

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT IN RESPECT OF THE FINANCIAL YEAR ENDED 31 MARCH 2023

MEDICLINIC GROUP LIMITED

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

INTRODUCTION

This statement is issued by Mediclinic Group Limited (the 'Company' or 'Mediclinic') in respect of the financial year ended 31 March 2023 ('FY23') and marks our eighth statement in this regard.

It is published in accordance with the Modern Slavery Act 2015 and confirms our continued commitment to preventing modern slavery and human trafficking in the workplace as well as our supply chain, and sets out the steps taken to prevent any form of such practices in our business or indirectly through our supply chain. During the year, no material incidents of modern slavery, human trafficking or any violation of human rights were observed or reported on throughout Mediclinic or its subsidiaries (the 'Group').

BUSINESS OVERVIEW



37 200+
EMPLOYEES



120+
FACILITIES



35 500+
SUPPLIERS

Mediclinic is a diversified international private healthcare services group, established in South Africa in 1983, with divisions in Switzerland, Southern Africa (South Africa and Namibia) and the United Arab Emirates ('UAE').

We also hold a 29.9% interest in Spire Healthcare Group plc, a leading private

healthcare group based in the UK and listed on the London Stock Exchange.

Our core purpose is to enhance the quality of life.

We are focused on providing specialist-orientated, multidisciplinary services across the continuum of care

in such a way that the Group will be regarded as the most respected and trusted provider of healthcare services by all stakeholders in each of its markets.

For further information on the Mediclinic business and the Group's divisions, visit www.mediclinic.com.

APPROACH



ETHICS
CODE



AWARENESS
TRAINING



SUPPLIER
MEETINGS



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 Mediclinic's values and is of fundamental importance.

Our [Code of Business Conduct and Ethics](#) (the 'Ethics Code') specifically prohibits – in relation to employees – child, forced and/or compulsory labour. It also confirms our commitment to treating employees

fairly, with respect for their human rights and dignity, and to circumventing any indirect adverse human rights impact linked to the Group's operations or services by our suppliers or industry associates. The Ethics Code provides that suppliers and associates, as far as practical and reasonably possible, are evaluated on their approach to human rights prior to the conclusion of procurement or

related agreements, and are required to uphold equivalent ethical standards as Mediclinic. We undertake to not support nor transact with any business involved in slavery or human trafficking and to act in accordance with all applicable legislation of the jurisdictions in which we conduct business.

TRAINING AND OVERVIEW OF KEY AREAS

The Mediclinic Board of Directors (the 'Board') and all relevant employees – particularly those managing employees, dealing with potential applicants and overseeing the supply chain – are kept informed of the regulatory requirement to ensure an understanding of the risks and the Group's position on slavery and human trafficking; to manage those risks accordingly; and to stay abreast of global developments in this regard. This information forms part of the induction programme for all relevant employees. Given that the greatest risk lies within our supply chain, awareness training is scheduled on an annual basis with all procurement business units within the Group, as well as new recruits, to ensure employees and suppliers can identify and combat modern slavery.

RECRUITMENT

Human resources employees are cognisant of human trafficking and other forms of modern slavery and assist in the elimination thereof, especially in our hiring practices, by sharing this information with their teams and by reporting any incidents.

SUPPLY CHAIN MANAGEMENT

The performance of our supply chain directly impacts on our ability to deliver quality care to our clients. Our supply chain teams select and engage with high-performing suppliers that can support our purpose to enhance the quality of life. We believe in responsible sourcing and select reputable manufacturers from several

countries. Our strict selection criteria for manufacturers and products, based on globally accepted standards and certifications, form the basis of preventing modern slavery. We require suppliers to eliminate human trafficking and modern slavery, and to exercise due diligence in their operations and supply chains. We rely on suppliers to deliver superior products and services that conform to Mediclinic standards and values, and expect them to adhere to the Group's applicable policies.

Factors considered when selecting new suppliers or reviewing contracts with existing suppliers include:

- the organisation's reputation and stability;
- compliance with relevant labour legislation, including health and safety legislation and relevant 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.

Once suppliers are selected, global contracts are continuously reviewed to track performance.

Modern slavery and sustainability are standing agenda items in supplier meetings.

Due to the geographic diversity of our operations and the potential for cost saving and improved efficiency, 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 the Company, was established to attend to the innovation, purchasing and distribution of a limited range of medical supplies and related products. In 2016, it achieved the internationally accepted ISO 13485:2016³ certification and is audited annually by an external auditor from the BSI, the national standards body of the UK, to maintain its certification. Formal agreements with critical suppliers as well as supplier selection evaluation are key focus areas during ISO certification. Medical Innovations 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.

Supplier premises located in geographic areas that are considered high risk for modern slavery and human trafficking are physically visited, inspected and audited by Mediclinic, prior to procurement contracts being concluded.

Notes

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

² Companies exporting products from the United States are often asked by foreign customers to supply a certificate from the Food and Drug Administration ('FDA'). This certificate contains information about the product's regulatory or marketing status, with the process considering all aspects of manufacturing, including labour practices.

³ 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. This certification process has a specific section relating to supplier selection and contracting.

Our Group Supply Chain Risk Management Policy ensures Mediclinic maintains a reliable supply chain of reputable service providers to guarantee safe products in all our facilities. It provides the framework to realise our Group procurement philosophy; to identify, assess and mitigate supply chain risks; and to globally ensure compliance with all applicable regulations and legislation. Annual internal audits of all procurement departments test compliance against supply chain policies and identify areas for improvement. This policy is reviewed annually to ensure it clearly reflects our commitment to prioritising suppliers that have action plans to minimise their environmental impact and sufficient safeguards to meet our social standards.

During meetings attended by senior procurement team members from all geographies, the supply chain is assessed and training provided to increase awareness and identify potential risk areas. We continuously engage in industry forums to obtain relevant information regarding supply chain risks.

Onboarding suppliers receive detailed collateral on the Group's ethics lines to inform them of their availability, dedicated process and confidentiality, and to promote the reporting of any concerning practices or incidents.

DUE DILIGENCE AND RISK ASSESSMENT

We continue to raise awareness of modern slavery and a due diligence questionnaire forms part

of the onboarding process with new suppliers. It is also sent to a selection of existing suppliers to proactively assess risks relating to human rights, transparency and awareness, among others. Our suppliers indicated they have initiatives to eliminate all risks relating to human rights violations in their organisation and supply chain. Mediclinic representatives are equipped with information on modern slavery and related activities, how to identify worker exploitation and how to report such instances.

No steps against suppliers were required as we received no information or alerts regarding any members of our supply chain.

Should certain suppliers require training on modern slavery and human trafficking, we will provide assistance and guidance to help them improve. Mediclinic employees involved in the purchasing of equipment or consumables are also bound to strict ethical principles, ensuring we maintain a high standard of integrity in our supplier relationships.

MOVING FORWARD

We do not tolerate any human rights violations and will continue to ensure that no form of modern slavery, human trafficking or related exploitation occurs in any part of our operations. We recognise our responsibility to eliminate illegal practices that encroach and infringe upon human rights.

Managed by independent service providers, our anonymous toll-free

ethics lines enable all employees, suppliers and third parties to report concerns. All reports are dealt with in a non-discriminatory and confidential manner. Any form of retaliation against an employee or other person making a report in good faith will not be tolerated.

We aim to drive positive change in the next financial year by:

- continuing the distribution of our supplier due diligence questionnaire to new and existing suppliers to proactively assess risks relating to human rights violations, among others; improve transparency; and enhance awareness of and insight into modern slavery and human trafficking;
- promoting awareness of human rights abuses across the Group and providing the necessary training for key staff members to recognise and, most importantly, report such incidents; and
- considering trends, current practices and recommendations developed by governments or other institutions on preventing modern slavery and human trafficking.

Approved by the Board on 7 June 2023.



Jannie Durand
Non-executive Chair