Ramsay Health Care

Group Responsible Sourcing Policy

Approved by the Board of
Ramsay Health Care Limited on 26 November 2026

ramsayhealth.com

Ramsay
Health Care

Ramsay Health Care Limited ACN 001 288 768

Group Responsible Sourcing Policy

1. PURPOSE

The Group Responsible Sourcing Policy (**Policy**) outlines Ramsay Health Care's commitment to responsible sourcing practices and sets out the behaviour and standards that we expect all our suppliers to uphold. By suppliers we mean any individual or entity that provides goods or services to, or performs work for or on behalf of, Ramsay Health Care Limited or its subsidiaries (**Ramsay** or the **Ramsay Group**), including their subcontractors, representatives and agents.

We expect that all our suppliers, whether directly or through their supply chain, conduct themselves in accordance with the principles and standards in this Policy and implement suitable management systems and processes.

We encourage all our suppliers to exceed these minimum standards. A supplier's ability to meet and exceed the standards set out in this Policy will be considered when Ramsay makes procurement decisions.

We expect all our suppliers to communicate this Policy to their related entities, employees, agents, suppliers and subcontractors so that they are aware of, understand and comply with this Policy. Ramsay also expects all its suppliers to examine not only their own operations, but their supply chains, to identify and appropriately address risk areas where they do not comply with these standards.

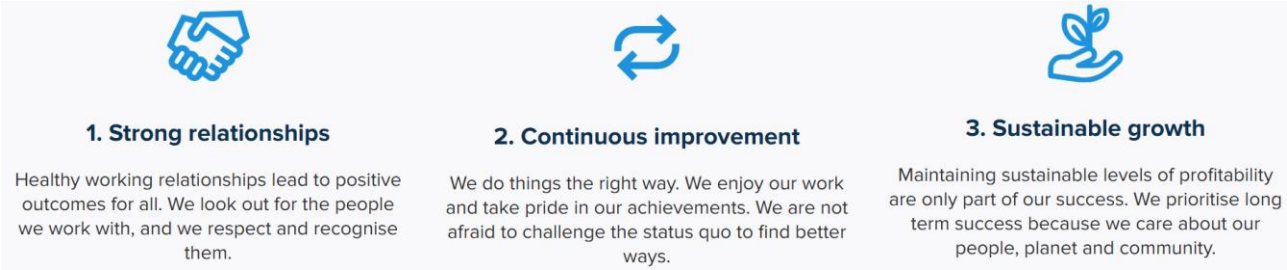
Ramsay subsidiaries may supplement this Policy with policies that have specific relevance to their operations and market location. Where Ramsay is party to a joint venture but does not exercise effective control, Ramsay will look to assist the joint venture entity to promote high standards across its supply chains.

2. OUR VALUES

We are guided by our purpose of '*People caring for people*' which underpins our ambition to be a leading healthcare provider of the future. That ambition is supported by our sustainability strategy, Ramsay Cares, which has three core pillars:

- Caring for our People;
- Caring for our Planet; and
- Caring for our Community.

Ramsay's interconnection with people, planet and community is also reflected in our three core values:



These values promote strong relationships with our partners, constant improvement and sustainable growth, and inform our approach to responsible and ethical business practice.

Our approach to responsible sourcing and relationships with our suppliers is guided by both our values and Ramsay Cares. Ramsay respects and values its suppliers as partners and cares about the way it treats and does business with them. We expect all our suppliers to share our commitment to responsible sourcing practices and value a collaborative approach to achieving our sustainability objectives.

3. HUMAN RIGHTS AND LABOUR RIGHTS

Ramsay strives to support and respect the protection of human rights and to improve the communities in which we operate. Our approach is guided by our participation in the United Nations Global Compact and our commitment to the United Nations Sustainable Development Goals.

Ramsay encourages its suppliers to facilitate training and education for their personnel to promote awareness of, and compliance with, all applicable modern slavery laws and regulations. Suppliers should maintain accurate records for the training provided to personnel.

The Ramsay Group requires our suppliers to:

3.1 Human rights and modern slavery

a) Conduct their business in a manner that is aligned with the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
b) Manage their operations and supply chain in a manner that is consistent with the United Nations Guiding Principles on Business and Human Rights.
c) Comply with applicable laws, regulations and conventions in relation to criminal conduct, in particular in relation to forced, bonded or compulsory labour, child labour, slavery (including modern slavery), servitude, forced marriage, debt bondage and human trafficking and in relation to modern slavery risk reporting requirements.
d) Not engage in or tolerate the use of forced, bonded, compulsory labour, slavery, servitude, forced marriage, debt bondage or human trafficking, the use or threat of physical or other punishment, the use of deceptive recruiting, or the physical, sexual or psychological abuse, inhumane treatment or other forms of intimidation of workers.
e) Review and audit their operations and supply chain to identify any breaches of, or risk of non-compliance with, modern slavery laws and regulations.
f) Comply with international and local obligations relating to the employment of children, including adhering to the minimum legal working age in their jurisdiction or with the standards set by the International Labour Organization, whichever is higher.
g) Ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development.

3.2 Labour practices

a) Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment of workers.
b) Provide workers with clear and understandable information about all relevant employment conditions before they enter employment.
c) Ensure working hours do not exceed the maximum hours per week required by applicable laws.
d) Avoid subcontracting with individuals or entities reasonably known to disregard or be in breach of applicable labour laws and regulations.
e) Ensure that only workers with a legal right to work shall be employed or engaged.

3.3 Freedom of association

Respect workers' rights, in accordance with applicable laws, to freedom of association, to collective bargaining, to establish and join or not join workers' associations, and to engage in lawful industrial activity, without interference, intimidation or harassment.

3.4 Anti-discrimination & harassment

a) Not engage in or tolerate direct and indirect discrimination based on gender, age, race, ethnicity, nationality, immigrant status, religion, marital status, sexual orientation, gender identity, pregnancy, disability, union membership or political affiliation, or any other status protected by applicable laws.
b) Provide and support a workplace which is free from bullying, harassment, victimisation and abuse, whether physical, sexual, verbal or psychological.
c) Promote the principles of diversity, inclusion and respect in the workplace and through their supply chains

3.5 Accessibility

Ensure the workplace is accessible for all persons, including by making reasonable adjustments in line with relevant discrimination laws, standards and regulations.

3.6 Indigenous rights

a) Respect, protect and promote the rights and autonomy of Indigenous peoples.
b) Uphold the right of Indigenous peoples impacted by their operations or supply chain to free, prior and informed consent.

3.7 Work health and safety

a) Comply with applicable workplace and product health and safety laws and respect workers' rights to refuse to perform work that is unsafe.
b) Provide a safe and hygienic environment for workers and third parties, by identifying and managing risks, providing safe and appropriate equipment, training and resources, and ensuring access to facilities and amenities.
c) Encourage workers to report safety concerns about their workplace, investigate those concerns and undertake remedial action if necessary.
d) Identify, evaluate and control any exposure to chemical, biological and other harmful agents.
e) Ensure that where accommodation is provided to workers that it is clean, safe and meets the basic needs of the workers it is provided to.

4. TRANSPARENCY AND GOVERNANCE

Ramsay conducts its business with integrity and is committed to ensuring high standards of governance and business ethics throughout its supply chain.

The Ramsay Group requires our suppliers to:

4.1 Ethical business practices

a) Comply with all applicable legal and regulatory requirements of the jurisdictions in which the supplier operates, including valid directions from government or government authorities. The standards outlined in this Policy do not replace or alter any legal or regulatory obligations of suppliers.
b) Obtain, maintain and comply with all required permits, licences and registrations.
c) Act and conduct their business in a fair, honest, ethical, transparent and professional manner.
d) Ensure that no conflict of interest arises between any personal or business interests and their obligations and duties relating to their business relationship with Ramsay.
e) Not engage in corruption of any kind, including fraud, bribery, secret commissions, kickbacks, illicit payments, facilitation payments or any other form of corrupt conduct, and comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations.
f) Not make a payment to any third party, including any of their agents, suppliers and subcontractors, if they know or suspect that person may use or offer all or part of the payment as a bribe.
g) Ensure that the giving or accepting of any gifts, entertainment or hospitality is done in an open and transparent way and in compliance with Ramsay's policies and protocols, including the Ramsay Code of Conduct and Group Anti-Bribery and Corruption Policy.
h) Not engage in or tolerate association with any criminal organisations or illegal activity.
i) Comply with international and applicable local laws and regulations relating to sanctions, export or import and trade controls.
j) Not engage with persons, countries or organisations sanctioned by the United Nations Security Council or the government of a relevant jurisdiction, or take supply of goods or materials that originate from such sanctioned countries, or which were sourced or made using forced, bonded, compulsory labour, child labour, slavery (including modern slavery), servitude, forced marriage, debt bondage or human trafficking.
k) Develop, maintain and implement policies consistent with this Policy, and maintain adequate records and systems to ensure compliance with this Policy.
l) Ensure accurate and complete books and records are kept, including of all financial transactions.
m) Comply with all applicable policies and procedures of Ramsay.

4.2 Data protection and cyber security

a) Not disclose or release any of the Ramsay Group's confidential or proprietary information to any third party, without the prior written consent of Ramsay.
b) Not publicly disclose their supply association with the Ramsay Group or use the Ramsay Group's name or brand elements without the prior written consent of Ramsay.
c) Have systems for identifying and protecting against cyber security risk, and taking reasonable actions to control and mitigate such risks.
d) Proactively manage data protection and personal data to minimise the risk of that information being compromised or misappropriated.

4.3 Quality

a) Ensure any supplied medical devices are compliant with applicable laws and standards, including the current ISO 13485 standard.
b) Maintain quality control systems which are compliant with applicable laws and standards, including the current ISO 9001 standard.
c) Maintain and retain all required records which demonstrate compliance with applicable quality standards and regulations.
d) Develop and maintain processes for voluntary and compulsory product recalls which comply with all applicable laws and regulations.
e) Notify Ramsay immediately in writing if any product is directly or indirectly the subject of regulatory action, a product recall or where there is an event relating to the supplier or the product which could create adverse publicity for Ramsay.
f) Have, maintain and retain (for the required periods) all appropriate records demonstrating the supplier's adherence to all relevant quality standards.
g) Have and maintain all appropriate insurances with a reputable insurer to cover the supplier's business operations and risks and hold this insurance (including any run-off cover) for appropriate periods in accordance with the supplier's purchasing or supply agreement with Ramsay.

4.4 Supply Chain Resilience

a) Identify, assess and manage risks that may be reasonably expected to affect the continuity, security, integrity or resilience of their supply chain.
b) Maintain appropriate business continuity, contingency and risk management processes that are designed to minimise disruption and support the ongoing supply of critical goods and/or services to the Ramsay Group.
c) Maintain reasonable visibility of material risks and vulnerabilities with upstream supply chains supporting goods and services supplied to the Ramsay Group and, where reasonably requested provide information regarding those risks and vulnerabilities that is relevant to Ramsay's assessment of supply chain continuity and resilience.
d) Notify Ramsay of any actual or anticipated disruption, shortage, cyber-related incident, geopolitical event, climate-related event, natural disaster event or any other circumstances that may reasonably be expected to materially affect continuity of supply of goods and/or services to the Ramsay Group.

5. SUSTAINABILITY

Ramsay is committed to Caring for our Planet and operating sustainably. Ramsay seeks to build relationships with suppliers who are committed to environmental and resource sustainability.

5.1 Climate

Ramsay has committed to near-term and long-term science-based emissions targets to help limit global warming to 1.5°C. Information about Ramsay's sustainability and climate-related targets is available on our website at https://www.ramsayhealth.com/en/sustainability/.

Ramsay strongly encourages suppliers to:

a) Measure their greenhouse gas emissions and establish a baseline.

b) Align with science-based emissions targets using Science Based Targets Initiative (SBTi) guidance and tools, and submit them to the SBTi for validation.

5.2 Environment

The Ramsay Group requires our suppliers to:

a) Comply with applicable environmental laws, regulations and standards and obtain, maintain and comply with necessary permits or approvals.
b) Implement systems to manage, store and responsibly dispose of hazardous waste materials.
c) Consider product packaging and ways to minimise the use of single-use plastic packaging material.
d) Seek opportunities to increase their reliance on renewable energy sources or zero carbon electricity.
e) Minimise greenhouse gas emissions.
f) Actively manage the environmental impact of their operations across all areas, including by maximising the efficient use of energy, water and resources, minimising waste and pollution and implementing policies and procedures in relation to ethical and compliant materials sourcing and biodiversity.

5.3 Treatment of animals

Maintain and implement policies and guidelines which ensure the ethical and humane treatment of animals, and whenever possible, promote the use of non-animal alternatives.

5.4 Conflict minerals

Where suppliers source the minerals of tin, tungsten, tantalum, and gold (3TG) for the manufacture of electronic medical devices, implement policies and systems to provide reasonable assurance that products and components supplied to Ramsay are deemed free of 3TG originating from conflict affected or high risk sources.

6. SUPPLIER DIVERSITY

Ramsay will seek to create diverse supplier relationships and collaborate in targeted industry partnerships to influence and support positive change in our global supply chain.

Where permitted by procurement requirements and criteria, Ramsay will take a proactive approach to creating diverse supplier relationships that are mutually beneficial and foster stronger communities. The aim for supplier diversity in our procurement and sourcing activities is to provide opportunities for suppliers that are indigenous-owned, social enterprises, disability enterprises, women-owned businesses and other diverse suppliers to participate in relevant competitive market tenders.

7. MONITORING AND COMPLIANCE

Ramsay monitors and promotes compliance with this Policy through the Ramsay Responsible Sourcing Program. Ramsay applies a risk-based approach to determine the level of assessment and due diligence required for suppliers and supply arrangements. Suppliers identified as potentially presenting an elevated responsible sourcing risk must participate in enhanced due diligence activities as determined by Ramsay. These activities may include independent third-party assessments relating to corporate social responsibility, modern slavery, labour and human rights, environment and climate-related risks, ethical business conduct, supply chain transparency and disclosure, or other responsible sourcing matters.

Ramsay, in its absolute discretion, may also designate particular supplier categories, products, services, sourcing regions and/or supplier groups as presenting elevated responsible sourcing risk (**Designated Suppliers**). In such circumstances, Designated Suppliers must participate in enhanced due diligence measures under the Responsible Sourcing Program. Ramsay may review and update these designations periodically.

We reserve the right to review compliance with this Policy and require our suppliers to co-operate and provide any information as we may reasonably require to perform such a review. If a supplier is unwilling or unable to

comply with the Policy or refuses to participate in our Responsible Sourcing Program, we reserve our right under the relevant supplier agreement to either suspend or terminate the agreement.

Suppliers are expected to implement their own systems, processes and policies to ensure compliance with this Policy as a condition of doing business with Ramsay.

A supplier must immediately notify Ramsay if they become aware of any breach of this Policy, any allegations of non-compliance or investigations into non-compliance by authorities. The process to follow is set out in section 8 below. Suppliers must take all reasonable steps to address, remedy and prevent any further breach.

We may, from time to time, review and update this Policy. We encourage suppliers to visit Ramsay's website from time to time for any changes to this Policy.

To provide feedback regarding this Policy or Ramsay's Responsible Sourcing Program, contact the Ramsay Responsible Sourcing team at ResponsibleSourcing@RamsayHealth.com.

8. RAISING A CONCERN

We encourage suppliers to report concerns in relation to any actual or suspected breach of this Policy through:

- the confidential Ramsay Whistleblower Hotline at www.ramsay.deloitte.com.au
- contacting the Ramsay Group General Counsel, Group Executive Legal & Company Secretariat; or
- contacting the Ramsay General Counsel in the region in which the supplier operates.

9. GOVERNANCE

This Policy is overseen by the Board, Risk Management Committee and Group Executive. Any material breaches of this Policy must be reported to the Ramsay Responsible Sourcing Team, relevant local risk committees and Risk Management Committee.

10. RELATED RAMSAY POLICIES

This Policy should be read in conjunction with related policies available at https://www.ramsayhealth.com:

- Group Human Rights and Labour Policy
- Group Diversity and Inclusion Policy
- Group Anti-Bribery & Corruption Policy
- Code of Conduct
- Group Sustainability Policy
- Whistleblower Policy
- Work Health & Safety Policy