



# Modern Slavery Statement 2023

People caring for people.



**Ramsay**  
Health Care

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 Ramsay group companies during the year ended 30 June 2023 to identify and reduce the risks of modern slavery and human trafficking in its business and supply chains.

This statement covers the following groups of entities, and their operations are outlined on page 4:

- Ramsay Health Care Limited;
- Australian Reporting Entities<sup>i</sup> (see Appendix for full list); and
- the UK Reporting Entities<sup>ii</sup> (see Appendix for full list).

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

- Ramsay Group or Ramsay means the Ramsay consolidated group, being Ramsay Health Care Limited 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 the Elysium Reporting Entities;
- Ramsay Santé means Ramsay Santé SA and its subsidiaries (Ramsay Health Care owns 52.79% of Ramsay Santé which is listed on the European financial markets' platform Euronext); and
- Ramsay Sime Darby means Ramsay Sime Darby Health Care Sdn Bhd and its subsidiaries (Ramsay Sime Darby Health Care is a 50:50 joint venture and is not controlled by Ramsay).

#### Important notice and disclaimer

This document has been prepared by Ramsay Health Care Limited ACN 001 288 768 (Ramsay) 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

## This year's modern slavery statement

Ramsay's modern slavery statement addresses both the reporting requirements under the Australian MSA and the UK MSA and has been prepared using valuable input from a wide range of internal stakeholders.

## 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.

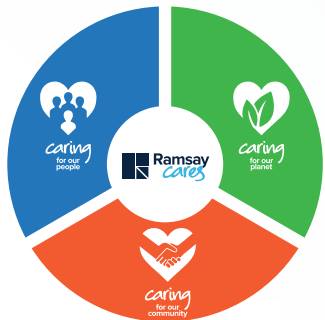
## CEO Message

"We are proud of our commitment to helping end the complex global problem of modern slavery in all its forms.

This Modern Slavery Statement includes Ramsay's framework for managing and mitigating human slavery risk and our roadmap to achieving our priorities. It also highlights some examples of our ongoing efforts to prevent the occurrence of modern slavery and human trafficking in our operations and supply chains.

I take this opportunity to thank our Modern Slavery Working Group, our people and suppliers for their work to help Ramsay meet these important obligations and empower others to do so too."

Craig McNally  
Managing Director & Group CEO



## 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: caring for our people, caring for our planet and caring for our communities.

Entrenched in our Ramsay Cares principles is Ramsay's commitment to 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 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.



## 2. Our Structure, Operations and Supply Chains

### The business and operations of Ramsay's reporting entities

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'.

#### AUSTRALIAN REPORTING ENTITIES

Ramsay's Australian Reporting Entities operate 74 private hospitals and day surgery units in Australia and Ramsay is Australia's largest private hospital operator. Ramsay's Australian operations include mental health facilities as well as the operation of three public facilities. Ramsay has established the Ramsay Pharmacy retail franchise network which supports over 60 community pharmacies. Ramsay Australia 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). Ramsay Australia services also include Ramsay Connect, which offers community, home-based or remotely delivered care, and Ramsay Health Plus, which delivers personalised allied health services. Ramsay Australia admits more than one million patients annually and employs more than 33,000 people.

#### ASIAN JV

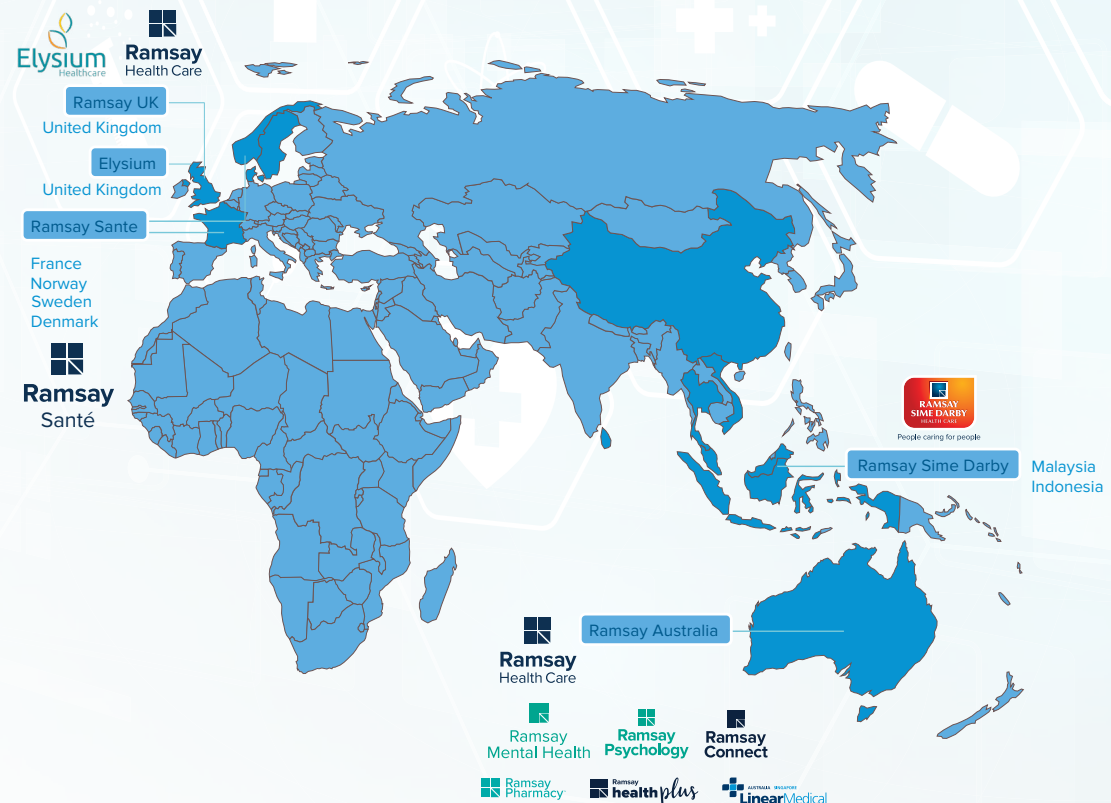
Through its Australian Reporting Entities, Ramsay has an investment in Ramsay Sime Darby, a non-controlled 50:50 joint venture arrangement with Malaysian multinational conglomerate Sime Darby Berhad. Ramsay Sime Darby operates three hospitals in Indonesia and four hospitals in Malaysia, and employs more than 4,000 people. In June 2023, Ramsay announced that a decision had been made to explore the possibility of realising a sale of Ramsay Sime Darby.

#### UK REPORTING ENTITIES

Ramsay's UK Reporting Entities operate the Ramsay UK 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. Ramsay UK cares for over 200,000 patients annually and employs more than 7,000 people. Ramsay's UK Reporting Entities also include Elysium Healthcare, 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 2023, Elysium Healthcare had 84 operational sites across England and Wales, and employs approximately 9,000 people.

#### EUROPE

Through its UK Reporting Entities, Ramsay owns 52.79% of Ramsay Santé, 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 36,000 people and its facilities treated approximately ten million patients in FY2023.



## Governance and responsibility for managing modern slavery: Role of the Board and Management

### Board and Executive Leadership Team

Ramsay's Board is ultimately responsible for overseeing performance and operations of the Group, setting the Group's values and governance framework and monitoring Ramsay's culture and compliance in accordance with our code of conduct. This includes oversight of our approach to human rights and approval of our annual Modern Slavery Statement.

The Board is assisted by the Board Committees, primarily the Global Risk Management Committee, and the Executive Leadership Team in discharging its responsibilities. Material business risks are identified and reported via the Global Risk Management and Audit Committees in line with Ramsay's Risk Management Framework and the Board approved Risk Appetite Statement. Ramsay identifies harm to people (which includes modern slavery) as a low risk appetite range, meaning it is unacceptable to take risks and takes a no compromise approach.

### Key Policies & Programs

Ramsay's Global Human Rights and Labour Policy is a key pillar of Ramsay's approach to addressing our responsibility to minimise modern slavery risks in our operations and supply chain. Under this policy, the Board and Executive Leadership Team are responsible for the oversight of Ramsay's approach to human rights, which includes

modern slavery, and Ramsay commits to due diligence processes that work towards identifying, preventing, mitigating and accounting for impacts on human rights. The policy requires all staff to report known or reasonably suspected modern slavery non-compliance in any Ramsay business or those of our suppliers and outlines grievance mechanisms. Consistent with The Ramsay Way, the policy reiterates our commitment to identifying and managing modern slavery risks across our business operations and supply chains. Any material breaches of the policy are reported to the Global Risk Management Committee quarterly through the regional Chief People Officer.

Ramsay's Responsible Sourcing Program monitors and promotes compliance with our Global Responsible Sourcing Policy, which outlines our commitment to responsible sourcing practices and approach to identifying and managing risks in our global procurement. This policy sets out the behaviour and standards that we expect all our suppliers to uphold. Any material breaches of the policy are reported to the Global Risk Management Committee annually through the

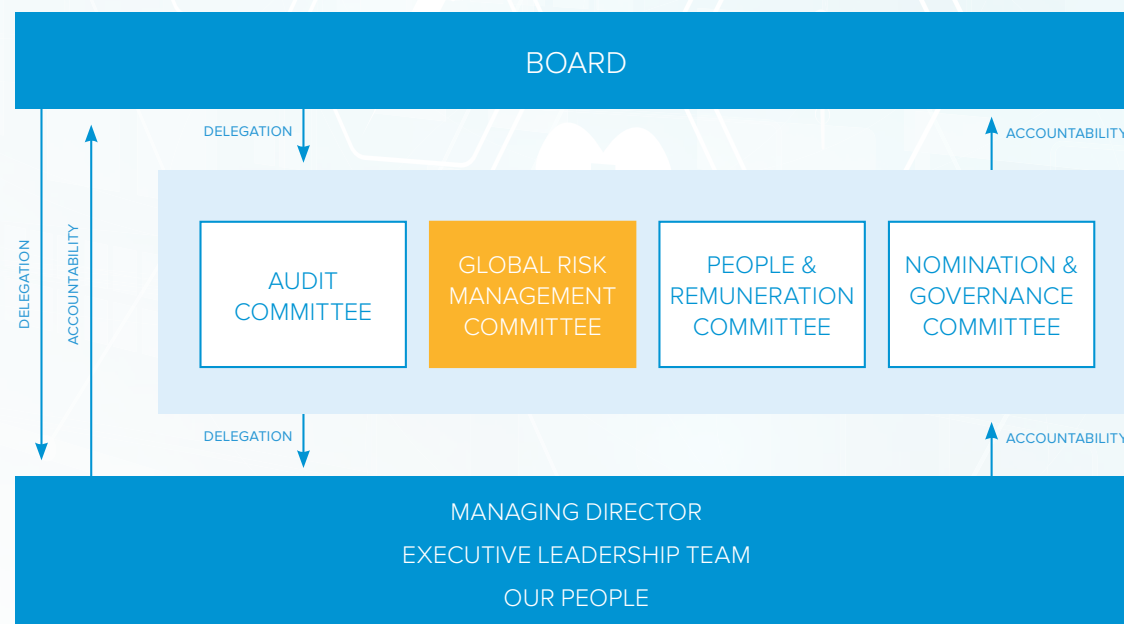
Responsible Sourcing Team and relevant regional Risk Management Committee.

These policies are approved by the Board and reviewed every two years. Further information is available on the [Sustainability Governance section](#) of Ramsay's website.

### 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, which is charged with proposing group wide key performance indicators (KPIs), policies and standards to address modern slavery risks and

implementing management actions to reduce the risk of modern slavery practices across the Ramsay Group operations and supply chain. The Modern Slavery Working Group meets quarterly, and its recommendations are then put to the Global Executive Leadership Team for approval and endorsement, which includes the Managing Director & Group CEO, Group Chief Financial Officer, the Group Chief People Officer, the Group Chief Medical Officer, Group General Counsel & Company Secretary and the CEOs of each of Ramsay Australia, Ramsay UK, Elysium Healthcare, Ramsay Santé and Ramsay Sime Darby.



## Our modern slavery road map snapshot



### Progress to date

#### To date, Ramsay has:

- ✓ Developed the Modern Slavery Improvement Plan, and continued focus on refinement of procurement due diligence and response plan for managing modern slavery risk
- ✓ Developed and implemented the Global Responsible Sourcing Framework and the new Responsible Sourcing Policy
- ✓ Appointed the Global Responsible Sourcing Manager
- ✓ Continued focus on cascading expectations and accountabilities at a regional level and capacity building, including through policies and guides
- ✓ Articulated clear grievance and remediation mechanisms through our policies and procedures
- ✓ Delivered e-learning and training modules on modern slavery risks, and continued training globally to cover introduction of new regulatory requirements
- ✓ Expanded modern slavery due diligence toolbox to include complementary monitoring processes and continued the roll out of supplier assessment processes and achieved supplier assessments of over 30% of global suppliers by share of spend in FY2023, with a focus on high-risk categories
- ✓ Worked with suppliers with identified risk ratings to reduce risk exposure



### Next steps and priorities

#### Our next steps and priorities include:

- Continue strengthening processes, capacity building and consistency in approach at a regional level, through the Responsible Sourcing Program
- Embed use of modern slavery due diligence toolbox and complementary monitoring processes across regions (as relevant)
- Undertake provenance mapping of 40% of global suppliers by share of spend, with a focus on high-risk categories
- Undertake EcoVadis assessments of suppliers representing 60% of Global spend by the end of FY2024 as part of ongoing KPI to increase supplier assessment target spend to 80% of Global spend by end of FY2026
- Engage with suppliers to reduce risk exposure including undertaking onsite third party audits
- Continue focus on training globally to cover introduction of new regional regulatory requirements
- Continue refinement of due diligence and response plan for managing modern slavery risk



### Long term goals

#### Ramsay's long term vision is:

- 🎯 Continuous improvement through a process of reviewing 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



BUSINESS &  
HUMAN RIGHTS  
ACCELERATOR



Ramsay Health Care participated in the UN Global Compact's inaugural Business & Human Rights Accelerator which was a 6-month long program aimed at accelerating the integration of respect for human rights and the *United Nations Guiding Principles on Business and Human Rights* (UNGPs) within Australian businesses. The program involved learning from global and local peers on better practices to identify and mitigate adverse human rights impacts, develop a business-ready action plan, plan engagement with key stakeholders and rightsholders, and build an effective grievance processes.



## 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 87% of our medical spend is with our top 30 suppliers. In the UK, for Ramsay UK our top 50 suppliers account for approximately 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 380 active contracts. Over 87% of our medical spend with our top 30 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. Approx 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 approx 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, approx 60% of our medical spend with our top 20 suppliers, 85% of our non-medical spend with our top 20 suppliers, in the Nordics approx 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.

# 3. Modern Slavery Risks & Mitigating Actions

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

Ramsay Health Care is a member of the United Nations Global Compact. The United Nations Guidelines on Business & Human Rights (UNGPs) inform Ramsay on how we understand the risks of modern slavery in our operations and supply chains. As explained in the UNGPs, a business’s operations and its supply chains are at risk of creating adverse human rights impacts and being involved in modern slavery defined in three ways: causing modern slavery or impacting human rights through their operational activities, contributing to modern slavery or human rights

impacts through their operational activities or being linked to modern slavery or human rights impacts through the supply chain sourcing of goods and services used in its operations. Ramsay recognises that the most significant potential risk of modern slavery or creating adverse human rights impacts is within our global supply chains and the following table sets out operational and supply chain categories which have been identified as giving rise to a potential risk of modern slavery for the Australian Reporting Entities and the UK Reporting Entities.

SUPPLY CHAIN CATEGORIES	SOURCING COUNTRIES	POTENTIAL MODERN SLAVERY RISKS IDENTIFIED	DESCRIPTION OF RISK FACTOR
<b>MEDICAL SPEND CATEGORIES</b>			
<b>Medical consumables (including generic and volume based, low-cost clinical consumables)</b>	Tier 1 mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (ie Australia, USA, EU and the UK).  Tier 2 and beyond has identified suppliers are manufacturing or sourcing from: China, Taiwan, Malaysia, Thailand, Sri Lanka, Vietnam and Pakistan.	Potential modern slavery risks identified include child labour, forced labour, debt bondage, substandard or exploitive working conditions, excessive overtime and substandard accommodation.	The countries in which our Tier 1 suppliers are manufacturing/sourcing materials for medical consumables are associated with higher risks of labour exploitation/hazardous working conditions due to political instability, poor governance, low levels of regulation and poverty.  There are modern slavery risks associated with the products themselves as they are typically sourced in bulk at low cost with tight delivery time frames which leads to a greater risk of suppliers engaging in practices such as underpaying workers, excessive overtime, poor working conditions, reliance on low-skilled and migrant workforce.
<b>Medical equipment and medical implants</b>	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).  Tier 2 and beyond has identified these multinationals have facilities (eg for manufacturing, assembly, distribution or sterilisation) that are located in the following countries: China, Mexico, Puerto Rico, Costa Rico, Dominican Republic, Brazil and India.	Potential modern slavery risks identified include child labour, forced labour, debt bondage, substandard or exploitive working condition and excessive overtime.	The countries in which our Tier 1 suppliers have facilities (eg for manufacturing, assembly, distribution or sterilisation of medical equipment and medical implants) are associated with higher risk of labour exploitation, including child labour and low-skilled workers, hazardous working conditions due to political instability, poor governance, low levels of regulation, poverty.
<b>Vaccines &amp; pharmaceuticals</b>	Tier 1 mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (ie Australia, USA, EU and UK).  Mapping beyond Tier 1 in progress.		Ramsay purchases vaccines and pharmaceuticals in two ways, firstly through Tier 1 multinational suppliers with headquarters in countries with modern slavery, human rights and/or labour laws; secondly, through a local distributor that sources from multinational suppliers that in turn become our Tier 2 suppliers with headquarters in countries with modern slavery, human rights and/or labour laws.  Ramsay is still the process of completing the supply chain mapping for the production locations and the production and sourcing of raw materials that go into these products.
<b>OTHER CATEGORIES (NON-MEDICAL SPEND)</b>			
<b>Uniforms, textiles</b>	Tier 1 locally based suppliers, subject to local region laws.  Tier 2 and beyond has identified suppliers are manufacturing or sourcing from: China, Bangladesh, Indonesia and India.	Potential modern slavery risks identified include child labour, forced labour, excessive overtime, debt bondage, deceptive recruitment.	Ramsay purchases uniforms through Tier 1 locally based suppliers who are subject to local region laws. In Australia through engagement with our Tier 1 suppliers we have completed supply chain mapping for our uniforms and have identified that the production of raw materials that go into these products are extracted and the products produced at the lower tiers of global supply chains.  The countries in which our suppliers are manufacturing / sourcing raw materials are often countries where there is less human rights regulation, oversight and/or enforcement, and there is a higher risk that these raw materials used in uniforms could be harvested by children overseas exploited through the worst forms of child labour.



SUPPLY CHAIN CATEGORIES	SOURCING COUNTRIES	POTENTIAL MODERN SLAVERY RISKS IDENTIFIED	DESCRIPTION OF RISK FACTOR
<b>IT/Telecommunications</b>	Tier 1 mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws. Mapping beyond Tier 1 in progress.		Ramsay purchases IT/telecommunications products and services through Tier 1 multinational suppliers with headquarters in countries with modern slavery, human rights and labour laws.  Ramsay is still in the process of completing the supply chain mapping for the production locations and the production and sourcing of raw materials that go into these products. Through research, Ramsay has identified that the production of raw materials that go into these products are extracted and the products produced at the lower tiers of the global supply chains.
<b>Facility services and management (utilities, food and catering, security, waste, laundry, cleanings)</b>	Tier 1 locally based, generally smaller, suppliers, subject to local region laws.	Potential modern slavery risks identified include use of migrant labour, base-skilled workers, international students and temporary workers on short term contracts.	Ramsay purchases facility services and management mainly through locally based, generally smaller, suppliers that are subject to local region laws.  In Australia, the cleaning industry is identified as high-risk for modern slavery by the Australian Government due to the risk of exploitation of vulnerable populations in the sector.  The sector's high reliance on migrant labour, base-skilled workers, international students and temporary workers from low-English speaking countries heightens the risk of exploitation of these vulnerable populations, including through underpayments and barriers to reporting their experience of harm: language, level of education and literacy, visa insecurity and disability may be contributory factors.
<b>Building and construction</b>	Tier 1 locally based, large suppliers, subject to local region laws, labour is primarily employed through sub-contractors or agents.	Potential modern slavery risks identified include use of migrant labour, excessive working hours, debt bondage, wages below minimum wage requirements, hazardous working environments and deceptive and dangerous practices.	The construction industry's high reliance on labour employed through sub-contractors or agents, as well as the materials used, may have a complex multi-tiered supply chain. Cost and time schedule pressures, as well as a high concentration of migrant labour, create a higher level of risk of excessive working hours, debt bondage, wages below the minimum wage requirements, hazardous working environments, and deceptive and dangerous practices.
<b>Renewable energy projects (eg solar panels)</b>	Tier 1 locally based suppliers, subject to local region laws, labour is primarily employed through sub-contractors or agents.  Tier 2 and beyond has identified suppliers are manufacturing or sourcing from: China and Mongolia.	Potential modern slavery risks identified include forced labour, debt bondage, substandard or exploitive working condition, excessive overtime and substandard accommodation.	The manufacturing process for solar panels poses higher risks of labour exploitation, with inherent risks of forced labour associated with raw material polysilicon which is an essential component in the manufacturing process of solar panels.

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	POTENTIAL MODERN SLAVERY RISKS IDENTIFIED
<b>Recruitment processes, reliance on agency labour contractors and independent services (such as locums &amp; doctors)</b>	Ramsay's employees are covered by local region laws. For Ramsay Australia, 89% of employees are covered by Enterprise Agreements. For Ramsay Santé**, 96% of employees are covered by collective bargaining agreements (**France: 100% of employees, and the Nordics: 92% of employees).  Ramsay uses Tier 1 locally based, generally larger, suppliers for recruitment services and agency labour services that are subject to local region laws and (where relevant) credentialing processes.  Through our research, Ramsay has identified that using third-party labour hire companies increases risk by reducing visibility over recruitment practices.	The reduced visibility over recruitment practices creates a higher risk of the potential for deceptive recruitment processes, including debt-bondage and deceptive recruitment.

## How we assess and address those risks: medical spend supply chain mapping and due diligence tools

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 FY2023, we engaged with our top medical suppliers to focus on mapping our Tier 1 and where practicable, Tier 2 of our supply chain. These suppliers are global multi-national organisations with complex and geographically diverse operations. As outlined in the diagram on page 11, our ongoing work has identified over 30% of our medical products by share of spend are sourced from over 750 supplier facilities located in over 30 countries.

As part of our supplier mapping processes, we have used the EcoVadis CSR assessments, EcoVadis IQ risk mapping platform to assess the inherent country and industry risk of our suppliers. In FY2023, we commenced using the FairSupply platform to enhance our capabilities and assist with supply chain mapping and assessing modern slavery risks down to Tier 10. We know our Tier 1 medical suppliers are mainly headquartered in lower-risk countries like Australia, USA, EU and the UK, and we know that some manufacturing raw material sourcing occurs overseas. FairSupply is helping us assess risk at

each tier of our supply chains which informs our due diligence and supplier engagement. 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.

**The outcomes of Ramsay's supplier assessments are taken up during our annual and biannual supplier review meetings, which take place in-person and virtually. During these meetings Ramsay and the supplier discuss the outcomes of the assessment and align on corrective actions needed to address identified risks and gaps. These supplier meetings and corrective actions are tracked, including through the EcoVadis Corrective Action Plan tool, which allows Ramsay to measure the improvements and outcomes of remediation actions through a verified independent third party process.**

### Corrective actions through supplier assessments

During FY2023, the EcoVadis Corrective Action Plan tool was utilised by our suppliers to complete 88 corrective actions with further 101 corrective actions still in progress through the annual EcoVadis CSR Assessment. These suppliers had a higher risk rating, and

Ramsay was able to work with these suppliers to gain greater transparency and insight into our Tier 1 and where practicable Tier 2 suppliers' business practices by seeking to understand the reason for the higher risk rating, driving supplier accountability and delivering effective and verifiable outcomes that ultimately resulted in a revised CSR Assessment rating. Suppliers unwilling to take accountability and corrective actions are suspended – see glove supplier case study on p12.

### Assessing and addressing risks through mapping

Mapping our supply chains within FairSupply's Integrated Assessment Engine, which links supply chain data from 190 countries in relation to 15,909 industry sectors, means we know a supplier's location and corresponding business or industrial activities, and the economic inputs required to produce their products and services that can be traced and mapped to Tier 10 of the supply chain.

By identifying risk associated with a supplier, Ramsay can request suppliers to complete questionnaires, provide further information about their modern slavery policies and risks, and undertake further due diligence or actions.

# Supply Chain Mapping FY2023

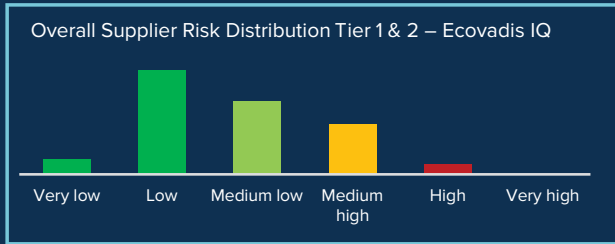
Whilst predominantly focused on Tier 1, Ramsay’s supply chain mapping includes Tier 2 and beyond as we continue our mapping deeper into the supply chain, particularly for our medical and pharmaceutical component of spend.

**30+**  
Countries  
**750+**  
Supplier Facilities

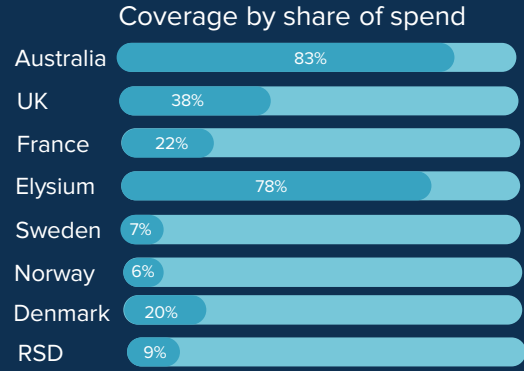


Our medical spend supply chain mapping has identified that most of our suppliers present a low to medium-low risk, which means that the risks we have identified (outlined on page 8) are inherent in countries from which we are sourcing.

Our ongoing monitoring of our suppliers through annual EcoVadis CSR Assessments and due diligence processes is vitally important. Ramsay aims to continue its work with Tier 1 suppliers that present a higher risk in order to provide greater transparency and insight into our Tier 1 and where practicable our Tier 2 suppliers’ business practices, to drive accountability and to deliver effective and verifiable outcomes.



Informed by FairSupply, our EcoVadis CSR assessments, and 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:

### Medical gloves supply chain mapping deep dive – ongoing

Medical gloves are an essential product that is sourced as a finished product through local distributors across all our facilities in Australia, UK, Europe and Asia. In FY2023, we continued our focus on the procurement of medical gloves as a high-risk category industry and geography for modern slavery and expanded the mapping of our medical glove supply chain beyond Tier 1 to identify our Tier 2 and Tier 3 suppliers that are the original source of manufacture. We have commenced mapping our Tier 4 suppliers with initial progress achieved in identifying the facilities that process the natural rubber latex which is then used by the manufacturing facilities that produce the latex gloves supplied to Ramsay.

The graph below shows the progress to date of our medical glove supply chain mapping, including the number of suppliers in each of Tiers 1 to 4, and the percentage of spend by country 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.

In FY2023, we have also assessed our medical glove suppliers using the FairSupply platform and using the Dow Jones RiskCentre Third Party Platform, which give us the capability to actively monitor key global watchlists particularly for issues related to forced labour. Alongside our existing supplier assessment, risk identification and

monitoring tools, we continued to mutually recognise other programs of compliance and assessments that are accepted by Ramsay as part of our Responsible Sourcing Framework. This includes the Sedex Members Ethical Trade Audit (SMETA) compliance tool.

**As we progressively map through the supply chain, we are able to engage beyond our Tier 1 suppliers through direct access to Tier 2 suppliers and the CSR assessments of Tier 2 – 4 suppliers. This provides visibility at the manufacturing level as well as assessment outcomes and corrective actions taken by those suppliers. If our review identifies anything of concern, Ramsay seeks to address these with the Tier 1, Tier 2 or Tier 3 supplier directly. Where suppliers are unwilling to engage with Ramsay or there is a lack of objective steps taken towards compliance, Ramsay will seek to suspend the supplier.**



#### Glove Supplier Case Study

During FY2023, one of Ramsay's Tier 2 suppliers that distributed medical gloves was unwilling to disclose any information about their original glove manufacturing. After consultation, the supplier was unwilling to remedy this non-compliance or take any corrective actions which resulted in Ramsay suspending the supply of medical gloves from this supplier.



## Supply Chain Mapping – Medical Gloves FY2023

Ramsay Australia	Tier 1	Tier 2	Tier 3	Tier 4
Supplier Count	8	11	17	1
Mapping Progress (by share of spend)	100%	99%	99%	–
CSR Assessment (by share of spend)	97%	99%	50%	–

Ramsay UK	Tier 1	Tier 2	Tier 3	Tier 4
Supplier Count	1	6	9	1
Mapping Progress (by share of spend)	100%	100%	100%	–
CSR Assessment (by share of spend)	100%	98%	98%	–

Elysium	Tier 1	Tier 2	Tier 3	Tier 4
Supplier Count	1	4	–	–
Mapping Progress (by share of spend)	100%	100%	–	–
CSR Assessment (by share of spend)	0%	0%	–	–

Ramsay France	Tier 1	Tier 2	Tier 3	Tier 4
Supplier Count	7	11	–	1
Mapping Progress (by share of spend)	100%	99%	–	1%
CSR Assessment (by share of spend)	0%	73%	–	0%

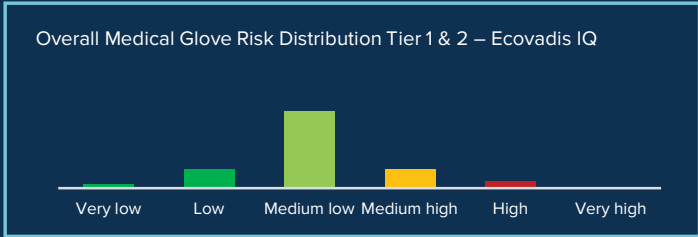
Denmark, Sweden & Norway	Tier 1	Tier 2	Tier 3	Tier 4
Supplier Count	9	29	18	1
Mapping Progress (by share of spend)	100%	100%	30%	–
CSR Assessment (by share of spend)	6%	1%	10%	–

Ramsay Sime Darby	Tier 1	Tier 2	Tier 3	Tier 4
Supplier Count	14	6	9	1
Mapping Progress (by share of spend)	100%	85%	85%	–
CSR Assessment (by share of spend)	0%	14%	54%	–



The EcoVadis IQ risk management tool has helped us identify that most of our suppliers represent a medium-low risk, however these Tier 1 & 2 suppliers are co-located in our countries of operation.

The Tier 3 suppliers which are the original manufacturers of the medical gloves present a higher risk and during FY2023 we continued to engage with our Tier 1 & 2 suppliers in ensuring robust due diligence processes are in place across the supply chain. Over 97% of our Tier 1 & 2 supplier for Australia and UK (Excluding Elysium) have completed an EcoVadis CSR Assessment. Over 73% of our Tier 1 & 2 suppliers for France have completed an EcoVadis CSR assessment.



Informed by FairSupply, our EcoVadis CSR assessments, and guided by 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: Deep dives and case studies



### Solar panels deep dive

In FY2023, we reviewed our due diligence on the sourcing of solar panels for the Australian renewable energy projects.

The spend on solar panels in Australia represent <1% of our annual procurement spend. However, a deep dive into the solar panel supply chain was conducted because of the inherent risk of forced labour associated with raw material polysilicon which is an essential component in the manufacturing process of solar panels.

We engaged our Tier 1 solar panel providers and installers through our Responsible Sourcing Program to identify the country of origin of our solar panels, understanding what due diligence and raw material traceability processes had been undertaken. To help us understand current best practice in due diligence around solar panel sourcing in Australia, we engaged with leading energy companies and other organisations with large portfolios of installed rooftop solar panels. This industry engagement process has informed and guided us in the necessary due diligence activities required for the sourcing of solar panels. As a result, during FY2023 specific changes to sourcing solar panels were implemented in the areas of governance, supplier risk assessment, ongoing

monitoring and supplier relationship management. These specific changes include having our solar suppliers complete a detailed modern slavery questionnaire developed by FairSupply, as well as requesting all suppliers of solar panels to demonstrate their own due diligence around modern slavery risks in their supply chains and be transparent in their findings, as a condition of their supply to Ramsay. We will continue to monitor this high-risk category and work closely with our contracted suppliers in their efforts to mitigate the risk of modern slavery in their own supply chains, including by requesting suppliers map their supply chains beyond Tier 1, to share their reporting or results of audits, and to communicate any preventative actions they are taking to mitigate modern slavery risks.



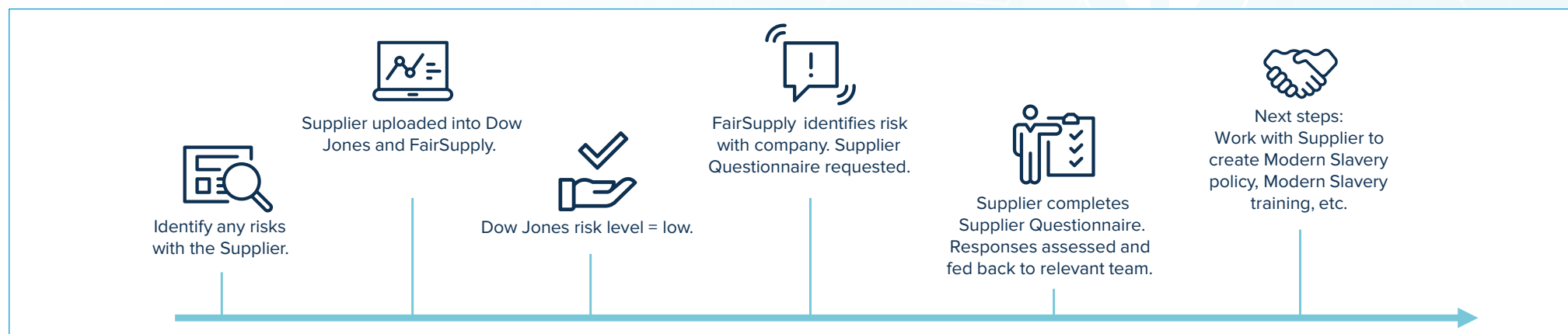
### Cleaning services deep dive

In Australia the cleaning industry is identified as high-risk for modern slavery by the Australian Government. These risks are due to the sector's high reliance on vulnerable populations including migrant labour and base-skilled workers, often from low-English speaking countries and with short-term contracts within the industry. The high risk of exploitation is heightened further by

barriers to reporting their experience of harm: language, level of education and literacy, visa insecurity and disability may be contributory factors. Working with the Cleaning Accountability Framework (CAF), new resources were released including a training video on the risks of modern slavery in the cleaning industry. Ramsay has shared this educational video with its Australian procurement and supply chain personnel to build awareness and preparedness to identify and respond to identified risks.

As Ramsay contracts with suppliers for cleaning services in hospitals and clinics across Australia, Ramsay completed supply chain mapping of Tier 1 for all cleaning suppliers. We then undertook an initial process of modern slavery risk identification for all Tier 1 suppliers using the FairSupply Modern Slavery Risk Assessment platform.

The recent introduction of the CAF has created an opportunity for us to reach out and engage with existing cleaning suppliers who are CAF certified, so that we can gain a better understanding of the requirements and benefits of supplier certification. The engagement with these suppliers will inform our due diligence requirement for sourcing services from the cleaning industry in Australia going forward.





## How we assess and address those risks: Ramsay's 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.

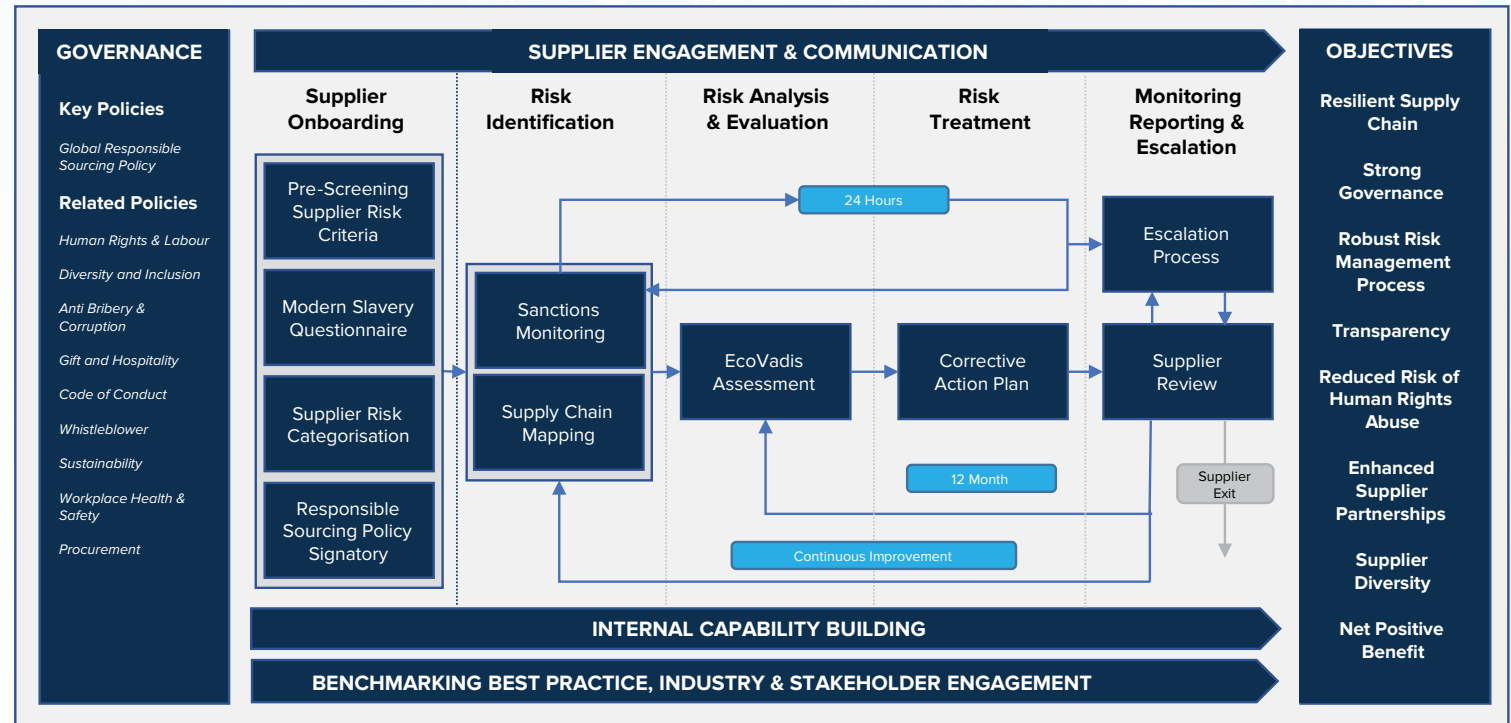
Ramsay's Global Responsible Sourcing Framework is part of Ramsay's Human Rights Commitment, and takes a risk-based approach to ensuring Ramsay's supply partners do not create an unacceptable risk. Under the Framework, Ramsay must first understand the supply chain from end to end and engage suppliers regularly with a focus on the provenance of what is being purchased and then use its supplier network and strengthen supply chain resilience and identify, assess and manage risks jointly.

The diagram opposite outlines this process of supplier engagement and communication within Ramsay's human rights and responsible sourcing governance framework: working towards defined objectives, building internal

capability, benchmarking best practice and engaging with industry and stakeholders. The Global Responsible Sourcing Manager works with business unit Heads of

Procurement and procurement teams to lead the development, implementation and review of the Responsible Sourcing Framework and Supplier Risk Management

Framework to embed the Framework within the procurement functions.



- OBJECTIVES**
- Resilient Supply Chain
  - Strong Governance
  - Robust Risk Management Process
  - Transparency
  - Reduced Risk of Human Rights Abuse
  - Enhanced Supplier Partnerships
  - Supplier Diversity
  - Net Positive Benefit

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

Ramsay has a zero tolerance approach to slavery and human trafficking from our suppliers. We make clear our expectations of suppliers, and where suppliers are not able to satisfy us as to their compliance or corrective actions, Ramsay will first endeavour to work with the supplier to help them improve their practices in this area. If there is unwillingness from the supplier to engage with Ramsay on this issue in good faith or there is a lack of objective steps taken towards compliance and corrective action, Ramsay will seek to suspend the supplier. In addition to the measures outlined elsewhere in this section 3, the following are some examples of steps Australian Reporting Entities and UK Reporting Entities have taken to seek to minimise the risk of modern slavery in FY2023:

In FY2023, Ramsay implemented the FairSupply Modern Slavery Risk Assessment platform to enhance our capabilities and assist with supply chain mapping and assessing modern slavery risks down to Tier 10, as outlined above. We also commenced using the Dow Jones RiskCenter Third Party platform to screen and monitor new and existing suppliers across a range of risk categories including anti-bribery & corruption, human rights, and modern slavery. The information identified on these suppliers is then actioned in accordance with our Responsible Sourcing Framework which is outlined on p15.

EcoVadis CSR Assessments and EcoVadis IQ platform continue to remain our key assessment and supply chain mapping tools, however, we recognise that some suppliers will have already completed social compliance audits from alternative third-party providers. In FY2023, we adopted mutual recognition of suppliers that provided their Sedex Members Ethical Trade Audit (SMETA) Report Version 6.1. All non-conformances in the SMETA reports were reviewed and no indicators of modern slavery were present.

We also know that not all suppliers will meet the necessary criteria to participate in an EcoVadis CSR Assessment based on spend amount, spend category or geographic location. Accordingly, in FY2023 we commenced use of the FairSupply Modern Slavery Questionnaire as an alternative procurement process for new and existing suppliers that do not undertake the EcoVadis CSR Assessment. The FairSupply Questionnaire includes questions that provide information and clarity on the suppliers', policies, governance, systems and processes to identify and address modern slavery risks.

In FY2023, we achieved our milestone of having 40 per cent of our suppliers (by share of spend) assessed by EcoVadis and we are on track to achieve our target of 80 per cent of suppliers (by share of spend) assessed by FY2026.

Where a supplier's performance rating is below our minimum standards, we proactively engage with the supplier to use the EcoVadis corrective actions tools and agree the best course to improve their performance rating and reduce their risk profile. During FY2023, the EcoVadis Corrective Action Plan tool was utilised by our suppliers to complete 88 corrective actions. A further 101 corrective actions are still in progress. Corrective actions include requiring suppliers to provide documentation relating to their policies on working conditions as well as requiring them to provide information on their labour and human rights reporting and system certification.

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.

As previously reported, 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.

In FY2023, Elysium has engaged in the process of commencing supplier onboarding and EcoVadis CSR Assessments of its suppliers and established a target KPI of 60% of spend for FY2024.

In FY2023, Ramsay's Norwegian operations, operating under the name Capio Volvat, also added and are in the process of implementing new modules into their quality management system to assist with assessing supplier information for compliance with the UN conventions on Human Rights and Labour Rights. These modules assess the risk level of the supplier as low, medium or high and allows the team to decide if deeper investigation into any specific supplier is needed. In addition, Capio Volvat's website contains contact information to the quality department for any queries relating to Norwegian Supply Chain Transparency.

Linear continues its Manufacturer Audit Programme, involving comprehensive manufacturer due diligence and continual monitoring, in line with Ramsay's Responsible Sourcing Framework. This involves Management team interviews and site visits, along with routine inspections by Linear representatives, providing ongoing onsite exposure to worker conditions and the opportunity to ask specific questions about labour and slavery risks. A manufacturer's human resources representative continues to participate in business review meetings and in FY2023 a Ramsay UK Director and Senior Legal Counsel participated 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: Modern Slavery Improvement Plan, policies, processes and training

### 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 is reviewed on an annual basis and forms part of Ramsay's review of the effectiveness of our modern slavery actions. These recommendations have been embedded in our annual Modern Slavery Statement KPIs and are tracked through our Modern Slavery Working Group as part of our annual reporting. The modern slavery road map snapshot on p6 provides an overview of the progress against the key actions and progress against the recommendations.

### Key Policies

Ramsay's key policies addressing our responsibility to minimise modern slavery risks in our supply chains are the Global Human Rights and Labour Policy and the Global Responsible Sourcing Policy. These policies are introduced in the context of governance and responsibility for managing modern slavery on p4, and are approved by the Board and reviewed every two years.

### Global Human Rights and Labour Policy

The Global Human Rights and Labour Policy was last updated in FY2022 and is due for review in FY2024. The 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 the Policy, Ramsay expressly prohibits forced labour and modern slavery, commits to the engagement of workers who have capacity, are of legal age to work and have the free will to consent to work 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. **Monitoring and Compliance:** Ramsay's due diligence processes to monitor compliance with this Policy include the due diligence risk assessment tools outlined on p16. Under this Policy, all staff have a responsibility to report known or reasonably suspected modern slavery in any Ramsay business or those of our suppliers. In addition to the annual Modern Slavery Statement, in consultation with key executives, procurement and human resources managers, Ramsay's regions monitor performance against this Policy through their annual regional workforce reporting.

### Global Responsible Sourcing Policy

The Global Responsible Sourcing Policy was developed in FY2023 and outlines Ramsay's commitment to responsible sourcing practices and sets expectations for our operations and all

direct suppliers in relation to human rights and responsible sourcing, including modern slavery. The new Policy is a key element of Ramsay's Responsible Sourcing Framework, and has been adopted or referenced by Ramsay's regional teams across Australia, the UK and Europe.

**Monitoring and Compliance.** Ramsay monitors and promotes compliance with this Policy through the Ramsay Responsible Sourcing Program and to identify and manage risks in our global procurement activities, Ramsay may require its suppliers to complete a corporate social responsibility assessment conducted by an independent third-party such as EcoVadis or FairSupply as outlined on p16. Suppliers are expected to implement their own systems, processes and policies to ensure compliance with this Policy as a condition of doing business with Ramsay.

### Code of Conduct

In FY2023, Ramsay updated the Code of Conduct for employees to explicitly outline our expectations on our people with regard to respecting human rights and reducing risks of modern slavery.

### Other related global policies include:

- Global Anti-bribery and Corruption Policy
- Global Sustainability Policy
- Whistleblower Policy
- Workplace Health and Safety Policy
- Global Diversity and Inclusion Policy

In addition, 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.

### 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 which applies to all current and former directors, officers, employees, associates and suppliers of the Group. 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.

In FY2022, Ramsay 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. To support the Group's modern slavery initiatives, as part of our FY2023 commitments we continued our focus on cascading expectations and accountabilities



at a regional level with an additional 'Modern Slavery Response Plan Quick Guide' resource to assist Ramsay's Australian and UK procurement, purchasing, supply and people teams to understand how to respond to a potential modern slavery concern using practical steps and parameters. This Quick Guide has been shared with our regional teams for adapting locally as part of our Global commitment to developing grievance and remediation mechanisms specific to modern slavery issues that may be identified across our business and supply chain.

### Training

In FY2023, training was delivered via the e-learning module developed in FY2022 to all Ramsay Australia procurement and supply managers and global graduates as part of an annual refresher program, and a legal and responsible sourcing briefing was presented to all regional People Leaders to build capacity and consistency across global workforce strategies. Ramsay UK continues to require all staff to undertake online modern slavery every two years.

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. In FY2023, Ramsay's online e-learning training module was successfully completed by approximately 250 people and this module was shared with the regional teams across the UK and Europe for adapting to local regulatory requirements. Ramsay will continue to make available regular training in line with its mandatory learning framework.

### New regulatory requirements – compliance and training

As part of our FY2023 commitment to focus on training globally to cover introduction of new regional regulatory requirements, Ramsay's Norwegian operations, operating under the name Capio Volvat, have provided training to key members of its procurement team in relation to the new Norwegian Supply Chain Transparency Act. From FY2023, Capio Volvat will commence reporting in line with the Norwegian Supply Chain Transparency Act. This will be an annual publication that includes a report describing the processes and working methods Capio Volvat has used to ensure compliance to the Norwegian Supply Chain Transparency Act. This includes:

- A general description of Capio Volvat's organisation, operating area, guidelines and routines for dealing with actual and potential negative consequences for basic human rights and decent working conditions.
- Information about actual negative consequences and significant risk of negative consequences that the business has uncovered through its due diligence assessments.
- Information about measures that the business has taken or plans to take to reduce actual negative consequences or limited risk of negative consequences, and the result or expected results of these measures.

The report will be signed by the board of Capio Volvat Medisinske Senter AS and published on the official website of Volvat accessible [here](#).

Under the French 'Duty of Care' law, which imposes an affirmative obligation to prevent human rights violations and environmental abuse – within the company itself, its subsidiaries and its subcontractors and suppliers – Ramsay Santé is required to implement a Duty of Care Plan to prevent serious violations of human rights and fundamental freedoms, the health and safety of people, and the environment. The law imposes several obligations, including:

- Risk mapping.
- Procedures for regular assessment of subsidiaries, service providers and suppliers.
- Appropriate actions to mitigate risks of prevent serious harm.
- A mechanism for alerting and collecting reports on the existence of occurrence of risks.
- A system for monitoring the measures implemented and evaluating their effectiveness.
- The obligation to publish the Vigilance Plan and report on its implementation, including in Ramsay Santé's Universal Registration Document.

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

### 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.

Ramsay continues to engage with its Ramsay Sime Darby joint venture to share knowledge on human rights and modern slavery risk considerations across operations and supply chains. As part of ongoing engagement, Ramsay Sime Darby developed a vendor specific code of business conduct. The code targets vendor compliance with labour laws in applicable jurisdictions and enables Ramsay Sime Darby 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 latest Annual Report available on our website [here](#).

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

Ramsay understands the importance of having effective actions 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 FY2023 – Current Progress against our FY2023 KPIs is set out below

FY2023 KPI	FY2023 ACTIONS
<p><b>HUMAN RIGHTS COMMITMENT:</b></p> <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> <li>• Continue focus on training globally to cover introduction of new regional regulatory requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Developed new Global Responsible Sourcing Policy to include reference to minimum international human rights standards</li> <li>• Reviewed and commenced alignment of Ramsay's policy suite across regions with Global Human Rights and Labour Policy and Global Responsible Sourcing Policy, and commenced cascading obligations across the Group</li> <li>• Assigned responsibilities and accountabilities for human rights and modern slavery risk management at the executive, management and team levels, with clearly defined reporting lines</li> <li>• Delivered modern slavery online training to Australian procurement and supply managers, global graduates, and all Ramsay UK employees</li> <li>• Commenced adapting e-learning module for Elysium employees, training to commence in FY2024</li> <li>• Completed training for key members of Norwegian operations' procurement team on new Norwegian Supply Chain Transparency Act</li> <li>• Communicated new Global Responsible Sourcing Policy to suppliers via existing supplier engagement channels and new Global Human Rights and Labour Policy to employees via newsletters and briefings, and updated existing training</li> </ul>
<p><b>MANAGEMENT, SYSTEMS AND CONTROL:</b></p> <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>	<ul style="list-style-type: none"> <li>• Expanded and embedded modern slavery risk assessment and management into supplier lifecycle as part of the Global Responsible Sourcing Framework to govern the use of EcoVadis and support decision making and pathways</li> <li>• Implemented FairSupply platform for modern slavery risk screening across suppliers and supply chains, helping to identify and locate risks of modern slavery and allow procurement teams to use these findings to inform the approach to supplier due diligence</li> <li>• Completed provenance mapping of Ramsay's supply chains within FairSupply's Integrated Assessment Engine which links supply chain data from 190 countries in relation to 15,909 industry sectors, allowing us to identify suppliers' location and their GICs code, and the economic inputs required to produce their products and services, which can then be traced and mapped to Tier 10 of the supply chain</li> <li>• Presented to regional People Leaders to build capacity and consistency across global workforce strategies</li> </ul>

FY2023 KPI	FY2023 ACTIONS
<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>	<ul style="list-style-type: none"> <li>Completed supply chain provenance mapping of 35% of suppliers by share of spend, with a focus on top 8 Global suppliers of medical devices and consumables and medical gloves</li> <li>Commenced focus on high-risk categories in Australia, including solar panel suppliers, commercial cleaning in hospitals and Linear’s suppliers</li> </ul>
<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>	<ul style="list-style-type: none"> <li>Engaged with potential and existing suppliers through FairSupply and EcoVadis to assess the risks of modern slavery and identify policies, governance, processes or due diligence required to reduce risk exposure</li> <li>Completed EcoVadis supplier assessments for over 40% of global spend with all countries and businesses engaging suppliers to conduct EcoVadis CSR Assessments</li> <li>Engaged Elysium for supplier onboarding and commencement of EcoVadis CSR Assessments and established a target KPI of 60% of spend for FY2024</li> <li>Adopted mutual recognition of suppliers’ CSR assessment and audit programs, namely Sedex Members Ethical Trade Audit (SMETA) 6.1 and Amfori Business Social Compliance Initiative (BCSI) audit</li> </ul>
<p><b>Grievance and remediation</b></p> <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>	<ul style="list-style-type: none"> <li>Developed Modern Slavery Response Plan Quick Guide to assist Ramsay’s Australian and UK procurement, purchasing, supply and people teams to understand how to respond to a potential modern slavery concern, and cascaded Quick Guide to other regions for adapting for local requirements</li> <li>Participated in the UN Global Compact Business and Human Rights Accelerator</li> </ul>



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

For FY2024, we continue to align our activities with the three key focus areas of our Modern Slavery Improvement Plan.

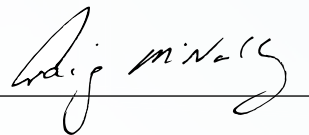
FOCUS AREA	INITIATIVE	KPIs TO MEASURE EFFECTIVENESS
HUMAN RIGHTS COMMITMENT	Policies, procedures and templates	<ul style="list-style-type: none"> <li>Review Human Rights &amp; Labour Policy</li> </ul>
MANAGEMENT, SYSTEMS AND CONTROL	Capability to assist with focus on modern slavery	<ul style="list-style-type: none"> <li>Continue strengthening processes, capacity building and consistency in approach at a regional level, through the Responsible Sourcing Program</li> <li>Embed use of modern slavery due diligence toolbox and complementary monitoring processes across regions (as relevant)</li> </ul>
	Mapping of operations and supply chain	<ul style="list-style-type: none"> <li>Undertake provenance mapping of 40% 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>Engage with suppliers to reduce risk exposure including undertaking onsite third party audits</li> <li>Undertake EcoVadis assessments of suppliers representing 60% of global spend by the end of FY2024 as part of ongoing KPI to increase supplier assessment target spend to 80% of global spend by end of FY2026</li> </ul>
	Training	<ul style="list-style-type: none"> <li>Continue focus on training globally to cover introduction of new regional regulatory requirements</li> <li>Support smaller suppliers in building their capability</li> </ul>
GRIEVANCE AND REMEDIATION	Policies, procedures and templates	<ul style="list-style-type: none"> <li>Continue refinement of due diligence and response plan for managing modern slavery risk</li> </ul>

## 5. Consultation Process and Approval

This statement has been prepared by Ramsay Health Care Limited in consultation with Directors of each Australian Reporting Entity and each UK Reporting Entity and it has been approved by the Board of Ramsay Health Care Limited on 24 October 2023, the Board of Ramsay Health Care (UK) Limited on 25 October 2023 and the Board of Elysium Healthcare on 26 September 2023. The process of consultation involved:

- quarterly virtual meetings with Ramsay’s Modern Slavery Working Group which includes representatives from Ramsay Australia (and the Australian Reporting Entities), Ramsay UK and Elysium Healthcare (and the Ramsay UK Reporting Entities), Ramsay Santé and Ramsay Sime Darby, as well as our Group Head of Legal, Global Responsible Sourcing Manager and Group Sustainability Officer. The Working Group provided input and review via email and engaged functional leads where needed for targeted input, and also provided a platform for knowledge sharing and capability building with our Malaysian joint venture and our European operations and teams;
- review by the Global Executive Leadership Team (ExCo), which is comprised of the functional leads with key responsibility for the day-to-day management of the Ramsay Group, with some ExCo members being appointed directors of our Australian and UK Reporting Entities as well our European operations, which worked to facilitate consultation and buy-in across the business and operations; and
- input via email from the various relevant internal stakeholder groups (including Procurement, Human Resources, Legal, and Risk).

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 2023.



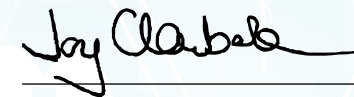
**Craig McNally**  
Managing Director & Group CEO  
Ramsay Health Care Limited  
25 October 2023



**Carmel Monaghan**  
CEO & Director  
Ramsay Health Care Australia  
25 October 2023



**Nick Costa**  
CEO & Director  
Ramsay Health Care (UK) Limited  
25 October 2023



**Joy Chamberlain**  
CEO & Director  
Elysium Healthcare  
25 October 2023

## 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 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



## 7. Appendix

Below is a list of reporting entities of Ramsay Health Care Limited. The regions of the Ramsay Group ecosystem are outlined on page 4 in section 1.

**All reporting entities below are covered by this joint statement.**

<sup>i</sup> **Australian Reporting Entities** are all Australian subsidiaries / joint ventures that have consolidated revenue of A\$100 million (together with Ramsay Health Care Limited, being the Australian Reporting Entities for the purposes of the Australian MSA): 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, 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, 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).

<sup>ii</sup> **UK Reporting Entities** are 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 Group Limited, Elysium Healthcare Holdings 1 Limited, Elysium Healthcare Holdings 2 Limited, Elysium Healthcare Holdings 3 Limited, Elysium Healthcare LC Limited, 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 (Healthlinc) 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, Regis Healthcare 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 Reporting Entities).