

CORPORATE POLICY

GROUP SUSTAINABLE DEVELOPMENT POLICY

1. PURPOSE

This policy formally documents the Mediclinic Group's commitment, strategy, reporting standards and governance approach to manage its economic, social and environmental impacts and performance. The Group's commitment, strategy, reporting standards and governance approach to manage its environmental impacts and performance is dealt with in further detail in the Group Environmental Policy.

2. SCOPE

This policy applies to each Operating Division of Mediclinic International and shall be adopted and implemented by the EXCO of each Operating Division.

3. **DEFINITIONS**

"Board" means the board of directors of Mediclinic International;

"CPSC" means the Clinical Performance and Sustainability Committee

of Mediclinic International:

"EXCO" means Executive Committee of either Mediclinic International

or an Operating Division, as the context may indicate, or in the absence of an Executive Committee, the most senior

management committee;

"GRI" means the Global Reporting Initiative's Sustainability
Reporting Standards issued by the Global Sustainability

Standards Boards, as may be amended from time to time;

"Group Sustainability Function"

means the sustainability function of Mediclinic International, under supervision of the Chief Corporate Services Officer of

Mediclinic International;

"Mediclinic International" means Mediclinic International plc;

"Mediclinic Group" or "the Group"

means Mediclinic International and the Operating Divisions;

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"Operating Division(s)"

means the operating divisions of Mediclinic International in (i) South Africa and Namibia (Mediclinic Southern Africa, (ii) Switzerland (Hirslanden), and (iii) the United Arab Emirates (Mediclinic Middle East).

4. SUSTAINABLE DEVELOPMENT PHILOSOPHY

The Mediclinic Group is focused on its core business of providing acute, specialist-orientated healthcare on a sustainable basis. The Group is committed to ethical business practices and efficient risk management, and continually strives to be a responsible corporate citizen by, *inter alia*, continuously monitoring and managing its economic, social and environmental impacts.

Mediclinic International is committed to being a good corporate citizen and believes that sustainability must be integrated in its business strategy, focusing not only on its financial output, but also on managing and utilising social and environmental resources efficiently to ensure a sustainable business in the long term.

Mediclinic International is committed to continuously review, develop and improve its sustainability strategy, governance approach and public reporting.

The Mediclinic Group is committed to quality care and aspires to be regarded as the most respected and trusted provider of hospital services by patients, doctors, and funders of healthcare. The Group's dedication to excellence in healthcare is evidenced by the quality of care and facilities provided. This and various other sustainability considerations are entrenched in the Group's vision and values.

Mediclinic International recognises that it is accountable to its stakeholders and is committed to effective and regular engagement with them and to publicly report its sustainability performance in accordance with GRI.

Mediclinic International acknowledges that strategy, risk, governance, performance and sustainability are all inter-connected and that these should be addressed in an integrated manner. Through the Group's integrated approach, Mediclinic International believes that it will continue to achieve financial growth, effectively manage its risks, protect the environment and enhance social wellbeing at the same time, resulting also in the maintained trust and respect of the Group's stakeholders.

5. OBJECTIVES

Mediclinic International aims to achieve the following key objectives through its focus on sustainability:

- effectively manage its significant economic, social and environmental impacts and risks by:
 - **developing an engaged and productive workforce**, through its focus on, *inter alia*, employee recruitment and retention; employee development and training; employee recognition and remuneration; employee health and safety; and sound labour relations;
 - **minimising its environmental impacts**, through its focus on, *inter alia*, maintaining an effective environmental management system, safe waste and hazardous waste practices, reduction of emissions, energy efficiency; and responsible water usage;
 - being an ethical and responsible corporate citizen, through its focus on, inter alia, maintaining and strengthening the respect and trust of its stakeholders, including the financial markets; zero tolerance for bribery and corruption; respecting human rights; supply chain management; and corporate social investment;
- creating a responsible investment proposition for shareholders and potential investors;
- building the Group's brands and reputation; and
- early identification and response to non-financial risks.

6. GOVERNANCE OF SUSTAINABLE DEVELOPMENT

6.1 Responsibility

The CPSC is responsible to, *inter alia*, monitor the Group's sustainable development activities, to draw matters within its mandate to the attention of the Board as may be required and to report on the matters within its mandate to the shareholders of Mediclinic International.

The Mediclinic International EXCO is responsible for the management of sustainable development throughout the Mediclinic Group, with delegated responsibilities to the Group Sustainability Function and the EXCOs of the Operating Divisions. The Mediclinic International EXCO or Group Sustainability Function shall report any significant matter in

this regard to the CPSC and/or the Board. The role of the Group Sustainability Function is to assist Mediclinic International to discharge its responsibilities as a good corporate citizen and to assist with the implementation of this policy throughout the Group.

6.2 <u>Setting of material sustainability priorities</u>

The Mediclinic International EXCO shall annually review the material sustainability priorities for the Mediclinic Group, after feedback from the Operating Divisions, , and make a recommendation to the CPSC. In determining the material sustainability priorities, management shall perform a materiality assessment. During the materiality assessment, focus should be placed on the Group's most significant sustainable development impacts and risks, being those which directly affect the Group's ability to create value, reflecting the Group's impacts and legitimate expectations of its stakeholders. In this process, Mediclinic should acknowledge its dependency on the six capitals (financial, manufactured, human, intellectual, social and relationship and natural) in order to create value.

6.3 <u>Duties and responsibilities of Group Sustainability Function</u>

The duties and responsibilities of the Group Sustainability Function shall include:

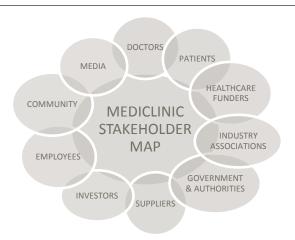
- development, review and implementation of the Group's sustainability strategy and governance procedures;
- liaison with the Operating Divisions to ensure consistent adoption and implementation of Group's sustainability strategy and governance procedures;
- provide guidance to the Operating Divisions regarding the implementation of the Group's sustainability strategy and governance procedures;
- keep up to date with international sustainable development trends and reporting standards;
- coordinate the feedback by the Operating Divisions to the Mediclinic International EXCO;
- coordinate any feedback as may be required by the Mediclinic International EXCO to the CPSC and Board;
- coordinate the information required in order to participate in relevant surveys and respond to information requests relating to the Group's sustainability;
- manage the preparation of the annual sustainable development reporting or such sustainable development reporting published on the Company's website.

6.4 Internal and External Reporting

Any significant sustainability issues shall be reported to the CPSC without delay.. The Company shall report, by way of a standalone Sustainable Development Report or sustainable development reporting published on the Company's website; and consider and recommend for approval to the Board the sustainability highlights included in the Company's annual reportThe annual Sustainable Development Report of Mediclinic International shall be presented to the CPSC for review and recommendation to the Board.

6.5 Stakeholder Engagement

The nature of the Group's business implies close personal engagement with a wide range of stakeholders, as indicated below, which is achieved through a variety of communication methods. The results of the Group's stakeholder engagement shall be taken into consideration when determining or confirming the material sustainability priorities of the Group, as referred to in 6.2 above.



6.6 Management Cycle

Whilst continuously monitoring performance throughout a calendar year, the following key stages form part of the management cycle:



7. PUBLIC REPORTING & SURVEYS

Mediclinic International is committed to publicly report on its sustainable development performance in order to provide its stakeholders with relevant information on the Mediclinic Group's non-financial aspects of corporate practice that, in turn, create economic, social and environmental value. The sustainability reporting shall be reviewed at least annually and published on the Company's website to coincide with the annual report of Mediclinic International. It shall also be made available to the Group's employees by publishing relevant information on the intranets of the Company and the Operating Divisions.

The annual sustainability reporting shall, as far as reasonably possible, adhere to the recommendations of GRI or such other standards as may be decided by the Mediclinic International EXCO.

The Mediclinic International EXCO shall annually consider and make a recommendation to the CPSC on the need for or level of external assurance of the Group's public reporting on sustainable development.

Mediclinic International is committed to annually participate in or conduct the following:

- the FTSE4Good and the FTSE/JSE Responsible Investment Indices;
- verification of the Group carbon footprint and publishing of relevant information in this regard;
 and
- any other indices and surveys deemed appropriate by the Group Sustainability Function.

8. PUBLICATION OF POLICY

This policy or a summary thereof shall be made available to all employees of the Mediclinic Group

	and published on the intranets or other document management system of the Operating Divisions; and to the public through the website of Mediclinic International.
9.	REVIEW
	This policy shall be reviewed as and when deemed necessary, but at least annually, by the Board upon recommendation of the CPSC.
10.	QUESTIONS ON INTERPRETATION
	Any questions regarding the interpretation and/or implementation of this policy should be addressed to the Group Sustainability Function.