

# **CORPORATE POLICY**

## **CODE OF BUSINESS CONDUCT AND ETHICS**

Responsible departments: Group Services: Risk Management and Group Corporate Governance and Legal

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## MEDICLINIC INTERNATIONAL'S VALUES

Our commitment to high-quality, cost-effective, integrated healthcare services not only refers to our commitment to excellence to our clients, but to all our stakeholders. We are committed to conducting our business with honesty and integrity. Our values represent our beliefs and should be reflected in our actions at all times.

Mediclinic employees live the organisational values of being:

### CLIENT CENTRED

In our behaviour, we commit to:

- determining client needs;
- involving clients in decisions that affect them;
- actively managing client experiences; and
- delivering on promises.

### TRUSTING AND RESPECTFUL

In our behaviour, we commit to:

- treating others with courtesy and kindness;
- embracing diversity;
- providing and welcoming feedback; and
- respecting privacy.

### PATIENT SAFETY FOCUSED

In our behaviour, we commit to:

- prioritising patient safety;
- identifying and managing patient safety risks;
- involving patients in improving their safety; and
- accurately recording and securely storing patient information.

### PERFORMANCE DRIVEN

In our behaviour, we commit to:

- setting objectives and measuring progress;
- honouring decisions;
- addressing challenges, complaints and inefficiencies; and
- being accountable and decisive.

### TEAM ORIENTATED

In our behaviour, we commit to:

- supporting colleagues;
- collaborating to enable problem-solving and decision-making;
- encouraging team spirit; and
- creating opportunities for all colleagues to express opinions and share ideas.

## A MESSAGE FROM THE GROUP CEO

Dear colleagues

As a healthcare provider, we commit to doing no harm. Yet, as with any other business, our operations have environmental, social and governance ('ESG') impacts, affecting people and the planet. Our efforts in responsibly managing and minimising these impacts are interwoven with how we do business. As such, ethical behaviour has always been a fundamental guiding principle in our business and we continuously focus on ensuring an organisational culture which creates stakeholder value and supports fairness, transparency, honesty, accountability and responsibility. This commitment supports our vision to be the partner of choice that people trust for all their healthcare needs.

In addition to various policies or guidelines which are already in place within the Group, this Code provides a guideline to help you understand and live the Mediclinic values.

Our business has grown across regional borders and today we are an international company committed to being a responsible corporate citizen in every country and community in which we do business.

I am personally committed to these ethical standards and expect every employee within the Group to understand the behaviour expected from them and to assist in ensuring that our business is conducted accordingly.

It is not practical to include in one document every policy that may be relevant for every employee in all countries in which we operate. There may thus be many more policies and guidelines that must be adhered to and that will be enforced throughout the Group. If you are uncertain in any instance of what to do, or you have any ethical concerns, please raise them with your direct manager, or the specified ethics contact person within your division (as listed in **Annexure A**), or the Group General Manager: Risk Services.

Kind regards



**Dr Ronnie van der Merwe**  
Group Chief Executive Officer

## 1. DEFINITIONS

<b>‘the Board(s)’</b>	means the board(s) of directors of the company indicated in the context;
<b>‘the Code’</b>	means the Code of Business Conduct and Ethics embodied in this document;
<b>‘division(s)’</b>	means the divisions of Mediclinic International in (i) Southern Africa (South Africa and Namibia), (ii) Switzerland and (iii) the Middle East;
<b>‘Ethics Contact Person(s)’</b>	means the designated employee of Mediclinic International and each of the divisions responsible to receive and/or deal with any ethical concerns or reports of actual or potential incidents of non-compliance with the Code (as listed in Annexure A);
<b>‘the Group’ or ‘Mediclinic’ or ‘Mediclinic International’</b>	means Mediclinic International plc and its divisions, subsidiary companies and associated entities;
<b>‘Group General Manager: Risk Services’</b>	means the Group General Manager: Risk Services of Mediclinic International;

## 2. PURPOSE AND SCOPE

The purpose of the Code is to provide a framework for directors and employees of the standards of business conduct and ethics that are required of all divisions, directors and employees (which includes agency staff and contract workers) within Mediclinic, in order to promote and enforce ethical business practices and standards throughout the Group.

Although the Code cannot provide specific answers to every conceivable situation in the workplace, it should provide basic guidance and is complementary to our values and other policies implemented within the Group.

## 3. YOUR RESPONSIBILITY TO COMPLY WITH THE CODE

Each employee and director within the Group is expected to read, understand and comply with all provisions of the Code relevant to their area of responsibility.

Mediclinic will not tolerate non-compliance with any matter dealt with in the Code. It is required to take formal developmental, corrective or disciplinary action as may be appropriate, giving regard to the seriousness of the contravention. Failure to take action as is required, is seen as unethical and also regarded as a contravention of the Code.

Any uncertainty about a matter not clearly dealt with in the Code, should be taken up with your manager. If the matter can still not be resolved, it should be referred to your division’s Ethics Contact Person (as listed in **Annexure A**) or the Group General Manager: Risk Services.

All directors and employees who have any concerns of an actual or possible contravention of the Code or any other wrongdoing within the Group, should report such matter immediately in the manner set out in paragraph 4.3 below.

## 4. IMPLEMENTATION AND MANAGEMENT OF THE CODE

### 4.1 **Governance**

The governance of our business conduct and ethics programme includes the following elements:

- acceptance and implementation of the principles embodied in the Code;
- communication of the Code throughout the Group and externally to our stakeholders (where relevant);
- training of new directors and employees during orientation;
- monitoring compliance and taking appropriate corrective actions in cases of non-compliance; and
- public reporting of material non-compliance.

The Executive Committee of each division is responsible to ensure that:

- the Code is implemented within their respective division and communicated to employees and other relevant stakeholders;
- new employees receive training on the content of the Code;
- compliance with the Code is monitored and the necessary corrective actions are taken in cases of non-compliance; and
- all instances of non-compliance with the Code, highlighting any instances of material non-compliance with the Code, as well as the corrective action taken by management are reported to the Group General Manager: Risk Services, as and when requested, but at least annually and in the format as may be prescribed from time to time.

### 4.2 **Responsibility**

The Board of Mediclinic International is ultimately responsible for the monitoring of compliance with the Code. To this end, the Mediclinic International Board has delegated the monitoring of compliance with the Code to the Mediclinic International Environmental, Social and Governance ('ESG') Committee, with material non-compliance to be reported to the Mediclinic International Board.

However, due to the international structure of the Group, the Executive Committees of the divisions are responsible for the management and monitoring of compliance with the Code within their respective division.

The divisions must give feedback, at least annually, to the ESG Committee of Mediclinic International of any material non-compliance with the Code.

The Code shall be reviewed as and when deemed necessary, but at least annually by the Mediclinic International Board, upon recommendation by the ESG Committee.

### 4.3 **Anonymous and confidential reporting of non-compliance**

Any person who becomes aware of any existing or potential violation of the Code is required to promptly report such incident to the relevant Ethics Contact Person or Ethics Line (where available), the contact details of which are listed in **Annexure A**.

All reports will be dealt with in a non-discriminatory and confidential manner. Anyone contacting an Ethics Contact Person or making use of the Ethics Line has the option to remain anonymous. Any form of retaliation against an employee or other person making a report in good faith shall not be tolerated. Making a report in good faith means that the person making the report believes that the information is complete, true and accurate. Unjust retaliation by a line manager or other employee may lead to disciplinary action, including termination of services. Any employee who believes that he/she has experienced retaliation should report the matter to the relevant Ethics Contact Person.

All reports received on the ethics line will be assessed and referred for proportionate and independent investigation to ensure that the necessary and appropriate corrective actions are taken.

## 5. APPLICATION OF THE CODE

Honesty and integrity are expected from each director and employee at all times. Mediclinic does not tolerate any form of dishonesty, bribery, corruption or misrepresentation. In support hereof, the Group manages the risks related thereto and is committed to the following:

### 5.1 Maintaining good corporate governance

The Group is committed to maintaining strict principles of good corporate governance and the highest standards of integrity and ethics.

To this end the Group has been a signatory of the World Bank's Ethical Principles in Healthcare ('EpiHC') initiative since September 2020. The initiative is underpinned by 10 principles. These principles, as set out below, are used by the Group to support ethical practices and decision-making:

- Respecting Laws and Regulations
- Making a positive contribution to society
- Promoting high quality standards
- Conducting business matters responsibly
- Respecting the environment
- Upholding patients' rights
- Safeguarding information and using data responsibly
- Preventing discrimination, harassment, and bullying
- Protecting and empowering staff
- Supporting ethical practices and preventing harm

The Board of Mediclinic International is accountable to the Group's shareholders for ensuring sound management of the Group and is committed to ensuring a high standard of discipline, independence, ethics, equity, social responsibility, accountability, cooperation and transparency. This supports the effective delivery of the Group's strategy to build and maintain a sustainable business.

Under section 172 of the UK Companies Act 2006, the directors of Mediclinic International are required to act in the way they consider, in good faith, will be most likely to promote the success of the Group for the benefit of its stakeholders as a whole. In carrying out this duty, directors must have regard (among other matters) to the following factors:

- the likely consequences of any decision in the long term;
- the interests of the companies' employees;
- the need to foster the company's business relationships with suppliers, customers and others;
- the impact of the company's operations on the community and the environment;



- the desirability of the company maintaining a reputation for high standards of business conduct; and
- the need to act fairly between shareholders of the company.

An extensive Corporate Governance Manual has been compiled and implemented throughout the Group to assist and provide guidance to the executive committees and the company secretaries of the Group to ensure continued focus and compliance with the Group's strict principles of good corporate governance.

## 5.2 **Respecting our stakeholders**

We manage our business responsibly, respecting and taking into consideration the needs of all our stakeholders, which include our clients, communities, employees, alumni and potential applicants, financial institutions, governments and authorities, healthcare insurers, industry associations, industry partners, investors, the media, medical practitioners, professional societies and suppliers. We maintain an honest, transparent and ethical relationship with all our stakeholders and treat them with dignity and respect. We are committed to engage effectively with our stakeholders. Further information is available in our annual Sustainable Development Report at [annualreport.mediclinic.com](http://annualreport.mediclinic.com), where there is detail on all our stakeholders, our methods of engagement and the effectiveness thereof.

### Clients

- We are focused on continuously maintaining and improving the quality of care and safety of our clients.
- We commit to care within our care settings.
- We are focussed on our clients' needs and dedicated to their wellbeing.
- We continually engage with our clients to measure, maintain and improve their satisfaction.
- We respect our clients' right to privacy and confidentiality.
- We respect our clients' rights, including but not limited to dignity, non-discrimination, full information on health status and treatment, a second opinion, access to medical records, self-determination and participation, refusal of treatment and the right to complain.
- We are committed to ethical billing practices (i.e. not conducting unnecessary treatments, requiring bills to be accurate, truthful and properly coded, and billing only for services actually provided).

### Communities

- We commit to growing our established relations with the communities within which we operate and follow an approach of mutual understanding, trust and reliability.
- We conduct our business in a socially responsible manner focussing on our triple bottom line (i.e. ESG impacts).

### Employees, alumni and potential applicants

- We maintain good employee relations.
- We recognise and uphold the rights of employees to freedom of association and collective bargaining, as provided for in relevant labour laws.
- We do not engage in child, forced and/or compulsory labour.
- We treat our employees fairly, with respect to their human rights and dignity.
- We uphold fair remuneration practices and remunerate our employees competitively.
- We provide our employees with internal opportunities and a safe and healthy working environment.
- We value diversity and provide equal opportunities for all in the workplace and do not tolerate any form of unfair discrimination – such as access to employment, career

development, training or working conditions – based on gender, age, religion, nationality, race/ethnic origin, language, health status, family status, disability, sexual orientation or other form of differentiation. We shall achieve diversity and inclusion and set objectives relating to equal opportunities (specifically referring to transformation in the Southern African operations and Emiratisation in the United Arab Emirates) to ensure a workforce representative of the economically active population.

- We do not indulge any form of favouritism, which includes nepotism and cronyism.
- We do not tolerate, permit and condone any form of harassment.
- We communicate regularly and openly with our employees.
- We invest in the continuous training and development of our employees.

#### Financial institutions

- Our communication with financial institutions is pro-active and transparent, providing timely and accurate financial reporting.

#### Government and authorities

- We respect the authority of the governments in the countries in which we conduct our business.

#### Healthcare insurers

- Our negotiations with funders of healthcare are handled ethically and with integrity to ensure a fair tariff to our clients as well as maintaining a sustainable business.

#### Industry associations

- We engage with key stakeholders via an industry body to leverage from these associations, to ensure its active participation in national conversations.

#### Industry partners

- We form ethical partnerships to ensure we expand across the continuum of care, improving our integrated healthcare proposition for our clients and delivering value.

#### Investors

- We commit to provide a responsible investment proposition for investors and to communicate regularly and openly with our investors based on the principles of balanced reporting, clarity and transparency.

#### Media

- We commit to communicate openly, proactively and transparently to build and sustain a professional Company reputation.

#### Medical practitioners

- We ensure that associated and/or employed medical practitioners are appropriately qualified, credentialed, competent and practising within their official scope of practice.
- We aim to support the delivery of ongoing quality care through peer group benchmarking where feasible.
- We respect our medical practitioners' freedom of association and clinical independence.
- We maintain good working relationships with our medical practitioners by supporting and assisting them where possible.
- We maintain quality facilities and equipment to provide an optimal working environment to our medical practitioners.
- We do not accept or give inappropriate gifts or invitations from or to our medical practitioners (as dealt with in more detail in paragraph 5.5 below).

- We do not permit any payment of referral fees or other payment to employed or independent medical practitioners to reward the referral of clients to the Group's facilities or services or other facilities (e.g. laboratory, radiology) under any circumstances.
- We communicate regularly and openly with our medical practitioners.
- We measure our medical practitioners' satisfaction regularly.

#### Professional societies

- We commit to engage divisionally with professional societies and form part of industry wide engagements as a Group.

#### Suppliers

- We make use of strict and fair selection criteria in our choice of suppliers.
- We commit to responsibly obtain products and services of the highest quality.
- We do not accept or give any inappropriate gifts or invitations from or to our suppliers or any other third party (as dealt with in more detail in paragraph 5.5 below).
- We evaluate suppliers and other business advisors and associates (as far as practical and reasonably possible) on their human rights and other social and environmental practices prior to entering into investment or procurement agreements.
- As part of our responsibility to respect human rights, we shall avoid and not contribute to any direct or indirect adverse human rights impact that is directly linked to the Group's operations or services by our suppliers or other business relations.

### 5.3 **Maintaining a safe and pleasant working environment**

#### Health and safety

Special attention is given to health and safety aspects in the workplace to ensure a healthy workforce; a safe environment for our employees, clients and visitors; and a working environment in which to sustain and enhance our operations. Any accidents, injuries and unsafe equipment, practices or conditions shall be reported to a manager or other designated person responsible for a healthy and safe work environment.

Specific preventative measures include:

- Adherence to general healthcare environment safety procedures, and appropriate management of medical waste, sharps injuries and other hazardous exposure.
- Ensuring that Standardised Infection & Prevention Control measures are in place which include standardised policies and surveillance.
- In the event of Methicillin-resistant Staphylococcus Aureus outbreaks, at-risk employees are screened and decolonised.
- On acceptance of employment, healthcare services employees are screened for pulmonary tuberculosis and screened and vaccinated against Hepatitis B if indicated.
- In line with UAE visa requirements, Middle East employees also undergo mandatory HIV and Hepatitis C screening.
- Relevant vaccinations are offered as appropriate in different settings.
- Flu vaccines are offered annually to employees.
- Other vaccines, e.g. diphtheria, measles, COVID-19 are offered when there is an indication.
- Radiation exposure and compliance with prevailing acceptable exposure limits are monitored centrally where applicable.

#### 5.4 **Acting within authority**

Honesty and integrity are expected from each director and employee at all times. Every director and employee shall ensure that he or she always acts within his/her authority on behalf of any of the divisions or on behalf of the Group. Only employees authorised to do so may enter into contracts, sign documents, or use a letterhead on behalf of any respective company within the Group or represent or exercise authority on its behalf.

#### 5.5 **Avoiding actual or perceived conflict of interests**

Every employee must avoid any conflict of interests, real or perceived, between their own interests and the interests of the Group. A director or an employee may not place himself/herself in a position in which he/she has or can have a personal interest conflicting with his/her duty to act in the interests of the Group, unless this has been duly authorised. This duty also includes the duty:

- to disclose any interest in a contract with the Group;
- not to use opportunities known to them due to their position within Group for personal gain;
- not to misappropriate corporate opportunities; and
- not to compete with the Group.

Conflicts of interests are situations where directors or employees may make decisions based on personal gain rather than the best interest of the Group ('actual conflict'). In certain instances, a director or employee may make a decision without allowing their personal interests to influence their decision-making, but could be perceived by the Group's stakeholders as having a conflict of interests and may jeopardise their trust in the Group ('perceived conflict').

Actual and perceived conflicts of interests should be avoided and all directors and employees must promptly declare the nature and extent of all contracts, business interests, directorships, affiliations and/or relationships that could possibly give rise to a conflict of interests, actual or perceived, with the Group in accordance with the prescribed policies and procedures of the Group and/or the divisions to their Ethics Contact Person (as listed in **Annexure A**). Directors of Mediclinic International should contact the Company Secretary.

#### **Outside business interests/involvement/employment**

The Group's employees shall not:

- hold an interest or operate in any capacity, serve as a director or work as an employee or consultant for any competitor or any current or potential business partner;
- use the resources of the Group to run private businesses or conduct work for another organisation;
- confer any benefit, monetary or otherwise, on a business partner or competitor of the Group in which such employee or a family member, in his/her personal capacity, hold a beneficial interest;
- take benefit, personally or through their family or personal associates, directly or indirectly, from opportunities that may arise through the use of the Group's intellectual property, information or position; or
- obtain services or products from a supplier or business entity that deals with the Group at a value less than such services or products are delivered or sold in the ordinary course of business.

Any director within the Group shall:

- have no interest in any contract that is of significance in relation to the Group's business;

- treat all non-public information that he/she might have acquired in the course of performing his/her duties as confidential and will not use any such information for personal advantage or for the advantage of a third person;
- immediately disclose all relevant information and business interests should any situation arise that may result in a potential conflict of interest with the Group; and
- upon request, declare all other directorships and business interests.

#### Offering of gifts

Our business relationships are based on honesty and integrity. No director or employee of the Group is to make, offer, promise or authorise an unlawful or improper gift (which includes gifts, invitations, entertainment, travel or payment of any kind) to the Group's suppliers, supporting doctors or other third parties.

No spending on donations, lobbying, membership of, or support to political parties or to non-governmental or other organisations that engage in political activities shall be made by the Group, unless it has been pre-approved by the Executive Committee of the relevant division and reported to the Group Executive Committee. This prohibition relates to financial support and does not preclude the Group to engage and/or lobby directly or through an industry association in relation to policy, laws and regulations relevant to the Group's business.

Any gift shall be offered in accordance with the prescribed policies and procedures of the Group and/or the division.

#### Acceptance of gifts

The acceptance of improper gifts (which includes gifts, invitations, entertainment, travel or payment of any kind) may lead to improper business practices and is governed by a strict approval procedure in terms of the Group's Anti-bribery Policy. The policy allows for the acceptance of gifts of a nominal value, subject to approval (refer to the Group policy) by the designated managers and prohibits, *inter alia*, the following subject to certain exclusions contained in the policy:

- any form of cash payments by a supplier or third party to an employee of the Group;
- donations by a supplier or third party to an internal Group or departmental function; and
- advertising of suppliers or third parties at an event presented by any entity within the Group.

Any gift which might compromise or appear to compromise our directors' or employees' business judgement shall be refused.

#### Personal use of company information and business opportunities

Directors and employees (and/or any member of their immediate family) shall not use his/her position within the Group for any personal gain or for the benefit of any third party, such as:

- personal exploitation of information to which an employee has access by reason of his/her employment with the Group;
- dealing in Mediclinic International shares with insider information (as governed by the Group's Code of Conduct in respect of Insider Trading); and
- personal use of any business opportunity in which the Group is or may be interested.

#### Kickbacks & Remuneration

- Perverse incentives are prohibited. Corporate Office and hospital management ensure strict compliance with established rules, including the Group Anti-bribery Policy.

### Ethical Behaviour and Billing, and Falsification of Diagnosis and Documentation

- Operational and clinical management at each hospital is responsible for ensuring the ethical conduct of doctors and employees. Human resources policies, and the code of conduct of professional bodies, address issues of misconduct and criminal behaviour. Regular documentation and clinical coding audits ensure compliance with legal, ethical and operational requirements. Across all divisions, fraudulent behaviour of doctors and employees can be reported via the independent ethics lines.

### 5.6 **Adherence to laws, rules, codes, standards and Group policies**

The Group shall act in accordance with all applicable laws of the jurisdictions in which it conducts business.

The Boards of Mediclinic International and the Executive Committees of the divisions shall ensure that an appropriate management system is in place to monitor compliance with applicable laws, rules, codes standards and policies within the Group and consider all instances of material non-compliance.

### 5.7 **Fair competition**

The Group shall not engage in any anti-competitive behaviour and supports and adheres to the relevant competition and antitrust laws applicable in the various countries in which it operates. These laws are complex and the Group has therefore issued guidelines to its employees on competition law compliance within their relevant jurisdiction.

Each manager is personally responsible to know, understand and adhere to the applicable guideline. Where there is even the slightest doubt about an action, managers must immediately consult with their respective legal departments.

### 5.8 **Respecting human rights**

The Group is committed to conducting its business in a manner that respects and promotes the human rights and dignity of all those within its sphere of influence and avoids complicity in human rights abuses throughout its operations and relationships, as confirmed in its engagement with stakeholders and annual Modern Slavery and Human Trafficking statement, available on the Company website at [www.mediclinic.com](http://www.mediclinic.com).

### 5.9 **Diversity and empowerment initiatives**

The Group shall set and manage goals regarding local and international diversity and empowerment initiatives.

### 5.10 **Protection of assets**

The Group's employees are expected to, in respect of the management of:

#### Funds

- exercise integrity, prudence and good judgement in incurring and approving business expenses and ensure that business expenses are reasonable and incurred wholly, exclusively and necessarily in the best interest of the Group;
- obtain authorisation for all transactions and expenses occurred;
- not conceal any funds or any transactions from either management and/or the auditors; and
- not enter into any transaction for the purposes of unlawfully evading any tax, duty or other levy imposed by the government in those jurisdictions the Group conducts business either for the benefit of the Group or third parties.

### Assets

- use the Group's assets prudently with due care and diligence; and
- take appropriate steps to protect the Group's assets against theft, loss, damage and waste.

### Intellectual property

- take precautions to avoid inadvertent disclosure of such information;
- enter into confidentiality agreements with any third parties to whom the Group discloses such information;
- not release information to third parties without proper authorisation;
- use only properly licensed computer software; and
- be honest in obtaining, interpreting, using and disclosing information.

## 5.11 **External communication**

The Group's commitment to honesty and integrity includes our commitment to being truthful in all communications.

### Accurate and fair disclosure

Our communications with the public and our shareholders are based on the principles of balanced reporting, clarity and transparency.

Mediclinic's annual reports are prepared in accordance with the International Financial Reporting Standards, the listing rules issued by the Financial Conduct Authority, the listings requirements of the JSE, the 2018 Corporate Governance Code and the United Kingdom Companies Act 2006 (including the Companies, Partnerships and Group [Accounts and Non-Financial Reporting] Regulations 2016 aimed at improving the transparency of companies regarding non-financial and diversity information), where relevant.

The Company's reporting on sustainable development is done in accordance with the Global Reporting Initiative Sustainability Reporting Standards 2016, the Sustainability Accounting Standards Board's standards for health care delivery (where applicable) and the non-financial reporting regulations referred to above.

### Media relations

In order to ensure that the media receive accurate information and to address the risk of disclosing confidential or price sensitive information, all communication with the media shall be referred to the relevant senior managers within the Group.

## 5.12 **Protecting the Group's brands and reputation**

Our actions are guided by the overall aim to protect the Group's brands and reputation. In this regard we shall at all times act honestly and with integrity in all our business activities. No misleading messages, omission of important facts, false claims or reference to our competitors are allowed. We obtain business ethically and do not tolerate any form of bribes or kickbacks (as dealt with in more detail in paragraph 5.5 above).

### 5.13 **Protecting the environment**

We are committed to protecting the environment, conserving our natural resources and utilising our natural resources in an effective and responsible manner, and implementing sound environmental practices in all our business activities. We will refrain from doing business with third parties who do not conduct their business in an environmentally responsible manner.

### 5.14 **Respecting cultural diversity**

All directors and employees shall be aware that, also when visiting a foreign country, their behaviour is a reflection on the Group and that they are therefore expected to familiarise themselves with the norms, laws and customs of the diverse cultures within the Group and the respective countries and show the required respect for any cultural differences.

### 5.15 **Upholding ethical clinical practices**

In addition to the EPIHC principles as set out in paragraph 5.5, specific restrictions and special precautionary measures in line with local legislation also apply to the following clinical areas (see **Annexure B**):

- Advanced care planning, end-of-life and terminal care
- Assisted reproductive technology and IVF
- Drug trials and medical research
- Euthanasia
- Forced female circumcision
- Genetics
- Inappropriate care
- Informed consent
- Organ trade
- Pharmacy and related services reporting and disclosure of adverse events
- Treating individuals restricted by imposed sanctions
- New technology (including robotics)
- Termination of pregnancy

## 6. **ASSOCIATED GROUP POLICIES AND/OR PROCEDURES**

The following associated policies and/or procedures apply within the Group:

- Corporate Governance Manual
- Anti-bribery Policy
- Guidelines on Competition Law Compliance
- Disclosure Procedures Manual
- Code of Practice for Dealing in Mediclinic Securities
- Policy on the Signing and Safekeeping of Contracts
- Group Sustainable Development Policy
- Group Environmental Policy
- Regulatory Compliance Policy
- Fraud Risk Management Policy
- Group Research Policy



## 7. ASSOCIATED EXTERNAL GUIDELINES

The following associated external guidelines provided guidance in drafting the Code:

- World Bank Ethical Principles in Healthcare  
<https://www.epihc.org/principles>
- Declaration of Helsinki  
<https://www.wma.net/what-we-do/medical-ethics/declaration-of-helsinki/>
- Declaration of Taipei on Ethical Considerations Regards Health Databases and Biobanks  
<https://www.wma.net/policies-post/wma-declaration-of-taipei-on-ethical-considerations-regarding-health-databases-and-biobanks>

## 8. QUESTIONS ON INTERPRETATION

Please contact your Ethics Contact Person (listed in **Annexure A**) or the Group General Manager: Risk Services with any questions on the implementation, application or interpretation of the Code.

## ANNEXURE A: ETHICS CONTACT PERSONS

### MEDICLINIC INTERNATIONAL



Ethics Contact Person: Dirk Lubbe  
Address: Mediclinic Corporate Office  
25 Du Toit Street  
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Toll-free: **0800 005 316** (South Africa only)  
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**ANYONE CONTACTING AN ETHICS CONTACT PERSON OR MAKING USE OF THE ETHICS LINE HAS THE OPTION TO REMAIN ANONYMOUS. ALL REPORTS WILL BE TREATED IN A CONFIDENTIAL MANNER.**

## ANNEXURE B: CLINICAL SCENARIO CONSIDERATIONS

All clinical scenarios below adhere to local legislation as it may apply regardless of whether it is/is not specifically mentioned in the text below.

<b>SPECIFIC CLINICAL SCENARIO CONSIDERATIONS</b>				
<i>(Division-specific details to be noted if additional detail other than the Group principle applies)</i>				
	<b>GROUP</b>	<b>SWITZERLAND</b>	<b>MIDDLE EAST</b>	<b>SOUTHERN AFRICA</b>
<b>Advanced care planning, end-of-life and terminal care</b>	Local regulatory and relevant legal frameworks apply.			
			Clusters in the Middle East have local Ethics committees in place to deal with medical/bio ethical issues.	
<b>Assisted reproductive technology and IVF</b>	Local regulatory and relevant legal frameworks apply.			
			Bourn Hall Fertility Centre complies with Federal Law No. (11) of 2008. Licensing authorities manage compliance.	
<b>Drug trials and medical research</b>	Drug trials and medical research adhere to the principles of the Declaration of Helsinki and relevant local legislation governing the conduct of drug trails and clinical research.			
	Studies are tracked via local registers following approval from an accredited Clinical Research Ethics Board and relevant business approvals.			
			There is a dedicated Middle East research ethics committee that	

**SPECIFIC CLINICAL SCENARIO CONSIDERATIONS**

*(Division-specific details to be noted if additional detail other than the Group principle applies)*

	<b>GROUP</b>	<b>SWITZERLAND</b>	<b>MIDDLE EAST</b>	<b>SOUTHERN AFRICA</b>
			reviews all trials and research projects. Studies also require approval from the appropriate IRB of the Dubai Health Authority or the Department of Health Abu Dhabi. All published articles are mandatory to report to the Department of Health.	
<b>Euthanasia</b>	Euthanasia is neither practised nor condoned in any Mediclinic facility.			
<b>Forced female circumcision</b>	Forced female circumcision is neither practised nor condoned in any Mediclinic facility.			
<b>Genetics</b>	<p>Local regulatory and relevant legal frameworks apply.</p> <p>Genetic testing is offered in each division considering relevant ethical principles.</p> <p>The results of genetic testing are governed by the same strict data privacy principles and rules which apply to other personal information.</p>			
<b>Inappropriate care</b>	Appropriate care is a Group-wide focus area and cost reporting and management processes and structures are in place.			
		Indication boards implemented for certain high-risk, high-cost	Cost-per-event is monitored and managed proactively.	

### SPECIFIC CLINICAL SCENARIO CONSIDERATIONS

*(Division-specific details to be noted if additional detail other than the Group principle applies)*

	GROUP	SWITZERLAND	MIDDLE EAST	SOUTHERN AFRICA
		interventions, primarily in the oncology setting.		
<b>Informed consent</b>	Local regulatory and relevant legal frameworks apply.  Documented informed consent is indicated for all relevant medical and surgical interventions.			
<b>Organ trade</b>	Organ transplant and donation are permitted, but organ trade is neither condoned nor permitted.  The organ donation and receipt processes is carefully documented and is in line with applicable local legislation.			
<b>Pharmacy</b>	Local regulatory and relevant legal frameworks apply.  Pharmacy policies, procedures and audits ensure compliance with local legislation, ethical and operational requirements.  Mediclinic is not involved with the manufacturing of any pharmaceutical products, including abortifacient drugs.			
<b>Stem cell therapies</b>	The use of embryonal stem cells in clinical practice for routine care is illegal in all countries the Group operate in. The Group has to date not approved embryonal stem cell studies in Mediclinic.  In clinical practice the use of induced pluripotent stem cells is more common and ethically acceptable.			
<b>Reporting and disclosure of adverse events</b>	Each hospital has a formal adverse event reporting system, with a Group-wide system introduced in 2021. A 'just culture' (Frankl framework) is promoted.  The reporting system is non-punitive and the recorded adverse events are discussed at the hospitals' clinical hospital committees. To prevent similar incidents, learning from events is a key focus area.			
<b>Treating individuals subjected to imposed sanctions and those subjected to UK sanctions</b>	Local legislation and imposed sanctions apply – emergency medical care obligatory.			

**SPECIFIC CLINICAL SCENARIO CONSIDERATIONS**

*(Division-specific details to be noted if additional detail other than the Group principle applies)*

	<b>GROUP</b>	<b>SWITZERLAND</b>	<b>MIDDLE EAST</b>	<b>SOUTHERN AFRICA</b>
<b>New technology (including Robotics)</b>	<p>Equipment must be CE<sup>1</sup>-certified and/or certified by the Food and Drug Administration of the United States. Local regulatory approvals apply where required.</p> <p>Equipment may only be used for the approved indications and as dictated by local or international guidelines. Clinical safety and competency must be proven before any new technology is implemented at a division or in a facility.</p>			
<b>Termination of pregnancy ('TOP')</b>	<p>Local regulatory and legal frameworks apply.</p> <p>Employees are allowed freedom of choice as to whether they wish to refrain from participating in any TOP for moral, religious, ethical or related reasons.</p>			
		<p>TOP is legal during the first trimester and thereafter if there is threat of severe physical or psychological harm to the mother. Counselling requirements apply for women who state that they are in distress.</p>	<p>TOP in Dubai is only allowed at state facilities according to strict criteria set by the Dubai Health Authority.</p> <p>According to the UAE law, it is a crime to abort a pregnancy unless it endangers the woman's life or there is evidence that the baby will be born with fatal deformities and will not survive. Hence, any potential cases are referred to a government</p>	<p><b>South Africa</b> TOP is legal during the first trimester, thereafter if there is a threat of severe physical or psychological harm.</p> <p><b>Namibia</b> TOP is only allowed for medical reasons. TOP can only be performed under strict medical supervision within the confines of the laws, which state that consent to abortion can only be given in cases of</p>

<sup>1</sup> CE marking is a certification mark that indicates conformity with health, safety and environmental protection standards for products sold within the European Economic Area ('EEA'); it is also found on products sold outside the EEA that are manufactured in, or designed to be sold in, the EEA.

**SPECIFIC CLINICAL SCENARIO CONSIDERATIONS**

*(Division-specific details to be noted if additional detail other than the Group principle applies)*

	<b>GROUP</b>	<b>SWITZERLAND</b>	<b>MIDDLE EAST</b>	<b>SOUTHERN AFRICA</b>
			facility and are not performed at a Mediclinic facility.	rape, incest and when the life of the mother is in danger.