

Global Human Rights and Labour Policy

Revised Version Approved by the
Board of Ramsay Health Care Limited
on 22 February 2022



Ramsay
Health Care

Global Human Rights and Labour Policy

POLICY PURPOSE

This policy outlines the position of Ramsay Health Care Limited and its subsidiaries (**Ramsay**) with respect to human and labour rights. The policy sets out Ramsay’s commitment to operate in accordance with all key universal human and labour rights across its regions globally.

APPLICATION OF THE POLICY

This policy applies to the following:

- all Ramsay businesses worldwide, which include operations in Australia, United Kingdom, Europe and Asia;
- Ramsay’s Board and all employees, Ramsay facilities, Ramsay departments and business units;
- consultants, temporary staff, agency staff, volunteers and students engaged by Ramsay; and
- suppliers that supply goods and services to Ramsay (and employees of those suppliers), which must also adhere with the Ramsay Code of Conduct for Agents, Manufacturers and Suppliers.

Ramsay businesses operating in specific countries or regions may supplement this policy with policies that have specific relevance to their operation and region, including standards of action to be implemented operationally by each region.

Where Ramsay holds a majority ownership in, or otherwise effectively controls, a joint venture, this policy will apply to the joint venture. Where Ramsay does not exercise effective control of a joint venture, Ramsay is nonetheless committed to exercising its influence to assist the joint venture entity to avoid improper conduct.

OUR POLICY STATEMENT

A respect for human rights is at the heart of Ramsay’s foundational purpose of “people caring for people” – an ethos known as The Ramsay Way, and is consistent with the key internationally recognised human rights and standards, including the International Bill of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, the Children’s Rights and Business Principles and the International Covenant on Economic, Social and Cultural Rights.

The Ramsay Way also articulates our commitment to continuous improvement, 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, our people and our partners and suppliers**.

WE SUPPORT



We support the United Nations Global Compact, a special initiative of the UN Secretary-General calling on companies to align their operations and strategies with ten universally accepted principles related to human rights, labour, the environment and anti-corruption.



We are committed to driving action on the relevant United Nations Sustainable Development Goals (SDGs), which provide a blueprint to achieve a better and more sustainable future for all and underpin our Ramsay Cares Sustainability Strategy.

1. COMMITMENT TO OUR PATIENTS

We respect and welcome patients without distinction; we provide transparency in terms of quality of care, providing a safe and inclusive environment and protecting the privacy of our patients. Ramsay's enduring purpose of being *people caring for people* is fundamental to how we operate our business. "Caring" is not simply a value statement. It underpins the way we approach work every day to meet the expectations of our people, patients and partners.

Access

- We provide access to quality care that meets the needs of the individual, supports independence and choice.

Patient Safety

- We provide safe and high-quality health care that meets national standards.
- We provide care in an environment that is safe and makes our patients feel safe.
- Our focus on patient safety includes assisting our healthcare professionals and Visiting Medical Practitioners to monitor the safety and quality of care they provide and ensure accountability for the safety and quality of care at all levels of our organisation.
- We are committed to the safety, participation and empowerment of all children. We have zero tolerance of child abuse; all allegations and safety concerns will be treated very seriously and consistently, in line with our policies and procedures.
- We do not tolerate violent or aggressive behaviour and it is never acceptable to abuse, bully or harass others.

Respect

- We treat our patients as individuals and with dignity.
- We respect our patients' cultures, heritage, identities and beliefs.
- We recognise and respect their choices as a patient and care for their wellbeing as a person.

Partnership

- We encourage open and honest communication.
- We support patients in their decision-making about their care and recognise patients may want to include other people in their decision-making process.

Patient privacy & information

- Ramsay is committed to respecting and ensuring the privacy and confidentiality of personal information.
- Ramsay will provide clear information about a patient's condition, the possible benefits and risks of different tests and treatments to ensure the patients can give informed consent.
- We will provide information about services, waiting times and costs and assist patients to understand and use health information.
- We will provide access to patients about their health information and be transparent if their health treatment or outcome is not as expected, including how it happened, how it may affect the patient and what is being done to address the situation.

Continuous improvement in care through feedback

- We foster a culture of continuous improvement by regularly and consistently reviewing and improving the performance of our patient safety and quality system.
- We encourage patients to provide feedback; any concerns will be addressed in a transparent and timely way and will not affect the quality of care provided.

2. COMMITMENTS TO OUR PEOPLE

We foster a safe and inclusive culture; we strive to attract industry leading talent and support the development of our people. Our people are our greatest asset and Ramsay is committed to providing human services and labour policies founded on universal human and labour rights. In turn, Ramsay expects its people to conduct themselves in furtherance of those rights. We recognise and celebrate Ramsay's diversity by nurturing working environments that respect and encourages a diverse range of views, knowledge and experience.

Industry leading talent and diversity

- Ramsay supports diversity in our workforce to promote diversity of thought, new perspectives and a competitive advantage in understanding our patients, innovation, problem-solving and decision-making. As part of Ramsay's Global Diversity and Inclusion policy, diversity and inclusion are a business imperative in improving and retaining a diverse group of talented people to ensure our people feel supported and valued. The Global Diversity and Inclusion Policy further highlights our business commitment and enhancement in the workforce.
- Ramsay commits to the development of our people. We balance Ramsay's global presence, which provides opportunities for career development and shared best practice, with local health care provided for and by local people.
- Ramsay respects and values the local communities and economies within which it operates and commits to recruitment opportunities for the engagement of local people.
- We encourage opportunities for the engagement of disadvantaged workers, where reasonably practical and mutually beneficial to the worker and Ramsay.
- Ramsay commits resources to regional learning and development frameworks that are inclusive of all roles, relevant to the needs of our people and operations locally.

Express prohibitions of employment

- Ramsay commits to the engagement of workers who have capacity, are of legal age to work and have the free will to consent to work.
- Ramsay expressly prohibits child labour. Ramsay requires each of its regions and Suppliers to implement employment/engagement practices, including recruitment policies and appropriate checks, to protect all persons who are not of legal age from working in the relevant jurisdiction, especially children.
- Ramsay expressly prohibits forced labour and modern slavery. Ramsay requires each of its regions and Suppliers to implement employment/engagement practices to protect the rights of every worker to voluntarily work under the terms and conditions offered, free of compulsion or coercion and which, at a minimum, conform to universal human and labour rights and legislated employment standards in the relevant jurisdiction.

Industrial rights

- Ramsay, in its capacity as an employer, commits to and respects the right of workers to freedom of industrial association and of employees to collectively bargain their terms and conditions of employment, in accordance with applicable laws.
- This policy requires Ramsay's regional operations to implement anti-discrimination and industrial relations practices and frameworks which support the commitment to negotiate in good faith with employees who choose to collectively bargain employment terms and conditions, in full compliance with the labour laws and industrial frameworks of the relevant jurisdiction.

Discrimination

- Ramsay supports employment practices that are non-discriminatory; we reject unlawful discrimination against any person on the basis of a characteristic, status or belief that is irrelevant to the work required or health care to be provided.
- Ramsay prohibits discrimination on the following grounds, at a minimum: gender identity, age, sexual orientation, marital or relationship status, race, disability, ethnicity, nationality, cultural background, political or religious belief, trade union or veteran status, pregnancy, carer or family responsibilities.

Fair working conditions and labour standards

- Ramsay values our people and will deliver terms and conditions of employment consistent with applicable laws and human and labour rights, at a minimum.
- Ramsay employment terms and conditions must correspond with the legislative framework of the relevant jurisdiction and the universal human and labour rights endorsed by this policy.
- Remuneration at Ramsay is determined on an objective, merit basis and based on equal remuneration regardless of gender; remuneration rates must comply with the industrial framework of the relevant jurisdiction which are fair and comply with or exceed regional minimum wage standards.
- We want our people to work reasonable hours and will monitor and take measures to reduce excessive working hours, where they are identified.

Voice of our people

- Ramsay intends to promote the furtherance of labour standards in all its regional operations by seeking representation on, and involvement in, relevant key industrial and workforce bodies within the relevant jurisdiction.

3. COMMITMENTS TO OUR PARTNERS AND SUPPLIERS

We work with our partners and suppliers to reduce the risk of modern slavery and labour-related harm across our operations and supply chain. We expect our partners and suppliers to share our commitment to upholding universal human and labour rights and reducing the risks of modern slavery.

- Suppliers must adhere to the Ramsay Code of Conduct for Agents, Manufacturers and Suppliers, as a term of the arrangements under which goods and services are supplied to Ramsay.
- Each regional business must include in procurement contracts a prohibition on child and forced labour by any Ramsay controlled entities or third-party Suppliers; this can be enforced through an express contractual term or by requiring compliance with the Code of Conduct for Agents, Manufacturers and Suppliers.
- Where Ramsay holds a majority ownership in, or otherwise effectively controls, a joint venture, this policy will apply to the joint venture. Where Ramsay does not exercise effective control of a joint venture, Ramsay is nonetheless committed to exercising its influence to assist the joint venture entity to avoid improper conduct.

MONITORING

- Our due diligence processes will work towards identifying, preventing, mitigating and account for impacts on human rights; this includes risk assessments of our operations and across our suppliers to identify and manage high risk areas.
- All staff have a responsibility to report known or reasonably suspected non-compliance with Ramsay's prohibition of the employment or engagement of children, modern slavery or forced labour of any person in any Ramsay businesses or those of our suppliers.
- Ramsay publishes its Modern Slavery Statement annually, which will further enhance the transparency of our operations and supply chain in relation to human rights.
- In consultation with key executives, procurement and human resources managers, Ramsay's regional CEOs will report on performance against this policy in the annual regional workforce report.

GRIEVANCE AND REMEDIATION

A) OUR COMMITMENT

- We will provide our patients, people, partners and suppliers with effective grievance mechanisms which provide legitimate, accessible, predictable, equitable and transparent processes and which are conducted in a way that is rights compatible and provides a source of continuous learning.
- We will embed human rights, labour-related and modern slavery considerations into existing grievance processes across the business, such as whistle-blower processes, to ensure that reported grievances are appropriately addressed.
- Remediation processes will be available where issues have caused or contributed to adverse impacts.

B) HOW TO REPORT CONCERNS OR FEEDBACK ABOUT THE WAY WE MANAGE OUR HUMAN RIGHTS

- We encourage all stakeholders to report concerns or feedback they may have regarding the way we manage human rights in our operations and supply chain. Ramsay encourages individuals to report grievances in one of the following ways:
 - by making a report through the [Ramsay Whistleblower Hotline](https://www.ramsay.deloitte.com.au) at www.ramsay.deloitte.com.au
 - by contacting the Ramsay Group General Counsel & Company Secretary, or
 - by contacting the General Counsel in the region in which the relevant Ramsay business operates.
- The [Ramsay Whistleblower Hotline](https://www.ramsay.deloitte.com.au) provides a way to confidentially report concerns.

EXPECTED OUTCOMES

We expect that Ramsay's businesses apply the higher standard and encourage partners to adopt standards which are consistent with internationally accepted human rights principles where they differ from the local laws/regulations.

RESPONSIBILITIES

Implementing the Global Human Rights and Labour Policy is a business-wide responsibility.

It is our duty to comply with applicable laws and regulatory requirements, while aspiring to higher standards. To do so, Ramsay will:

- Foster a culture that empowers and encourages all our people to act in accordance with this policy.
- Have adequate accountability, resourcing and management systems, as well as training, where necessary.
- Monitor human rights, modern slavery and labour-related risks and opportunities at a regional level, across our operations and procurement activities.
- Periodically review regional policies and frameworks that are relevant to this policy, for example anti-discrimination, recruitment, code of conduct and industrial relations policies.
- Ensure our policy reviews adhere to the Ramsay Global Policy Impact Assessment Checklist (see Appendix 1), so that procedural responsibilities are met.
- Work with suppliers and partners to improve social and environmental outcomes from procurement and contracting.
- Raise awareness and encourage action to support this policy and the universal human and labour rights it endorses.
- Monitor our performance and commitment to human rights by tracking and reporting our progress, through the annual Modern Slavery Statement and Impact Report, which are publicly available online.

GOVERNANCE

Our approach to human rights and labour relations is overseen by the Board and Global Executive. Any material breaches of this policy need to be reported to the regional Chief People Officer and reported quarterly to Global Risk Management Committee

DEFINITIONS

our people: All employees and directors of Ramsay Health Care Limited and its subsidiaries (but which does not include non-controlled joint venture entities).

child: A person of less than 15 years of age (International Labour Office, Declaration on Fundamental Principles and Rights at Work, 1998)

forced labour: work undertaken by a person involuntarily and obtained under threat of penalty (International Labour Office, Forced Labour Convention, 1930).

modern slavery: modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

suppliers: Any persons and organisations who supplies goods or services to Ramsay.

RELATED POLICIES

Other related global policies include:

- Code of Conduct for Employees
- Code of Conduct for Agents, Manufacturers & Suppliers
- Global Diversity and Inclusion Policy
- Global Sustainability Policy
- Workplace Health and Safety Policy
- Anti-bribery and Corruption Policy
- Zero Tolerance – Aggregation and Violence Policy
- Supplementary regional policies

POLICY REVIEW

This policy was approved by the Ramsay Health Care Board on 22 February 2022.

This policy will be reviewed at least every two years by the People and Remuneration Committee to ensure it reflects best practice and is effective.

APPENDIX

Policy human rights and equality impact assessment checklist

The human rights and equality impacts should be assessed when introducing new policies to Ramsay. This checklist list can be used as a guide.

- Does the document/project affect any group less or more favourably than another on the basis of: race, ethnic origins, nationality, gender/reassignment, culture, pregnancy/maternity, religion/belief, sexual orientation, marriage/civil partnership, age, disability (learning, physical, sensory impairment and mental health problems)?
 - Is there any evidence that some groups are affected differently?
 - If you have identified potential discrimination, are there exceptions valid, legal, and/or justifiable?
 - Is the impact of the document/project likely to be negative?
 - If so, can the impact be avoided?
 - What alternative is there to achieving the document/project without impact?
 - Can we reduce the impact by taking different action?
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