

Corporate Social Responsibility Policy (CSR)

1. SUMMARY

- 1.1 This policy applies to Ramsay, its employees, stakeholders, contractors and external business partners.
- 1.2 Ramsay expects its business to be conducted with the utmost regard to the standards of ethical business practice.
- 1.3 This Corporate Social Responsibility (CSR) has been approved by the Board of Directors and is reviewed periodically.
- 1.4 New suppliers and customers are requested to sign a declaration that they adhere to the principles laid out in this Policy in their own business dealings.
- 1.5 Our Corporate Social Responsibility (CSR) has been developed to ensure that our business is conducted in adherence with the highest ethical and legal principles and sets standards of professionalism and integrity for all employees and operations wherever we operate in the world.

In summary, our Corporate Social Responsibility (CSR) is the following:

- All employees have the responsibility to ensure, and the right to expect, that Ramsay's business is conducted with the highest ethical standards and legal principles;
- We will operate within the applicable law;
- We do not make political donations;
- We do not make or receive bribes;
- We avoid situations that might give rise to conflicts of interest;
- We aim to be a responsible Company within our local communities; and
- Employees are encouraged and supported to report, in confidence, any suspicions of wrong doing and a process is provided for that to be done.

2. INTRODUCTION

- 2.1 We do not intend to summarise here every instance in which we may be called upon to observe and practise good business ethics. This summary aims to remind us that if we follow and abide by basic ethical principles in our day-to-day business conduct, we will promote an environment of mutual trust and respect and continue to be known as an organisation for its integrity.

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- 2.2 We believe that trust promotes long-term business relationships which are built on honesty, openness and fairness. All aspects of our business must be based on the highest ethical standards. Key to our success is our employees. We are all part of the same team, so we must all take responsibility for our own actions and conduct. As managers are the leaders of our business, they should be familiar with how this Corporate Social Responsibility (CSR) applies not only to them, but to those who report to them and others that they may work with on Company business. Everyone in the organisation is required to adhere to this Corporate Social Responsibility (CSR). No one has the authority to waive any part of it and any attempt to do so may result in immediate disciplinary action, including termination of employment.
- 2.3 Being a company that trades globally, we have to follow applicable laws and regulations in all locations where we do business. Where a law might not explicitly address an ethical matter, we should use our good judgment to ensure that we not only adhere to the spirit of the law, but follow the principles of honesty, integrity, and common sense. Where a local law is stricter than our Corporate Social Responsibility (CSR), we should follow that law, but, where it is not, we will follow our Corporate Social Responsibility (CSR) to protect our reputation.

If you have any questions about how this Policy affects you or if you are aware of what you believe to be inappropriate, unethical, or unlawful conditions, please contact your manager or HR Manager. If you have any queries or concerns that you would rather not raise at a local level, you may contact the Company Secretary, the Managing Director or another member of the Board of Ramsay.

3. EMPLOYMENT, DISCRIMINATION AND HARASSMENT

- 3.1 Subject to any local practices and business operational requirements, we aim to offer unambiguous and fair terms of employment and to provide employees with appropriate opportunities to learn and develop their skills and for career progression. We will honour all applicable terms and conditions of employment. Where it is legal to do so, employees have the freedom to join a union, associate or bargain collectively without fear of discrimination against the exercise of such freedoms.
- 3.2 We will provide working conditions which promote good health, safety and environmental practices. Employees are encouraged to report immediately any health, safety or environmental concerns to their manager in order to safeguard the welfare of themselves and their colleagues.
- 3.3 Employees have a duty to act in a responsible manner in the workplace, having due regard for their colleagues' health, safety and general welfare.
- 3.4 We value the diverse backgrounds and nationalities of our employees and believe that diversity forms a strength to our business. All employees, regardless of their nationality, race, religious beliefs, marital status, sexual orientation, disability or age, should be treated fairly and honestly with both respect and dignity. Harassment or bullying of any kind, whether sexual, physical, mental, abusive or offensive, will not be tolerated. Where an employee is found to have acted in a discriminatory manner or bullied or harassed another person, they will be subject to disciplinary or grievance procedures. All employees are strongly encouraged to report any such incidents.

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- 3.5 Ramsay is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.
- 3.6 Ramsay is committed to paying fair wages and benefits and in accordance with minimum thresholds under national legislation. Working hours are operated in accordance with national legislation.
- 3.7 We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.
- 3.8 We will respect the human rights of all employees, including:
- Ensuring employees have the freedom to join a union, associate or bargain collectively without fear of discrimination against the exercise of such freedoms;
 - Not using forced labour or child labour; and
 - Respecting the rights of privacy of employees and protecting access and use of their personal information.

4. CONDUCT AND BEHAVIOUR STANDARDS

- 4.1 All employees are expected to contribute to the success of Ramsay by performing their jobs as required and conducting themselves in a professional manner consistent with the Company's business philosophy, values and standards of business conduct.
- 4.2 Employee honesty and integrity are essential to ethical business practices. Employees are required to prepare all reports, including expense reports and time sheets, accurately and truthfully.
- 4.3 Any conduct that is considered to be detrimental to the best interests of the Company may result in immediate disciplinary action, including possible termination of employment.
- 4.4 Misuse of the Company's property, including equipment, supplies, e-mail, internet, and IT and telephone systems can constitute unethical conduct. These tools and resources are intended to assist employees in conducting legitimate company business. Any other use of such property is discouraged.
- 4.5 Any of the following conduct by any employee, including the Directors must be reported immediately to the Company Secretary. If the Company Secretary is alleged to be involved in the conduct, then the report shall be made to the Managing Director.
- Violation of the Company's policies or procedures designed to ensure full, fair, accurate, timely and clear disclosure of company information as required by any applicable governmental law, rule or regulation.

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- Failure to disclose full, fair, accurate, clear and timely information to the appropriate individual(s) within the Company any and all information that relates to the Company's business, operations or financial condition that might need to be reported or disclosed any governmental law, rule or regulation.
- Misrepresentation, concealment, falsification or destruction of any documents or other information relating to the Company's business, operations or financial condition that might be required to be reported, disclosed, or used to prepare documents required to be reported or disclosed, to any applicable governmental law, rule or regulation.
- Any other activity or conduct that could cause an individual, the Company or any of its officers or directors to violate any applicable governmental law, rule or regulation relating to full, fair, accurate, timely and clear disclosure of information required to be disclosed to any third person.

5. COMPLIANCE WITH THE LAW

- 5.1 At all times we will stay within the laws, rules and regulations of the countries, states or other jurisdictions in which we operate. It is our policy to co-operate fully with relevant public authorities and regulatory bodies as appropriate.
- 5.2 The management team is responsible for ensuring that legislation is complied with and that requirements are appropriately communicated to the staff.
- 5.3 If there are any doubts or uncertainties about ethical questions or compliance with the law, an employee should contact his or her immediate manager or supervisor for guidance prior to taking any further action. The Company has an 'open door' policy to bring any such queries, if necessary, to a higher level of management.
- 5.4 The Company has an established system of controls in place to ensure that all declarations made to government bodies accurately represent local data.
- 5.5 In certain areas the relationship with affiliates might preclude companies from tendering for certain government contracts or making certain types of grant application. Extra care must be taken not to infringe these rules.

6. ETHICS IN THE MARKETPLACE

- 6.1 In promoting ourselves we shall be clear, honest and truthful, but at the same time respecting that we may need to maintain confidentiality of certain matters that are not yet public.

Customers, suppliers and others shall be treated with respect and competition with peer companies should be fair and ethical. The following lists some of the major issues regarding ethics in the marketplace:

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- There is nothing to be gained through misrepresentation, exaggerated claims or other forms of false advertising. Our products and services must stand on their own merits and quality.
- The Company will not tolerate collaboration with competitors to establish, set or maintain prices or to restrain trade unlawfully.
- Customers should be given factual information about prices, schedules, services and other terms of business. Suppliers, subcontractors, advisers or representatives also deserve to be treated fairly, honestly and in accordance with agreed terms.
- Customers, suppliers, advisers or representatives may, occasionally, divulge confidential information. It is our duty to respect these confidences in accordance with any applicable contractual and legal requirements.
- Complaints from customers, suppliers, subcontractors, advisers or representatives should be dealt with respect and promptly and fairly.
- Whilst we should strive to gain an understanding of our competitors so that we can perform in the marketplace, we will not tolerate any industrial espionage.
- We will not knowingly infringe the copyright, trademarks, patents or other properly registered intellectual property of others.
- Management should have due regard as to how entering into new contracts or arrangements with others will affect the reputation and ethics of Ramsay.

7. POLITICAL CONTRIBUTIONS

- 7.1 It is our policy that we will not make any political donations of any kind. We will not use any corporate funds, whether in cash, goods, services, equipment, or otherwise, to make contributions to political candidates, political parties or committees, or political entities.

8. BRIBES OR OTHER PAYMENT TO INFLUENCE BUSINESS TRANSACTIONS

- 8.1 The giving or receiving of any bribe or payment to influence others is not only illegal but is indefensible. The Company will not tolerate bribery and prohibits bribes of any kind, including facilitation payments and 'kickbacks', to be made to or accepted from customers, suppliers, politicians, government or foreign officials, advisers or representatives.

For further information please refer to the Anti-Bribery and Anti-Corruption Policy.

9. GIFTS AND ENTERTAINMENT

- 9.1 Corporate entertaining and gifts can be acceptable when there is a clear business purpose, and they are neither excessive nor offensive. Extra care must be taken in accepting or giving gifts and

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entertainment. These are not permitted if it would create a real or perceived conflict of interest. Neither the receipt nor the giving of excessive entertainment, substantial gifts or favours is acceptable.

Provided the gifts and entertainment are:

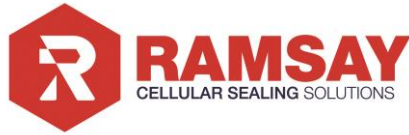
- Consistent with Ramsay business practices;
- Do not violate any applicable laws; and
- The disclosure of which would not cause us any embarrassment they may be given or accepted.

For further information please refer to the Anti-Bribery and Anti-Corruption Policy.

10. CONFLICTS OF INTEREST

10.1 All conflicts of interest, whether actual or potential, should be avoided. Actions taken by employees should be objective and based on what is best for the Company. Examples of possible conflicts could be (the list is not exhaustive):

- Accepting a personal payment from a supplier, this could be seen to be influencing your business decision making.
- Working or providing consulting services, either directly or indirectly, for a competitor or engaging in an activity that might be competitive with the business interests of Ramsay (including working for a supplier).
- Using Ramsay customer lists or contacts for marketing an employee's own or third-party's goods or services, even if such goods or services do not compete with Ramsay.
- Dealing with a business that you, or a close member of your family, may have dealings with. You should disclose any such interest to the Company Secretary. You need not disclose shareholdings in companies, provided they are not significant and do not create a conflict of interest.
- Accepting or carrying out a second job, consultancy, etc, without first seeking permission from the Company Secretary (and notification to your manager), to ensure this will not conflict with other interests of Ramsay.
- Undertaking any private work which might generate intellectual property in the same industry as the Company, as this might be difficult to distinguish this from the work of Ramsay.
- Dealing in shares or other securities in Ramsay, when you are in possession of information, which is not public.
- Accepting an appointment to the board of any other company, without first obtaining prior approval from the Managing Director of Ramsay.
- Mixing of personal and business relationships in certain cases may give rise to a conflict of interest. For example, having a friendship with the account manager at a major supplier to the Company.



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If you are unsure whether you need to disclose such a relationship, you should speak, in confidence, to the HR Manager for further guidance.

If you believe you have an actual or potential conflict of interest, please raise your concerns immediately with your manager. You should not take part in, or seek to influence, a business decision which might result in a conflict of interest arising.

11. PROPRIETARY INFORMATION

- 11.1 Trade secrets, technology, knowhow, ideas, customer lists, unpublished financial data, marketing and pricing strategies, and business plans are some of Ramsay's most valuable business assets. Every employee has a duty to ensure that such information remains confidential in order to protect their proprietary nature. Disclosure of such information must not be made without proper authorisation. Our trade secrets are our intellectual property. They are what make our business special and sets us apart from the competition. We all have an obligation to protect our intellectual property. You may, in the course of your employment, be given or come into contact with information that is of a commercially sensitive nature or is provided to you so that you may gain a better understanding of our business, for example, at staff meetings. Depending on the type of information disclosed, you might not be permitted to tell your colleagues of this information or divulge it to anyone else outside the organisation. Breaching of this obligation may result in disciplinary action. If in doubt, you should seek clarification from your manager, the person who provided you with the information or the Managing Director.

You should never ever attempt to obtain or use another company's proprietary information for our benefit or otherwise in violation of law or any applicable agreement.

12. INFORMATION SECURITY

- 12.1 It is the utmost importance to protect Ramsay's information as it is vital to our continuing success. Inadequate protection of our information, or misusing it, could give the competition an unfair advantage, as well as diminish the quality of our products and services, increase the risk of litigation or otherwise harm the Company. All employees have a responsibility to our customers, shareholders, and each other to ensure that we protect our information from unauthorised access, use, modification, destruction, theft, or disclosure and must treat such information in accordance with the Company's data protection policy.

13. FAIR COMPETITION

- 13.1 Competition laws and regulations in the United Kingdom and elsewhere around the world are intended to promote fair competition in the marketplace and to limit activities that might restrain trade. Employees must never discuss or enter into any arrangement or understanding with a competitor regarding the pricing of products, favouring or withholding business from particular

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customers or suppliers, or any other activity that may be seen to have anti-trust or anti-competition implications. Any questions regarding trade or competition laws or how they might affect the way we conduct business should be referred to the Company Secretary.

14. COMMUNICATION WITH THE FINANCIAL COMMUNITY AND/OR MEDIA

- 14.1 The Company's reputation is the utmost importance. An innocent or unguarded remark could have a catastrophic effect on the Company. If you are approached by the media or the financial community and have not been authorised to provide information on the Company's behalf, you should refer the enquiry to the Managing Director.

15. WHISTLE BLOWING

- 15.1 If you suspect wrong doing in the workplace (whether or not the suspected act has actually occurred), you should immediately report the matter to your line manager or HRManager, or, if you prefer not to report it to them or feel they are unable to address your concerns or the matter is of a more serious nature, to the Managing Director.
- 15.2 Any reports made will be held in the strictest of confidence, although we may need to divulge your identity to the person investigating your concern. If we do so, we will discuss this with you first.
- 15.3 The Company does not view an employee who has 'blown the whistle' as a troublemaker, but rather as a witness to an event. You will not suffer discrimination or persecution for raising concerns which are in the public interest, even if the concern is not proved and, if possible, you will be informed of the outcome. Discrimination and persecution of employees who raise genuine concerns will not be tolerated under any circumstances and support will be provided to whistle blowers as appropriate. However, if we conclude that an employee had made false allegations maliciously, with a view to personal gain, or the making of any allegations had not been in the public interest, that employee will be subject to the disciplinary process.

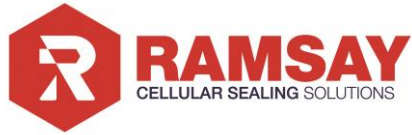
For further information please refer to the Ethics (Whistle blowing) Policy.

16. DISCIPLINARY ACTION

- 16.1 Any employee who violates our Corporate Social Responsibility (CSR) will be subject to the disciplinary process.

17. MONITORING AND REVIEW

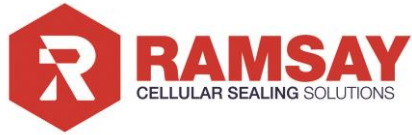
- 17.1 The Company Secretary will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness particularly in the light of changes to global business activity and scale of operation.



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- 17.2 All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrong doing.
- 17.3 Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.
- 17.4 This policy does not form part of the employee's contract of employment.

Version	Date	Details	Author	Approved
V.1	July'23	Creation of Policy	Lisa Botfield	MD & Management Team



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We would kindly ask that you please sign the below to confirm receipt of this information, which will be retained on file.

If signing on behalf of a business or contractor, please attach a copy of your Company CSR Policy for our records.

I have been issued with the document "Corporate Social Responsibility Policy (CSR)" v.1 July 2023, and can confirm I have read, understood and accepts its contents.	
Full Name	
Signature	
Business Name (if applicable)	
Position in Business (if applicable)	
Date	