

2026 MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

ZERO TOLERANCE FOR SLAVERY, SERVITUDE, FORCED LABOUR AND HUMAN TRAFFICKING

INTRODUCTION

This statement is issued by Mediclinic Holdings Limited ('the Company') and its fully owned subsidiary, Mediclinic Group Limited ('Mediclinic'), in respect of the financial year ended 31 March 2026 ('FY26').

It is published in accordance with the United Kingdom ('UK') Modern Slavery Act 2015 and confirms our continued commitment to prevent modern slavery in the workplace and our supply chain. Modern slavery encompasses servitude, forced labour, child labour and human trafficking. This statement sets out steps taken to prevent such practices in our business or indirectly through our supply chain. During the year, no incidents of modern slavery were observed or reported on throughout the Company or Mediclinic and its subsidiaries (referred to as the 'Mediclinic Group' and, together with the Company, the 'Group').

BUSINESS OVERVIEW



38 000+
EMPLOYEES



130+
FACILITIES



35 500+
SUPPLIERS

The Mediclinic Group provides private healthcare services in Switzerland, Southern Africa (South Africa and Namibia) and the United Arab Emirates ('UAE').

The Group also holds a 29.8% interest in Spire Healthcare Group plc, a leading private healthcare group based in the UK and listed on the London Stock Exchange.

Mediclinic's core purpose is to enhance the quality of life through the provision of specialist-orientated, multidisciplinary services across the continuum of care.

For further information on the Mediclinic Group, visit www.mediclinic.com.

APPROACH



ETHICS
CODE



AWARENESS
TRAINING



SUPPLIER
MEETINGS



GROUP SUPPLY
CHAIN RISK
MANAGEMENT
POLICY



DUE
DILIGENCE
QUESTIONNAIRE



ETHICS
LINES



PROCUREMENT
PHILOSOPHY

ETHICAL FOUNDATION AND POLICIES

Our commitment to sound ethical relations with all stakeholders forms part of the Group's values. We follow a proactive approach to ensure our employees and suppliers understand expectations.

Mediclinic treats employees fairly and with dignity. Our [Code of Business Conduct and Ethics](#) (the 'Ethics Code') specifically prohibits child, forced and/or compulsory labour. As far as practical and reasonably possible, suppliers and associates are evaluated on their approach to human rights before agreements are concluded and are required to uphold equivalent ethical standards as the Group. We undertake not to support nor transact with any business involved in modern slavery and to act in accordance with all applicable legislation of the jurisdictions in which we conduct business.

OVERVIEW OF KEY AREAS

The Company and Mediclinic Boards of Directors (the 'Boards') and all relevant employees – particularly those managing employees, dealing with applicants and overseeing the supply chain – are kept informed of:

- the risks of modern slavery and the Group's position thereon;
- risk management; and
- global developments in this area.

TRAINING

Since the greatest risk lies within our supply chain, we offer annual modern slavery awareness training for all Mediclinic procurement business units and new recruits. Mediclinic Group representatives are trained to identify worker exploitation and report injustices.

RECRUITMENT

The Group's Human Resources personnel are equipped to recognise unacceptable labour practices and are required to escalate concerns in accordance with Mediclinic's reporting and investigation practices.

SUPPLY CHAIN MANAGEMENT

Supplier selection

The performance of our supply chain directly impacts our ability to deliver quality care. We believe in responsible sourcing and select reputable manufacturers. Our strict selection criteria, based on globally accepted standards and certifications, form the basis of preventing modern slavery. Our purchase orders require the supplier to comply with our values, company standards and applicable policies upon acceptance.

Factors considered in supplier selection or contract renewal include:

- the organisation's reputation and stability;
- compliance with applicable labour and environmental legislation, including health and safety legislation and local and international standards;
- company values;
- ethical behaviour;
- mutual trust and respect; and
- transparency.

Currently, the majority of our supply chain is required to conform to the following criteria:

- ISO 9000 and/or ISO 13485 quality management certification;
- relevant ISO certification of the products utilised;
- CE MDR¹ and/or FDA² certification;
- compliance with all relevant local regulations, including applicable labour legislation; and
- credible health technology assessments in support of new technologies.

Notes

¹ CE Medical Device Regulation ('MDR') marking is a certification mark that indicates conformity with health, safety and environmental protection standards for products manufactured and/or sold within the European Economic Area ('EEA'). Manufacturing standards and labour practices are considered during certification.

² A certificate from the Food and Drug Administration ('FDA') provides information about the product's regulatory or marketing status, with the process considering all aspects of manufacturing, including labour practices.

Policy

The Group Procurement and Supply Chain Risk Management Policy ensures we maintain a reliable supply chain to guarantee safe products in all our facilities. It provides a framework for risk management compliance with applicable regulations and legislation. Annual review ensures the policy prioritises suppliers with action plans to minimise their environmental impact and sufficient safeguards to meet our social standards. Material updates are referred to the Mediclinic Group Executive Committee for approval. Once approved, the policy is ratified at divisional executive committee level ahead of implementation. Management remains responsible for advising employees on changes to policies. Regular internal audits of all procurement departments test compliance against this policy or its local equivalent and identify areas for improvement.

Risk management

We require suppliers to exercise due diligence in their operations and supply chains. Furthermore, modern slavery and sustainability are frequently discussed at supplier meetings.

Supplier premises in areas considered high risk for modern slavery are physically visited, inspected and audited before procurement contracts are concluded. Employees are required to report any actual or suspected incidents not aligned with Group policies and can do so in confidence.

A due diligence questionnaire forms part of the onboarding process with new suppliers and is sent to selected existing suppliers to proactively assess risks to human rights. Our suppliers indicated they have policies and related initiatives to eliminate the risk of human rights violations in their organisation and supply chain.

We continued to review suppliers' environmental and social performance, particularly those suppliers located in areas with a high risk for child labour. Where no policies or strategies to promote nature and people were found, we undertook further consultation to positively influence suppliers.

In terms of the Swiss due diligence obligations on child labour applicable to the Mediclinic Group, we created an internal system to keep record of all the mitigating actions taken.

Training

Senior procurement employees from all geographies assess the supply chain and undergo training to identify potential risk areas. We continuously engage in industry forums to obtain relevant information regarding supply chain risks.

During onboarding, new suppliers receive detailed information on the availability, process and confidentiality of Mediclinic Group ethics lines to promote the reporting of any injustices.

Should any suppliers require training on the risks of modern slavery, we will provide assistance to help them improve. Employees involved in the purchasing of equipment or consumables are bound to strict ethical principles, ensuring we maintain a high standard of integrity in our supplier relationships.

Subsidiary certification

Our international procurement initiatives aim to unlock synergies and implement standardisation to the Group's benefit. Medical Innovations (Pty) Ltd ('Medical Innovations'), a wholly owned South African subsidiary of Mediclinic which purchases and distributes medical supplies, achieved the international ISO 13485:2016¹ certification in 2016. Formal agreements with critical suppliers and supplier selection evaluation are key focus areas during ISO certification. Medical Innovations is audited annually to maintain its certification, complies with all local regulations and is registered with the South African Health Products Regulatory Authority to import and export medical devices and consumable products.

NEXT STEPS

We do not tolerate any human rights violations and will continue to ensure that no form of modern slavery occurs in any part of our operations.

Our anonymous toll-free ethics lines, managed by independent service providers, enable employees, suppliers and third parties to report concerns. Reports are dealt with in a non-discriminatory and confidential manner. No form of retaliation against an employee or other person making a report in good faith will be tolerated.

In the next financial year we will:

- continue to distribute our supplier due diligence questionnaire to proactively assess human rights risks;
- promote awareness of human rights abuses and provide the necessary training for key staff members to recognise and, most importantly, report such incidents across the Group; and
- consider trends, current practices and recommendations developed by governments or other institutions to prevent modern slavery.

Approved by the Boards of Mediclinic Holdings Limited and Mediclinic Group Limited on 21 May 2026.



Jannie Durand

Chair of Mediclinic Holdings Limited and Mediclinic Group Limited

Note

¹ ISO 13485:2016 specifies requirements for a quality management system where an organisation needs to demonstrate its ability to provide medical devices and related services that consistently meet customer and applicable regulatory requirements.