

Ramsay Health Care

Code of Conduct

Approved by the Board of
Ramsay Health Care Limited
on 21 February 2023

[ramsayhealth.com](https://www.ramsayhealth.com)



Ramsay
Health Care

A professional portrait of Craig McNally, the Managing Director & CEO. He is a middle-aged man with a balding head, wearing dark-rimmed glasses, a white dress shirt, a patterned purple tie, and a dark blue suit jacket. He is smiling slightly and looking directly at the camera. The background is a blurred office interior with vertical lines, possibly from a window or door frame.

Message from our Managing Director & CEO

Every year, millions of people and their families trust us to do the right thing, in the right way. Our colleagues, communities and stakeholders expect us to act responsibly and sustainably; to be lawful, ethical and professional and to respect the people and places around us.

How we do that is guided by this Code of Conduct. Just as The Ramsay Way steers our daily approach to work, this Code sets out very clear expectations and understandings to ensure we all know the right way to behave, respond, take action and do our work.

Everyone at Ramsay must comply with this Code of Conduct. It explains our responsibilities, sets standards, provides guidance and promotes safe behaviour. Following the Code helps to protect you and your colleagues and our business.

Please take time to read and absorb our Code of Conduct and commit to following its principles and practices every day.

Thank you,
Craig McNally
Managing Director & CEO

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Our purpose – People Caring for People

The way we operate our business is guided by our purpose of ‘people caring for people’. Caring is not just a value statement but an intrinsic part of the way we work and make decisions in order to meet the expectations of our patients, service users, employees, doctors and other stakeholders.

Our values – The Ramsay Way

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.



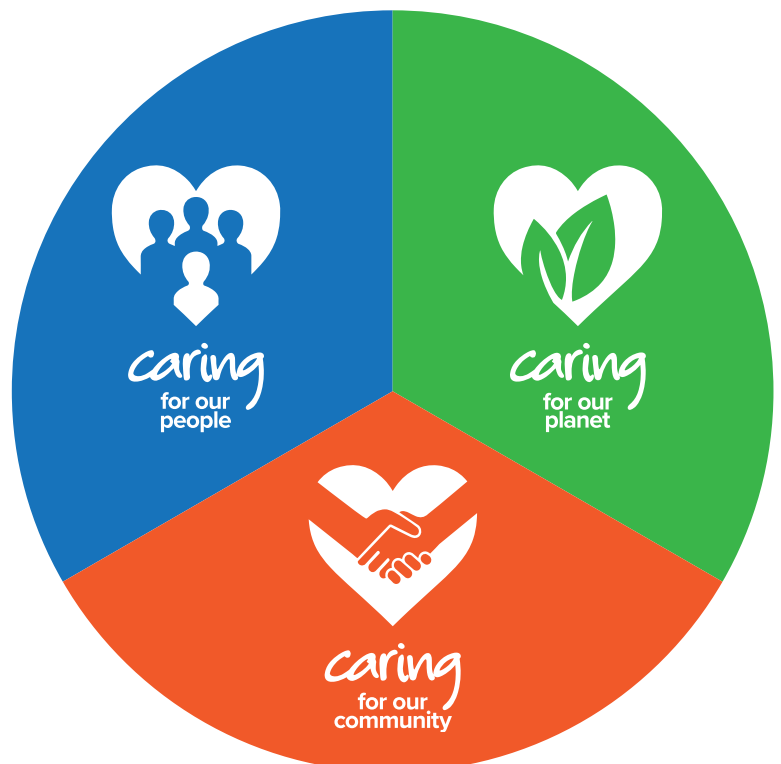
We seek to grow sustainably

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.

Our Ramsay Cares sustainability strategy

Our purpose is supported by our sustainability strategy, Ramsay Cares, which sets specific, measurable targets aimed at producing healthier people, a thriving planet and stronger communities. It reaffirms our intention to have a positive impact for current and future generations. Ramsay Cares is centred on three important pillars: Caring for our people, Caring for our Planet and Caring for our Community.



Purpose of the Code

The Ramsay Health Care Limited (Ramsay) Code of Conduct (the Code) is a statement on the shared values of the Ramsay Group and how we conduct ourselves and our business.

Who does the Code apply to?

- When we refer to 'you' this includes employees, volunteers and Directors. We also expect contractors, consultants, visiting medical officers and others to follow the Code in connection with their work for us.
- The Code is important. It should be reviewed by everybody, regardless of role or location, from the newest graduate recruit to executive management and members of the Board.
- We also have a Board Charter which sets out specific standards expected of our Directors.

What do we expect of you?

- Following the Code is mandatory. You should read it, so you know where to find answers if you need them.
- You should follow the principles and spirit of the Code (not just the literal meaning).
- It is everybody's responsibility to set the highest standards for themselves, to monitor their own behaviour, and to notify the appropriate person if the conduct of others is not aligned with the Code.
- You should also read Ramsay's other mandatory Global policies, standards and procedures including the Diversity and Inclusion Policy, Whistleblower Policy, Anti-Bribery & Corruption Policy, Human Rights and Labour Policy and Securities Trading Policy. Copies of these policies are available on the Ramsay's external website. Other policies, standards and procedures that are specific to the country in which you are employed will apply, and you should familiarise yourself with them.

How do I use the Code?

- The Code can be used to guide how we apply The Ramsay Way and how we work.
- We can also use the Code to guide us if we are uncomfortable with the behaviour of others and if we are not sure whether or not that behaviour is appropriate and if we should take action.
- When we are not sure of the meaning of the principles in the Code, we can ask our manager or another appropriate person.
- We cannot defend inappropriate behaviour by claiming that we do not understand what is expected of us. It is our duty to make ourselves aware of the principles in the Code and apply these to our own conduct.

Don't look the other way, tell us

- We ask that you raise any concerns about breaches of the Code. The standard we walk by is the standard we accept.
- Please do this promptly and honestly, in line with the company's grievance policy in your country of employment.
- While it may feel uncomfortable to make a report, it is important that issues are identified and addressed quickly. The longer an issue remains unaddressed, the more serious it may become.
- It is not The Ramsay Way to ignore or pretend that a problem does not exist.
- If you are unsure if a behaviour is in line with the Code, ask yourself these questions:



Values: Does it contradict The Ramsay Way?



Feel: Is it inconsistent with my personal values?



Policies: Does it breach company policies, procedures or standards?



Safety: Could somebody be hurt or seriously and negatively affected?



Law: Is it illegal?



Conscience: Would I be uncomfortable telling my friends, family or a stranger?

If you answered 'yes' to any of these questions, raise your concerns with an appropriate person.

Raising concerns & getting help



Speaking up

Each of us is responsible for understanding the Code and The Ramsay Way values. These principles must be followed as a condition of, and for the duration of, your engagement with Ramsay.

Failure to do so may lead to disciplinary action and possibly dismissal, or a termination of your engagement with Ramsay.

It is our right and our responsibility to raise our concerns if we think that something is inconsistent with the Code or The Ramsay Way. We do not need to be directly affected by an issue to raise it. Often another person's inappropriate actions may not be deliberate, but may be due to a lack of understanding, time or suitable resources. Raising concerns helps us identify and address the matter and improve how we work.



Who should you tell?

In raising concerns, we should consider the principles and processes of the Grievance Policy. We should try first to raise any issues with the person involved where we feel comfortable doing so. If this is not possible or successful, we should talk to our supervisor or manager, or alternatively their supervisor or manager.

Where there is no appropriate person at our facility, we can contact Human Resources or the company's executive management.

Where we are not comfortable raising an issue internally, or where we have raised an issue and we do not feel that it has been appropriately dealt with, we can use the contacts in the Whistleblower Policy and procedures relevant to where you are employed.



What happens when you speak up?

All concerns will be treated seriously and respectfully.

Concerns raised and complaints made will be taken seriously and investigated whilst respecting the confidentiality of all those involved. Investigations will be dealt with in a consistent, transparent and effective manner, within reasonable time frames and ensuring fairness to all parties. The process of resolving a concern or complaint should be viewed as a source of continuous learning and an opportunity to improve services, processes, outcomes and culture.

If a formal complaint is made, all parties must:

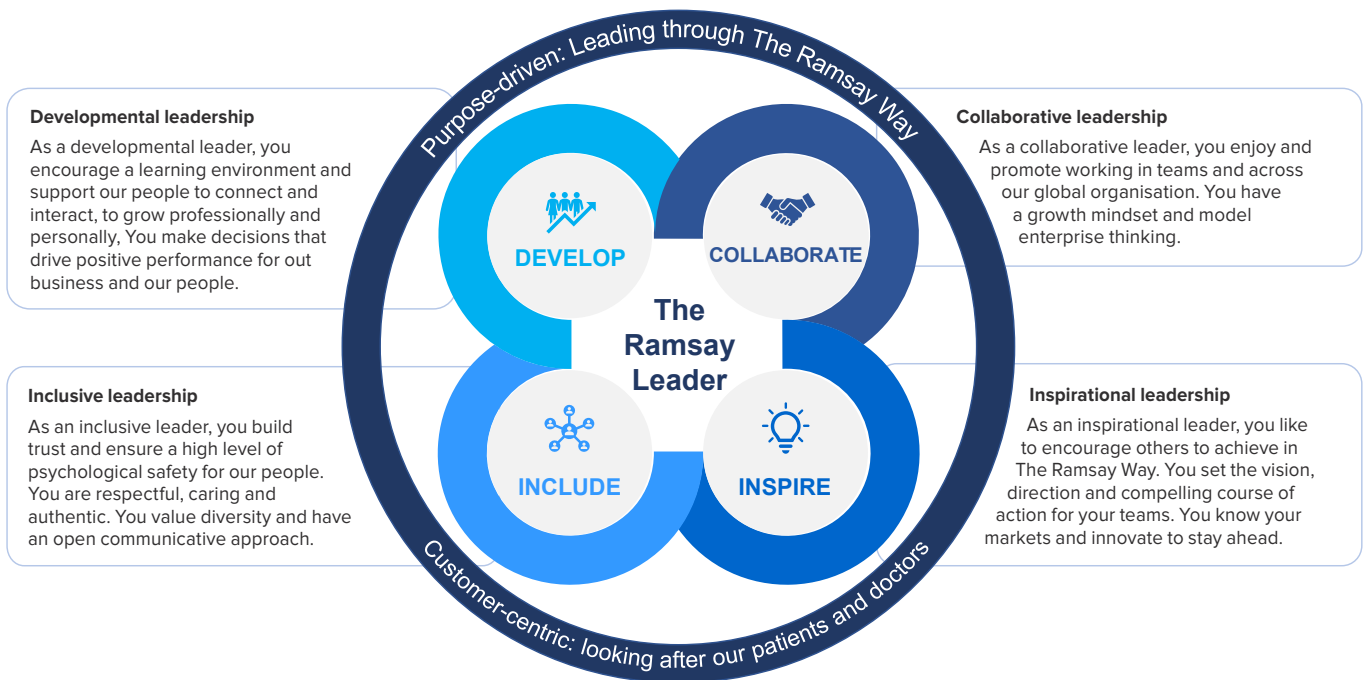
- Give a true and accurate report and cooperate in establishing the facts;
- Declare any bias or pertinent facts that may impact upon their role in the investigation and ability to remain impartial;
- Maintain confidentiality at all times;
- Conduct themselves in a professional manner and observe appropriate workplace behaviours;
- Refrain from any form of victimisation during or after the investigation process.

Appropriate records and reports will be kept in order to establish facts and the process followed, including the resolution of the matter. When a matter is finalised, any reports, or details of investigations will be kept on a secured, confidential file.

The Risk Management Committee of the Board will receive information regarding material breaches of our Code and consider if any further action should be taken to address particular issues or trends in the reports.

Ramsay Leaders

Ramsay's purpose of 'people caring for people' is to be upheld and embodied by everyone who leads people at Ramsay. It underpins how Ramsay leaders interact, influence and make decisions.



We also expect our leaders to:

- **Set clear expectations** for your team on conduct and outcomes through the lens of The Ramsay Way
- **Be a role model** for the high standards that we expect and continually model respectful, caring and authentic behaviour
- **Demonstrate accountability**, including through self-reflection and continual learning
- **Promote a speak-up culture** that supports a high level of psychological safety for our people
- **Embed the Code of Conduct** into day-to-day activities, operational and people management processes and decision-making



The principles of the Code of Conduct

Respect for others






Ramsay's strengths are based on its people. Our dealings with each other in the workplace – and those with the wider community – should reflect mutual respect. We should treat others as we expect to be treated.

Each of us should strive to be honest, courteous, reliable and responsible in our interactions with others at all times. We treat everybody with dignity, including patients and service users and their families, colleagues, contractors, other healthcare providers, students, members of the public and other service providers. Treating people with dignity includes ensuring our own honesty and integrity and respecting confidentiality.

We recognise the need to respect and value the diversity of the workforce and we commit to supporting that diversity by providing a working environment where everyone receives fair and just treatment and is free to achieve their best.

We believe in equal employment opportunity and a workplace free from discrimination, bullying and harassment. We always show respect in our interactions with others.

Behaviours that have no place at Ramsay

Harassment		An action or behaviour that would be reasonably viewed as humiliating, intimidating or offensive.
Sexual harassment and sexual assault		An unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances. We must never subject someone to a workplace environment that is hostile on the ground of sex including by, for example, displaying obscene or pornographic material or engaging in general sexual banter, innuendo or offensive jokes which result in one sex feeling unwelcome or excluded.
Bullying		Repeated behaviour directed towards a worker (or group of workers) that a reasonable person, having considered the circumstances, may see as unreasonable, including victimising, humiliating, intimidating or threatening behaviour.
Racism and racial harassment		A racial slur, derogatory comment or unwanted conduct based on race, descent, ancestry, ethnicity, ethnic origin, nationality, national origin, country of origin, cultural background or status as an immigrant.
Discrimination		Direct or indirect adverse treatment of an individual or group based on personal attributes unrelated to job requirements, such as gender, gender identity, intersex status, breastfeeding, age, race, colour, cultural background, religion, ethnicity, nationality, physical or mental disability, social and economic status, sexual orientation, marital and civil partnership status, political beliefs, union membership, family or carer's responsibilities, pregnancy, national extraction or social origin.

Please see any discrimination, bullying and harassment policies and guidelines that apply in the country in which you are employed for more detail, and speak up if you witness this behaviour. It's also important to support your colleagues to speak up if they believe they are experiencing sexual harassment, harassment or bullying.

Zero tolerance

We will promptly investigate any allegations of inappropriate behaviour and there will be serious consequences for anyone found to engage in this kind of behaviour.

It is important to keep in mind that what will constitute unacceptable harassment or bullying will largely depend on the recipient's perception. Each of us and in particular our managers should be aware of this and ensure that our behaviour does not impact adversely on our colleagues.

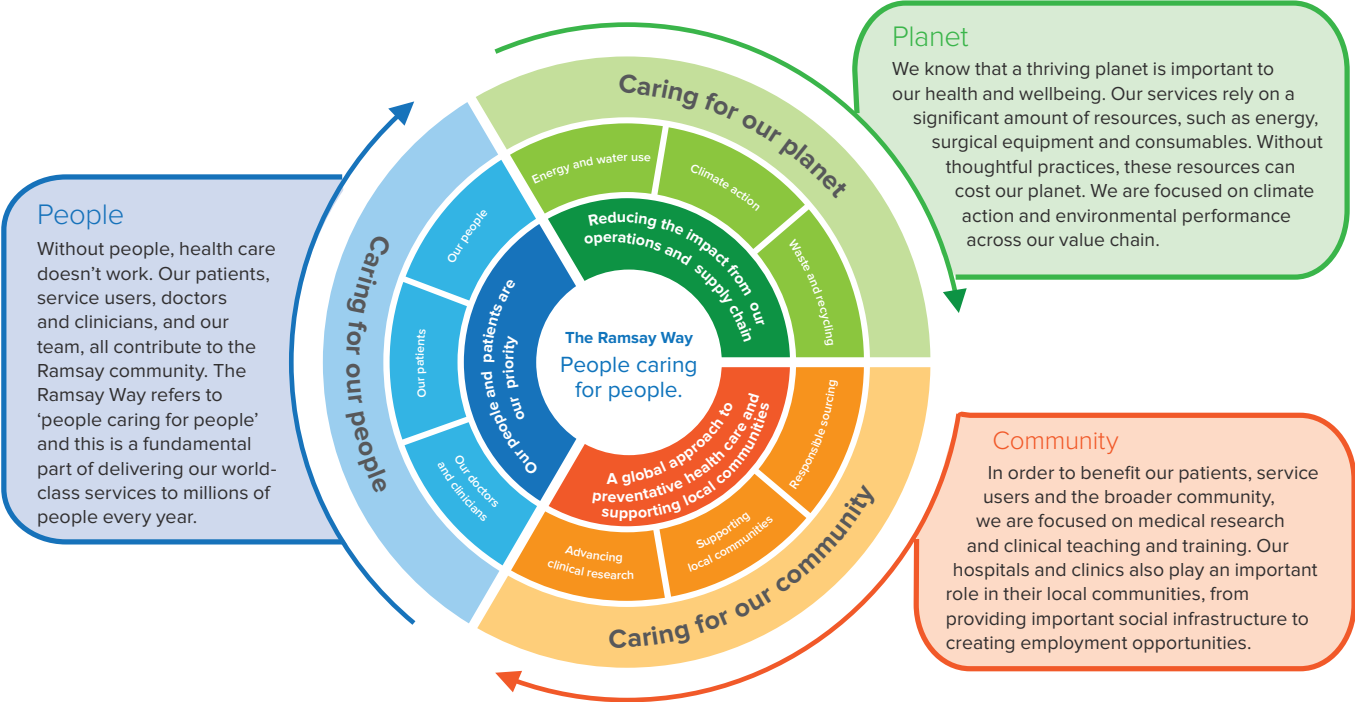
Examples of how we apply this principle

ALWAYS	NEVER
Make employment and career development decisions based on merit	Conduct, participate in or tolerate discrimination, bullying or harassment of any kind
Foster diversity, inclusion and respect for culture	Allow stereotypes to influence our treatment of others
Comply with laws and the principles of human rights	Deliberately disrespect or mislead another person

Sustainability, society & the environment

Ramsay believes a great company is one that makes the world a better place.

We are committed to making a meaningful, positive difference through our Ramsay Cares sustainability strategy, which focuses on action to promote healthier people, a thriving planet and stronger communities. It reaffirms our intention to have a positive impact for current and future generations. Ramsay Cares forms part of our strategic planning and risk management approaches.



Company-wide sustainability and environmental targets are set, and performance against these targets is closely monitored, measured and reported on a regular basis.



Human rights and modern slavery

Ramsay works with our suppliers to reduce the risk of modern slavery practices. We are also committed to operating in accordance with all key universal human and labour rights across our regions globally.

We seek to continually improve, ensuring we work to identify, prevent, mitigate and account for any impacts of our operations on human rights. This includes potential remediation for any adverse impacts. As a leading health care provider, our commitment to human and labour rights particularly relates to three key groups - our patients and service users, our people and our partners and suppliers.

Examples of how we apply this principle

ALWAYS	NEVER
<p>Create and promote an environmentally sustainable and responsible culture</p> <p>Foster innovation and a culture of continuous improvement</p> <p>Develop our people and provide resources so they can take positive action</p> <p>Strive to reduce energy and water usage, minimise waste and work towards net zero</p> <p>Respect human rights and foster an inclusive culture</p>	<p>Ignore issues related to social or environmental sustainability when creating strategies and investing in infrastructure</p> <p>Fail to understand the impact of our decisions</p>

Ethics & integrity

Working with integrity means doing things the right way and giving as much consideration to the way we do things as to the results themselves. We prioritise integrity in our relationships and decision-making and everyone at Ramsay is responsible for upholding The Ramsay Way values in our own actions.

Company assets

We must exercise professional care at all times when using or coming into contact with company assets and especially when we have responsibility for the organisation's funds which must be controlled and used in a manner that ensures optimal benefit to the Ramsay community.

When dealing with Ramsay's property or assets, we must:

- protect any property and assets of the company (eg computers, telephones, other office equipment, intellectual property and confidential information);
- only use company property and assets for legitimate business purposes;
- safeguard company property and assets from misuse, loss, theft and unauthorised use;
- only remove company property and assets from official premises with a good and proper reason and if so, store them securely and take steps so that confidentiality is maintained; and
- never use company property and assets for any unlawful purpose or to obtain an unauthorised benefit.

Gifts and business relationships

We conduct our business relationships in a professional, impartial manner. We must select our business partners appropriately and not due to personal relationships. While hospitality is a genuine part of a business relationship we must make sure that any gift is not excessive, is appropriate and doesn't exert undue influence on us.

We do not encourage patients or service users or their families to give gifts which go beyond common courtesies and we will declare any gifts received to our manager, hospital director or senior corporate manager immediately. We do not foster relationships with patients or service users that go beyond those appropriate to our professional capacity.

You should refer to the Ramsay Global Gifts & Hospitality Policy and the Global Anti-Bribery & Corruption Policy, as well as any applicable processes in your country, for further detail.

If you have extensive dealings with companies based in countries where gift giving has important cultural significance and plays an important role in business relationships, you should be aware and respectful of such cultural practices but remain mindful of Ramsay's Gifts & Hospitality Policy.

Reporting and managing conflicts of interest

We must not at any time misuse our position, privilege or status for our own gain or the gain of our close personal associates. Any decisions we make in the process of our work must be made in the best interests of the Ramsay community and our patients and service users.

We should not allow a conflict of interest to arise between our personal or business interests and the obligations and duties related to our role or business relationship at Ramsay.

Where a conflict of interest may or does arise, we must:

- declare it to our manager, in writing; and
- withdraw from any relevant decision making where we may not be able to be objective.

This includes:

- where a close personal relationship exists between two of us; and
- where we or a close personal associate has a business interest that may give rise to a conflict of interest (such as a role with, or business interest in, a vendor to Ramsay).

The specific responsibilities of Directors with respect to conflicts of interest have been set out in the Board Charter.

Zero tolerance for corruption

We do not tolerate corruption of any kind. We do not receive or offer gifts, bribes or payments, nor any other benefit which has the effect of compromising our objectivity. No money should be exchanged except in genuine business transactions. We do not threaten others but try to influence them with reason and genuine arguments.

All allegations of corruption will be rigorously investigated and may result in disciplinary action including possible dismissal.

Insider trading and dealing in securities

Where your position at Ramsay gives you access to “inside” information that is not generally available to the public, we are not able to use the information for our own financial gain. The improper use of this information to gain advantage in share trading is known as “insider trading”. It is illegal, and is subject to severe penalties. The Board has adopted the Securities Trading Policy on trading in company shares, which must be followed by Directors, Senior Executives and employees in general.

Confidential information and intellectual property

We recognise the value of intellectual property such as policies, procedures, systems, manuals, registered patents, designs, trademarks, know-how, trade secrets, logos, business names and confidential information. We understand that these belong to Ramsay and we exercise our professional care in ensuring that such property is secure at all times. When we leave our role at Ramsay, we are obliged to return all Ramsay’s confidential information and intellectual property within our possession and control.

Examples of how we apply this principle

ALWAYS	NEVER
<p>Report any suspected misuse or abuse of any company asset</p> <p>Understand that all tools and materials created during our employment belong to Ramsay</p> <p>Report any situations where a potential conflict of interest may arise and/or where we may not be able to be objective</p> <p>Declare any role we have in any other company which has dealings with Ramsay</p>	<p>Misappropriate funds received by the company; accept funds for anything other than valid business services rendered; or expend the organisation’s funds for anything other than legitimate business purpose</p> <p>Tolerate any corruption, fraud, theft or unauthorised use of the organisation’s property</p> <p>Misuse our position, privilege, status or any information or knowledge that we have obtained as a result of these for our own gain or the gain of close personal associates or family members</p> <p>Misuse Ramsay resources or our position to influence others</p>

Health & safety

Ramsay is committed to being an industry leader in the provision of a safe work environment and safe systems of work. The Company accepts responsibility for the development, implementation and evaluation of safe systems of work within a consultative framework.

Across the organisation, health and safety practices are governed by policies, standards, guidelines, procedures and tools that apply broadly. Managers are responsible for the implementation of these resources and for ensuring that supporting systems are in place to maximise effectiveness.

Company-wide health and safety targets are set, and performance against these targets is closely monitored, measured and reported on a continual basis.

Safety is everyone's responsibility

Each of us is required to:

- report hazards and adverse events when they occur;
- take reasonable care of themselves and others;
- comply with safety management systems including instructions, requirements and measures; and
- facilitate the maintenance of a safe working culture and safe work environment.

Deliberate breaches of safe work systems or disregard for the safety of others may be subject to disciplinary action and possible dismissal.

Patient safety

Ramsay strives to deliver high-quality, safe and effective clinical care in an environment where risks and issues are anticipated, identified early and responded to rapidly. We work to do this through reviewing and improving our patient safety and quality system performance. Safety is everyone's business and the cornerstone of quality.

You should be aware of the "Speak Up For Patient Safety" programmes in the country in which you are employed. For example, the PACE model, which provides graded assertiveness language for speaking up:

Probe – "Can I clarify...?"

Alert – "Perhaps we could just check..."

Challenge – "You need to hear my concern"

Emergency – "For the safety of the patient YOU MUST STOP AND LISTEN!"

Examples of how we apply this principle

ALWAYS	NEVER
Comply with the requirements of mandatory health and safety laws, policies, standards and procedures, and assist those working with us to do the same	Undertake any work outside of our own scope of practice, competency or skill set
Assess the hazards and risk inherent to each situation and adapt our behaviour accordingly, taking steps to minimise any risks or hazards identified	Undertake work outside safe operating procedures
Report any near miss, accident, injury, illness, or unsafe condition so that appropriate action can be taken to prevent, correct or control the situation	Continue to work or begin work when we are "unfit" for any reason
	Make another person unsafe either deliberately or by not applying due care or attention

Commitment to child safety

Ramsay is committed to child safety.

We want children to be safe, happy and empowered. We support and respect all children. We are committed to the safety, participation and empowerment of all children.

We have zero tolerance of child abuse, and all allegations and safety concerns will be treated very seriously and consistently in line with our policies and procedures.

We have legal and moral obligations to contact authorities when we are worried about a child's safety, which we follow rigorously.

Ramsay is committed to taking all reasonable steps to prevent child abuse and identify risks early and remove and reducing these risks.

Ramsay has human resources and recruitment practices which consider the safety of children. Ramsay is committed to regularly training and educating our employees on child safety.

We are committed to the cultural safety of children from a culturally and/or linguistically diverse background, and to providing a safe environment for children with a disability. In the Australian context, we are committed to the cultural safety of Aboriginal children.

We have specific policies, procedures and training in place that support our leadership team and employees to achieve these commitments.

If you believe a child is at immediate risk of abuse phone emergency services.

Examples of how we apply this principle

ALWAYS	NEVER
<p>Have child safety policies and procedures in place to support Ramsay's commitment to child safety</p> <p>Comply with the requirements of child safety laws and assist those working with us to do the same</p> <p>Have robust human resource and recruitment practices in place to select appropriate employees and discourage inappropriate employees entering the organisation</p> <p>Provide child safety training to relevant employees</p> <p>Take all allegations of child abuse seriously and investigate and report to relevant authorities as appropriate</p>	<p>Tolerate child abuse</p> <p>Disregard the views and concerns of children, particularly if they are worried about their safety or the safety of another</p> <p>Allow relevant employees to work with children without appropriate safety checks in place</p> <p>Ignore our reporting obligations</p>

Privacy & compliance with the law

As a global company Ramsay is subject to international and local laws, regulations and customs. Ramsay's commitment to meet our legal requirements is combined with a desire to uphold ethical business practices.

Each of us is expected to be aware of the laws relevant to our location and role and comply with them. Where there is a difference between the expectations set by local customs, norms, laws, regulations or established company culture, the higher standard of behaviour must be followed.

Breaches and potential consequences

Breach of any law will be viewed as a serious breach of the terms of employment and will result in disciplinary action and possibly dismissal. Any concerns or suspected breaches should be reported to the relevant manager or to the Group or relevant regional General Counsel. Ignorance does not remove your obligation to comply with the law. If you are unsure or have any questions, you must seek advice.

Confidentiality and privacy

Compliance with the law includes confidentiality and privacy of information. We must respect the principles of confidentiality as regards the health and personal information of our patients, service users and employees, company information regarding the business and commercial affairs or property, assets and activities of the company and any other information not in the public domain.

We should not disclose any information acquired through our role without the appropriate authorisation or consent unless it is the law or a part of our professional duty of care.

Anti-competitive practices

We must not engage in anti-competitive practices or behaviours that may prevent, restrict or distort competition. This includes any agreements, decisions, discussions or collaborative practices with competitors or others that may prevent, restrict or distort competition.

Examples of how we apply this principle

ALWAYS	NEVER
Ensure we are aware of all laws applicable to our role and comply with these Exercise good judgement Understand and respect the need for confidentiality and privacy when we discuss another person's confidential information	Tolerate corruption of any kind Discuss confidential information unless required to do so in our role

Professionalism & diligence

We expect the highest level of professionalism throughout the Ramsay community. We maintain the highest standards in everything that we do, performing our roles to the best of our individual ability and with the interests of the company's stakeholders in mind.

Professional standards

We take professional registration requirements seriously and must ensure that we comply with these and all other professional standards applicable to our role.

We possess the competence, diligence, honesty, and judgement to properly perform our duties. We are therefore required to inform our manager if our personal circumstances change and this impacts (or has the potential to impact) our ability to carry out our roles. Changes in personal circumstances include criminal charges or convictions, bankruptcy, civil judgements or loss or failure to obtain professional licenses or registrations, whether or not these occur locally or overseas.

We maintain relevant, contemporary professional standards by:

CONSISTENTLY...	WHEN AT WORK ...
<ul style="list-style-type: none">• Complying with the safety, quality and health services standards for accreditation relevant to the country in which we are employed• Participating in industry forums, consultations and workshops where applicable• Consulting with statutory health care authorities relevant to the country in which we are employed• Complying with Ramsay policies and best practice guidelines relevant to the country in which we are employed• Informing our manager if our personal circumstances change and this impacts (or has the potential to impact) our ability to carry out our roles	<ul style="list-style-type: none">• Complying with health and safety requirements appropriate to our role• Being "fit for work" which means ensuring that we do not undertake any activity or employment outside of our role at Ramsay that could have a detrimental effect on our work performance or which might give rise to a conflict of interest• Ensuring that the personal use of any alcohol, drugs or medication does not adversely affect our work performance or endanger the health, safety or welfare of others in the workplace• Maintaining appropriate, professional standards of dress and grooming

Professional development

Professional development and job satisfaction are important to the performance and satisfaction of our people and Ramsay provides a range of training, upskilling and advancement programs to promote learning across the business. They range from self-paced online courses to intensive, tailored on-the-job learning and executive group programs. We seek to encourage Ramsay people to be lifelong learners, to embrace challenges and realise their potential.

Risk management

Ramsay has implemented several proactive and contemporary risk management practices intended to prevent and/ or minimise the potential for loss, harm, injury or damage to people, Ramsay or the environment.

Ramsay has implemented comprehensive communication, reporting, accountability and committee frameworks for managing corporate, clinical, workplace, environmental or property risks.

We are all jointly responsible for identifying, analysing and evaluating risk accurately, effectively and in a timely manner. We are also responsible for taking steps to minimise and control any risk relevant to our work or situation.

Reporting and accountability

Accurate recording and reporting reflects on Ramsay’s reputation and credibility and ensures that we meet our legal and regulatory obligations. As a result, we must comply with all applicable reporting and record keeping standards relating to all business activities including:

- medical issues;
- time tracking;
- expense reports; and
- financial records and transactions.

We will ensure that our records and reports are truthful, accurate, complete, consistent, timely and understandable.

In particular, we must ensure that all accounting records accurately and fairly reflect the underlying transactions and all assets, liabilities and any disposal of Ramsay’s assets. Once created, records, reports and other data must be appropriately stored and/or disposed of according to information management practices and applicable laws and regulations.

We are each responsible for identifying statutory obligations or other applicable requirements relevant to our records and for ensuring retention and storage is conducted in accordance with those obligations and standards. There is no justification for falsifying records or misrepresenting facts. Such conduct may constitute fraud, and can result in civil or criminal liability for you and/or Ramsay.

Examples of how we apply this principle

ALWAYS	NEVER
Comply with all professional standards, guidelines, codes of practice and company policies governing our work	Falsify, conceal or tamper with information, records or financial reports or allow or influence others to compromise the integrity of these
Continually strive to improve our efficiency, service quality and risk minimisation strategies	Ignore developments in practice models and professional standards, or assume that our skills and knowledge are up to date
Create, maintain and store accurate records, accounts and documentation, ensuring confidentiality and preventing unauthorised access	Allow ourselves to become “unfit for work” for any reason



Communication & transparency

Ramsay values clear and transparent communications with all stakeholders so the whole Ramsay community and the public at large can source and understand relevant information and engage in the organisation's strategies and activities.

Form of disclosure

We will provide timely, accurate, consistent and complete disclosure of information, using appropriate language. No verbal or written communications should be aggressive, hostile, derogatory or demeaning towards others. This includes online and face-to-face communications.

Transparency, honesty and integrity

We will encourage transparency and honesty in all communications, while considering requirements relating to confidentiality and privacy. Disclosure of inappropriate or inconsistent information will not be tolerated.

Ramsay promotes a culture of consultation and cooperation and aims to ensure that its workplaces encourage people to raise their concerns and ask if they are unsure what to do. Managers must aim to involve and engage their teams and keep them informed of any business decisions which may impact their role. We should all collaborate to share information, work towards a co-operative and positive workplace culture, increase productivity, ensure better and more informed decision making, promote continuous quality improvement and minimise disputes and disagreements.

Disclosure to the ASX

As a general rule the Australian Securities Exchange (ASX) requires that all listed companies disclose information which may have a material impact on the share price and as such may be relevant or critical to an investor's decision making. This principle is known as "continuous disclosure". Ramsay will immediately make public any relevant information or any major development which may be relevant to this obligation. Public disclosures must only be made by authorised spokespersons.

You should refer to the Ramsay Disclosure & Communications Policy for further detail.

Examples of how we apply this principle

ALWAYS	NEVER
Work to communicate and cooperate within the Ramsay community for the purposes of clear understanding and collaboration	Conceal facts or omit information that is relevant to another person's role or the company's business operations
Balance transparency with considerations for confidentiality and privacy	Divulge what may be confidential information without specific authorisation to do so. If you are unsure about the degree of confidentiality assigned to information, contact the relevant manager
Ensure communications are complete, fair, accurate, timely and comprehensible	Ignore our obligations under "continuous disclosure" as a company listed on the Australian Securities Exchange

Key related policies and documents

- Whistleblower Policy

Respect for Others

- Diversity & Inclusion Policy
- Human Rights & Labour Policy
- Depending on the country in which you are employed, also see the:
 - Discrimination, bullying and harassment policies and guidelines
 - Grievance policies and associated guidelines

Sustainability, society & the environment

- Global Responsible Sourcing Policy
- Global Sustainability Policy
- Environmental Management Statement
- Depending on the country in which you are employed, also see the relevant environmental policies and guidelines

Ethics & integrity

- Securities Trading Policy and Securities Trading Procedures
- Ramsay Global Anti-Bribery & Corruption Policy
- Ramsay Global Gifts & Hospitality Policy
- Depending on the country in which you are employed, also see any:
 - Employment of Family and Friends policies and guidelines
 - Codes of Ethics for all clinical disciplines (refer to the relevant national boards for each profession)

Health & safety

- Depending on the country in which you are employed, see the applicable health and safety policies and guidelines (including, for example, applicable safety, incident management, manual handling and zero tolerance policies).

Privacy & compliance with the law

- Depending on the country in which you are employed, see the:
 - Privacy policies and guidelines
 - Legal services policies and procedures
 - Health practitioner regulation national law acts (refer to the relevant area in which you are employed)

Professionalism & diligence

- Depending on the country in which you are employed, also see the:
 - Ramsay Facility Rules
 - Risk management policies and guidelines
 - Clinical governance frameworks
 - Code of Professional Standards for all clinical disciplines (refer to the relevant see health practitioner regulation national law acts relevant to the country and areas in which you are employed).

Communication & transparency

- Communications Policy
- Disclosure & Communications Policy
- Social Media Policy
- Media Policy
- Depending on the country in which you are employed, also see the incident management policies and procedures

