



# Modern Slavery Statement 2020/2021



**Ramsay**  
Health Care

## 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 (**Ramsay**) and other relevant Ramsay group companies during the year ended 30 June 2021 to identify and reduce the risks of modern slavery and human trafficking in its business and supply chains.

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>

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 – 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, AHH 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, 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, 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 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).

3 Ramsay Sime Darby Health Care is not controlled by Ramsay.

### 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.

# 1. Introduction

A respect for human rights is at the heart of The Ramsay Way and our entrenched philosophy of ‘People Caring for People’. We are committed to maintaining these principles across all aspects of our business through our global sustainability strategy ‘Ramsay Cares’, which aims to deliver stronger communities, healthier people and a thriving planet.



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. This commitment is entrenched in our Ramsay Cares principles: caring for our people, caring for our planet, and caring for our community. 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.

## This year’s modern slavery statement

This is the second 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.

## COVID-19 impact

COVID-19 continues to have a significant impact globally and presents an ongoing risk to 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 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.



# Road map snapshot



## Progress to date

### To date, Ramsay has:

- ✓ Established systems for our risk assessment of high risk suppliers and key business risk areas
- ✓ Committed additional resourcing to modern slavery by establishing a Modern Slavery Working Group with Terms of Reference to drive initiatives to address modern slavery risks in our business
- ✓ Refined the process of mapping our supply chains through the EcoVadis supplier assessment platform across Australia, the UK and EU, and commenced the rating of key suppliers covering over 20% of Global spend.
- ✓ Included a supplier assessment target in our Sustainability Linked Loan Facility for Ramsay Australia and UK
- ✓ Undertaken an external review of our processes on modern slavery risk reduction (Group and Australia) led by the internal assurance function and identified some policy improvement areas, including to review existing grievance and remediation mechanisms
- ✓ Developed the Modern Slavery Improvement Plan: a three-year plan with a focus on accountability, monitoring and training
- ✓ Provided in-person or virtual training to key business risk areas and to procurement teams



## Next steps and priorities

### Our next steps and priorities include:

- Updating policies to cascade expectations and accountabilities at regional level and developing a Global responsible sourcing framework
- Delivering new e-learning and training modules on modern slavery risks while continuing to provide supplier assessment training to regional procurement teams
- Appointing a Global Responsible Sourcing Manager and giving consideration to appropriate resourcing requirements within procurement teams at the regional level
- Continuing the roll out of supplier assessment processes, including increasing the third party (or independent) supplier assessment target spend to 80% of Global spend by 2026 (Australia and UK target)
- Working with suppliers with EcoVadis ratings to improve performance on factors relating to modern slavery risk
- In Australia and UK, continuing to include modern slavery contract clauses into new and existing contracts
- Articulating clear grievance and remediation mechanisms through our policies and procedures, including promoting our confidential Whistleblower Hotline to workers, contractors and suppliers as a process through which they can raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct



## 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

## 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 quality health care services in Australia and overseas. A list of our controlled entities is available in our 2021 Annual Report.

Ramsay has a global network of clinical practice, teaching and research. Our operations extend across 10 countries, with over eight million admissions/patient visits to our facilities in over 460 locations. Ramsay employs over 80,000 people globally.

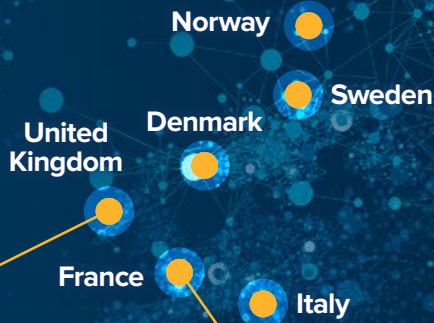
Ramsay was founded by Paul Ramsay AO (1936–2014) in 1964 and has always focused on maintaining the highest standards of quality and safety; being an employer of choice; and operating the business based on a culture known as the 'Ramsay Way' with a philosophy based on 'People Caring for People'<sup>1</sup>.

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).



<sup>1</sup> Please refer to [www.Ramsayhealth.com/About-Us/Values](http://www.Ramsayhealth.com/About-Us/Values) website

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



## Ramsay UK

has a network of 34 acute hospitals and day procedure centres providing a comprehensive range of clinical specialties to private and self-insured patients and patients referred by the NHS. Ramsay UK also operates a diagnostic imaging service and provides neurological services through its three neuro-rehabilitation facilities. Ramsay UK cares for almost 200,000 patients per year and employs over 7,000 people.

## 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 Europe. In France, Ramsay Santé has a market leading position with 132 acute care and mental health facilities. In Denmark, Norway and Sweden Ramsay Santé operates 210 facilities including primary care units, specialist clinics and hospitals. Ramsay Santé also operates a 93 bed hospital in Italy. Ramsay Santé employs around 35,000 staff and treats approximately seven million patients annually.

## Ramsay Sime Darby\*\*

is a joint venture between Ramsay and Sime Darby Berhad. Ramsay Sime Darby operates three hospitals in Indonesia, four hospitals and a nursing college in Malaysia and one day surgery in Hong Kong. Ramsay Sime Darby employs over 4,000 people.

Hong Kong

Indonesia

Australia

## Ramsay Australia

has 72 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 more than 59 community pharmacies. Ramsay Australia admits over one million patients and employs over 31,000 people.

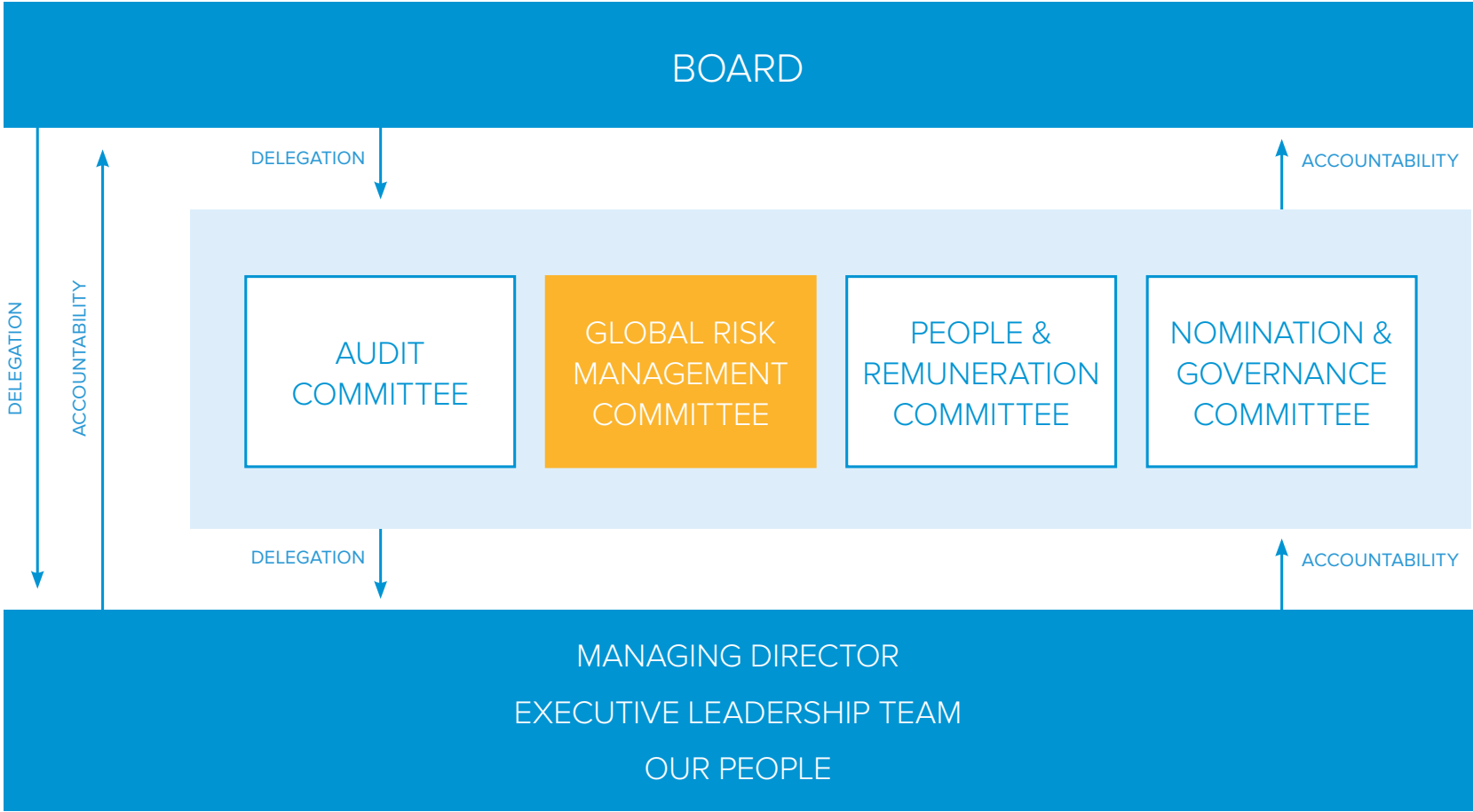
\* Ramsay owns 52.5% of Ramsay Santé, which is an entity listed on the European financial markets platform, Euronext.

\*\* Ramsay Sime Darby Health Care Sdn Bhd is a 50:50 joint venture and 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 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.



## 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 over 85% of our medical spend is with our top 20 suppliers. In the UK, our top 80 suppliers account for 80% of our spend. Ramsay Australia has in excess of 4,000 suppliers and Ramsay UK has 2000 suppliers, of which the head offices are in Australia, the UK, Europe, the USA and Asia. Approximately 60% of Ramsay Santé's 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

4,000+ suppliers, of which 15% have a Head Office in Australia and the remaining and the remaining 85% have Head Offices in Europe, the UK and the USA

### **RAMSAY UK**

Over 236 active contracts

70% of our medical spend with top 50 suppliers

2000 suppliers, of which 20% have a Head Office in the UK and the remaining 80% have offices in Europe, the USA and Asia

### **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

4000+ suppliers, over 40% of which have a global Head Office in France and the remaining with Head Offices mainly in Europe.



# 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* 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* 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>Staff covered by local region laws</li> <li>For Ramsay Australia, 89% of employees covered by Enterprise Agreements</li> <li>For Ramsay Santé, 98% of employees covered by collective bargaining agreements**</li> <li>For Ramsay Sime Darby, 100% of Indonesian employees covered by collective bargaining agreements</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 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.

\*\* This is comprised of France: 100% of employees, and the Nordics: 96% of employees.

## 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 highlighted below.

In FY2021 we undertook a major external review of our processes on modern slavery risk reduction (Group and Australia) led by the internal assurance function and identified opportunities to update policies and procedures. As a result, Ramsay has adopted a new supplier assessment approach and articulated its 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.

In FY2021 we implemented EcoVadis as the common supplier due diligence and assessment platform across the Group's Australian, UK and EU businesses.

Linear continues to undertake 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.

In FY2021, Linear introduced a new requirement that a member of the manufacturer's HR team must attend business review meetings that form part of its Programme. This aims to enhance the due diligence process and enable a broader and more robust discussion on people-specific processes.

In FY2021 we developed an e-learning module for all staff involved in procurement and purchasing. This will be adapted and delivered to each region throughout FY2022.

Our Australian and UK businesses 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.

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 seek to ascertain what actions suppliers take to ensure that slavery and human trafficking do not occur in their businesses or supply chains.

In FY2021 we undertook a Global review of our procurement and supply chains, which (among other things) will inform the development of a new Global responsible sourcing framework.

# 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, 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 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 has committed to reviewing 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.

## 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 Code 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 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 is reviewing 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.

## 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.

### **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.

### **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 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 FY2022. 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. 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 are reviewing our policies and procedures to better articulate our grievance and remediation mechanisms specific to modern slavery issues identified across our business and supply chain. A review of the Group's grievance and remediation process is one of the FY2022 action items that has come out of the Modern Slavery Improvement Plan.

### **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 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. Information on our joint ventures is contained in our 2021 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.

## A. Effectiveness assessment for FY2021 – Current Progress

Our effectiveness against our FY2021 KPIs is set out below:

FY2021 KPI	FY2021 ACTIONS
Identify the requirement and/or resources to assess risks within the business (local and/or globally) – FY2021	<ul style="list-style-type: none"> <li>Established the Modern Slavery Working Group and agreed Terms of Reference</li> <li>Allocated resourcing to focus on common supplier assessment platform</li> <li>Joined the UN Global Compact and their Modern Slavery Community of Practice</li> </ul>
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 – FY2021–2022 <sup>2</sup>	<ul style="list-style-type: none"> <li>Agreed EcoVadis as the common supplier assessment platform (Australia, UK and EU)</li> <li>Commenced rating key suppliers covering 20% of Global spend</li> <li>Included supplier assessment target in Sustainability Linked Loan Facility for Ramsay Australia and UK</li> </ul>
Standardise current policies and procedures across Ramsay’s global operations to incorporate best practice – FY2021 (ongoing)	<ul style="list-style-type: none"> <li>Undertaken an external review of our processes on modern slavery risk reduction (Group and Australia) led by the internal assurance function and identified policy improvement areas, including to review existing grievance and remediation mechanisms</li> </ul>
Prepare and implement a new supplier due diligence questionnaire addressing modern slavery and information governance to be sent to suppliers – FY2021	<ul style="list-style-type: none"> <li>Implemented EcoVadis supplier due diligence and assessment platform across our Australian, UK and EU regions</li> <li>Commenced rating key suppliers covering 20% of Global spend</li> </ul>
Develop a mandatory e-learning module for all staff involved in procurement and purchasing. This includes defining and adapting content specific to each region – FY2021. The rollout of training is targeted to take place in FY2022.	<ul style="list-style-type: none"> <li>Developed e-learning module for all staff involved in procurement and purchasing</li> <li>Developed new training pack for senior management and procurement on legal requirements and grievance mechanisms</li> <li>Provided supplier assessment training to regional procurement leads</li> </ul>

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

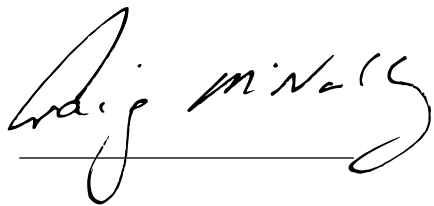
For FY2022, we have aligned our focus activities with the three key focus areas of our Modern Slavery Improvement Plan.

FOCUS AREA	INITIATIVE	KPIs TO MEASURE EFFECTIVENESS
Human rights commitment	Policies, procedures and templates	<ul style="list-style-type: none"> <li>• Update policies to cascade expectations and accountabilities at a regional level</li> <li>• Develop Global responsible sourcing framework</li> </ul>
	Training our people	<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>
Management systems and control	Resourcing to assist with focus on modern slavery	<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> </ul>
	Mapping of operations and supply chain	<ul style="list-style-type: none"> <li>• Increase supplier assessment target spend to 80% of Global spend by end of FY2026 (Australian and UK target)</li> </ul>
	Risk assessment of high-risk suppliers and key business risk areas	<ul style="list-style-type: none"> <li>• Identify high risk areas across top 50 suppliers using EcoVadis IQ</li> <li>• Work with suppliers with lower EcoVadis rating</li> </ul>
Grievance and remediation	Policies, procedures and templates	<ul style="list-style-type: none"> <li>• Articulate clearly modern slavery grievance and remediation mechanisms across:               <ul style="list-style-type: none"> <li>o Global Human Rights and Labour Policy</li> <li>o Code of Conduct for Agents, Manufacturers Suppliers</li> <li>o Whistleblower Policy and Handbook</li> <li>o Website</li> </ul> </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 27 October 2021 and the Board of Ramsay Health Care (UK) Limited on 25 October 2021. 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 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 2021.



**Craig McNally**

CEO and Managing Director  
Ramsay Health Care Limited  
27 October 2021



**Dr Andy Jones**

CEO and Director  
Ramsay Health Care (UK) Limited  
25 October 2021

# 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 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