

CORPORATE POLICY

GROUP SUSTAINABLE DEVELOPMENT POLICY

1. **PURPOSE**

This policy formally documents Mediclinic's commitment, strategy, reporting standards and governance approach to manage its economic, social and environmental impacts and performance, to support the long-term sustainable success of the Group, generating value for shareholders and contributing to wider society. 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 the Group and shall be adopted and implemented by the Group Executive Committee as well as the Executive Committee of each Division.

3 **DEFINITIONS**

"Board"

means the board of directors of Mediclinic International plc;

"CPSC"

means the Clinical Performance and Sustainability Committee of Mediclinic International plc;

"Executive Committee"

means the Group Executive Committee or a 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" or "the Group"

means Mediclinic International and the Divisions; and

"Division(s)"

means the 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

Mediclinic is focused on its core business of providing specialist-orientated, multi-disciplinary healthcare services across the continuum of care, 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 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 is committed to continuously review, develop and improve its sustainability strategy, governance approach and public reporting.

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

Mediclinic 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 the GRI.

Mediclinic acknowledges that strategy, risk, governance, performance and sustainability are all inter-connected and that these should be addressed in an integrated manner. Through the integrated approach adopted, Mediclinic 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 strives to achieve the following key objectives through its focus on sustainability:

- effectively manage its significant environmental, social and governance impacts and risks by:
 - **neutralising its environmental impacts**, through its focus on, *inter alia*, becoming carbon neutral (reduction of emissions, energy efficiency), maintaining an effective environmental management system, safe waste and hazardous waste practices, and sustainable water usage;
 - building stakeholder trust, through its focus on, inter alia, maintaining and strengthening
 the respect and trust of its stakeholders; respecting human rights (referring to improved
 diversity and inclusion and prevention of modern slavery); employee recruitment;
 employee engagement; employee health and safety; optimal supply chain performance;
 effective contributions to Corporate Social Investment;
 - **being an ethical and responsible corporate citizen**, through its focus on, *inter alia*, zero tolerance for bribery and corruption; effective measures, practices and controls to protect the Group's Information Assets; maintaining high-quality healthcare infrastructure:
- 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.

GOVERNANCE OF SUSTAINABLE DEVELOPMENT

6.1 Responsibility

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

The Group Executive Committee is responsible for the management of sustainable development throughout the Group, with delegated responsibilities to the Group Sustainability Function and the Executive Committees of the Divisions. The Mediclinic International Executive Committee 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 the Company 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 Group Executive Committee shall annually review the material sustainability priorities of the Group, after feedback from the 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, manufacturing, human, intellectual, social and relationship and natural) in order to create value.

6.3 <u>Duties and responsibilities of the 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 Divisions to ensure consistent adoption and implementation of the Group's sustainability strategy and governance procedures;
- provide guidance to the Divisions regarding the implementation of the Group's sustainability strategy and governance procedures;
- remain up to date with international sustainable development trends and reporting standards:
- coordinate the feedback by the Divisions to the Group Executive Committee;
- coordinate any feedback as may be required by the Group Executive Committee 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; and
- 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 report. The annual Sustainable Development Report of Mediclinic International shall be presented to the CPSC for review and recommendation to the Board for approval.

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 paragraph 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 the Group's sustainable development performance in order to provide its stakeholders with relevant information on 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 Divisions.

The annual sustainability reporting shall, as far as reasonably possible, adhere to the recommendations of the GRI or such other standards as may be approved by the Group Executive Committee.

The Group Executive Committee 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 Mediclinic and published on the intranets or other document management system of the Divisions; and to the public through the website of Mediclinic International at www.mediclinic.com.
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.