

Ramsay Health Care

# Code of Conduct

Approved by the Board of  
Ramsay Health Care Limited  
on 28 May 2026.

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# Message from our Managing Director & CEO

Ramsay Health Care's purpose of 'people caring for people' is not just about the care we provide patients. It should be reflected in how we work with each other and our communities, how we make decisions and how we show up every day.

This Code of Conduct sets the standards we are all expected to follow. It is here to help us use good judgement, make sound decisions, maintain trust and be clear about what we expect from ourselves and each other. These standards apply to everyone at Ramsay.

At its core, this is about taking responsibility, doing the right thing, speaking up when you see something is not right and when you see a better way of doing things.

It is also about creating a culture where people support each other, raise concerns early and contribute to a stronger Ramsay. That is how we build trust and keep improving.

I encourage you to read this Code and use it to guide how you work every day.

Thank you,

**Natalie Davis**

Group CEO & Managing Director

*“At its core, this is about taking responsibility, doing the right thing, speaking up when you see something is not right and when you see a better way of doing things.”*



**Natalie Davis**  
Managing  
Director & CEO



# 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.

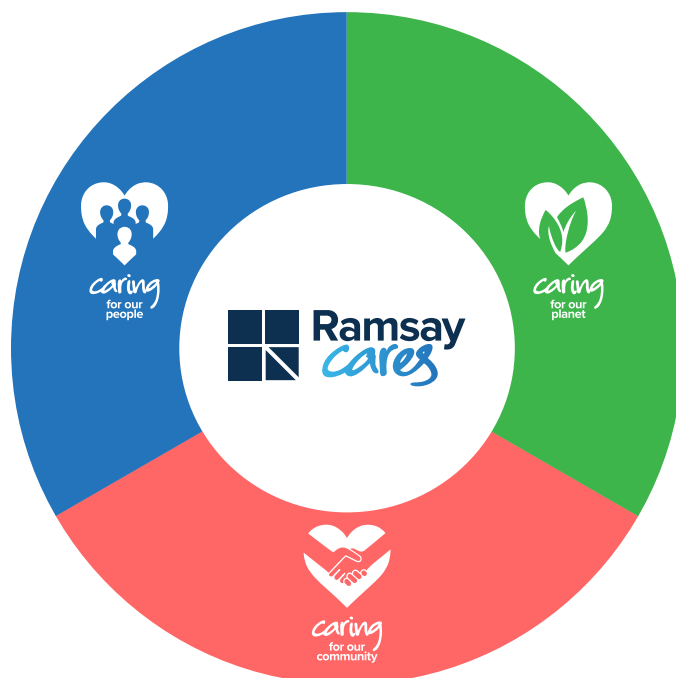


**We seek to grow sustainably**

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.

# 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 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 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?

# 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.

## When to raise a matter under the Whistleblower Policy

Ramsay has a separate Whistleblower Policy (available on the intranet and website), which should be used where you have information about 'Improper Conduct'. 'Improper Conduct' is defined in the Whistleblower Policy and means any suspected or actual misconduct or improper state of affairs or circumstances in relation to the Group. For example, 'Improper Conduct' includes breaches of laws, fraud, corruption, conduct likely to damage Ramsay's financial position or reputation or conduct that represents a danger to the public or financial system. Further information can be found in the Whistleblower Policy.

'Improper Conduct' generally does not cover personal work-related grievances. Generally, personal work-related grievances are more effectively addressed by contacting your relevant manager or Human Resources contact. For further information, please refer to the Ramsay Grievance Policy or Ramsay Performance Management and Disciplinary Policy.

Ramsay has alternate escalation processes for patient/carer concerns about patient or clinical care. For example, in Australia, if a patient, their family, or carers, believe something is 'not right' with the clinical condition of the patient, or they are concerned about the patient's condition, and need to escalate concerns and call for rapid assistance, the Ramsay Rule should be followed. More information about The Ramsay Rule can be found [here](#). In addition, Ramsay also has other policies and procedures, such as the Complaint Management Policy and Clinical Incident Management Policy, in support of the escalation of clinical matters raised by patients and/or their carers.



## What happens when you speak up?

All concerns will be treated seriously and respectfully.

Concerns raised 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 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.

## The Ramsay Leader



### Developmental Leadership

As a developmental leader, you encourage a learning environment and support our people to connect and interact, to grow professionally and personally. You make decisions that drive positive performance for our business and our people.

### Collaborative Leadership

As a collaborative leader, you enjoy and promote working in teams and across our global organisation. You have a grown mindset and model enterprise thinking.

### Inclusive Leadership

As an inclusive leader, you build trust and ensure a high level of psychological safety for our people. You are respectful, caring and authentic. You value diversity and have an open, communicative approach.

### Inspirational Leadership

As an inspirational leader, you like to encourage others to achieve in The Ramsay Way. You set the vision, direction and compelling course of action for your teams. You know your markets and innovate to stay ahead.

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

|                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Harassment</b>                                                                  | An action or behaviour that would be reasonably viewed as humiliating, intimidating or offensive.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Sexual harassment, Sex- based harassment and Hostile workplace environments</b> | An unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, where a reasonable person, having regard to all the circumstances would anticipate that the person harassed would be offended, humiliated or intimidated.. We must never subject anyone 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 could reasonably result in the workplace environment being offensive, intimidating or humiliating a person because of their sex. |
| <b>Bullying</b>                                                                    | Repeated unreasonable behaviour directed towards a worker (or group of workers) that creates a risk to health and safety. This includes victimising, humiliating, intimidating or threatening behaviour.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Racism and racial harassment</b>                                                | 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, is reasonably likely, in all the circumstances, to offend, insult, humiliate or intimidate another person                                                                                                                                                                                                                                                                                                                              |
| <b>Discrimination</b>                                                              | 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 not tolerate inappropriate behaviour and there will be serious consequences for anyone found to engage in this kind of behaviour.

People can experience behaviour in different ways, so it is important to be mindful of how our actions may affect others. Managers and staff should ensure their behaviour supports a respectful and safe workplace.

**Examples of how we apply this principle**

| ✓ Always                                                                                                                                                                                                                                      | ✗ Never                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Make employment and career development decisions based on merit</li><li>• Foster diversity, inclusion and respect for culture</li><li>• Comply with laws and the principles of human rights</li></ul> | <ul style="list-style-type: none"><li>• Conduct, participate in or tolerate discrimination, bullying or harassment of any kind</li><li>• Allow stereotypes to influence our treatment of others</li><li>• Deliberately disrespect or mislead another person</li></ul> |





# 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 on current and future generations. Ramsay Cares forms part of our strategic planning and risk management approaches.



## **Caring for our people**

Ramsay Health Care recognises people are at the heart of our business from our people, our doctors and partners, our patients and the community. We are committed to ensuring the ethos of ‘people caring for people’ remains at the centre of everything we do. We are focused on fostering a caring and inclusive culture, a high level of engagement, and supporting key areas such as high-quality patient outcomes and experience, development and training, safety, wellbeing and mental health.



## **Caring for our planet**

Ramsay Health Care recognises that conserving and protecting the environment for future generations is a critical issue. We are committed to working toward the delivery of environmentally sustainable outcomes and achieving continual improvement in performance. We are focused on the key challenges of climate change, reducing greenhouse gas emissions, limiting and reducing energy use and water consumption, and improving our energy and water efficiency. We aim to prevent and reduce pollution and shift towards a more circular and responsible use of resources. This includes reducing avoidable waste, minimising single-use plastics where it is safe to do so, increasing recycling, and integrating more sustainable development and procurement practices.



## **Caring for our communities**

Ramsay Health Care recognises that we have an important role to play in the communities we serve and society at large. Our focus on health care provides us the opportunity to commit significant resources to medical research, clinical teaching and training and capability building. We are focused on a global approach to preventative health care and supporting local communities through education and awareness, charitable support and regional investment.

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                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Create and promote an environmentally sustainable and responsible culture</li><li>• Foster innovation and a culture of continuous improvement</li><li>• Develop our people and provide resources so they can take positive action</li><li>• Strive to reduce energy and water usage, minimise waste and work towards net zero greenhouse gas emissions</li><li>• Respect human rights and foster an inclusive culture</li></ul> | <ul style="list-style-type: none"><li>• Ignore issues related to social or environmental sustainability when creating strategies and investing in infrastructure</li><li>• Fail to understand the impact of our decisions</li></ul> |



# Health & safety

Ramsay is committed to being an industry leader in the provision of a safe work environment and safe systems of work, including psychosocial safety. 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 Program 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                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Comply with the requirements of mandatory health and safety laws, policies, standards and procedures, and assist those working with us to do the same</li><li>• Assess the hazards and risk inherent to each situation and adapt our behaviour accordingly, taking steps to minimise any risks or hazards identified</li><li>• Report any near miss, accident, injury, illness, or unsafe condition so that appropriate action can be taken to prevent, correct or control the situation</li></ul> | <ul style="list-style-type: none"><li>• Undertake any work outside of our own scope of practice, competency or skill set</li><li>• Undertake work outside safe operating procedures</li><li>• Continue to work or begin work when we are “unfit” for any reason</li><li>• Make another person unsafe either deliberately or by not applying due care or attention</li></ul> |

# 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, including signs of possible child abuse, neglect, family violence and prenatal harm, 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.

## Examples of how we apply this principle

| ✓ Always                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | ✗ Never                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Have child safety policies and procedures in place to support Ramsay's commitment to child safety</li><li>• Comply with the requirements of child safety laws and assist those working with us to do the same</li><li>• Have robust human resource and recruitment practices in place to select appropriate employees and discourage inappropriate employees entering the organisation</li><li>• Provide child safety training to relevant employees</li><li>• Take all allegations of child abuse seriously and investigate and report to relevant authorities as appropriate</li></ul> | <ul style="list-style-type: none"><li>• Tolerate child abuse</li><li>• Disregard the views and concerns of children, particularly if they are worried about their safety or the safety of another</li><li>• Allow relevant employees to work with children without appropriate safety checks in place</li><li>• Ignore our reporting obligations</li></ul> |

**If you believe a child is at immediate risk of abuse follow the notification pathway in your jurisdiction.**



# 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                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Ensure we are aware of all laws applicable to our role and comply with these</li><li>• Exercise good judgement</li><li>• Understand and respect the need for confidentiality and privacy when we discuss another person’s confidential information</li></ul> | <ul style="list-style-type: none"><li>• Tolerate corruption of any kind</li><li>• Discuss confidential information unless required to do so in our role</li></ul> |

# 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"><li>• Complying with the safety, quality and health services standards for accreditation relevant to the country in which we are employed</li><li>• Participating in industry forums, consultations and workshops where applicable</li><li>• Consulting with statutory health care authorities relevant to the country in which we are employed</li><li>• Complying with Ramsay policies and best practice guidelines relevant to the country in which we are employed</li><li>• Informing our manager if our personal circumstances change and this impacts (or has the potential to impact) our ability to carry out our roles</li></ul> | <ul style="list-style-type: none"><li>• Complying with health and safety requirements appropriate to our role</li><li>• 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</li><li>• 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</li><li>• Maintaining appropriate, professional standards of dress and grooming</li></ul> |

## 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                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Comply with all professional standards, guidelines, codes of practice and company policies governing our work</li><li>• Continually strive to improve our efficiency, service quality and risk minimisation strategies</li><li>• Create, maintain and store accurate records, accounts and documentation, ensuring confidentiality and preventing unauthorised access</li></ul> | <ul style="list-style-type: none"><li>• Falsify, conceal or tamper with information, records or financial reports or allow or influence others to compromise the integrity of these</li><li>• Ignore developments in practice models and professional standards, or assume that our skills and knowledge are up to date</li><li>• Allow ourselves to become “unfit for work” for any reason</li></ul> |





# 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Work to communicate and cooperate within the Ramsay community for the purposes of clear understanding and collaboration</li><li>• Balance transparency with considerations for confidentiality and privacy</li><li>• Ensure communications are complete, fair, accurate, timely and comprehensible</li></ul> | <ul style="list-style-type: none"><li>• Conceal facts or omit information that is relevant to another person’s role or the company’s business operations</li><li>• 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</li><li>• Ignore our obligations under “continuous disclosure” as a company listed on the Australian Securities Exchange</li></ul> |

# Key related policies and documents

Whistleblower Policy

## Respect for Others

Diversity & Inclusion Policy

Group 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

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 Group Gifts & Hospitality Policy

Ramsay Australia AI Governance Framework

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





**Ramsay**  
Health Care

