

# 2022 SASB AND GRI STANDARDS DISCLOSURE INDEX



# SASB AND GRI STANDARDS DISCLOSURE INDEX

This disclosure index ('Index') identifies the location of the general and specific standard disclosures required by the Sustainability Accounting Standards Board ('SASB') and the Sustainability Reporting Standards developed by the Global Reporting Initiative ('GRI Standards'). The 2022 Sustainable Development Report has been prepared in accordance with the GRI Standards: Core option.

The references included in this Index refer mainly to sections of the Company's [2022 Annual Report](#), relating to the financial year ended 31 March 2022, and the [2022 Sustainable Development Report](#), relating to the calendar year ended 31 December 2021, published on the Company's website at [annualreport.mediclinic.com](http://annualreport.mediclinic.com).

Although many of the SASB and GRI Standards' disclosures have been reported on by the Company, this Index covers the Group's general standard disclosures and the material-specific standard disclosures, based on the Company's materiality assessment referred to on page 9 of the [2022 Sustainable Development Report](#).

Reference to the assurance of the various aspects is not included in this Index. Please refer to pages 48-50 of the [2022 Sustainable Development Report](#) for an explanation of the Group's independent assurance, as referred to in the index below next to *GRI Standard 102-56 (External assurance)*.

GRI Standard disclosure reference	SASB disclosure reference	Description	Section of report	Page reference
<b>GRI 102: GENERAL DISCLOSURES</b>				
<b>ORGANISATIONAL PROFILE</b>				
102-1 102-2 102-3 102-4 102-5 102-6 102-7		Name; Activities, brands, products and services; Location of headquarters; Location of operations; Ownership and legal form; Markets served; Scale of the organisation	Annual Report: • At a glance • Business model	4 25
102-8		Information on employees and other workers	Annual Report: • Stakeholder engagement • Sustainable development overview (Connecting to our people)  Sustainable Development Report: • Connect (Connecting to our people)	27 40  21
102-9		A description of the organisation's supply chain, including its main elements as they relate to the organisation's activities, primary brands, products and services	Sustainable Development Report: • Connect (Connecting to our suppliers)	39
102-10		Significant changes to the organisation and its supply chain	Annual Report: • Chair's Review • Group Chief Executive Officer's Report	6 10

GRI Standard disclosure reference	SASB disclosure reference	Description	Section of report	Page reference
<b>GRI 102: GENERAL DISCLOSURES CONTINUED</b>				
<b>ORGANISATIONAL PROFILE CONTINUED</b>				
102-11		Precautionary principle or approach	Annual Report: • Risk management report	91
102-12		External initiatives	Sustainable Development Report: • Our approach to sustainability • Independent assurance	6 48
102-13		Membership of associations	Sustainable Development Report: • Significant stakeholders (Industry associations, Professional societies)	20
<b>STRATEGY</b>				
102-14		Statement from senior decision-maker	Annual Report: • Chair's Review • Group Chief Executive Officer's Report  Sustainable Development Report: • From our leadership • Our sustainability champions	6 10  3 44
102-15		Description of key impacts, risks and opportunities	Annual Report: • Group Chief Executive Officer's Report • Strategy overview • TCFD report • Clinical services overview • Risk management report • Audit and Risk Committee Report • ESG Committee Report  Sustainable Development Report: • Our material issues • Conserve (Risks to the business, Risk mitigation) • Connect (Risks to the business, Risk mitigation) • Comply (Risks to the business, Risk mitigation)	10 16 47 58 91 121 135  9 11 19 42
<b>ETHICS AND INTEGRITY</b>				
102-16		Values, principles, standards and norms of behaviour	Annual Report: • Corporate Governance Statement  Sustainable Development Report: • Comply (Governance and ethics)	109  43, 46

GRI Standard disclosure reference	SASB disclosure reference	Description	Section of report	Page reference
<b>GRI 102: GENERAL DISCLOSURES CONTINUED</b>				
<b>ETHICS AND INTEGRITY CONTINUED</b>				
102-17		Mechanisms for advice and concerns about ethics	Annual Report: <ul style="list-style-type: none"> <li>Corporate Governance Statement</li> <li>Audit and Risk Committee Report</li> </ul> Sustainable Development Report: <ul style="list-style-type: none"> <li>Comply (Preventing bribery and corruption)</li> </ul>	109 121 46
<b>GOVERNANCE</b>				
102-18 102-19 102-20 102-21 102-22 102-23 102-24 102-25		Governance structure of the organisation, including any committees responsible for decisions on economic, environmental and social impacts; Process for delegating authority for economic, environmental and social topics; Executive-level person responsible for economic, environmental and social topics; Process for consultation between stakeholders and highest governing body on economic, environmental and social topics; Composition of highest governance body and its committees; Chair of the highest governance body; Nomination and selection process for highest governance body; Processes of highest governance body for management of conflicts of interest	Annual Report: <ul style="list-style-type: none"> <li>Corporate Governance Statement</li> </ul> Sustainable Development Report: <ul style="list-style-type: none"> <li>Comply</li> </ul>	109 41
102-26		Highest governance body's and senior executives' role in the development, approval, and updating of the organisation's purpose, value or mission statements, strategies, policies and goals related to economic, environmental and social topics	Annual Report: <ul style="list-style-type: none"> <li>Investment case</li> <li>Strategy overview</li> <li>Business model</li> <li>Corporate Governance Statement (The role of the Board)</li> <li>ESG Committee Report</li> </ul> Sustainable Development Report: <ul style="list-style-type: none"> <li>Comply (Our sustainable development governance structure)</li> </ul>	9 16 25 112 135 43

GRI Standard disclosure reference	SASB disclosure reference	Description	Section of report	Page reference
<b>GRI 102: GENERAL DISCLOSURES CONTINUED</b>				
<b>GOVERNANCE CONTINUED</b>				
102-27 102-28		Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics; Processes for evaluating highest governance body's own performance, particularly with regard to economic, environmental and social topics	Annual Report: • Corporate Governance Statement (Assessing the Board's effectiveness) • ESG Committee Report • Nomination Committee Report (Directors' induction and ongoing development)	117  135 138
102-29 102-30 102-31		Highest governance body's role in identification and management of economic, environmental and social impacts, risks and opportunities; Review of the effectiveness of the organisation's risk management processes; Frequency of review of impacts, risks and opportunities	Annual Report: • TCFD report • Risk management report (Principal risks and uncertainties) • Audit and Risk Committee Report • ESG Committee Report	47 91 121 135
102-32		Highest committee or position that formally reviews and approves the organisation's sustainability report and ensures that all material topics are covered	Annual Report: • ESG Committee Report  Sustainable Development Report: • Governance structure	135  1, 43
102-33 102-34		Process for communicating critical concerns; Nature and total number of critical concerns communicated to the highest governing body	Annual Report: • ESG Committee Report  Sustainable Development Report: • Governance structure	135  43
102-35 102-36 102-37 102-38 102-39		Remuneration policies and linkage between performance criteria in remuneration policies and highest governance body's and senior executives' economic, environmental and social topics; Process for determining remuneration; How stakeholders' views are sought and taken into account regarding remuneration, including the results of the voting on remuneration policies; Ratio of annual total compensation of highest paid individual to the median annual total compensation for all employees per country; Percentage increase in annual total compensation ratio	Annual Report: • Remuneration Committee Report  Sustainable Development Report • Connect (Remuneration, rewards and benefits)	143  25

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<b>GRI 102: GENERAL DISCLOSURES CONTINUED</b>				
<b>STAKEHOLDER ENGAGEMENT</b>				
102-40 102-42 102-43 102-44		List of stakeholder groups engaged by organisation; Basis for identification and selection of stakeholders with whom to engage; Approaches to stakeholder engagement; Key topics and concerns that have been raised through stakeholder engagement and how organisation responded	Annual Report • Stakeholder engagement • Corporate Governance Statement (Board engagement with workforce, shareholders and other stakeholders)  Sustainable Development Report: • Significant stakeholders	26 115  20
102-41		Collective bargaining agreements	Sustainable Development Report: • Connect (Labour relations)	28
<b>REPORTING PRACTICE</b>				
102-45 102-46 102-47 102-48 102-49 102-50 102-51 102-52 102-53 102-54 102-55 102-56		Entities included in the consolidated financial statements; Defining report content and topic boundaries; List of material topics; Restatements of information; Changes in reporting; Reporting period; Date of most recent report; Reporting cycle; Contact point for questions regarding the report; Claims of reporting in accordance with the GRI Standards; GRI content index; External assurance	Annual Report: • Report profile  Sustainable Development Report: • About this report • Independent assurance	1  1 48
<b>GRI 103: MANAGEMENT APPROACH</b>				
103-1		Explanation of the material topic and its boundary	Sustainable Development Report • Materiality assessment	9
103-2		The management approach and its components	Annual Report: • Risk management report  Sustainable Development Report: • Materiality assessment • Governance structure	91  9 43
103-3		Evaluation of the management approach	Annual Report: • Corporate Governance Statement (Assessing the Board's effectiveness)  Sustainable Development Report: • Governance structure	117  43

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<b>MATERIAL-SPECIFIC STANDARD DISCLOSURES</b>				
<b>MATERIAL ISSUE 1: NEUTRALISING ENVIRONMENTAL IMPACT</b>				
<b>Aspect: Emissions</b>				
305-1 305-2 305-3		Direct greenhouse gas ('GHG') emissions (scope 1); Indirect GHG emissions (scope 2); Other indirect GHG emissions (scope 3)	Annual Report: • Sustainable development overview (Carbon emissions) • TCFD report  Sustainable Development Report: • Conserve (Carbon emissions)	37 55 10, 52
305-4 305-5 305-6 305-7		GHG emission intensity; Reduction of GHG emissions; Emissions of ozone-depleting substances (ODS); NOx, SOx and other significant air emissions	Annual Report • Sustainable development overview (Our approach to sustainability, Conserve)  Sustainable Development Report: • Conserve (Carbon emissions)	35, 37 10, 52
<b>Aspect: Energy</b>				
302-1 302-3 302-4	HC-DY-130a.1	Energy consumption within the organisation; Energy intensity; Reduction of energy consumption	Annual Report: • Sustainable development overview (Energy consumption) • TCFD report  Sustainable Development Report: • Conserve (Energy consumption)	38 55 14, 52
<b>Aspect: Water</b>				
303-1 303-2 303-3		Total water withdrawal by source; Water sources significantly affected by withdrawal of water; Percentage and total volume of water recycled and reused	Annual Report: • Sustainable development overview (Using and reusing water resources sustainably)  Sustainable Development Report: • Conserve (Using and reusing water resources sustainably)	39 17, 53
<b>Aspect: Effluents and waste</b>				
306-1 306-2 306-3 306-4 306-5	HC-DY-150a.1 HC-DY-150a.2	Total water discharge by quality and destination; Waste by type and disposal method; Significant spills; Transport of hazardous waste; Water bodies affected by water discharges and/or runoff	Annual Report: • Sustainable development overview (Having zero waste to landfill)  Sustainable Development Report: • Conserve (Waste)	38 16, 53
<b>Aspect: Compliance</b>				
307-1		Monetary value of fines and number of non-monetary sanctions for non-compliance with environmental laws and regulations	Annual Report: • TCFD report  Sustainable Development Report: • Conserve	49 10

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<b>MATERIAL-SPECIFIC STANDARD DISCLOSURES CONTINUED</b>				
<b>MATERIAL ISSUE 2: BUILDING STAKEHOLDER TRUST</b>				
<b>Aspect: Diversity and equal opportunity</b>				
405-1		Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership and other indicators of diversity	Annual Report <ul style="list-style-type: none"> <li>Corporate Governance Statement (Board composition and diversity)</li> <li>Nomination Committee Report (Organisational diversity)</li> </ul> Sustainable Development Report: <ul style="list-style-type: none"> <li>Connect (Diversity and inclusion)</li> </ul>	103, 110  141  29
<b>Aspect: Employment</b>				
401-1	HC-DY-330a.1 HC-DY-330a.2	Total number and rate of new employee hires and terminations, and employee turnover by age group, gender and region	Sustainable Development Report: <ul style="list-style-type: none"> <li>Connect (Recruitment and retention)</li> </ul>	23
<b>Aspect: Training and education</b>				
404-2		Type and scope of programmes implemented and assistance provided to upgrade employee skills, and transition assistance programmes provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment	Sustainable Development Report: <ul style="list-style-type: none"> <li>Connect (Training and development, Future workforce)</li> </ul>	28, 35
<b>Aspect: Occupational health and safety</b>				
403-2	HC-DY-320a.1	Type of injury and rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities by region and by gender	Sustainable Development Report: <ul style="list-style-type: none"> <li>Connect (Wellbeing)</li> </ul>	33, 57
<b>Aspect: Non-discrimination</b>				
406-1		Incidents of discrimination and corrective actions taken	Sustainable Development Report: <ul style="list-style-type: none"> <li>Connect (Human rights)</li> </ul>	37



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**MATERIAL-SPECIFIC STANDARD DISCLOSURES CONTINUED**

**MATERIAL ISSUE 2: BUILDING STAKEHOLDER TRUST CONTINUED**

**Aspect: Local communities**

	HC-DY-240a.1	Discussion of strategy to manage the mix of patient insurance status	Annual Report: <ul style="list-style-type: none"> <li>Market review</li> <li>Strategy overview</li> <li>Stakeholder engagement (Healthcare insurers)</li> <li>Group Chief Financial Officer's Report (Switzerland)</li> </ul>	15 16 28 77
	HC-DY-240a.2	Amount of Medicare Disproportionate Share Hospital (DSH) adjustment payments received	Not applicable	-
413-1		Operations with local community engagement, impact assessments, and development programmes	Sustainable Development Report: <ul style="list-style-type: none"> <li>Significant stakeholders (Communities)</li> <li>Connect (Corporate social investment)</li> </ul>	20 37

**MATERIAL ISSUE 3: BEING AN ETHICAL AND RESPONSIBLE CITIZEN**

**Aspect: Anti-corruption**

205-3		Confirmed incidents of corruption and actions taken	Annual Report: <ul style="list-style-type: none"> <li>Sustainable development overview (Preventing bribery and corruption)</li> </ul>	45
			Sustainable Development Report: <ul style="list-style-type: none"> <li>Comply (Preventing bribery and corruption)</li> </ul>	46

**Aspect: Anti-competitive behaviour**

206-1		Total number of legal actions for anti-competitive behaviour, anti-trust and monopoly practices	Annual Report: <ul style="list-style-type: none"> <li>Risk management report (Competition)</li> </ul>	95
			Sustainable Development Report: <ul style="list-style-type: none"> <li>Compliance with consumer protection laws</li> </ul>	46

**Aspect: Socio-economic compliance**

419-1		Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area	Annual Report: <ul style="list-style-type: none"> <li>Sustainable development overview (Preventing bribery and corruption)</li> </ul>	45
			Sustainable Development Report: <ul style="list-style-type: none"> <li>Comply (Preventing bribery and corruption)</li> </ul>	46

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### MATERIAL-SPECIFIC STANDARD DISCLOSURES CONTINUED

### MATERIAL ISSUE 3: BEING AN ETHICAL AND RESPONSIBLE CITIZEN CONTINUED

#### Aspect: Customer privacy

	HC-DY-230a.1	Percentage of patient records that are Electronic Health Records (EHR) that meet 'meaningful use' requirements	Clinical Services Report	32
418-1	HC-DY-230a.2 HC-DY-230a.3 HC-DY-230a.4	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Annual Report: • Corporate Governance Statement: (ICT governance)	120
		Total amount of monetary losses as a result of legal proceedings associated with data security and privacy	Sustainable Development Report: • Comply (Protecting information assets)	47

### OTHER SPECIFIC STANDARD DISCLOSURES

### CATEGORY: ECONOMIC

#### Aspect: Economic performance

201-1		Direct economic value generated and distributed	Annual Report: • Key performance indicators	23
201-2	HC-DY-450a.1	Financial implications and other risks and opportunities for the organisation's activities due to climate change	Annual Report: • TCFD report	47
			Sustainable Development Report: • Conserve (Climate change)	12
201-3		Coverage of the organisation's defined benefit plan obligations and other retirement plans	Annual Report: • Group Chief Financial Officer's Report (Swiss pension benefit obligation)	88
			• Note 27 of the Group annual financial statements	219
			Sustainable Development Report: • Connect (Remuneration, rewards and benefits)	25
201-4		Financial assistance received from government	Annual Report: • Note 5 of the Group annual financial statement	193
			Sustainable Development Report: • Significant stakeholders (Governments and authorities)	20

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**OTHER SPECIFIC STANDARD DISCLOSURES CONTINUED**

**CATEGORY: ECONOMIC CONTINUED**

**Aspect: Market presence**

202-1		Ratios of standard entry-level wage by gender compared to local minimum wage at locations of significant operation	Sustainable Development Report: • Connect (Remuneration, rewards and benefits)	25
202-2		Proportion of senior management hired from the local community at locations of significant operation	Sustainable Development Report: • Connect (Diversity and Inclusion, Optimised supply chain)	32, 40

**Aspect: Indirect economic impacts**

203-1		Infrastructure investments and services supported	Annual Report • Chair's Review • Investment case • Group Chief Financial Officer's Report (Divisional results)  Sustainable Development Report: • Significant stakeholders (Communities) • Comply (Maintaining high-quality healthcare infrastructure) • Independent assurance	6 9 72, 76  20 47 48
	HC-DY-450a.2	Percentage of health care facilities that comply with the Centers for Medicare and Medicaid Services (CMS) Emergency Preparedness Rule	Not applicable	-
203-2		Significant indirect economic impacts, including the extent of impacts	Sustainable Development Report: • Connect (Training and development, Corporate social investment)	28, 37

**Aspect: Procurement practices**

204-1		Proportion of spending on local suppliers at significant locations of operation	Sustainable Development Report: • Connect (Connecting to our suppliers)	39
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**CATEGORY: ENVIRONMENTAL**

**Aspect: Materials**

301-1 301-2		Materials used by weight or volume; Recycled input materials used	Not reported	-
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## OTHER SPECIFIC STANDARD DISCLOSURES CONTINUED

### CATEGORY: ENVIRONMENTAL CONTINUED

#### Aspect: Energy

302-2 302-5		Energy consumption outside the organisation; Reductions in energy requirements of products and services	Annual Report: • Sustainable development overview (Energy consumption) • TCFD report  Sustainable Development Report: • Conserve (Energy consumption)	38 55 14, 52
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#### Aspect: Biodiversity

304-1 304-2 304-3 304-4		Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas; Significant impacts of activities, products and services on biodiversity; Habitats protected or restored; Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations	Annual Report • Sustainable development overview (Protecting biodiversity)  Sustainable Development Report • Conserve (Protecting biodiversity)	39 17
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#### Aspect: Materials

301-3		Percentage of products sold and their packaging materials reclaimed	Not applicable	-
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#### Aspect: Supplier environmental assessment

308-1 308-2		New suppliers that were screened using environmental criteria; Negative environmental impacts in the supply chain and actions taken	Annual Report • Sustainable development overview (Connecting to our suppliers)  Sustainable Development Report: • Connect (Connecting to our suppliers)	44 39
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### CATEGORY: SOCIAL (LABOUR PRACTICES AND DECENT WORK)

#### Aspect: Employment

401-2		Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations	Sustainable Development Report: • Connect (Retention, Remuneration, rewards and benefits)	24, 25
401-3		Return to work retention rates after parental leave	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Recruitment and retention)	23, 25, 55

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**OTHER SPECIFIC STANDARD DISCLOSURES CONTINUED**

**CATEGORY: SOCIAL (LABOUR PRACTICES AND DECENT WORK) CONTINUED**

**Aspect: Labour/management relations**

402-1		Minimum notice period(s) regarding operational changes	Sustainable Development Report: • Connect (Labour relations)	28
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**Aspect: Occupational health and safety**

403-1 403-3 403-4		Workers' presentation in formal joint management-worker health and safety committees; Workers with high incidence or high risk of diseases related to their occupation; Health and safety topics covered in formal agreements with trade unions	Sustainable Development Report: • Connect (Wellbeing)	33
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**Aspect: Training and education**

404-1 404-3		Average hours of training per year per employee; Percentage of employees receiving regular performance and career development reviews	Sustainable Development Report: • Connect (Training and development)	28
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**Aspect: Diversity and equal opportunity**

405-2		Ratio of basic salary and remuneration of men to women by employee category	Sustainable Development Report • Connect (Gender pay gap, Equal pay for equal work)	30
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**Aspect: Freedom of association and collective bargaining**

407-1		Operations and suppliers in which the right to exercise freedom of association and collective bargaining may be at risk	Sustainable Development Report: • Connect (Labour relations)	28
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**CATEGORY: SOCIAL (HUMAN RIGHTS)**

**Aspect: Investment**

412-2		Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	Not reported	-
412-3		Total number and percentage of significant investment agreements and contracts that include human rights clauses or that have undergone human rights screening	Not reported	-

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<b>OTHER SPECIFIC STANDARD DISCLOSURES CONTINUED</b>				
<b>CATEGORY: SOCIAL (HUMAN RIGHTS) CONTINUED</b>				
<b>Aspect: Child labour and forced/compulsory labour</b>				
408-1 409-1		Operations and suppliers at significant risk for incidents of child labour; Operations and suppliers at significant risk for incidents of forced or compulsory labour	Sustainable Development Report: • Connect (Human rights) • Comply  Website: • Modern Slavery and Human Trafficking Statement	37 46
<b>Aspect: Security practices</b>				
410-1		Security personnel trained in human rights policies or procedures	Not reported	-
<b>Aspect: Rights of indigenous people</b>				
411-1		Incidents of violations involving rights of indigenous people	Sustainable Development Report: • Connect (Human rights)	37
<b>Aspect: Human rights assessment</b>				
412-1 412-2		Operations that have been subject to human rights reviews or impact assessments; Employee training on human rights policies or procedures	Sustainable Development Report: • Connect (Human rights)  Website: • Modern Slavery and Human Trafficking Statement	37
<b>CATEGORY: SOCIAL (SOCIETY)</b>				
<b>Aspect: Local communities</b>				
413-2		Operations with significant potential or actual negative impact on local communities	Not applicable	-
<b>Aspect: Anti-corruption</b>				
205-1 205-2		Operations assessed for risks related to corruption; Communication and training about anti-corruption policies	Annual Report: • Corporate Governance Statement (Fraud, corruption, ethics and compliance)  Sustainable Development Report: • Comply (Preventing bribery and corruption)	120 46
<b>Aspect: Public policy</b>				
415-1		Political contributions	Annual Report: • Corporate Governance Statement (Political donations)  Sustainable Development Report: • Significant stakeholders (Governments and authorities)	169 20

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**OTHER SPECIFIC STANDARD DISCLOSURES CONTINUED**

**CATEGORY: SOCIAL (SOCIETY) CONTINUED**

**Aspect: Supplier social assessment**

414-1		Percentage of new suppliers screened using social criteria	Not reported	-
414-2		Negative social impacts in the supply chain and actions taken	Website: • Modern Slavery and Human Trafficking Statement	

**CATEGORY: SOCIAL (PRODUCT RESPONSIBILITY)**

**Aspect: Customer health, safety and experience**

	HC-DY-250a.1 HC-DY-250a.2 HC-DY-250a.3 HC-DY-250a.4 HC-DY-250a.5	Average Hospital Value-Based Purchasing Total Performance Score and domain score, across all facilities; Number of Serious Reportable Events (SREs) as defined by the National Quality Forum (NQF); Hospital-Acquired Condition (HAC) Score per hospital; Excess readmission ratio per hospital; Magnitude of readmissions payment adjustment as part of the Hospital Readmissions Reduction Program (HRRP)	Clinical Services Report • Patient experience • Patient safety	22 35
416-1		Assessment of the health and safety impacts of product and service categories	Annual Report: • Clinical services overview  • Clinical Services Report (Independent assurance)	58  48
416-2		Incidents of non-compliance concerning health and safety impacts of products and services	Annual Report: • Risk management report (Patient safety)	98
	HC-DY-510a.1	Total amount of monetary losses as a result of legal proceedings associated with Medicare and Medicaid fraud under the False Claims Act	Not applicable	-

**Aspect: Management of controlled substances**

	HC-DY-260a.1 HC-DY-260a.2	Description of policies and practices to manage the number of prescriptions issued for controlled substances; Percentage of controlled substance prescriptions written for which a prescription drug monitoring programme (PDMP) database was queried	Not reported	-
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**CATEGORY: SOCIAL (PRODUCT RESPONSIBILITY) CONTINUED**

**Aspect: Pricing and billing transparency**

	HC-DY-270a.1 HC-DY-270a.2 HC-DY-270a.3	Description of policies or initiatives to ensure that patients are adequately informed about price before undergoing a procedure, Discussion of how pricing information for services is made publicly available; Number of entity's 25 most common services for which pricing information is publicly available, as percentage of total services performed	Annual Report: <ul style="list-style-type: none"> <li>Clinical services overview (Clinical ethics summary)</li> <li>Note 4 of the Group annual financial statements</li> </ul>	71 191
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**Aspect: Marketing and labelling**

417-1 417-2 417-3		Requirements for product and service information and labelling; Incidents of non-compliance concerning product service information and labelling; Incidents of non-compliance concerning marketing communications	Sustainable Development Report: <ul style="list-style-type: none"> <li>Comply (Governance of advertising)</li> </ul>	46
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