either completed or were in the process of completing the EcoVadis CSR assessment. Where a supplier's performance rating is below our minimum standards, we are proactively engaging with the supplier to use the EcoVadis corrective actions tools and agree the best course to improve their performance rating.

Ramsay Australia and Ramsay UK incorporate contractual provisions into our standard supply and services agreements to require suppliers to comply with modern slavery laws, notify Ramsay of any actual or suspected modern slavery in its supply chain or operations, and to allow Ramsay to audit a suppliers' premises and records

Elysium Healthcare was acquired by Ramsay in January 2022 and 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 CSR 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.

Linear continues to undertake comprehensive manufacturer due diligence and engages in continual monitoring through its Manufacturer Audit Programme, 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 labour and slavery risks. Linear makes known Ramsay's zero tolerance approach to slavery and human trafficking to all of its manufacturing partners. A manufacturer's HR representative continues to participate in business review meetings and it is proposed that in FY2023 a Ramsay UK Director and Senior Legal Counsel will participate in onsite meetings and inspections at two Linear manufacturing facilities in Taiwan. This highlights our investment in ensuring modern slavery risk management remains a focal point for Linear manufacturing partners.

## How we assess and address those risks: Medical Glove Supply Chain Mapping Deep Dive

Medical gloves are an essential product used throughout Ramsay's healthcare facilities. In our Australian and UK operations, we source medical gloves as a finished product through local distributors. However, as we understand the risk of modern slavery increases further downstream in the supply chain, in FY2022 we focused on the procurement of medical gloves as a high risk category industry and geography for modern slavery and commenced the mapping of our medical glove supply chain beyond Tier 1 to identify our Tier 3 suppliers that are the original manufacturers of the medical gloves purchased by our Australian and UK operations.

The graph shows the progress to date of our medical glove supply chain mapping, including the number of suppliers in each of Tiers 1 to 3, and the percentage of our spend that has been mapped as part of this deep dive. The medical gloves we purchase are manufactured in Malaysia, Sri Lanka, China, Thailand and Vietnam.

We remain cognisant of the inherent country and industry risks to which our medical glove supply chains are exposed, and are continuing our program of assessing and monitoring of these risks with our suppliers and within our supply chains.

To undertake this deep dive, we prioritised the engagement of our Tier 1 and Tier 2 medical glove suppliers to participate in the EcoVadis CSR assessment, which our key suppliers are required to complete under the Ramsay Responsible Sourcing Framework. Alongside our EcoVadis assessments, we have sought to identify medical glove suppliers who use other recognised tools for compliance assessments that are accepted by Ramsay as part of our Responsible Sourcing Framework. This includes the Sedex Members Ethical Trade Audit (SMETA) compliance tool.

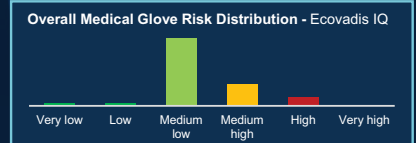
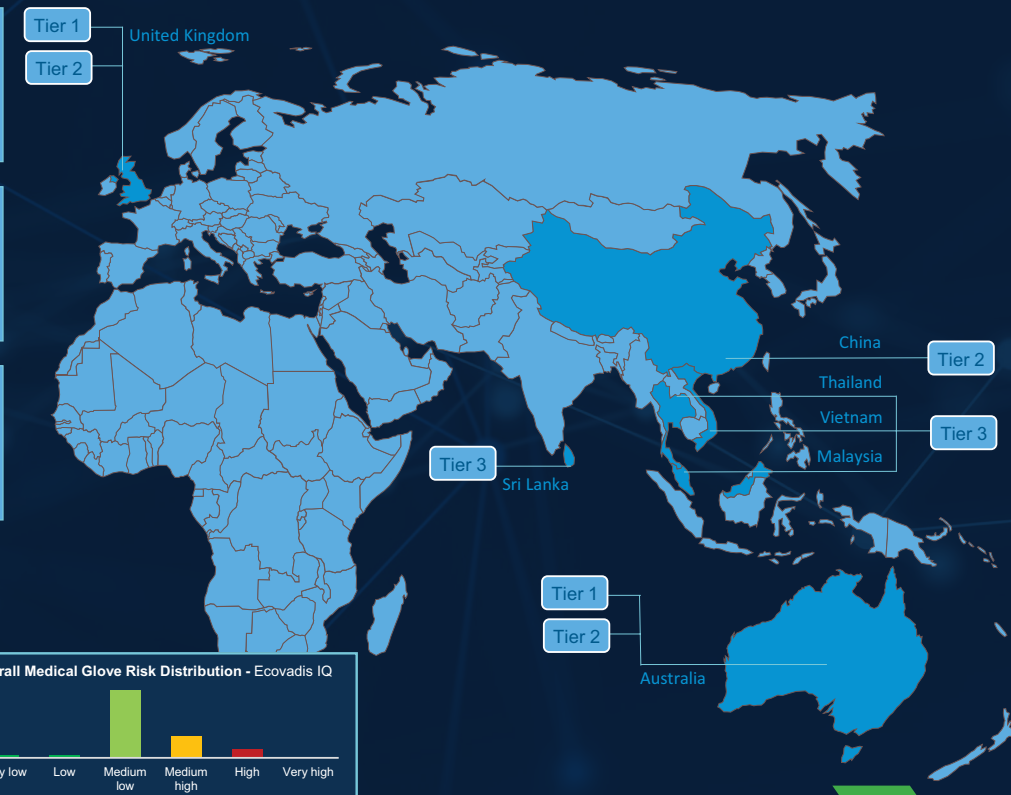
This process has resulted in over 80% of Ramsay Australia and UK (excluding Elysium) Tier 1 and Tier 2 medical glove suppliers completing a recognised assessment as at the date of this Statement. In Elysium Healthcare, our progress to date has enabled us complete supply chain mapping of our Tier 1 & 2 medical gloves suppliers by share of spend.

Using our EcoVadis IQ risk management reporting tool, we have identified that the majority of our suppliers represent a medium-low risk, however we know these are the Tier 1 & 2 suppliers for the Australian and UK operations. The Tier 3 suppliers which are the original manufacturers of the medical gloves present a higher risk and we aim to engage with our Tier 1 & 2 suppliers to ensure robust due diligence processes are in place across the supply chain with a view to driving positive change in reducing modern slavery risk in this sector.

| Ramsay Australia                   | Tier 1 | Tier 2 | Tier 3 |
|------------------------------------|--------|--------|--------|
| Suppliers                          | 14     | 14     | 5      |
| Mapping Progress By Share of Spend | 100%   | 85%    | 88%    |
| CSR Assessment By Share of Spend   | 84%    | 84%    | 83%    |

| Ramsay UK                          | Tier 1 | Tier 2 | Tier 3 |
|------------------------------------|--------|--------|--------|
| Suppliers                          | 1      | 6      | 6      |
| Mapping Progress By Share of Spend | 100%   | 97%    | 100%   |
| CSR Assessment By Share of Spend   | 100%   | 88%    | 39%    |

| Elysium                            | Tier 1 | Tier 2 | Tier 3 |
|------------------------------------|--------|--------|--------|
| Suppliers                          | 1      | 4      |        |
| Mapping Progress By Share of Spend | 100%   | 100%   |        |
| CSR Assessment By Share of Spend   | 0%     | 0%     |        |



Guided by our EcoVadis CSR assessments and the EcoVadis IQ risk mapping which includes the inherent country and industry risk, we can identify suppliers that pose a high risk in the supply chain. This information enables us to identify, mitigate and monitor risks.

**The increased visibility we have gained will inform our ongoing due diligence activities for the sourcing of medical gloves in FY2023.**

## How we assess and address those risks: policies and processes relevant to mitigating the risks of modern slavery and trafficking

### Modern Slavery Working Group

Ramsay's Modern Slavery Working Group is made up of representatives of each region and across various functions within the business. The Working Group is charged with proposing group wide key performance indicators (KPIs), policies and standards to address modern slavery risks within the Ramsay Group. It is responsible for designing and managing the implementation plan across the Ramsay Group.

The recommendations of the Modern Slavery Working Group are then put to the Global Executive for approval and endorsement, which includes the CEO, CFO, the Chief People Officer, the Chief Medical Officer and the CEOs of each of Ramsay Australia, Ramsay UK, Elysium Healthcare, Ramsay Santé and Ramsay Sime Darby.

### Policies

Ramsay has a number of policies (some of which are outlined below) in place to help us identify and mitigate the risk of modern slavery in our business and supply chains. Each policy has been reviewed and formally approved by the Board or appropriate committee. This includes the following (which apply to our Australian Reporting Entities and our UK Reporting Entities):

### Human Rights & Labour Policy

The Ramsay Global Human Rights & Labour Policy sets out our commitment to operate in accordance with all key universal human and labour rights across each region in which we operate. Under this policy, Ramsay:

- 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 our 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 our 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.

In FY2022, Ramsay reviewed this Policy to align with internationally recognised human rights and standards, and to articulate due diligence requirements and grievance and remediation mechanisms in respect to modern slavery issues

identified across Ramsay's business and supply chain.

To ensure Ramsay's salient human rights areas are addressed by this Policy, a key update was expanding the coverage to include our patients along with our people, partners, and suppliers. This was informed by existing patient commitments across parts of the Ramsay Group (eg in Ramsay Santé) and other expectations such as the Australian Charter of Healthcare Rights (Australian Commission on Safety and Quality in Health Care) and the NHS patient rights and commitments.

### Ramsay's Codes of Conduct

Ramsay's Codes of Conduct (the Code of Conduct for Employees, the Code of Conduct for Manufacturers, Suppliers and Agents, and Ramsay UK's Supplier Code of Conduct) define the standards of behaviour which are expected from Ramsay employees, manufacturers, suppliers and agents, and sets out our expectations for behaviour towards those with whom these parties come into contact. This includes the obligation to have "respect for others" and to comply with the laws and principles of human rights.

The Codes require these parties to do all things reasonably necessary to ensure that in their operations and broader supply chain:

- there is no forced, bonded, indentured labour or use of involuntary prison labour;
- there is no conduct involving the use of any form of slavery or servitude to exploit adults or children including human trafficking, forced marriage or deceptive recruiting for labour or services; and
- there is no direct or indirect use of child labour or other forms of exploitation of children.

The Code of Conduct for Employees also obliges representatives to raise concerns about breaches (which they can do directly to managers or otherwise through the process established by the Group's Whistleblower Policy).

In FY2022, Ramsay reviewed Ramsay's Code of Conduct for Manufacturers, Suppliers and Agents to articulate grievance and remediation mechanisms in respect to modern slavery issues identified across Ramsay's business and supply chain. As a result of the review, and in addition to articulating grievance and remediation mechanisms in respect to modern slavery issues, in FY2023 Ramsay has undertaken to replace the existing Code with a new Responsible Sourcing Policy that clearly sets out the expectations of suppliers when doing business with Ramsay in the areas of business ethics,

human rights and labour standards, the environment, society and the communities in which we operate. The new Policy will become a key element of Ramsay's Responsible Sourcing Framework.

### Procurement policies

Ramsay's procurement policies reiterate our commitment to fair and ethical business practices. In addition to the Code of Conduct for Manufacturers, Suppliers and Agents and the Code of Conduct for Employees, which are outlined above, Ramsay UK has implemented a number of other relevant policies, including the Supply of Goods Policy, Sustainable Procurement Policy and the New Supplier Creation Policy.

Across the Australian Reporting Entities and the UK Reporting Entities, Ramsay's people and suppliers are required to follow the applicable policies and standards.

### Internal Audit and compliance with policies

Ramsay has an internal audit program which measures the effectiveness of our risk control framework and includes assessing compliance with policies.

### Modern Slavery Improvement Plan

In FY2021, Ramsay undertook an external review of our processes on modern slavery risk reduction (Group and Australia) led by the internal assurance function. This has informed our Modern Slavery Improvement Plan, which outlines a three-year work plan to ensure accountability, monitoring and

training is embedded across Ramsay and our regional operations. The Improvement Plan will be reviewed on an annual basis and form part of Ramsay's review of the effectiveness of our modern slavery actions.

### Risk Areas and Training

The greatest risk of modern slavery within our business is in relation to the Group's suppliers (on the basis that the Group can only control our own actions). Training and legal briefings on modern slavery have been undertaken for the Group's procurement business units and will again be performed in FY2023. Among other things, these 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.

Ramsay regularly updates our training modules for both the Australian Reporting Entities and the UK Reporting Entities to align with the organisation's policies and relevant legislative updates. As part of our FY2022 KPIs, Ramsay developed and delivered a new e-learning module in Australia on modern slavery, as well as new senior management and procurement training on modern slavery. Ramsay will continue to make available regular training in line with its mandatory learning framework.

### Grievance mechanisms to support modern slavery initiatives

The Group offers multiple ways to report potential compliance concerns, including anonymously through an external provider under the Group's Whistleblower Policy. This 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). For those Ramsay subsidiaries outside of Australia that are not wholly owned or Ramsay related companies that are not controlled by Ramsay (eg. joint venture entities), Ramsay strongly encourages these entities to establish whistleblowing procedures that are consistent with the principles outlined in this policy.

To support the Group's modern slavery initiatives, in FY2022 we reviewed our policies and procedures to better articulate our grievance and remediation mechanisms specific to modern slavery issues identified across our business and supply chain.

### Elysium Healthcare

Ramsay acquired Elysium in January 2022. Elysium is committed to acting ethically in all business dealings and to improve processes and controls to manage modern slavery risks across its business and supply chains. This includes policies and codes of conduct that set out how Elysium employees are expected to behave, a safeguarding policy to

help Elysium employees recognise and report abuse and neglect, including within the context of modern slavery, and a whistleblowing policy which sets out a process for employees to raise concerns. For its suppliers, Elysium has implemented checks within its procurement processes to identify, assess and mitigate the risk of slavery and human trafficking occurring within its supply chains. Elysium uses an e-Procurement platform (ARCUS by Trade Interchange) to run due diligence on all suppliers, which has been in place since 2020. The ARCUS platform is the gateway for suppliers into Elysium and they are all subject to the Supplier Information Management (SIM) module. Elysium has a process for continually reviewing and updating this supplier process as appropriate.

### Non-managed/non-controlled entities and joint ventures

This statement does not apply to any non-managed/non-controlled entities or joint ventures in which Ramsay holds a financial interest. Despite this, Ramsay is working towards identifying over-arching risks relating to these partnerships and setting our expectations for alignment by our partners with our core standards, including ongoing respect for human rights. For those 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 outlined in Ramsay policies.

In FY2022, Ramsay engaged with its Ramsay Sime Darby joint venture to share knowledge on human rights and modern slavery risk considerations across operations and supply chains, this included representatives from the respective procurement, people, finance, risk and sustainability teams. As part of ongoing engagement, Ramsay Sime Darby has identified that in FY2023 it is targeting the roll-out of a vendor specific code of business conduct. The code will target vendor compliance with labour laws in applicable jurisdictions and give Ramsay Sime Darby certain rights to audit the business practices of its vendors as part of ongoing due diligence processes related to the awarding of contracts.

Information on our joint ventures is contained in our 2022 Annual Report available on our website [www.ramsayhealth.com/Investors/Annual-and-Financial-Report](http://www.ramsayhealth.com/Investors/Annual-and-Financial-Report).

# 4. Assessing the Effectiveness of Ramsay’s Modern Slavery Actions

Ramsay understands the importance of assessing the effectiveness of the actions we are taking to assess and address modern slavery risks. Several of our processes help track our performance across the Australian Reporting Entities and the UK Reporting Entities, including the outline of how we assess and address modern slavery risks in Section 3 of this Statement and our effectiveness assessment against our KPIs in this Section 4.

## A. Effectiveness assessment for FY2021 – Current Progress

Our effectiveness against our FY2021 KPIs is set out below:

| FY2022 KPI  | FY2022 ACTIONS   |
|---|--|
| <p><b>Human Rights Commitment:</b></p> <ul style="list-style-type: none"> <li>Update policies to cascade expectations and accountabilities at a regional level</li> <li>Develop Global Ramsay Responsible Sourcing Framework</li> </ul>   | <ul style="list-style-type: none"> <li>Developed and implemented a new Global Human Rights and Labour Policy</li> <li>Developed and implemented a new Global Responsible Sourcing Framework</li> </ul>   |
| <ul style="list-style-type: none"> <li>Deliver new e-learning module training</li> <li>Deliver new senior management and procurement legal training on modern slavery</li> <li>Continue to provide supplier assessment training to regional procurement teams</li> </ul>  | <ul style="list-style-type: none"> <li>Developed and delivered a new e-learning module in Australia on modern slavery</li> <li>Developed and delivered new senior management and procurement legal training on modern slavery</li> <li>Delivered regional procurement teams training on EcoVadis CSR assessment tool</li> </ul>  |
| <p><b>Management, systems and control:</b></p> <ul style="list-style-type: none"> <li>Appoint Global Responsible Sourcing Manager</li> <li>Consider appropriate resourcing requirements within procurement teams at regional level</li> <li>Increase supplier assessment target spend to 80% of Global spend by end of FY2026 (Australian and UK target)</li> <li>Identify high risk areas across top 50 suppliers using EcoVadis IQ</li> <li>Work with suppliers with lower EcoVadis rating</li> </ul> | <ul style="list-style-type: none"> <li>Appointed Global Responsible Sourcing Manager effective December 2021</li> <li>Commenced engagement with regional procurement teams on capacity building at a regional level</li> <li>Achieved supplier assessment of over 20% of Global spend in FY2022, targeting 80% of Global spend by end of FY2026 (Australian and UK target)</li> <li>Identified high risk areas across over top 100 suppliers using EcoVadis IQ</li> <li>Engaged with suppliers with low EcoVadis ratings and implemented corrective action plans where required</li> </ul> |
| <p><b>Grievance and remediation</b></p> <ul style="list-style-type: none"> <li>Articulate clearly modern slavery grievance and remediation mechanisms across:             <ul style="list-style-type: none"> <li>Global Human Rights and Labour Policy</li> <li>Code of Conduct for Agents, Manufacturers Suppliers</li> <li>Whistleblower Policy and Handbook</li> <li>Website</li> </ul> </li> </ul>  | <ul style="list-style-type: none"> <li>Updated policies to articulate clearly modern slavery grievance and remediation mechanisms, including that Ramsay’s Whistleblower Policy reporting channels can be used to raise concerns in relation to modern slavery or breaches of Ramsay’s Human Rights and Labour Policy</li> <li>Published relevant updated policies on Ramsay’s website</li> </ul>  |

\* As part of the FY2021 review of Ramsay’s Code of Conduct for Agents, Manufacturers Suppliers, Ramsay has undertaken to replace this policy with a new Responsible Sourcing Policy as part of its FY2022 KPIs. The new Policy articulates modern slavery grievance and remediation mechanisms and is available on Ramsay’s website: <https://www.ramsayhealth.com/Sustainability/Social>

## B. Target activities for how we measure effectiveness of the steps we take to address modern slavery risks

For FY2023, we continue to align our focus activities with the three key focus areas of our Modern Slavery Improvement Plan.

| FOCUS AREA                     | INITIATIVE   | KPIs TO MEASURE EFFECTIVENESS  |
|--------------------------------|--|--|
| Human rights commitment        | Policies, procedures and templates                                 | <ul style="list-style-type: none"> <li>• Develop new Global Responsible Sourcing Policy</li> <li>• Continue focus on cascading expectations and accountabilities at a regional level</li> </ul>  |
|                                | Training our people  | <ul style="list-style-type: none"> <li>• Continue focus on training globally to cover introduction of new regional regulatory requirements</li> </ul>  |
| Management systems and control | Capability to assist with focus on modern slavery                  | <ul style="list-style-type: none"> <li>• Expand modern slavery due diligence toolbox to include complementary monitoring processes</li> <li>• Continue capacity building and consistency in approach at a regional level</li> </ul>  |
|                                | Mapping of operations and supply chain                             | <ul style="list-style-type: none"> <li>• Map 30% of global suppliers by share of spend, with a focus on high-risk categories</li> </ul>  |
|                                | Risk assessment of high-risk suppliers and key business risk areas | <ul style="list-style-type: none"> <li>• Work with suppliers to reduce risk exposure</li> <li>• As part of ongoing KPI to increase supplier assessment target spend to 80% of Global spend by end of FY2026 (Australian and UK target):                             <ul style="list-style-type: none"> <li>– undertake EcoVadis supplier assessments for 40% of Global spend by the end of FY2023 (Ramsay Australia and Ramsay UK target); and</li> <li>– commence supplier assessments for Elysium Healthcare and establish target spend KPI</li> </ul> </li> </ul> |
| Grievance and remediation      | Policies, procedures and templates                                 | <ul style="list-style-type: none"> <li>• Continue focus and refinement of procurement due diligence and response plan for managing modern slavery risk</li> </ul>  |



## 5. Consultation Process and Approval

This statement has been prepared by Ramsay in consultation with each Australian Reporting Entity and each UK Reporting Entity and it has been approved by the Board of Ramsay Health Care Limited on 28 October 2022, the Board of Ramsay Health Care (UK) Limited on 26 October 2022 and the Board of Elysium Healthcare on 20 October 2022. The process of consultation involved engagement with the Group's Global Executive and input from the various relevant internal stakeholder groups (including Procurement, Human Resources, Legal and Corporate Affairs) as well as leveraging the knowledge of Ramsay's Modern Slavery Working Group which includes representatives from Ramsay Australia, Ramsay UK, Elysium Healthcare and Ramsay Santé.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 (UK) and s14 of the Australian Modern Slavery Act 2018 (Cth). It represents the UK Reporting Entities' and Australian Reporting Entities' statement on modern slavery for the financial year ended 30 June 2022.



**Craig McNally**  
CEO and Managing Director  
Ramsay Health Care Limited  
28 October 2022



**Nick Costa**  
CEO and Director  
Ramsay Health Care (UK) Limited  
28 October 2022



**Joy Chamberlain**  
CEO and Director  
Elysium Healthcare  
28 October 2022

## 6. How we address the Australian MSA and UK MSA reporting criteria in this Modern Slavery Statement

| Australian MSA mandatory reporting criterion  | UK MSA recommended reporting criterion   | Reference in this statement                    |
|---|--|--|
| Identify the reporting entity.  | Organisation's structure, its business and its supply chains.  | Reporting entities on page 2<br>Sections 1 – 2 |
| Describe the reporting entity's structure, operations and supply chains.  | As above.  | Section 2                                      |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it 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.   | Section 3                                      |
| Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those 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. | Section 3                                      |
| Describe how the reporting entity assesses the effectiveness of such actions.   | 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.  | Section 3 – 4                                  |
| Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.    | n/a  | Section 5                                      |
| Include any other information that the reporting entity, or the entity giving the statement, considers relevant.  | n/a  | Sections 1 – 6                                 |