Modern Slavery Statement 2024

People caring for people.

Ramsay Health Care

Contents

1. **Introduction** 3
2. **Our structure, operations and supply chain** 5
3. **Modern slavery risks and mitigating actions** 9
4. **Raising an issue through Ramsay's grievance mechanisms** 22
5. **Measuring effectiveness** 23
6. **Our FY2025 KPIs** 24
7. **Collaboration** 25
8. **Consultation** 26
9. **Appendix A – Australian and UK Criteria** 27
10. **Appendix B – Ramsay Group Companies** 28

This statement has been published in accordance with the Australian *Modern Slavery Act 2018* (Cth) (**Australian MSA**) and the UK *Modern Slavery Act 2015* (**UK MSA**). It sets out the steps taken by Ramsay Health Care Limited ACN 001 288 768 and other Ramsay group companies during the year ended 30 June 2024 to identify and reduce the risks of modern slavery in its business and supply chains.

This statement covers the following groups of entities, and their operations are outlined on page 5:

- Ramsay Health Care Limited;
- Australian Reporting Entities (see Appendix B for full list); and
- the UK Reporting Entities (see Appendix B for full list).

In addition, the following capitalised terms used throughout this statement are defined as follows:

- **Ramsay Group** or **Ramsay** means the Ramsay consolidated group, being Ramsay Health Care Limited and its subsidiaries;
- **Ramsay Australia** means Ramsay and the Australian Reporting Entities;
- **Ramsay UK** means Ramsay Health Care (UK) Limited and the Ramsay UK Reporting Entities (defined in Appendix B, para II);
- **Elysium Healthcare** means Elysium Healthcare Group Limited and the Elysium Reporting Entities (defined in Appendix B, para II); and
- **Ramsay Santé** means Ramsay Santé SA and its subsidiaries (Ramsay Health Care owns 52.79% of Ramsay Santé which is listed on the European financial markets' platform Euronext).

In this statement, we use the Australian MSA definition of 'modern slavery', which includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking in persons, deceptive recruiting and the worst form of child labour. The UK MSA uses a similar definition.

Important notice and disclaimer

This document has been prepared by Ramsay Health Care Limited ACN 001 288 768 (**Ramsay**) and is for informational purposes only. It is based on information available at the time of preparation and which is general in nature and should be read with Ramsay's other periodic reports and disclosures. This is not an offer, solicitation, invitation to apply, recommendation or advice to buy, sell or hold any securities of Ramsay. Undue reliance should not be put on forward-looking statements and any such statements are not guarantees or predictions of future performance. Certain information contained in this document is based on information provided by third parties and Ramsay is not responsible for this third party material and does not make any representation or warranty that it is accurate, complete, or up to date.

1. Introduction

This year's modern slavery statement

Ramsay's modern slavery statement addresses both the reporting requirements under the Australian MSA and the UK MSA and has been prepared using valuable input from a wide range of internal stakeholders.

Key initiatives for FY2024

- Updated and implemented our Global Human Rights and Labour Policy.
- More than 60% of our suppliers by spend undertook an independent sustainability assessment (EcoVadis).
- Through supplier engagement and FairSupply, mapped more than 40% of our suppliers by spend, exceeding our goal.

The Ramsay Way

People are at the heart of our success. 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.

CEO Message

"People and their wellbeing are at the heart of Ramsay Health Care and we are deeply committed to tackling the complex issue of modern slavery and safeguarding human rights. In 2024, we achieved several significant milestones including independent sustainability assessments for more than 60% of our suppliers (by spend). In 2025, we will continue to enhance our supplier due diligence and engagement, training programs and strategies to manage and mitigate these risks. This Modern Slavery Statement, developed with Ramsay's Modern Slavery Working Group, provides a valuable opportunity to reflect on our progress."

Craig McNally
Managing Director & Group CEO

Ramsay Cares

The Ramsay Cares Sustainability Strategy unites our global businesses in a shared vision for sustainability. Ramsay Cares focuses on fostering healthier people, stronger communities and a thriving planet. It reaffirms that we are here to have a positive impact for current and future generations. Ramsay Cares has three sustainability pillars:

- caring for our people;
- caring for our planet; and
- caring for our community.

Entrenched in our Ramsay Cares principles is Ramsay's commitment to take very seriously our responsibility to play our part to eradicate all forms of modern slavery. Ramsay understands that one of the keys to eradicating this complex issue is to set clear expectations for our people and suppliers, which will alert us to potential involvement in modern slavery and empower us to take steps to address it and to prevent such involvement in the future.

People

Without people, healthcare doesn't work. Our patients, doctors and clinicians, and our team all contribute to the Ramsay community. The Ramsay Way refers to 'people caring for people' and this is a fundamental part of delivering our world-class services to millions of people every year.

Planet

We know that a thriving planet is important to our health and wellbeing. Our services rely on a significant amount of resources, such as energy, surgical equipment and consumables. Without thoughtful practices, these resources can cost our planet. We are focused on climate action and environmental performance across our value chain.

Community

In order to benefit our patients and the broader community, we are focused on medical research and clinical teaching and training. Our hospitals and clinics also play an important role in their local communities, from providing important social infrastructure to creating employment opportunities.

Our modern slavery road map snapshot

To date, Ramsay has:

- Developed and implemented the Modern Slavery Improvement Plan, and continued focus on refinement of procurement due diligence and our response plan for managing modern slavery risk
- Developed and implemented the Global Responsible Sourcing Framework and the Responsible Sourcing Policy
- Appointed the Global Responsible Sourcing Manager and implemented the Procurement Roles and Responsibilities Matrix
- Updated and implemented the global Human Rights and Labour Policy
- Developed and implemented the modern slavery due diligence toolbox and complementary monitoring processes across several regions
- Articulated clear grievance and remediation mechanisms through our policies and procedures
- Undertaken provenance mapping of 40% suppliers by share of spend, with a focus on high-risk categories
- Arranged independent supplier assessments (EcoVadis) for 60% of global spend in FY2024
- Delivered e-learning and training modules on modern slavery risks, and continued training globally to cover introduction of new regulatory requirements. These are undertaken annually for procurement and supply staff in Australia and periodically for all staff at Ramsay UK
- Commenced the use of third party Sedex Members Ethical Trade Audit (SMETA) 6.1 4 Pillar on site audits with suppliers. We have also implemented a mutual recognition process for suppliers that have been assessed through other third-party sustainability assessment and audit programs, namely SMETA 6.1 4 Pillar and Amfori Business Social Compliance Initiative (BSCI) audits
- Included a supplier assessment target in our Sustainability Linked Loan Facility for Ramsay Australia and Ramsay UK.

Our next steps and priorities include:

- Continue strengthening processes, capacity building and consistency in approach at a regional level, through the Responsible Sourcing Program
- Continue to embed use of modern slavery due diligence toolbox and complementary monitoring processes across regions (as relevant)
- Maintain provenance mapping of 40% of suppliers by share of spend, with a focus on high-risk categories
- Undertake independent supplier assessments for 70% of suppliers by share of spend by the end of FY2025 as part of our ongoing KPI (see Section 6) to increase supplier assessment target spend to 80% of suppliers by share of spend by end of FY2026
- Continue to engage with suppliers to reduce risk exposure including undertaking onsite third party audits
- Continue our focus on periodic training globally to cover the introduction of new regional regulatory requirements
- Continue refinement of due diligence and response plan for managing modern slavery risk
- Test effectiveness of grievance policy and procedures.

Ramsay's long term vision is:

- Continuous improvement through a process of reviewing and improving our due diligence, risk management, training and supplier engagement systems along with our processes for the effective management and mitigation of modern slavery risks
- Ongoing supplier mapping, monitoring and collaboration on process improvements (including beyond Tier 1)
- Ongoing review of the effectiveness of actions taken to identify, assess and address modern slavery risks, including through our outcomes-focused KPIs (see Section 6).

2. Our structure, operations and supply chains

Our structure and operations as at 30 June 2024

Ramsay provides quality healthcare through a global network of hospitals and clinics providing clinical practice, teaching and research. Ramsay's leading global network extends across eight countries, with over 12 million admissions and patient visits to facilities in more than 530 locations. Ramsay was founded in 1964 by Paul Ramsay AO (1936–2014) and has always focused on maintaining the highest standards of quality and safety, being an employer of choice of over 89,000 employees globally. Of our workforce, 39% of employees are based in Australia, 43% in Europe and 18% in the UK.

AUSTRALIAN REPORTING ENTITIES

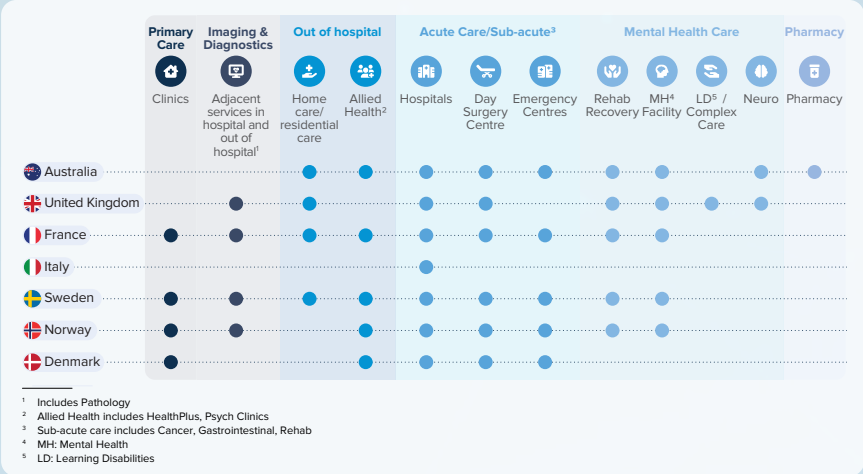
Ramsay's Australian Reporting Entities operate 74 private hospitals and day surgery units in Australia and Ramsay is Australia's largest private hospital operator. Ramsay's Australian operations include mental health facilities as well as the operation of three public facilities. The business also has 14 community psychology practices, hospital in the home services, telehealth and allied health clinics. In addition, Ramsay has established the Ramsay Pharmacy retail franchise network which supports more than 60 community pharmacies and 40 in-hospital dispensaries. Ramsay Australia operates Linear Healthcare Group (**Linear**), which supplies Linear branded medical consumables. Linear manages sourcing and supplier contracts predominantly based in China and Taiwan and also distributes Linear consumables within Australia (including to Ramsay's Australian operations). Ramsay Australia services also include Ramsay Connect, which offers community, home-based or remotely delivered care, and Ramsay Health Plus, which delivers personalised allied health services. Ramsay Australia cares for more than one million patients annually and employs more than 35,000 people

UK REPORTING ENTITIES

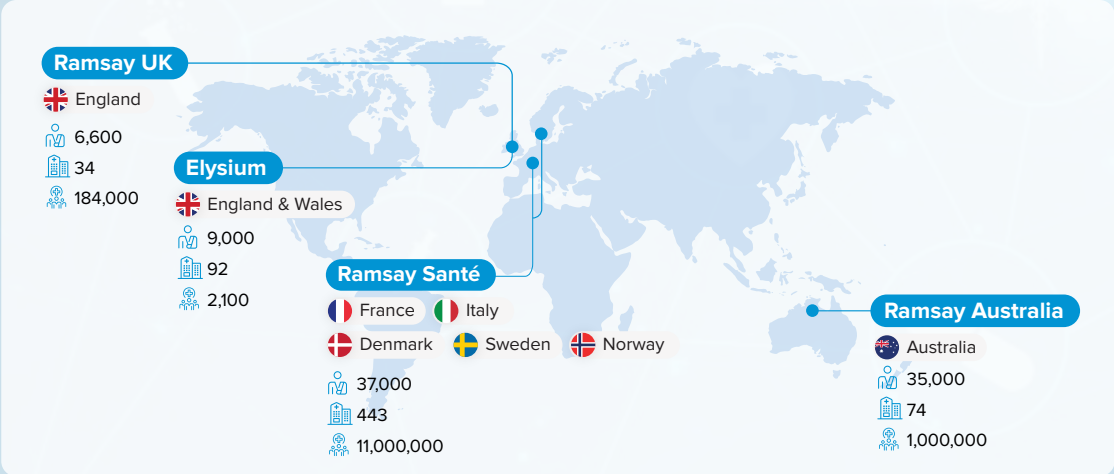
Ramsay's UK Reporting Entities operate 34 acute hospitals and day procedure centres in England providing a comprehensive range of clinical specialties to private and self-insured patients, as well as patients referred by the NHS. During FY2024, Ramsay UK also operated a diagnostic imaging service. Ramsay UK cares for over 184,000 patients annually and employs more than 6,600 people. Ramsay's UK Reporting Entities also include Elysium Healthcare, a leading independent operator of long-term medium and low secure hospitals and complex care homes for individuals with mental health conditions. Elysium Healthcare has 92 operational sites across England and Wales, cares for approximately 2,100 patients annually and employs more than 9,000 people.

EUROPE

Through its UK Reporting Entities, Ramsay owns 52.79% of Ramsay Santé, the second largest private care provider in Europe operating 244 hospitals and clinics, 167 primary care centres and 32 imaging and radiotherapy centres across five countries in Europe. In France, Ramsay Santé has a market leading position, with 183 acute care, rehabilitation and mental health facilities, imaging and primary care centres. In Denmark, Norway, Sweden and Italy, Ramsay Santé operates 210 facilities including primary care units, specialist clinics and hospitals, including a 93-bed hospital in Italy. Ramsay Santé cares for approximately 11 million patients annually and employs more than 37,000 people.



[1] Includes Pathology
[2] Allied Health includes HealthPlus, Psych Clinics
[3] Sub-acute care includes Cancer, Gastrointestinal, Rehab
[4] MH: Mental Health
[5] LD: Learning Disabilities



Governance and responsibility for managing modern slavery: Role of the Board and Management

Board and Executive Leadership Team

Ramsay's Board is ultimately responsible for overseeing performance and operations of the Group, setting the Group's values and governance framework and monitoring Ramsay's culture and compliance in accordance with our Code of Conduct. This includes oversight of our approach to human rights, which includes modern slavery, and approval of our annual Modern Slavery Statement.

The Board is assisted by the Board Committees, primarily the Global Risk Management Committee, and the Executive Leadership Team in discharging its responsibilities. The Executive Leadership Team is comprised of the Managing Director & Group CEO, Group Chief Financial Officer, Group Chief People Officer, Group Chief Risk Officer, Group Chief Transformation and Digital Officer, Group General Counsel & Company Secretary and the CEOs of each of Ramsay Australia, Ramsay UK, Elysium Healthcare and Ramsay Santé.

Material business risks can be identified and reported via the Global Risk Management and Audit Committees in line with Ramsay's Risk Management Framework and the Board approved Risk Appetite Statement. Ramsay identifies harm to people (which includes modern slavery) as a low-risk appetite range, meaning it is unacceptable to take risks and takes a no compromise approach.

Key Policies and Programs

Ramsay's **Global Human Rights and Labour Policy** is a key pillar of Ramsay's approach to addressing our responsibility to minimise modern slavery risks in our operations and supply chain. Under this policy, the Board and Executive Leadership Team are responsible for the oversight of Ramsay's approach to human rights, which includes modern slavery, and Ramsay commits to due diligence processes that will work towards identifying, preventing, mitigating and accounting for impacts on human rights including modern slavery risks across our business operations and supply chains. Any material breaches of the policy are reported to the Global Risk Management Committee quarterly.

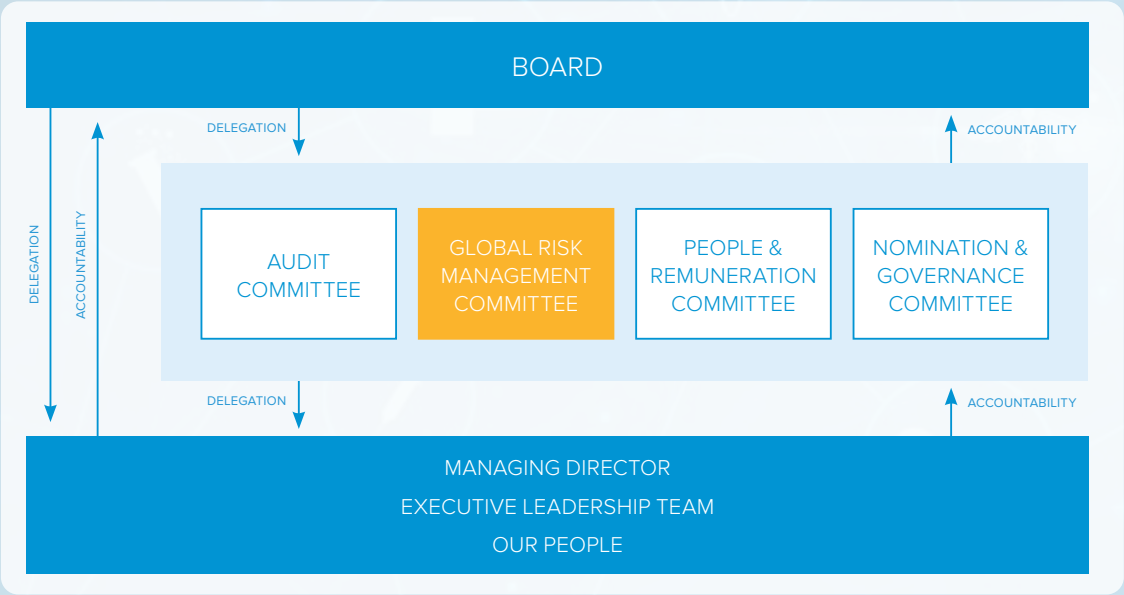
Ramsay's **Responsible Sourcing Program** monitors and promotes compliance with our **Global Responsible Sourcing Policy**, which outlines our commitment to responsible sourcing practices and approach to identifying and managing risks in our global procurement activities, and approach to identifying and managing risks, including modern slavery risks, in our global procurement. This policy sets out the behaviour and standards that we expect all our suppliers to uphold. Any material breaches of the policy are reported to the Global Risk Management Committee annually through the Responsible Sourcing Team and relevant regional Risk Management Committee.

These policies are approved by the Board and reviewed every two years. Further information is available on the Sustainability Governance section of Ramsay's website.

Please see Section 3 for further details of each of these policies, and the other related policies and procedures that form part of our governance in managing modern slavery, including our Code of Conduct.

Modern Slavery Working Group

Ramsay's Modern Slavery Working Group is made up of representatives of each region and across various functions within the business, which is charged with proposing group-wide key performance indicators (**KPIs**), policies and standards to address modern slavery risks and implementing management actions to reduce the risk of modern slavery practices across our business operations and supply chains. The Modern Slavery Working Group meets quarterly, and its recommendations are then put to the Executive Leadership Team for approval and endorsement. Please see Section 3 for further details of this Working Group.



Overview of our supply chains

Ramsay purchases from a wide range of procurement categories which include the below key categories across the regions. As an end user of goods and products, Ramsay is a downstream company in the supply chain. Most of our engagement and contracting is directly with our Tier 1 suppliers that provide the finished goods and products used every day in our hospitals and clinics. These suppliers range from large international corporations to small businesses.

Procurement Categories

Clinical – Direct Categories

- Airway Management
- Cardiology
- Cement and Bone Substitute
- Endoscopic Intervention
- Energy
- Exploration
- Extrarenal Purification and Apheresis
- Haemostasis
- Infection Control
- Infusion/Transfusion
- Instrumentation
- Laparoscopic/Videoscopic Surgery
- Medical Apparel
- Operating Room Draping
- Ophthalmological Implants
- Orthopaedic Implants
- Osteosynthesis
- Pain Management
- Power Tools
- Robot Surgery
- Spinal Implants
- Stent
- Wall Repair
- Wound Management

Non-Clinical – Indirect Categories

- Catering and Hospitality
- Contingent Labour
- Energy and Utilities
- Fleet
- Hard Facilities Management Services
- HR
- Janitorial
- Linen and Laundering
- Marketing
- Office Supplies
- Recruitment
- Soft Facilities Management Services
- Technology
- Travel
- Uniforms and Scrubs
- Waste and Recycling

Who we buy from

Ramsay's suppliers (ie Tier 1) source materials, components and products from their suppliers (ie our Tier 2 suppliers) who in turn source materials from their suppliers (ie our Tier 3 suppliers). Across our regions the Ramsay Group partners with over 18,000 Tier 1 suppliers which account for a global spend of AU$6.1bn. Underpinning our top 10 Tier 1 clinical and pharmaceutical suppliers are over 230,000 Tier 2 suppliers.

RAMSAY AUSTRALIA
(47% of AU$6.1bn global spend)

Over
270
active contracts

~82%
of our medical spend
with our top 30 suppliers

8,000+
suppliers

RAMSAY UK
(8% of global spend)

Over
320
active contracts

~80%
of our medical spend
with our top 20 suppliers

1,450+
suppliers

ELYSIUM HEALTHCARE
(6% of global spend)

Over
160
active contracts

~80%
of our medical spend
with our top 20 suppliers

2,000+
suppliers

RAMSAY SANTÉ
(34% of global spend)

CAPIO
(5% of global spend)

Over
500
active contracts and over 125 framework agreements in place

In France, approximately
60%
of our medical spend
with our top 20 suppliers

In Nordics, approximately
40%
of the spend is with the to 20 suppliers

In France, approximately
85%
of our non-medical spend with our top 20 suppliers

4,000+
suppliers

3. Modern Slavery Risks and Mitigating Actions

Risks of modern slavery practices in Ramsay's operations and supply chains

Modern slavery is defined in the Australian MSA as trafficking persons, slavery, debt bondage, servitude, forced labour, forced marriage, the worst forms of child labour and deceptive recruiting for labour or services, and the UK MSA uses a similar definition. Ramsay Health Care is a member of the United Nations Global Compact, and the United Nations Guidelines on Business and Human Rights (**UNGPs**) guides Ramsay on how we may cause, contribute to or be directly linked to human rights and modern slavery risks and impacts in our operations and supply chains.

The Australian Human Rights Commission and KPMG in their guide titled 'Modern Slavery in the Health Services Sector' (2021) found two areas of elevated modern slavery risk that are relevant to health services businesses: procurement of medical goods and operating activities. The factors that increase the risk of modern slavery are high-risk procurement categories, high-risk geographies, vulnerable populations, and high-risk business models. Below is a high-level overview of how Ramsay considers each of these health services risk factors followed by a deeper dive into specific modern slavery risks that have been identified by Ramsay.

High-risk procurement categories

- Using FairSupply, EcoVadis and other supplier sustainability assessment tools, Ramsay has determined the categories within its supply chain which are high risk from a modern slavery perspective.
- Ramsay has mapped its high risk procurement categories which includes those supply chain categories listed in the table below along with details of the steps taken to mitigate the modern slavery risks.
- In addition, Ramsay has undertaken deep dives into its supply chain for certain higher risk categories, including medical gloves and uniforms. Ramsay Australia and Ramsay UK have mapped 100% of Tier 1 suppliers, over 99% of Tier 2 suppliers and over 99% of Tier 3 suppliers for medical gloves.

High-risk geographies

- While Ramsay does not have facilities in high-risk geographies, using FairSupply, EcoVadis and other supplier sustainability assessment tools, Ramsay has reviewed and mapped a significant percentage of suppliers by spend to determine where it has exposure to modern slavery risks in its supply chains. Behind this text is a map of the higher risk geographies identified where some of our suppliers operate.
- In addition, Ramsay has undertaken periodic audits of some of its suppliers in higher risk geographies.

Vulnerable populations

- Ramsay recognises that certain suppliers operate in industries where there is likely to be an increased proportion of vulnerable populations in the workforce.
- The industries that Ramsay assessed as having a higher risk of exposing vulnerable populations to modern slavery include textile production and medical consumables. Outlined in the table below are further details of the risks identified in these areas.

High-risk business models

- The key high risk business models that Ramsay may have exposure to include outsourcing, third party labour-hire, independent contracting and subcontracting.
- During due diligence of a supplier, the risk of these business models is taken into consideration and appropriate contractual provisions are implemented.

The modern slavery risks can vary depending on our role as (a) a procurer of goods and services; (b) a provider of health related services; and (c) employer. Ramsay recognises that the most significant potential risk of modern slavery is within our global supply chains and the following table sets out operational and supply chain categories which have been identified as giving rise to a potential risk of modern slavery for the Australian Reporting Entities and the UK Reporting Entities.

Risks: Role of procurer of goods and services

SUPPLY CHAIN CATEGORIES	SOURCING COUNTRIES	POTENTIAL MODERN SLAVERY RISKS IDENTIFIED	DESCRIPTION OF RISK FACTOR
MEDICAL SPEND CATEGORIES			
Medical consumables (including generic and volume based, low-cost clinical consumables)	Tier 1 suppliers are mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (eg Australia, USA, EU and the UK). Tier 2 and beyond suppliers are manufacturing or sourcing from: China, Taiwan, Malaysia, Thailand, Sri Lanka, Vietnam and Pakistan.	Potential modern slavery risks identified include child labour, forced labour, debt bondage, substandard or exploitative working conditions, excessive overtime and substandard accommodation.	The countries in which our Tier 1 suppliers are manufacturing/sourcing materials for medical consumables are associated with higher risks of labour exploitation/ hazardous working conditions due to political instability, poor governance, low levels of regulation and poverty. There are modern slavery risks associated with the products themselves as they are typically sourced in bulk at low cost and tight delivery time frames which leads to a greater risk of suppliers engaging in practices such as underpaying workers, excessive overtime, poor working conditions, reliance on low-skilled and migrant workforce.
Medical equipment and medical implants	Tier 1 suppliers are mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (ie in Australia, USA, EU, New Zealand and the UK). These multinationals also have manufacturing, facilities in Brazil, China, Chile, India, Indonesia, Israel, Japan, Mexico, South Korea, and Turkey. Tier 2 and beyond suppliers are multinationals with facilities (eg for manufacturing, assembly, distribution or sterilisation) that are located in the following countries: Argentina, Brazil, China, Colombia, Costa Rico, Dominican Republic, India, Indonesia, Mexico, Malaysia, Philippines, Puerto Rico, Singapore, South Africa, Taiwan, Thailand and Vietnam.	Potential modern slavery risks identified include child labour, forced labour, debt bondage, substandard or exploitative working condition and excessive overtime.	The countries in which our Tier 1 suppliers have facilities (eg for manufacturing, assembly, distribution or sterilisation of medical equipment and medical implants) are associated with a higher risk of labour exploitation, including child labour and low-skilled workers, hazardous working conditions due to political instability, poor governance, low levels of regulation and poverty.
Vaccines and pharmaceuticals	Tier 1 suppliers are mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (eg Australia, New Zealand, USA, EU and UK). These multinationals also have manufacturing facilities in Brazil, China, India, and Turkey.	Potential modern slavery risks identified include child labour, forced labour, debt bondage, substandard or exploitative working conditions, excessive overtime and substandard accommodation.	Ramsay purchases vaccines and pharmaceuticals in two ways, firstly through Tier 1 multinational suppliers with headquarters in countries with modern slavery, human rights and/or labour laws; secondly, through a local distributor that sources from multinational suppliers that in turn become our Tier 2 suppliers with headquarters in countries with modern slavery, human rights and/or labour laws. Ramsay is still in the process of completing the supply chain mapping for the production locations and the production and sourcing of raw materials that go into these products.
OTHER CATEGORIES (NON-MEDICAL SPEND)			
Uniforms, textiles	Tier 1 suppliers are locally based suppliers, subject to local region laws. Tier 2 and beyond suppliers are manufacturing or sourcing from: Bangladesh, China, Indonesia, India, Malaysia, Pakistan, Sri Lanka, Tunisia, United Arab Emirates and Vietnam.	Potential modern slavery risks identified include child labour, forced labour, excessive overtime, debt bondage and deceptive recruitment.	Ramsay purchases uniforms through Tier 1 locally based suppliers who are subject to local region laws. In Australia through engagement with our Tier 1 suppliers we have completed supply chain mapping for our uniforms and have identified that the production of raw materials that go into these products are extracted and the products produced at the lower tiers of global supply chains. The countries in which our suppliers are manufacturing / sourcing raw materials are often countries where there is less human rights regulation, oversight and/or enforcement, and there is a higher risk that these raw materials used in uniforms could be harvested by children overseas exploited through the worst forms of child labour (please see case study on page 13).

SUPPLY CHAIN CATEGORIES	SOURCING COUNTRIES	POTENTIAL MODERN SLAVERY RISKS IDENTIFIED	DESCRIPTION OF RISK FACTOR
IT/Telecommunications	Tier 1 suppliers are mainly multinationals with headquarters in countries with modern slavery, human rights and/or labour laws (eg Australia, USA, EU and the UK).	Potential modern slavery risks identified include forced labour, excessive overtime, debt bondage, and deceptive recruitment.	Ramsay purchases IT/telecommunications products and services through Tier 1 multinational suppliers with headquarters in countries with modern slavery, human rights and/or labour laws. Ramsay is still in the process of completing the supply chain mapping for the production locations and these products and services. Through supplier engagement and research, Ramsay has identified that the production of raw materials that go into these products are extracted, and the products produced at the lower tiers of the global supply chains.
Facility services and management (utilities, food and catering, security, waste, laundry, cleanings)	Tier 1 locally based, generally smaller, suppliers, subject to local region laws.	Potential modern slavery risks identified include use of migrant labour, base-skilled workers, international students and temporary workers on short term contracts.	Ramsay purchases facility services and management mainly through locally based, generally smaller, suppliers that are subject to local region laws. Through research, Ramsay has identified this as a high-risk category due to the risk of exploitation of vulnerable populations in the sector. The sector's high reliance on migrant labour, base-skilled workers, international students and temporary workers from low-English speaking countries heightens the risk of exploitation of these vulnerable populations, including through underpayments and barriers to reporting their experience of harm: language, level of education and literacy, visa insecurity and disability may be contributory factors.
Building and construction	Tier 1 locally based, large suppliers, subject to local region laws, labour is primarily employed through sub-contractors or agents.	Potential modern slavery risks identified include use of migrant labour, excessive working hours, debt bondage, wages below minimum wage requirements, hazardous working environments and deceptive and dangerous practices.	The construction industry's high reliance on labour employed through sub-contractors or agents, as well as the materials used, create a complex multi-tiered supply chain. Cost and time schedule pressures, as well as a high concentration of migrant labour, create a higher level of risk of excessive working hours, debt bondage, wages below the minimum wage requirements, hazardous working environments, and deceptive and dangerous practices.
Renewable energy projects (eg solar panels)	Tier 1 locally based suppliers, subject to local region laws, labour is primarily employed through sub-contractors or agents. Tier 2 and beyond suppliers are manufacturing or sourcing from: China and Mongolia.	Potential modern slavery risks identified include forced labour, debt bondage, substandard or exploitative working condition, excessive overtime and substandard accommodation.	The manufacturing process for solar panels poses higher risks of labour exploitation, with inherent risks of forced labour due to the use of raw material polysilicon which is an essential component in the manufacturing process of solar panels.

Risks: Role of employer

OPERATIONAL CATEGORIES	OVERVIEW	POTENTIAL MODERN SLAVERY RISKS IDENTIFIED
Recruitment processes, reliance on agency labour contractors and independent services (such as locums and doctors)	Ramsay's employees are covered by local region laws. For Ramsay Australia, 89% of employees are covered by Enterprise Agreements. For Ramsay Santé**, 98% of employees are covered by collective bargaining agreements (**France: 100% of employees, and the Nordics: 89% of employees). We are cognisant that there are regions that have a higher risk of modern slavery within the workforce. We do not employ people in the areas designated by the Global Slavery Index as high risk. Ramsay uses Tier 1 locally based, generally larger, suppliers for recruitment services and agency labour services that are subject to local region laws and (where relevant) credentialing processes. Ramsay has identified that using third-party labour hire companies increases modern slavery risk by reducing visibility over recruitment practices. With regard to our direct employees, the entities within the Ramsay Group have country specific policies and procedures that outline employee rights and practices. In Australia, for example, we have the following policies in place to support behaviours and practices that reduce the risk of modern slavery occurring in our own operations: Global Human Rights and Labour Policy; Code of Conduct; Anti-bribery and Corruption Policy; and our Whistleblower Policy, amongst others.	The reduced visibility over recruitment practices when using suppliers for recruitment services and agency labour services creates a higher risk for the potential for deceptive recruitment practices, including debt-bondage.

Risks: Role of an operator of health care businesses

OPERATIONAL CATEGORIES	OVERVIEW	POTENTIAL MODERN SLAVERY RISKS IDENTIFIED
Provision of health care and allied goods and services to patients and customer	There is potential for modern slavery risks to be present in the patient and customer population. Whilst this is lower risk due to the nature of Ramsay's business and operations in the healthcare sector, Ramsay considers modern slavery risks in its role as a health service provider through its commitment to ensuring patient safety. For example, this includes patient health assessments on entry to Ramsay Australia facilities and mandatory reporting requirements if our staff members become aware of children safety related concerns. In addition, across the regions there are patient charters and associated procedures and policies which relate to patient rights and safety.	Provision of health care services may involve interaction with vulnerable populations at risk of modern slavery or human rights concerns.
Acquisition of health care and allied goods and services businesses	Further, when any new businesses are acquired by the Ramsay Group, due diligence is undertaken which often includes the wage levels and other indicators of modern slavery risks. Based on the materiality of the modern slavery risks, we determine what actions need to be taken as a priority to manage these risks. If we assess the existing mitigating actions taken by any target business to be insufficient to address the risks identified, then we may choose not to proceed with the proposed transaction. In addition, modern slavery prohibitions may be incorporated into the terms and conditions in the transaction documents. Post-acquisition, the new business may be required to report on modern slavery risks on a periodic basis and engage with the relevant executive and operational teams to monitor integration, compliance and progress.	Acquisition of businesses and or business partnerships may expose Ramsay to modern slavery risks in target business operations and supply chain.

Case Study – Ramsay UK Uniforms

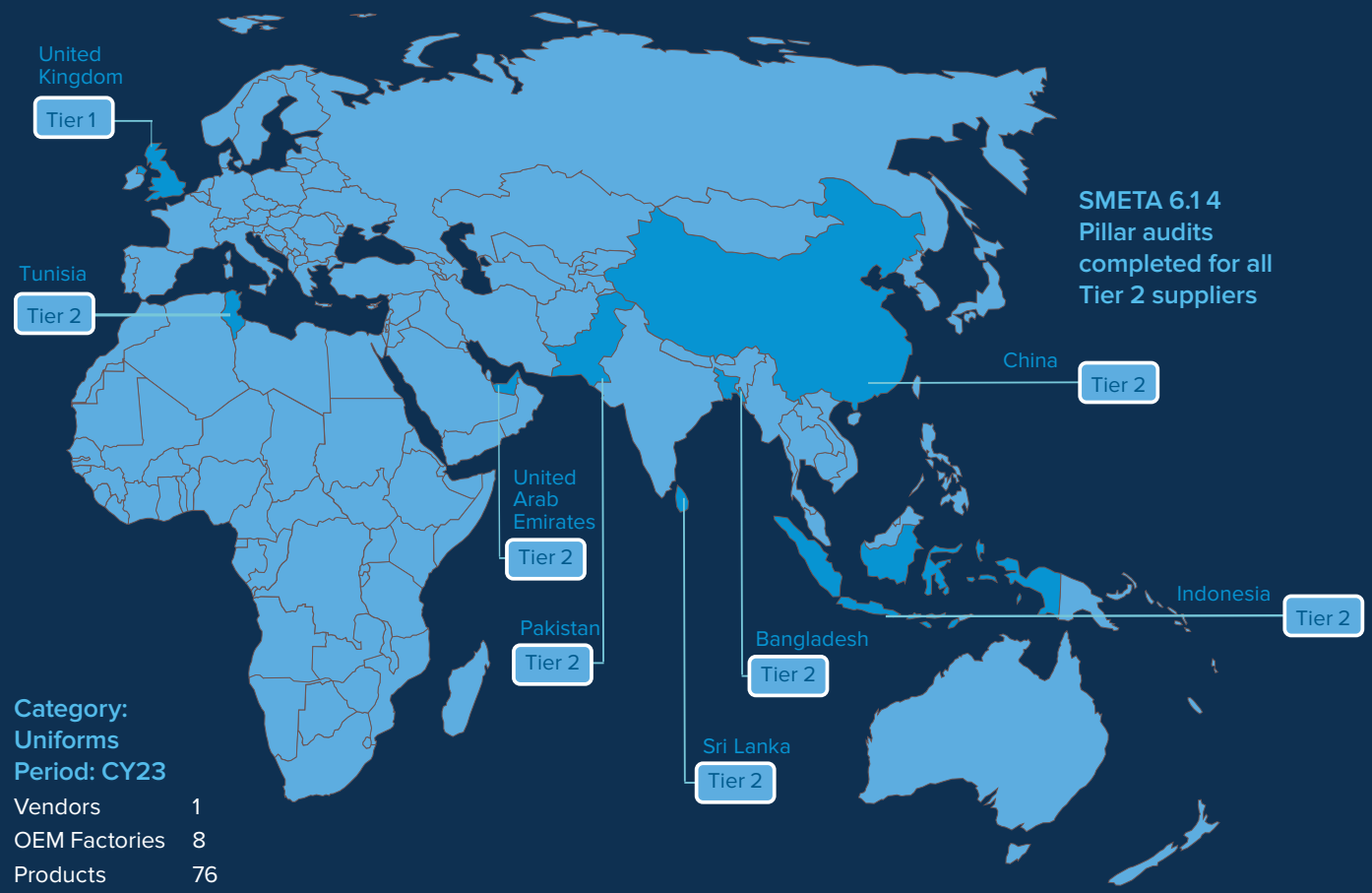
We undertook Tier 1 and Tier 2 supply chain mapping of our uniform suppliers due to the high risk nature of the product type and geographical origin.

The Ramsay UK Procurement team has undertaken a process of consolidating its suppliers of both clinical and non-clinical uniforms for employees. The consolidation process provides greater supply chain transparency and traceability to mitigate the risks of modern slavery. Ramsay understands that the garment supply chain operates in an environment with higher inherent modern slavery risks due to the industry being located across high-risk geographies.

A new supplier was engaged that was headquartered in England and has a global supply chain. As part of our due diligence process, we worked closely with the supplier in mapping the supply chain to confirm the sourcing from eight manufacturing facilities located across China, United Arab Emirates (UAE) Bangladesh, Pakistan, Sri-Lanka, Indonesia and Tunisia. This supply chain mapping allowed us to identify the key modern slavery risks of excessive overtime, migrant labour exploitation, forced labour, bonded labour (recruitment fees), deceptive recruitment, and child labour.

The management measures put in place by the new supplier include a membership with Sedex (Supplier Ethical Data Exchange) and adopting a code of standards based on Ethical Trading Initiative (ETI) base code. This includes minimum standards and audits at regular intervals to ensure ongoing compliance with anti-modern slavery and anti-corruption measures and environmental responsibility.

The primary risk management measures employed by the supplier is to conduct third party SMETA 6.1 4 Pillar audits at all manufacturing factories. These audits were shared with Ramsay and there were no findings associated with modern slavery. We will continue to work closely with the supplier to maintain ongoing transparency of the supply chain and monitoring of the SMETA audit results and corrective actions reporting.



SMETA 6.1 4 Pillar audits completed for all Tier 2 suppliers

Category: Uniforms
Period: CY23

Vendors	1
OEM Factories	8
Products	76

Product	Country of Origin (Tier 2)
Chefs Jacket	Bangladesh
Dress	Bangladesh, Indonesia
Female Blouse	China
Female Dress	China
Fleece	Sri Lanka
Knitwear	China
Medical Dress	Bangladesh, Indonedia
Medical Tunic	Indonesia

Product	Country of Origin (Tier 2)
Polo	Pakistan
Shirt	Sri Lanka
Suit Jacket	Banladesh, China
Suit Skirt	United Arab Emirates, China
Suit Trouser	Bangladesh, China
Suit Waistcoat	Sri Lanka
Sweatshirt	Great Britain, Pakistan
Trouser	China, Indonesia, Tunisia

How we assess and address those risks: Deep dives and case studies

In FY2024, we continued to focus our reviews on suppliers to those in high-risk categories such as medical consumables and in high-risk geographies. We assessed a large number of our medical consumables suppliers using the FairSupply platform and the Dow Jones Risk Centre Third Party Platform, which gives us the capability to actively monitor key global watchlists particularly for issues related to modern slavery. Alongside our existing supplier assessment, risk identification and monitoring tools, we continued to mutually recognise other programs of compliance and assessments that are accepted by Ramsay as part of our Responsible Sourcing Framework. This includes the SMETA 6.1 4 Pillar audit compliance tool.

STERILE SURGICAL SCISSORS CASE STUDY

We reviewed a sterile surgical scissors supplier due to their EcoVadis IQ highrisk rating which was primarily based on their geographical location in Pakistan. In the Walk Free Global Slavery Index 2023, Pakistan was listed as one of the 10 countries with largest estimated numbers of people in modern slavery. As part of our review, Ramsay required that the supplier undertake a SMETA 6.1 4 Pillar audit. The audit report did not identify any issues related to any form of modern slavery. The audit included interviews with six workers selected at random. In these interviews, no concerns were raised and the general attitude of the workers towards their workplace was favourable. There were three minor corrective actions related to safe and hygienic working conditions which the supplier is working to rectify.

MEDICAL CONSUMABLES CASE STUDY

We reviewed a supplier of surgical gowns, face masks, cotton balls and other disposable protective products, based in China and who operates across two facilities. Our review was triggered by a press release from a European medical company, responding to a Nordic media outlet alleging that the supplier could be involved in forced labour. In the press release, the European medical company asserted that the allegation was not true. Ramsay's review of the Dow Jones Third Party Risk platform, confirmed there were no red flags for sanctions or other official lists and no other adverse media reports for this supplier or its subsidiaries. In addition, Ramsay confirmed that there were no current or previous US Customs and Border Protection findings against this supplier or its subsidiaries. Further, Ramsay undertook a full review of our two SMETA 6.1 4 Pillar audits completed in June 2022 and again in June 2023 at the supplier's first facility. Neither audit report identified any form of modern slavery. Finally, in March 2024, we also undertook an Amfori BSCI Audit of their second facility which came to a similar conclusion.

DISPOSABLE PROTECTIVE PRODUCTS CASE STUDY

We reviewed a supplier of disposable protective products, including aprons, gowns, headscarves, shoe protection amongst other products, who has one relevant facility in China. Ramsay was alerted to an issue by a third party who had a concern with the supplier for an undisclosed reason. When investigating the reason for the concern, Ramsay discovered a historic allegation made against the supplier in 2020, that the supplier had employed at least 130 workers from a very vulnerable population to make masks. This issue did not appear in the Amfori BSCI audits of the supplier in 2022 and 2023. Ramsay undertook a new SMETA 6.1 4 Pillar audit at the supplier's facility, which did not find any issues related to any form of modern slavery. The audit included interviews with 10 workers selected at random. No concerns were raised, and the employees said they had a good relationship with management and were treated with respect. A SMETA 6.1 Corrective Action Plan Report was produced to address three minor non-conformities relating to health and safety, which the supplier is working to implement.

PROCUREMENT ROLES AND RESPONSIBILITIES MATRIX

As part of the three year Modern Slavery Improvement Plan, accountabilities and responsibilities were established in FY2021 across the Group. In FY2024, this was further developed through the implementation of the Procurement Roles and Responsibilities Matrix (the **Matrix**) to assist with the appropriate review and response to modern slavery risks. An example of how the Matrix mechanisms were tested are provided for the Disposable Protective Products Case Study below.

It was brought to our attention that a third party had a concern with the supplier for an undisclosed reason.

The Ramsay Group Treasury team was alerted then notified the Ramsay Group Legal and Group Procurement teams to investigate whether there were any modern slavery related concerns with the specific supplier.

The Global Responsible Sourcing Manager investigated the matter with both the third party and supplier.

Steps undertaken include:

- Daily monitoring of the supplier in the Dow Jones Third Party Risk Centre which monitors over 22,000 Government and official sanctions watchlists to ensure there were no issues flagged.
- Reviewing the last two Amfori BSCI Audits of this supplier, which were both undertaken within the past two years. These audits included a physical on-site audit and the reports did not contain any red flags.

Relevant supplier interviewed and new SMETA 6.1 4 Pillar audit of the supplier was arranged.

The Global Responsible Sourcing Manager reported to the Ramsay Global Executive Leadership Team on the due diligence steps undertaken from a modern slavery risk perspective.

Actions taken to assess and address modern slavery risks

Modern Slavery Working Group

Ramsay's Modern Slavery Working Group is responsible for considering initiatives and actions taken to assess and address modern slavery risks across the business and to continually improve our approach. This allows for knowledge sharing across the regions to help ensure how we handle responsible sourcing throughout our supply chain is continually reviewed and improved.

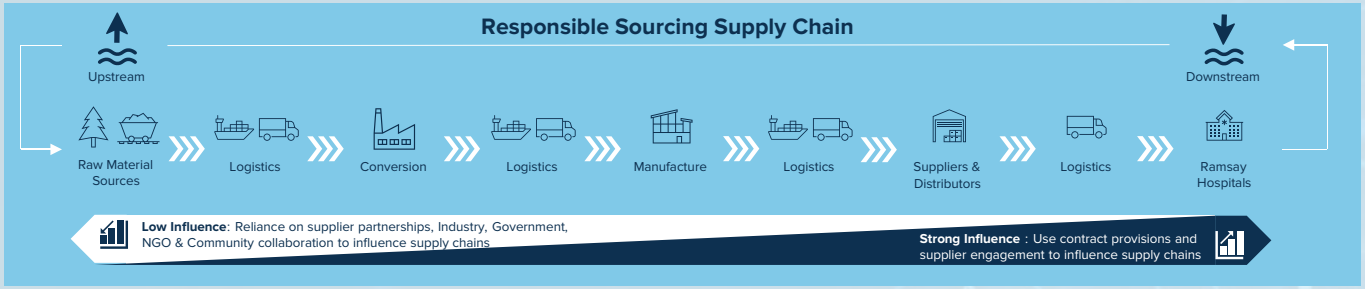
Ramsay's Responsible Sourcing Framework

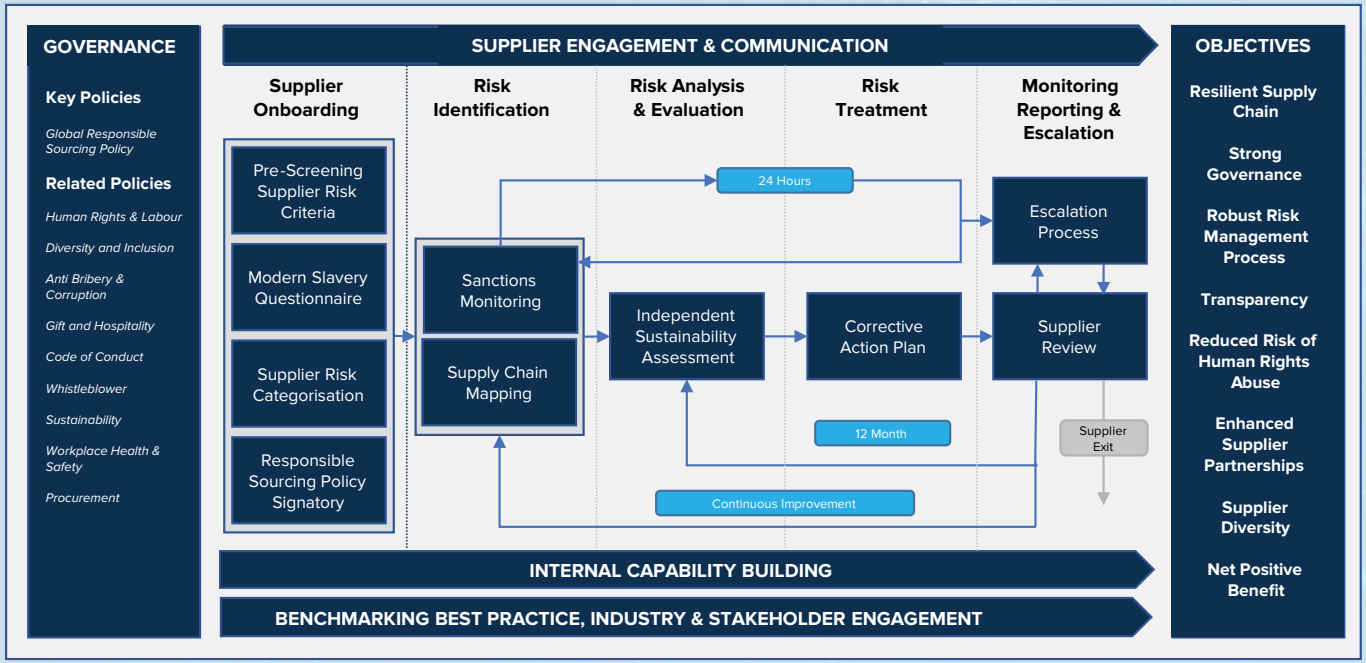
Ramsay's Global Responsible Sourcing Framework is part of Ramsay's Human Rights Commitment, and takes a risk-based approach to ensuring Ramsay's supply partners do not create an unacceptable risk (including in relation to modern slavery). Under the Framework, Ramsay must first understand the supply chain from end to end and engage suppliers regularly with a focus on the provenance of what is being purchased and then use its supplier network to strengthen supply chain resilience and identify, assess and manage risks jointly.

The diagram on the right outlines this process of suppler engagement and communication within Ramsay's Global Human Rights and Responsible Sourcing governance framework: working towards defined objectives, building internal capability, benchmarking best practice and engaging with industry and stakeholders. The Global Responsible Sourcing Manager works with business unit Heads of Procurement and procurement teams to lead the development, implementation and review of the Responsible Sourcing Framework and Supplier Risk Management Framework to embed the Framework within the procurement functions.

Key initiatives in FY2024 were:

- Enhanced mapping of our suppliers, 40% of our suppliers by spend were assessed and mapped.
- Increased level of modern slavery training, with 100% of the Australian procurement workforce trained in modern slavery risks.
- AU$6.1bn of spend with direct suppliers mapped globally
- Achieved more than 60% of our suppliers by spend having an independent sustainability assessment (EcoVadis).





How we assess and address risks: supply chain mapping, due diligence tools, processes and contractual controls

Ramsay has a zero tolerance approach to slavery and human trafficking from our suppliers. We make clear our expectations of suppliers, and where suppliers are not able to satisfy us as to their compliance or corrective actions, Ramsay will first endeavour to work with the supplier to help them improve their practices in this area. If there is unwillingness from the supplier to engage with Ramsay on this issue in good faith or there is a lack of objective steps taken towards compliance and corrective action, Ramsay will seek to suspend the supplier.

Overview

Our medical spend supply chain is a large proportion of our group spend and is primarily comprised of sourcing medical consumables, equipment, implants and pharmaceuticals. During FY2024, we engaged and collaborated with our top medical suppliers to focus on mapping our Tier 1 and in part, Tier 2 of our supply chain. These suppliers are global multi-national organisations with complex and geographically diverse operations. Our ongoing work has assessed and mapped over 40% of suppliers by share of spend, with products that are sourced from over 800 supplier facilities located in 44 countries. FairSupply has ranked 98% of our assessed spend as 'low/moderate-low' risk. In addition, we undertook independent sustainability assessments of 60% of our suppliers by share of spend. The outcomes of Ramsay's supplier assessments are presented during our annual and biannual supplier review meetings, which take place in-person and virtually. During these meetings Ramsay and the supplier discuss the outcomes of the assessment and align on corrective actions needed to address identified risks and gaps. These supplier meetings and corrective actions are tracked, including through the EcoVadis Corrective Action Plan tool, which allows Ramsay to measure the improvements and outcomes of remediation actions through a verified independent third party process.

Risk Identification: Mapping

We applied an initial risk assessment methodology to our clinical and non-clinical suppliers. This exercise provides the basis for our focus on ongoing due diligence and remediation activities across not only FY2024 but also for upcoming years. We utilised external consultants with proprietary technology which incorporates global company spend data to trace our supply chain from Tier 1 (our direct suppliers), Tier 2 (our supplier's suppliers) all the way to Tier 10. This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (**MRIO**) table which linked supply chain data from 190 countries, and in relation to 15,909 industry sectors.

This MRIO table was assembled using the following sources:

- The United Nations' (**UN**) System of National Accounts;
- UN COMTRADE databases;
- Eurostat databases;
- The Institute of Developing Economies, Japan External Trade Organisation; and
- Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO was then examined against the following international standards:

- The UN Guiding Principles on Business and Human Rights;
- The Global Slavery Index;
- International Labour Organisation Global Estimates of Modern Slavery; and
- The United States' Reports on International Child Labour and Forced Labour.

The proprietary algorithm was then applied to synthesise publicly available risk data against the MRIO table. The result of this process was the creation of a modern slavery risk profile for each supplier to Tier 10. This analysis was performed for the purposes of risk identification under the Australian and UK MSA.

The multi-faceted approach to modern slavery risk assessment included examination and analysis of the following:

- The individual suppliers and industries with the most elevated risk of modern slavery;
- Supply chain plots to provide a visual representation of the supply chains for Ramsay's top three first tier industries by spend;
- Plotting the relative slavery risk in the supply chains by tier, up to Tier 10;
- Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world; and
- An overview of the classification of the first tier of our supply chains by country and industry, including relative modern slavery risk.

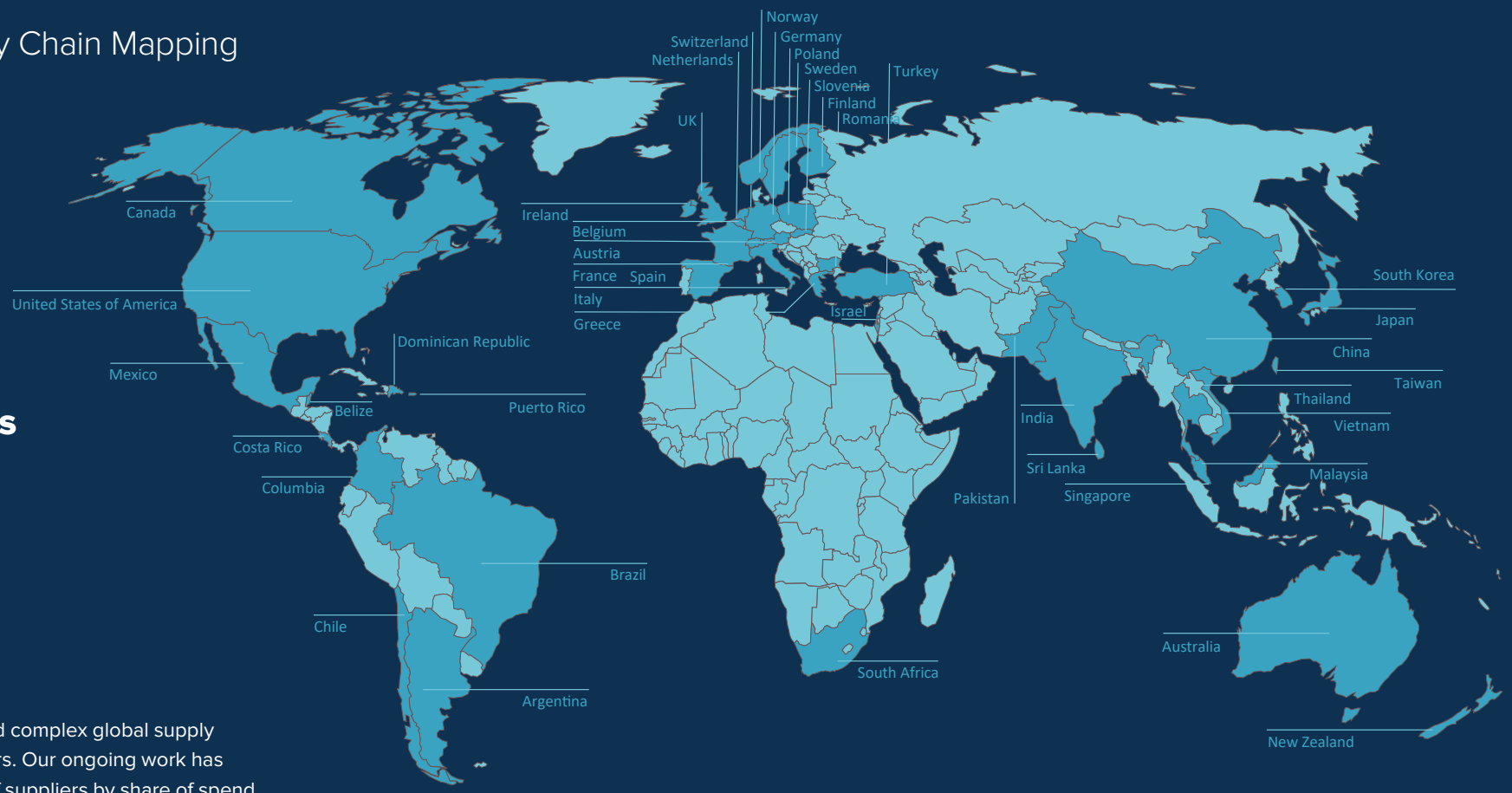
Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified. By identifying risk associated with a supplier, Ramsay can request suppliers to complete questionnaires, provide further information about their modern slavery policies and risks, and undertake further due diligence or actions. We know our Tier 1 medical suppliers are mainly headquartered in lower-risk countries like Australia, USA, EU and the UK, and we know that some manufacturing of raw material sourcing occurs overseas. This mapping helps us assess risk at each tier of our supply chains which informs our due diligence and supplier engagement.

FY2024 Global Supply Chain Mapping

44+
Countries

800+
Supplier Facilities

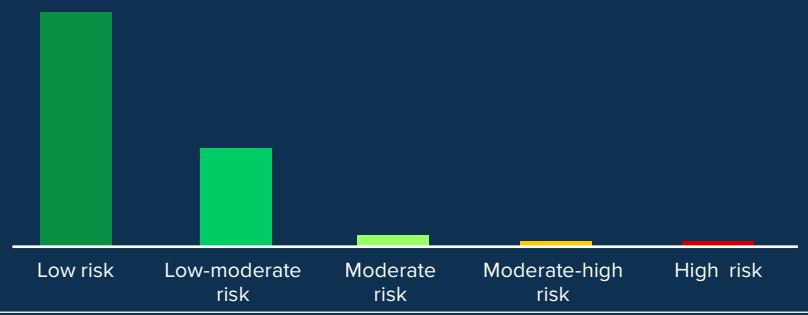
40%
Spend



Ramsay is supported by a large and complex global supply chain of over 18,000 direct suppliers. Our ongoing work has assessed and mapped over 40% of suppliers by share of spend, with products that are sourced from over 800 supplier facilities located in 44 countries.

During FY2024, we engaged and collaborated with our top medical suppliers to focus on mapping our supply chain. Whilst we predominantly focused on Tier 1, Ramsay's supply chain mapping includes Tier 2 and beyond where practicable as we continue looking deeper into our supply chain, particularly for the procurement categories we have identified as high risk. FairSupply has ranked 98% of our assessed spend as 'low/ moderate-low' risk.

Overall Supplier Risk Distribution Tier 1 & 2 – Ecovadis IQ



Informed by FairSupply, our EcoVadis CSR assessments and EcoVadis IQ risk mapping which includes the inherent country and industry risk, we can identify suppliers that pose a high risk in the supply chain. This information enables us to identify, mitigate and monitor risks.

Risk Analysis and Evaluation: Independent Sustainability Assessments

As part of our supplier mapping processes, we have used the EcoVadis CSR assessments and the EcoVadis IQ risk mapping platform to assess the inherent country and industry risk of our suppliers. EcoVadis CSR Assessments and the EcoVadis IQ platform continue to remain one of our key assessment and supply chain mapping tools, however, we recognise that some suppliers will have already completed social compliance audits from alternative third-party providers. As reported on previously, in FY2023 we adopted mutual recognition of suppliers that provided their SMETA Report Version 6.1. All non-conformances in the SMETA reports were reviewed and no indicators of modern slavery were present. We also know that not all suppliers will meet the necessary criteria to participate in an EcoVadis CSR Assessment based on spend amount, spend category or geographic location. For these suppliers we use the FairSupply Modern Slavery Questionnaire as an alternative procurement process. The FairSupply Modern Slavery Questionnaire includes questions that provide information and clarity on the suppliers' policies, governance, systems and processes to identify and address modern slavery risks. In FY2024, we achieved our milestone of having 60% of our suppliers (by share of spend) assessed by EcoVadis and we are on track to achieve our target of 80% of suppliers (by share of spend) assessed by FY2026.

Risk Treatment: Corrective Actions

Where a supplier's performance rating is below our minimum standards, we proactively engage with the supplier to use the EcoVadis corrective actions tools and agree the best course to improve their performance rating and reduce their risk profile. During FY2024, the EcoVadis Corrective Action Plan tool was utilised by some of our suppliers to complete 77 corrective actions with further 157 corrective actions still in progress through the annual EcoVadis CSR Assessment. These suppliers had a higher risk rating, and Ramsay was able to work with these suppliers to gain greater transparency and insight into our Tier 1 and where practicable Tier 2 suppliers' business practices by seeking to understand the reason for the higher risk rating, driving supplier accountability and delivering effective and verifiable outcomes that ultimately resulted in a revised CSR Assessment rating. Suppliers unwilling to take accountability and corrective actions are suspended. It should be noted that of the 8,393 potentially relevant Tier 2 suppliers that have completed an Ecovadis CSR assessment, 72% of those suppliers have a rating categorised as "good" or "advanced".

Contractual Controls

Ramsay Australia and Ramsay UK incorporate contractual provisions into our standard supply and services agreements to require suppliers to comply with modern slavery laws, notify Ramsay of any actual or suspected modern slavery in their supply chain or operations, and to allow Ramsay to audit a suppliers' premises and records. Elysium Healthcare utilises an e-Procurement platform (ARCUS by Trade Interchange) to run due diligence on its suppliers. Elysium suppliers must complete a series of questions and upload, annually where required, all statements and policies relating to Corporate Social Responsibility including Modern Slavery, Equal Opportunities and Human Rights, Environmental, Social and Sustainability issues throughout their supply chain. This process is underpinned by standard contractual terms and conditions with which all suppliers must comply.

Process Controls

Ramsay's Norwegian operations, operating under the name Capio Volvat, have implemented modules into their quality management system to assist with assessing supplier information for compliance with the UN conventions on Human Rights and Labour Rights. These modules assess the risk level of the supplier as low, medium or high and allow the team to decide if deeper investigation into any specific supplier is needed. In addition, Capio Volvat's website contains contact information for the quality department for any queries relating to Norwegian Supply Chain Transparency.

Linear continues its Manufacturer Audit Program, involving comprehensive manufacturer due diligence and continual monitoring, in line with Ramsay's Responsible Sourcing Framework. This involves management team interviews and site visits, along with routine inspections by Linear representatives, providing ongoing onsite exposure to worker conditions and the opportunity to ask specific questions about modern slavery risks.

How we assess and address those risks: Modern Slavery plans, policies, processes and training

Modern Slavery Improvement Plan: In FY2021, Ramsay undertook an external review of our processes for modern slavery risk reduction (Group and Australia) led by the internal assurance function. This has informed our Modern Slavery Improvement Plan, which outlines a three-year work plan to ensure accountability, monitoring and training is embedded across Ramsay and our regional operations from FY2021 to FY2024. The modern slavery road map snapshot on page 4 provides an overview of the progress against the key actions and progress against the recommendations. Ramsay is currently considering its continual improvement strategy for FY2025 and beyond.

Key Policies: Ramsay's key policies addressing our responsibility to minimise modern slavery risks in our supply chains are the Global Human Rights and Labour Policy and the Global Responsible Sourcing Policy. These policies are approved by the Board and reviewed every two years.

Global Human Rights and Labour Policy: The Policy sets out our commitment to operate in accordance with all key universal human and labour rights across each region in which we operate, and under the Policy Ramsay expressly prohibits forced labour and modern slavery, commits to the engagement of workers who have capacity, are of legal age to work and have the free will to consent to work and 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.

This was updated in FY2024 to reference the new Global Responsible Sourcing Policy and align the definition of discrimination to include sensitive medical conditions, immigrant status and union membership, amongst other amendments.

Under this Policy, all staff have a responsibility to report known or reasonably suspected modern slavery in any Ramsay businesses or those of our suppliers and provides grievance mechanisms. The Policy allows for breaches to be replaced through the Ramsay Whistleblower Hotline.

Monitoring and Compliance: Ramsay's due diligence processes to monitor compliance with this Policy include the due diligence risk assessment tools outlined on page 16. In consultation with key executives and human rights managers, Ramsay's regions monitor performance against this Policy in our annual regional workforce reporting.

Global Responsible Sourcing Policy: was developed in FY2023 and outlines Ramsay's commitment to responsible sourcing practices and sets expectations for our operations and all direct suppliers in relation to human rights, minimum standards with regard to human rights and responsible sourcing, including modern slavery. This Policy is a key element of Ramsay's Responsible Sourcing Framework, and has been adopted or referenced by Ramsay's regional teams across Australia, the UK and Europe.

Monitoring and Compliance: Ramsay monitors and promotes compliance with this Policy through the Ramsay Responsible Sourcing Program and to identify and manage risks in our global procurement activities, Ramsay may require its suppliers to complete a corporate social responsibility assessment conducted by an independent third-party such as EcoVadis or FairSupply as outlined on page 17. 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.

Procurement Roles and Responsibilities Matrix: was developed to support the Global Responsible Sourcing Policy. It contains cascading responsibilities throughout the Group. Responsibilities and accountabilities for human rights and modern slavery risk management are assigned at the executive, management and team levels, with clearly defined reporting lines (see page 13 for how this Matrix was implemented during a case study).

Code of Conduct: since its update in FY2023, the Code of Conduct for employees outlines the expectations on our people with regard to respecting human rights and reducing risks of modern slavery.

Other related global policies include:

- Global Diversity and Inclusion Policy
- Global Sustainability Policy
- Workplace Health and Safety Policy
- Anti-bribery and Corruption Policy
- Whistleblower Policy

Further information, and these policies, is available on the Sustainability Governance Section of Ramsay's website.

In addition, Ramsay UK has implemented a number of other relevant policies, including the Supply of Goods Policy, Sustainable Procurement Policy and the New Supplier Creation Policy. All grievance and remediation mechanisms are listed in Section 6.

Training:

In FY2024, Ramsay Australia delivered modern slavery training via the e-learning module to all newly employed procurement staff along with all supply managers and global graduates as part of an annual refresher program, and a legal and responsible sourcing briefing was presented to Global People Leaders to build capacity and consistency across global workforce strategies. Ramsay UK continues to require all relevant staff to undertake online modern slavery training every two years.

Ramsay regularly updates our training modules for both the Australian Reporting Entities and the UK Reporting Entities to align with the organisation's policies and relevant legislative updates. In FY2024, Ramsay's online e-learning training module was successfully completed by approximately 173 people in Australia and this module was shared with the regional teams across the UK and Europe for adapting to local regulatory requirements. Elysium has adopted and implemented the online modern slavery training module for its procurement staff. Ramsay will continue to make regular modern slavery training available in line with our mandatory learning framework.

New regulatory requirements – compliance and training:

As part of our FY2024 commitment to focus on training globally to cover introduction of new regional regulatory requirements, Ramsay's Norwegian operations, operating under the name Capio Volvat (**Capio**), have provided training to key members of its procurement team in relation to the Norwegian Supply Chain Transparency Act 2022 (the **NSCT Act**). Capio prepares an annual publication that includes a report describing the processes and working methods Capio has used to ensure compliance to the NSCT Act. This includes:

- A general description of Capio's organisation, operating area, guidelines and routines for dealing with actual and potential negative consequences for basic human rights and decent working conditions.
- Information about actual negative consequences and significant risk of negative consequences that the business has uncovered through its due diligence assessments.
- Information about measures that the business has taken or plans to take to reduce actual negative consequences or limited risk of negative consequences, and the result or expected results of these measures.

The report is signed by the board of Capio Volvat Medisinske Senter AS and published on the official website of Volvat accessible here.

Under the French 'Duty of Care' law, which imposes an affirmative obligation to prevent human rights violations and environmental abuse – within the company itself, its subsidiaries and its subcontractors and suppliers – Ramsay Santé is required to implement a Duty of Care Plan to prevent serious violations of human rights and fundamental freedoms, the health and safety of people, and the environment. The law imposes several obligations, including:

- Risk mapping.
- Procedures for regular assessment of subsidiaries, service providers and suppliers.
- Appropriate actions to mitigate risks of serious harm.
- A mechanism for alerting and collecting reports on the existence of occurrence of risks.
- A system for monitoring the measures implemented and evaluating their effectiveness.
- The obligation to publish the Vigilance Plan and report on its implementation, including in Ramsay Santé's Universal Registration Document.

In FY2024, A Duty of Care plan has been implemented following the same approach in Sweden, Norway and Denmark operations.

In addition to undertaking EcoVadis CSR Assessments of its suppliers, Ramsay Santé has updated its Responsible Procurement and Supplier Relations Policy, which includes a section on compliance with national and international laws, standards and regulations. Under this Policy, Ramsay Santé's suppliers undertake to act in accordance with the principles defined in the Global Responsible Sourcing Policy. Ramsay Sante has also implemented 'Know Your Supplier' assessment software for its largest suppliers along with a signallement.net whistleblowing system accessible to all internal, external and temporary employees.

Non-managed/non-controlled entities and joint ventures:

This statement does not apply to any non-managed/non-controlled entities or joint ventures in which Ramsay holds a financial interest. Despite this, Ramsay is working towards identifying over-arching risks relating to these partnerships and setting our expectations for alignment by our partners with our core standards, including ongoing respect for human rights. For those entities or joint ventures that are not wholly owned or controlled by Ramsay, we strongly encourage them to establish procedures that are consistent with the principles outlined in Ramsay policies.

Information on our joint ventures is contained in our latest Annual Report available on our website here.

4. Raising an issue through Ramsay's grievance mechanisms

Grievance mechanisms to support modern slavery initiatives

Ramsay offers multiple ways to report potential modern slavery compliance concerns. Outlined below are the policies and guides that articulate the modern slavery grievance and remediation mechanisms.

Whistleblower Policy

Ramsay provides employees, patients and suppliers multiple ways to report potential modern slavery compliance concerns, including anonymously through an external provider under the Group's Whistleblower Policy which applies to all current and former directors, officers, employees, associates and suppliers of the Group (which includes each of the Australian Reporting Entities and the UK Reporting Entities). The Whistleblower Policy is designed to encourage, support and protect people to report issues. The whistleblower reporting channels can be used to raise concerns regarding modern slavery breaches and breaches of Ramsay's Human Rights and Labour Policy.

For those Ramsay subsidiaries outside of Australia that are not wholly owned or Ramsay related companies that are not controlled by Ramsay (eg joint venture entities), Ramsay strongly encourages these entities to establish whistleblowing procedures that are consistent with the principles outlined in this policy.

In addition, Ramsay participated in the UN Global Compact Business and Human Rights Accelerator which enables businesses to move from commitment to action on human rights through to identification of key impacts, establishing ongoing due diligence processes and developing an actionable plan with appropriate grievance mechanisms.

Modern Slavery Response Plan Quick Guide

The Modern Slavery Response Plan Quick Guide (the **Guide**) is an easy reference guidance on how to respond to a potential modern slavery concern. The Guide assists Ramsay's Australian and UK Procurement, Purchasing, Supply and People teams and it outlines the practical steps to take, stakeholder engagement process and key considerations when faced with a potential modern slavery concern. The Guide has been shared with the Group's regional teams to adopt locally.

Issues raised through grievance mechanisms in FY2024

There were several modern slavery investigations undertaken in FY2024 that were triggered outside of the formal grievance mechanisms. Examples are referenced in section 3. There were no known incidents of modern slavery reported through our formal grievance mechanisms in FY2024.

5. Measuring effectiveness

Ramsay understands the importance of having effective actions to assess and address modern slavery risks. Several of our processes help track our performance across the Australian Reporting Entities and the UK Reporting Entities, including the outline of how we assess and address modern slavery risks and our effectiveness assessment against our KPIs.

Progress against our FY2024 KPIs is set out below:

FOCUS	INITIATIVE	KPIs TO MEASURE EFFECTIVENESS	STATUS
HUMAN RIGHTS COMMITMENT	Policies, procedures and templates	Update Global Human Rights and Labour Policy	**COMPLETED** Updated and approved by Ramsay Board.
MANAGEMENT, SYSTEMS AND CONTROLS	Capability to assist with focus on modern slavery	Continue strengthening processes, capacity building and consistency in approach at a regional level, through the Responsible Sourcing Program	**ONGOING** Ramsay Australia and Ramsay UK have reviewed the Labour and Human Rights Policy and Global Responsible Sourcing Policy (the Policies) and adopted or aligned their internal policies. Capio has incorporated the Policies into its Supplier Code of Conduct; and Ramsay Sante and Elysium are currently reviewing the Policies.
		Embed use of modern slavery due diligence toolbox and complementary monitoring processes across regions (as relevant).	**ONGOING** Ramsay has expanded and embedded modern slavery risk assessment and management into supplier lifecycle as part of the Global Responsible Sourcing Framework to govern the use of EcoVadis and support decision making and pathways.
	Mapping of operations and supply chain	Undertake provenance mapping of 40% of suppliers by share of spend, with a focus on high-risk categories	**COMPLETED** Building on mapping completed in FY2023 which focussed on top suppliers of medical devices, consumables and medical gloves. Ramsay exceeded its goal of mapping 40% of suppliers by spend.
	Risk assessment of high-risk suppliers and key business risk areas	Engage with suppliers to reduce risk exposure including undertaking onsite third party audits	**COMPLETED AND ONGOING** Commenced third party audits (e.g. SMETA 6.1) on some high risk suppliers.
		Undertake EcoVadis assessments of suppliers representing 60% of global spend by the end of FY2024 as part of ongoing KPI to increase supplier assessment target spend to 80% of global spend by end of FY2026	**COMPLETED** Across the group, 60% of suppliers by share of spend undertook sustainability assessments in FY2024.
	Training	Continue focus on training globally to cover introduction of new regional regulatory requirements	**ONGOING** All procurement employees in Ramsay Australia and Ramsay UK undertake online modern slavery training. In Australia, this online module is undertaken annually to stay abreast of regulatory requirements and best practice.
		Support smaller suppliers in building their capability	**ONGOING** Ramsay has developed an externally accessible modern slavery training module for supplier use that is expected to go live in FY2025.
GRIEVANCE AND REMEDIATION	Policies, procedures and templates	Continue refinement of due diligence and response plan for managing modern slavery risk	**ONGOING** In FY2024, the Procurement Roles and Responsibilities Matrix was implemented as outlined in the case study in Section 3.

6. Our FY2025 KPIs

In FY2025, our program of work includes

FOCUS	INITIATIVE	KPIs TO MEASURE EFFECTIVENESS
HUMAN RIGHTS COMMITMENT	Policies, procedures and templates	• Refresh our human rights and modern slavery assessment to ensure salient human rights and modern slavey risks are identified. • Ensure modern slavery due diligence is undertaken in M&A and new significant partnerships. • Review our Global Responsible Sourcing Policy and update if necessary.
MANAGEMENT, SYSTEMS AND CONTROLS	Capability to assist with focus on modern slavery	• Continue strengthening due diligence, processes, capacity building and consistency in approach at a regional level. • Continue to embed the use of the modern slavery due diligence toolbox and complementary monitoring processes across the regions (as relevant).
	Risk assessment of high-risk suppliers and key business risk areas	• Engage with high risk suppliers to reduce risk exposure including undertaking onsite third party audits. • Undertake sustainability supplier assessments for 70% of global spend by the end of FY2025. This is a part of an ongoing KPI to increase supplier assessment target spend to 80% of global spend by end of FY2026. • Work with suppliers to address corrective actions. • Expand the coverage of Tier 2 suppliers with an independent third party sustainability assessment. • Maintain mapping of 40% of suppliers by share of spend, with a focus on high-risk categories.
	Training	• Continue focus on training globally to cover introduction of new regional regulatory requirements. • Training and capability building with smaller suppliers.
GRIEVANCE AND REMEDIATION	Policies, procedures and templates	• Continue focus and refinement of response plan for managing modern slavery risk. • Test effectiveness of grievance and remediation processes.

7. Collaboration

Ramsay considers collaboration with businesses, industry bodies, governments and special interest groups a very important action. Ramsay representatives are active participants in the following groups:

Global Compact Network Australia

Ramsay is a member of UNGCNA's Modern Slavery Community of Practice. This group connects members and enables continued education on identifying, managing and communicating modern slavery risks.

UN Global Compact – Human Rights Due Diligence and Salient Rights

Building on from our attendance in FY2023 at the Business and Human Rights Accelerator which helps identify responsibilities in respecting human and labour rights, how to establish appropriate due diligence processes and how to report on human rights due diligence, Ramsay attended the UN Global Compact on Human Rights Due Diligence and Salient Rights.

EcoVadis APAC Round Table

Ramsay is represented at EcoVadis' APAC Round Table which is a forum related to sustainability and corporate social responsibility in the Asia Pacific region. At this quarterly forum, industry participants share experience and discuss best practice with regard to sustainability and CSR.

Knowledge sharing

Ramsay regularly shares our experience and improvement journey with other organisations both within the sector and in other industries either directly via briefings/roundtable discussions or at conferences.

8. Consultation and Approval

This statement has been prepared by Ramsay Health Care Limited in consultation with each Australian Reporting Entity and each UK Reporting Entity. The process of consultation involved:

- quarterly virtual meetings with Ramsay's Modern Slavery Working Group which includes representatives from Ramsay Australia (and the Australian Reporting Entities), Ramsay UK and Elysium Healthcare (and the UK Reporting Entities), Ramsay Santé, as well as Group Risk, our Group General Counsel and Company Secretary, Global Responsible Sourcing Manager and Group Sustainability Officer. The Working Group provided input and review via email and engaged functional leads where needed for targeted input, and also provided a platform for knowledge sharing with our European operations and teams;
- review by, and presentation to the Global Executive Leadership Team (**ExCo**), which is comprised of the functional leads with key responsibility for the day-to-day management of the Ramsay Group, with some ExCo members being appointed directors of our Australian and UK Reporting Entities as well as entities in our European operations, which worked to facilitate consultation and buy-in across the business and operations; and
- input via email from the various relevant internal stakeholder groups (including Procurement, Human Resources, Legal and Risk).

This statement is made in accordance with section 54(1) of the UK MSA and section 14 of the Australian MSA. It represents the UK Reporting Entities' and Australian Reporting Entities' statement on modern slavery for the financial year ended 30 June 2024.

This statement has been approved by the Board of Ramsay Health Care Limited on behalf of itself and each of the Australian Reporting Entities on 29 October 2024, the Board of Ramsay Health Care (UK) Limited on behalf of itself and each of the Ramsay UK Reporting Entities on 25 September 2024, and the Board of Elysium Healthcare Group Limited on behalf of itself and each of the Elysium Reporting Entities on 24 September 2024.

Ramsay Health Care Limited's approval was given on behalf of the Australian Reporting Entities as the 'higher entity' within the meaning of section 14(2)(d)(ii) of the Australian MSA.

Craig McNally
Managing Director & Group CEO
Ramsay Health Care Limited
14 November 2024

Carmel Monaghan
CEO & Director
Ramsay Health Care Australia Pty Limited
14 November 2024

Nick Costa
CEO & Director
Ramsay Health Care (UK) Limited
13 November 2024

Joy Chamberlain
CEO & Director
Elysium Healthcare Group Limited
12 November 2024

9. Appendix A

Australian MSA mandatory reporting criterion	UK MSA recommended reporting criterion	Reference in this statement
Identify the reporting entity.	Organisation's structure, its business and its supply chains.	Reporting entities on page 2 Sections 1, 2 and Appendix B
Describe the reporting entity's structure, operations and supply chains.	As above.	Section 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Section 3 –4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.	Section 3 –6
Describe how the reporting entity assesses the effectiveness of such actions.	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Section 5 – 6
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	n/a	Section 8 – 10
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	n/a	Sections 1 – 8

10. Appendix B

Below is a list of reporting entities of Ramsay Health Care Limited. The regions of the Ramsay Group ecosystem are outlined in Section 1.

All reporting entities below are covered by this joint statement.

I. Australian Reporting Entities are all Australian subsidiaries / joint ventures that have consolidated revenue of at least A$100 million (together with Ramsay Health Care Limited, being the Australian Reporting Entities for the purposes of the Australian MSA): Ramsay Health Care Investments Pty Limited ACN 078 881 473, Ramsay Health Care Australia Pty Limited ACN 003 184 889, North Shore Private Hospital Pty Limited ACN 059 183 596, Ramsay Centauri Pty Limited ACN 096 070 156, Alpha Healthcare Pty Limited ACN 000 727 882, Hospital Corporation Australia Pty Limited ACN 000 935 946, Alpha Westmead Private Hospital Pty Limited ACN 083 874 597, Benchmark Healthcare Holdings Pty Limited ACN 084 168 276 Benchmark Healthcare Pty Limited ACN 058 174 619, The Benchmark Hospital Group Pty Limited ACN 005 437 169, Benchmark – Surrey Pty Limited ACN 006 216 048, AH Holdings Health Care Pty Limited ACN 115 549 230, AHH Holdings Health Care Pty Limited ACN 115 549 169, Affinity Health Pty Limited ACN 106 722 347, Australian Medical Enterprises Pty Limited ACN 053 639 160, C&P Hospital Holdings Pty Limited ACN 106 722 570, Joondalup Hospital Pty Limited ACN 106 723 193, HCoA Hospital Holdings (Australia) Pty Limited ACN 079 097 528, HCoA Operations (Australia) Pty Limited ACN 083 035 661, Health Care Corporation Pty Limited ACN 000 392 101, Australian Hospital Care Pty Limited ACN 072 273 931, Australian Hospital Care (Pindara) Pty Limited ACN 005 288 095, Ramsay Pharmacy Retail Services Pty Ltd ACN 169 850 131, Australian Hospital Care (The Avenue) Pty Ltd ACN 072 759 338, Peninsula Hospital Unit Trust (Trustee: Benchmark – Peninsula Pty Limited), AME Trust (Trustee: AME Hospitals Pty Limited) and AME Property Trust (Trustee: AME Properties Pty Limited).

II. UK Reporting Entities are Ramsay Health Care (UK) Limited, Ramsay Health Care (UK) No. 1 Limited, Ramsay Health Care Holdings UK Limited, Ramsay Health Care Operations (UK) Limited, Westbourne Centre Birmingham Limited, Clifton Park Hospital Limited, Exeter Medical Limited, Independent British Healthcare (Doncaster) Limited (**Ramsay UK Reporting Entities**), and Elysium Healthcare Group Limited, Elysium Healthcare Holdings 1 Limited, Elysium Healthcare Holdings 2 Limited, Elysium Healthcare Holdings 3 Limited, Elysium Healthcare LC Limited, Elysium Healthcare Limited, Elysium Healthcare No.2 Limited, Elysium Healthcare No.3 Limited, Elysium Healthcare No.4 Limited, Elysium Neurological Services Limited, Elysium Neurological Services (Badby) Limited, Elysium Neurological Services (Adderley) Limited, Darlington Neurological Care Centre Limited, The Bridge Care Centre Limited, Elysium Healthcare (Farndon) Limited, Stanley House Limited, Lighthouse Healthcare Group Limited, Elysium Healthcare (Lighthouse) Limited, Elysium Healthcare (Acorn Care) Limited, Elysium Healthcare (Phoenix) Limited, Elysium Healthcare (Field House) Limited, Elysium Healthcare (Healthlinc) Limited Elysium Care Partnerships No.2 Limited, Elysium Healthcare No. 5 Limited, Elysium Healthcare (Ann House) Limited, Elysium Healthcare No. 6 Limited, Elysium Healthcare (Gregory House) Limited, CareProgress Limited, Elysium Care Partnerships Limited, London Care Partnership Community Care Services Limited, London Care Partnership (Supported Living) Limited, Celtic Resource Management Limited, Pendaren Court Limited, iMeUs Limited, Elysium Healthcare (Ultimate Care) Limited, Focus on Care Recruitment Limited, St George Healthcare Limited, Elysium Healthcare (St Mary's) Limited, Elysium Healthcare (All Saints) Limited, The Chimneys Healthcare Partnership Limited, The Chimneys Limited, Regis Healthcare Limited, Elysium Healthcare Property 1 Limited, Elysium Healthcare Property 2 Limited, Elysium Healthcare Property 3 Limited, Elysium Healthcare Property 4 Limited, Elysium Healthcare Property 5 Limited, Elysium Healthcare Property 6 Limited, Castle Road Homes Limited, Elysium Healthcare Property 7 Limited, Elysium Healthcare Property 8 Limited (**Elysium Reporting Entities**).