



# Modern Slavery Statement 2019/2020



**Ramsay**  
Health Care

# 1. Introduction

A respect for human rights is at the heart of The Ramsay Way and our entrenched philosophy of “People Caring for People”. Ramsay manages this through leadership committed to integrity, positive spirit, innovation and teamwork.

We take 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. Ramsay also 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.

## This year’s modern slavery statement

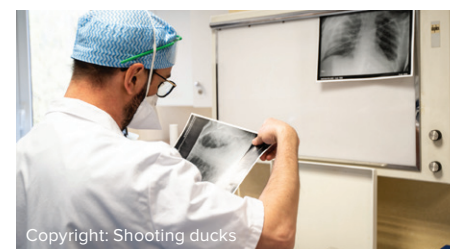
This modern slavery statement addresses both the reporting requirements under the UK Modern Slavery Act 2015 (**UK MSA**) and the *Australian Modern Slavery Act 2018* (Cth) (**Australian MSA**) and has been drafted using valuable input from a wide range of internal stakeholders.

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This statement has been published in accordance with the Australian Modern Slavery Act 2018 (Cth) and the UK Modern Slavery Act 2015. It sets out the steps taken by Ramsay Health Care Limited ACN 001 288 768 (**Ramsay**) and other relevant Ramsay group companies during the year ended 30 June 2020 to identify and reduce the risks of modern slavery and human trafficking in its business and supply chains.

## COVID-19 impact

The COVID-19 pandemic is a global crisis which has resulted in significant impacts to our business globally. Ramsay has responded and focussed our operations on delivering high quality patient care and keeping our people safe by minimising the impacts of supply chain constraints on medical supplies and equipment. We have been able to manage these constraints effectively through our global supply chain and regional network of facilities. We are cognisant that the unprecedented pressure on global supply chains means that we must be twice as vigilant in our approach to identify and manage the risk of modern slavery in our operations and supply chain.



### Important notice and disclaimer

This document has been prepared by Ramsay Health Care Limited ACN 001 288 768 (Ramsay) for inclusion on Ramsay’s website 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 or guidance and any such statements are not guarantees or predictions of future performance. Certain information contained in this document is based on information prepared by third parties (eg the supplier overview and associated modern slavery risks) 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.

## Reporting entities

This statement covers:

- Ramsay;
- 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 UK Reporting Entities;
- **Ramsay Santé** means Ramsay Santé SA and its subsidiaries; 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>

<sup>1</sup> 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 – Peninsula Pty Limited ACN 006 918 163, Benchmark – Surrey Pty Limited ACN 006 216 048, AH Holdings Health Care Pty Limited ACN 115 549 230, Affinity Health Pty Limited ACN 106 722 347, Australian Medical Enterprises Pty Limited ACN 053 639 160, AME Hospitals Pty Limited ACN 054 813 991, AME Properties Pty Limited ACN 008 897 783, 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, 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).

<sup>2</sup> This statement constitutes the annual modern slavery statement for the following Ramsay 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 (together with Ramsay, being the UK Reporting Entities for the purposes of the UK MSA).

<sup>3</sup> Ramsay Sime Darby Health Care is not controlled by Ramsay.



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

### About our business and operations

Ramsay is an Australian public company listed on the Australian Securities Exchange under the code RHC. Our operations focus on the delivery of health care services in Australia and overseas. A list of our controlled entities is available in our 2020 Annual Report.

Established in Sydney, Australia, in 1964 by Paul Ramsay AO, Ramsay has over 55 years of experience in providing high-quality services and has grown to be one of the largest and most diverse private health care companies in the world with over 77,000 employees across 11 countries. We treat 8.5 million patients in 519 locations, including hospitals and primary care clinics located in Australia, France, the United Kingdom, Sweden, Norway, Denmark, Germany, Italy, Malaysia, Indonesia and Hong Kong.

Additionally, Ramsay operates Linear Healthcare Group (**Linear**), which supplies Linear branded medical device consumables. Linear manages sourcing and supplier contracts predominantly based in China and Taiwan and also distributes Linear supplies within Australia (including to Ramsay's Australian operations).



# The Ramsay Group's operations are split across our key regions



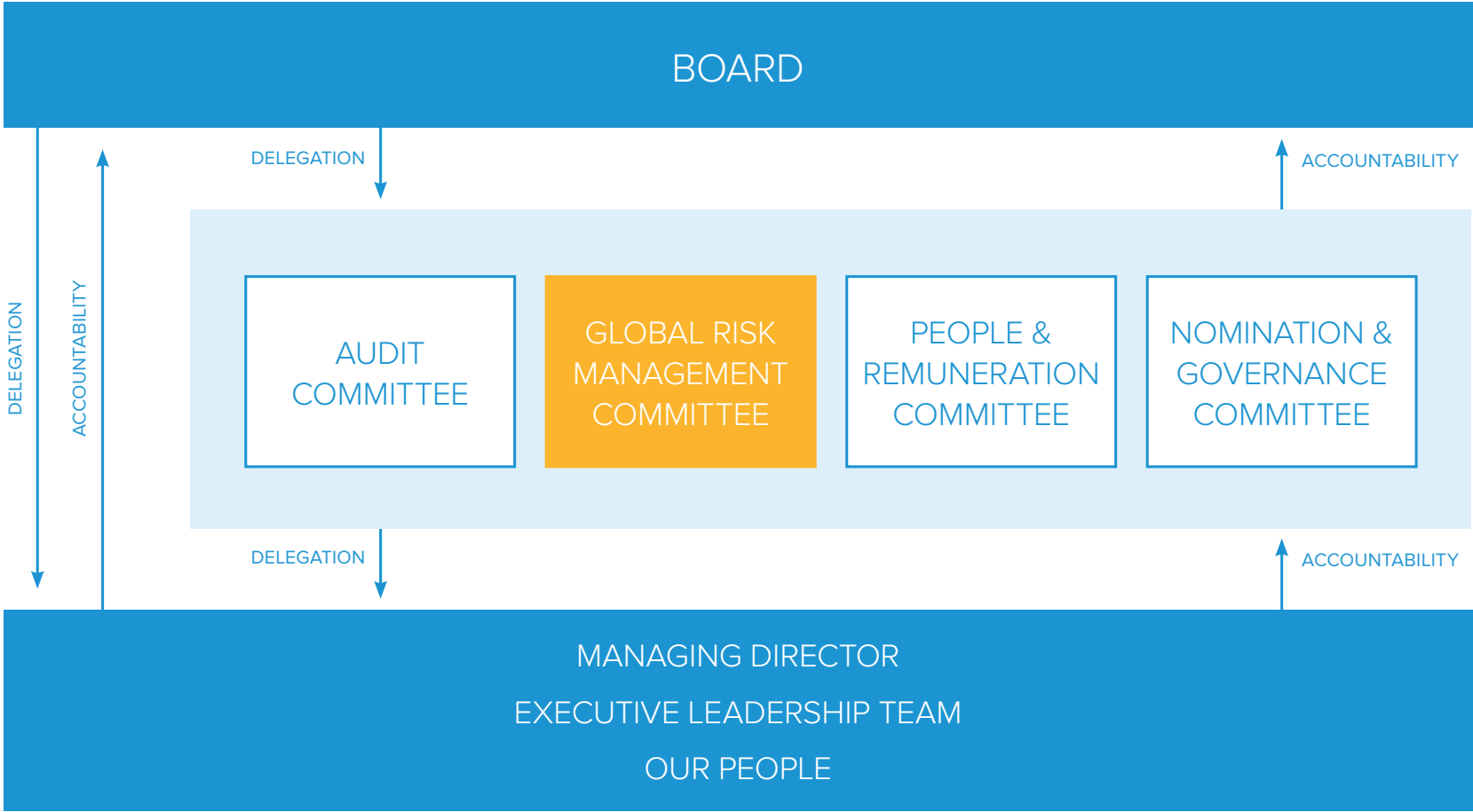
\* Ramsay owns 52.5% of Ramsay Santé, which is an entity listed on Euronext.

\*\* Ramsay Sime Darby Health Care is not controlled by Ramsay

# 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 with its code of conduct. The Board is assisted by the Board Committees in discharging its responsibilities.

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



## Overview of our supply chains

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

**Who we buy from:** In Australia and the United Kingdom, over 80% of our medical spend is with our top 20 suppliers. Each of Ramsay Australia and Ramsay UK have in excess of 4,000 suppliers, of which the head offices are in Australia, the UK, Ireland, USA, Germany, Japan, Sweden, Switzerland and the Netherlands. Approximately 53% of Ramsay Santé's medical spend in France, and approximately 40% in the Nordics, is with top 20 suppliers.

### **RAMSAY AUSTRALIA**

Over 280 active contracts

80% of our medical spend with our top 20 suppliers

4,000+ suppliers, of which 15% have a Head Office in Australia and the remaining 85% have Head Offices in Ireland, USA, UK, Sweden, Germany, Switzerland and the Netherlands

### **RAMSAY UK**

Over 242 active contracts

80% of our medical spend with top 20 suppliers

4,200+ suppliers, 20% of our suppliers have a Head Office in the UK, with the remaining 80% having offices in Ireland, USA, Germany, Japan and Sweden

### **RAMSAY SANTÉ (INCLUDING THE NORDICS)**

Over 420 active contracts and over 125 framework agreements in place

In France, 53% 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

2800+ suppliers, over 20% of which have a global Head Office in France and the remaining with Head Offices in Switzerland, Italy, Germany, the Netherlands and Belgium

# 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 consumables (including generic &amp; volume based, low cost clinical consumables)</b> <b>Medical equipment</b> <b>Medical implants</b> <b>Pharmaceuticals</b>	<ul style="list-style-type: none"> <li>Tier 1<sup>4</sup> mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws</li> </ul>	
<b>Uniforms</b>	<ul style="list-style-type: none"> <li>Tier 1<sup>4</sup> locally based suppliers, subject to local region laws</li> </ul>	
<b>IT/telecommunications</b>	<ul style="list-style-type: none"> <li>Tier 1<sup>4</sup> 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<sup>4</sup> 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<sup>4</sup> 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>Staff covered by local region laws</li> <li>For Ramsay Australia, 88.5% covered by EBAs</li> </ul>	
<b>Agency labour contractors</b>	<ul style="list-style-type: none"> <li>Tier 1<sup>4</sup> 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</li> </ul>	

<sup>4</sup> ‘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 become more prevalent. 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: Our supplier due diligence processes and contractual controls

Ramsay has a zero tolerance approach to slavery and human trafficking from its suppliers. It makes clear its 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 its supplier engagement and contracting to assess and address the modern slavery risks within its business. Some examples of steps Australian Reporting Entities and UK Reporting Entities have taken to seek to minimise the risk of modern slavery are highlighted below.

We have incorporated new 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.

We are undertaking a review of our procurement and supply chains for Continental Europe in FY21.

During FY20, Linear has undergone a compliance risk assessment with internal legal to assess various compliance risks, including slavery risk. The results confirmed Linear has appropriate measures in place to address slavery risk within its supply chain.

We have put in place a Code of Conduct for Manufacturers, Suppliers and Agents that applies across the Ramsay Group.

Linear has undertaken comprehensive due diligence on proposed manufacturers of its products and follow-up through its Manufacturer Audit Programme. These processes have included specific questions regarding workers' rights and child labour, management team interviews, site visits in order to gain an understanding of the worker conditions and routine inspections by Linear representatives. Linear makes known Ramsay's zero tolerance approach to slavery and human trafficking to all of its manufacturers.

We have implemented a Supplier Due Diligence Programme that is used to 'on-board' new suppliers in Ramsay UK, which includes obtaining copies of the supplier's codes of conduct and requiring suppliers to complete a questionnaire. Among other things, this Programme includes questions that focus on the supplier's modern slavery policies and practices. This way, we can ascertain what actions suppliers take to ensure that slavery and human trafficking do not occur in their businesses or supply chains.

## 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 has established a Modern Slavery Working Group with 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 Committee 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, 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 (unless otherwise specified).

### Human Rights & Labour Policy

The [Ramsay Global Human Rights & Labour Policy](#) sets out Ramsay's 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 its regions and suppliers to implement employment/ engagement practices to protect all persons who are not of legal age from working in the relevant jurisdiction; and
- requires each of its regions and suppliers to implement employment/ engagement practices to protect the rights of every worker to voluntarily work under the terms and conditions offered, free of compulsion or coercion, and which, at a minimum, conform to universal human and labour rights and legislated employment standards in the relevant jurisdiction.

### Ramsay's Codes of Conduct

Ramsay's Codes of Conduct (the Code of Conduct for Employees and the [Code of Conduct for Manufacturers, Suppliers and Agents](#), and including [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.

In particular, the Code of Conduct for Manufacturers, Suppliers and Agents was updated in 2020 and requires 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 codes also oblige 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).

### 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 the Company Representatives / Visitors Policy, Trial and Evaluation of Medical Equipment Policy, Supply of Goods Policy, Commercial Confidentiality 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.

Ramsay has included modern slavery on its FY21 internal audit plan.

### Joint ventures and Ramsay policies

For those Ramsay subsidiaries 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 procedures that are consistent with the principles outlined in these policies.

### 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 its 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 FY2021. 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 its training modules for both the Australian Reporting Entities and the UK Reporting Entities to align with the organisation's policies and relevant legislative updates. 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.

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

This statement does not apply to any non-managed/non-controlled joint ventures. Despite this, Ramsay is working towards highlighting our work to identify 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. Information on our joint ventures is contained in our 2020 Annual Report available on our website [www.ramsayhealth.com/Investors/Annual-and-Financial-Reports](http://www.ramsayhealth.com/Investors/Annual-and-Financial-Reports)



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

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

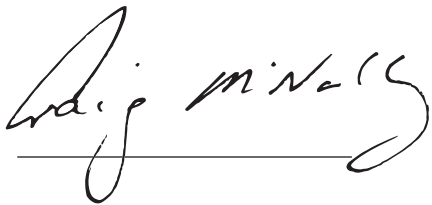
Ramsay understands the importance of assessing the effectiveness of the actions we are taking to assess and address modern slavery risks. Several of our processes help track our performance across the Australian Reporting Entities and the UK Reporting Entities.

CURRENT PROGRESS	FOCUS ACTIVITIES FOR FY21	KPIs TO MEASURE EFFECTIVENESS
Put in place additional resources to assist with focus on modern slavery	Refine the mandate of the Modern Slavery Working Group to drive initiatives to address modern slavery risks in the business	Identify the requirement and/or resources to assess risks within the business (local and/or globally) – FY21
Undertook mapping of operations and supply chains – focus on Tier 1 and top suppliers	Further map the Group’s supply chain with greater focus on suppliers beyond the top 20 and/or beyond Tier 1	Request supply chain mapping from top 20–50 suppliers based on identified risk/addressable spend and/or outsource to third party to undertake supplier supply chain mapping – FY21–22
Updated policies and procedures and templates	Identify opportunities to streamline processes or templates	Standardise current policies and procedures across Ramsay’s global operations to incorporate best practice – FY21
Undertook a risk assessment of high risk suppliers and key business risk areas	Further enhance supplier onboarding and monitoring processes to emphasise the importance of modern slavery risks and seek to implement common processes where applicable/possible	Prepare and implement a new supplier due diligence questionnaire addressing modern slavery and information governance to be sent to suppliers – FY21
Trained our people	Provide in-person or virtual training to key business risk areas and to procurement teams	Develop a mandatory e-learning module for all staff involved in procurement and purchasing. This includes defining and adapting content specific to each region (FY21). The rollout of training is targeted to take place in FY22 with the UK continuing to roll out existing training to the broader business in FY21.

## 5. Consultation Process and Approval

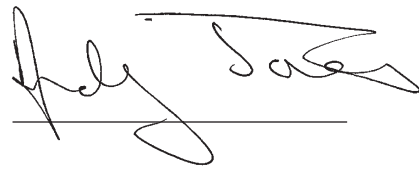
This statement has been prepared by Ramsay in consultation with each Australian Reporting Entity and each UK Reporting Entity and it has been approved by the Board of Ramsay Health Care Limited on 14 October 2020 and the Board of Ramsay Health Care (UK) Limited on 20 October 2020. The process of consultation involved engagement with the Group's Global Executive Committee 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 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 2020.



**Craig McNally**

CEO and Managing Director  
Ramsay Health Care Limited  
14 October 2020



**Dr Andy Jones**

CEO and Director  
Ramsay Health Care (UK) Limited  
20 October 2020

# 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.	Section 1 Section 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 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 – 5