

# Ramsay Health Care Code of Conduct for Manufacturers, Suppliers and Agents

## Statement of Intent

The Ramsay Health Care Group (**Ramsay**) aims at all times to be a leading provider of health care services. For consistency with this aim, it is critical for Ramsay to choose, promote and develop relationships with manufacturers, suppliers and agents involved in the conduct of its business to align with Ramsay's expectations of best practice and ethical behaviour.

In developing such relationships Ramsay endeavours wherever possible to exceed minimum requirements.

This Code of Conduct (**Code**) is designed to ensure as far as possible that manufacturers, suppliers and agents involved in the conduct of Ramsay's business and the supply of its products and services will:

- adhere to ethical business practices and comply with applicable laws, regulations and the directions of government authorities;
- implement systems to maintain quality, performance, work health and safety, continuous improvement and business continuity;
- meet basic internationally recognised standards for labour and human rights;
- comply with applicable laws in relation to confidentiality and privacy;
- implement and maintain good information security practices;
- manage the environmental impact of their activities and operate in an environmentally sustainable and responsible manner; and
- wherever possible require its next tier suppliers to acknowledge and comply with this Code to ensure as far as practicable a total supply chain initiative.

Ramsay is committed to the continuous improvement of this Code.

## Ramsay's Relationship with its Suppliers, Manufacturers and Agents

- Ramsay acknowledges that manufacturers, suppliers and agents (**Suppliers**) are integral to its business and strives to create mutually beneficial and rewarding outcomes from the application of best practices.
- Ramsay seeks to develop long term relationships with Suppliers who deliver high quality products and services on time, in full and to agreed specification, standard and price.
- Ramsay wishes to support Suppliers who attain the social responsibility standards sought by Ramsay and who strive to improve practices relevant to these standards, in order to assist Ramsay in making practical and principled business decisions.
- This Code requires the following compliance standards.

## Legal Compliance

Fundamental to this Code is legal compliance and wherever possible exceeding legal compliance in order to advance social and environmental responsibility. Ramsay requires all Suppliers to ensure that each of the Supplier's corporate entities and their respective directors, officers, employees, representatives, contractors and agents:

- abide by all applicable legal or regulatory requirements, including all laws, regulations and relevant and valid directions of government authorities;
- maintain and comply with all applicable permits, licences and registrations;
- ensure that all products and services supplied to Ramsay comply with applicable standards and codes;
- comply with the terms of the purchasing or supply agreement entered into by the Supplier and the relevant Ramsay corporate entity, including providing all reports to Ramsay as required by that agreement;
- comply with all applicable policies and procedures of Ramsay and any Ramsay health care facility;
- not engage in, endorse or permit for any reason any form of corruption, including extortion, fraud, illicit payments and bribery. In particular, Ramsay requires its Suppliers to comply with the UK Bribery Act 2010, the Australian Criminal Code and the 1997 OECD Convention; and
- meet generally accepted industry standards and practices.

## Ethical Business Practices

Ramsay requires its Suppliers and their directors, officers, employees, representatives, contractors and agents to act professionally, honestly and with a law-abiding philosophy. Suppliers must:

- notify Ramsay as soon as it becomes apparent that the Supplier has any form of conflict of interest with the products or services provided by the Supplier to Ramsay;
- not offer gifts beyond what is acceptable under usual legal business practice, or offer gifts in any event without first advising the local Ramsay Head of Procurement or equivalent senior manager when engaging with employees of Ramsay; and
- not offer gifts beyond what is acceptable under usual business practice to any official or other person in order to receive benefit of material or knowledge.

## Labour and Human Rights

Suppliers shall do all things reasonably necessary to ensure that in its 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;

- all workers have the right to join or form trade unions of their own choosing and to bargain collectively and Suppliers must adopt an open attitude towards the activities of trade unions;
- there is no discrimination against, or denial of access to, workers' representatives in the workplace;
- where the right to freedom of association and collective bargaining is restricted under law, the Supplier facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining;
- no person shall be employed at any age younger than legal minimum age for working in the jurisdiction in which the work is being conducted. In no event shall the Supplier or their subcontractors employ or engage workers less than 15 years of age (or 14 years of age where local law allows);
- there is no direct or indirect use of child labour or other forms of exploitation of children;
- there is a commitment to fair pay such that wages and benefits paid for a standard working week meet, at a minimum, national legal standards and the relevant industrial relations framework, but in any event shall always be enough to meet basic needs and to provide some discretionary income;
- all workers shall be provided with written and understandable information about their employment conditions and wages including relevant employment related policies and procedures, both before and during their employment;
- deductions from wages not provided for by national law shall not be permitted without the expressed permission of the worker concerned;
- all disciplinary measures are undertaken in line with the relevant governing industrial relations framework;
- working hours shall comply with national laws in the jurisdiction the work is undertaken;
- workers shall not on a regular basis be required to work in excess of their standard working hours per week and shall be provided with at least one day off for every 7-day period on average;
- work in excess of standard working hours (e.g overtime, on-call, recall) shall be in keeping with the relevant laws governing employment, not be in excess and on a regular basis and shall be in keeping with work health and safety policies;
- there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, pregnancy, health status (including in respect of HIV), marital status, veteran status, sexual orientation, union membership or political affiliation;
- only workers with a legal right to work shall be employed or engaged;
- workers shall not be required to supply or produce any government issued identification, passports or similar as a condition of employment. Where such documents are supplied or produced, the Supplier must not confiscate, withhold or destroy them or otherwise restrict access to them;
- to every extent possible work performed shall be on the basis of a recognised employment relationship established through national law and practice;
- obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment; and

- physical abuse or discipline, the threat of physical abuse, bullying, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited with appropriate internal and external mechanisms in place for employees to lodge complaints and/or report concerns.

## Work Health and Safety

Suppliers are expected to foster a culture within their operations and broader supply chain that supports the health and safety of workers and contractors. Suppliers shall do all things reasonably necessary to ensure that:

- a safe and hygienic working environment is provided, bearing in mind the prevailing knowledge of their industry and of any specific hazards and risks;
- adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment;
- workplace hazards shall be controlled through elimination, design, engineering and administrative controls, preventative maintenance and safe work procedures;
- workers shall not be disciplined for raising safety concerns or other concerns relating to conditions in the working environment;
- all workers shall receive regular and recorded work health and safety training;
- access shall be provided to clean toilet facilities and to clean drinking water, and, if appropriate, sanitary facilities for food storage;
- any exposure to chemical, biological and other harmful agents shall be appropriately identified, evaluated and controlled;
- accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers it is provided to;
- fatigue does not create a risk to health and safety. Appropriate control measures including work scheduling, rostering, environmental conditions and job demands should be implemented, monitored and reviewed to ensure effectiveness;
- a senior management representative assumes or is delegated responsibility for work health and safety issues;
- measurable objectives and targets around work health and safety are established which aim to reduce and where possible eliminate work related injury and illness; and
- work health and safety performance shall be monitored on an ongoing basis and prompt action shall be taken to address any identified issues and deficiencies.

## Quality

As a provider of health care services, the consistent delivery of reliable and quality products and services is essential to the operation of Ramsay's business and the delivery of quality services to its patients.

Ramsay expects its Suppliers to:

- only supply products and services to Ramsay which are of the highest quality, which meet their specifications and which comply with all applicable laws and standards;

- have robust quality control systems in place that cover not only the Supplier's systems and processes but also those of its broader supply chain;
- immediately notify Ramsay in writing when any product or component of a product is directly or indirectly the subject of any regulatory action, a product recall or where there is an event relating to the Supplier or the product that could create adverse publicity to Ramsay;
- have and maintain a sophisticated product recall process (incorporating both a voluntary recall and compulsory recall process) which complies with all applicable laws and regulatory requirements;
- have, maintain and retain (for the required periods) all appropriate records demonstrating the Supplier's adherence to all relevant quality standards; and
- have and maintain all appropriate insurances with a reputable insurer to cover the Supplier's business operations and risks and hold this insurance (including any run-off cover) for appropriate periods in accordance with the Supplier's purchasing or supply agreement with Ramsay.

### **Privacy and Confidentiality**

Suppliers must ensure that any confidential information they are provided with regarding Ramsay and its business operations is:

- kept confidential and secure at all times and only used for the purpose for which it was provided; and
- not disclosed to any third party without the prior written consent of Ramsay.

Suppliers must also ensure that they comply with all laws regarding confidentiality and privacy in respect of any personal information (within the meaning of local privacy laws) that the Supplier may collect or is provided with.

### **Information Security**

Ramsay requires Suppliers to maintain documented processes and routines for handling information security risks within their operations. Suppliers are responsible for identifying information and cyber security risks and taking reasonable actions to control and mitigate such risks.

Suppliers must perform their obligations in accordance 'Good Security Practice'. Good Security Practice means security standards and guidelines (including generally accepted principles regarding the segregation of the duties of governance, implementation, administration and control) and techniques such as strong authentication, access control and auditing and "least privilege" assignment, all as reasonably made available to the general public or information security practitioners and stakeholders by generally recognised authorities and organisations regarding information security. Examples of security frameworks Ramsay considers to be Good Security Practice are the US National Institute of Standards and Technology Cybersecurity Framework (NIST CSF) or the Australian Federal Government Information Security Manual (ISM).

Suppliers must:

- ensure any confidential information provided by Ramsay is encrypted while in transit and at rest;
- maintain and enforce procedures relating to transmission and communication methods to protect confidential information;
- maintain security with regard to the internet through firewalls and other measures that address unauthorised attempts to access applications, sites or services that are available through the internet, or to access data transmitted over the internet;
- maintain specifications of technical and organisational resources (covering computer system authentication, authorisation and accounting) required to ensure the confidentiality, integrity and availability of the data that is processed;
- restrict access to system features (including computer system configuration settings) and other tools relevant for computer system security to authorised personnel; and
- make available to Ramsay any independent compliance attestation material (for example SOC2 report or ISO27001 certification of compliance), as well as its other externally available security documentation.

## **Environmental Impact Management**

Ramsay seeks to build relationships with Suppliers who value the natural environment and are committed to environment and resource sustainability, in particular Suppliers who:

- meet legal obligations in relation to environmental performance including any necessary permits, approvals, registrations and reporting requirements;
- establish objectives, targets and key performance indicators that strive for continuous improvement of their environmental performance;
- demonstrate continuous reduction in the environmental impacts of their operations across all areas including emissions, pollution, waste, water and waste water, ethical and compliant materials sourcing and impact on biodiversity;
- maintain management systems to plan, document, measure, monitor and regularly review their environmental performance;
- implement systems to ensure materials presenting a hazard to the environment are handled, managed, stored and disposed of appropriately and in a manner that does not impact on local communities;
- identify and assess the environmental hazards which arise from their activities, products and services; and
- effectively manage environmental risk by applying best practice principles to the prevention of pollution.