

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT IN RESPECT OF THE FINANCIAL YEAR ENDED 31 MARCH 2025

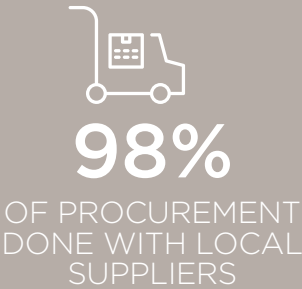
## ZERO TOLERANCE FOR SLAVERY, SERVITUDE, FORCED LABOUR AND HUMAN TRAFFICKING

### INTRODUCTION

This statement is issued by Manta Bidco Limited ('the Company') and its fully owned subsidiary Mediclinic Group Limited ('Mediclinic') in respect of the financial year ended 31 March 2025 ('FY25') and marks the second and tenth statement of the Company and Mediclinic, respectively.

It is published in accordance with the United Kingdom ('UK') Modern Slavery Act 2015 and confirms our continued commitment to preventing child labour, modern slavery and human trafficking in the workplace as well as our supply chain, setting out the steps taken to prevent any form of such practices in our business or indirectly through our supply chain. During the year, no incidents of child labour, modern slavery or human trafficking 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



On 26 May 2023, the Company became the ultimate holding entity of the Mediclinic Group, previously listed on the London Stock Exchange, JSE and Namibian Stock Exchange.

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 29.7% 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.

We are focused on providing specialist-orientated, multidisciplinary services across the continuum of care in such a way that the Mediclinic 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 Group, visit [www.mediclinic.com](http://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 and is of fundamental importance. We follow a proactive approach to ensure that our employees and suppliers understand what is expected of them.

Mediclinic's [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 Mediclinic 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 the Group. We undertake to not support nor transact with any business involved in child labour, 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 Company and Mediclinic Boards of Directors (the 'Boards') and all relevant employees – particularly those managing employees, dealing with potential applicants and overseeing the supply chain – are kept informed on the matter. In keeping with the regulatory requirement, we seek to:

- ensure an understanding of the risks and the Group's position on slavery, which includes child labour, and human trafficking;
- manage those risks accordingly; and
- stay abreast of global developments in this regard.

This information forms part of the induction programme for all relevant employees, which is dealt with internally. 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 Mediclinic Group, as well as new recruits, to ensure employees and suppliers can identify and combat these forms of exploitation. The Mediclinic Group's representatives are equipped with information on modern slavery and related activities, how to identify worker exploitation and how to report such instances.

### 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

Mediclinic sources supplies and services from a broad range of suppliers across the world, predominantly procuring locally through the agents of multinational companies. Central procurement leads support local procurement leads to ensure we leverage the global scale of the Mediclinic Group to obtain optimal pricing and continuity of supplies. We have centralised procurement and supply chain functions in all divisions and in Switzerland and the Middle East, a central logistics platform is utilised to streamline daily distribution.

The performance of our supply chain directly impacts 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 Group standards and values, and expect them to adhere to the Mediclinic Group's applicable policies. Our purchase orders require the supplier to comply with our company standards and values upon acceptance.

Factors considered when selecting new suppliers or reviewing contracts with existing suppliers 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 MDR<sup>1</sup> and/or FDA<sup>2</sup> 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 when meeting with suppliers.

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 Mediclinic, 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 13485:2016<sup>3</sup> certification and is audited annually by accredited external auditors to maintain its certification.

#### Notes

<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

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, prior to procurement contracts being concluded. Employees are required to report any actual or suspected incidents of conduct not aligned with Mediclinic Group policies and can do so in confidence.

The Group Procurement and Supply Chain Risk Management Policy ensures that we maintain a reliable supply chain of reputable service providers to guarantee safe products in all our facilities. It provides the framework to realise our Mediclinic Group procurement philosophy; to identify, assess and mitigate supply chain risks; and to globally ensure compliance with applicable regulations and legislation. 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. 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 and guiding employees on changes to policies and how those affect their ways of working. Regular internal audits of procurement departments test compliance against this policy or its local equivalent and identify areas for improvement.

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.

During onboarding, new suppliers receive detailed collateral on the Mediclinic 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 was also sent to a selection of existing suppliers during the reporting period to proactively assess risks relating to human rights, transparency and awareness, among others. Our suppliers indicated they have policies and related initiatives to eliminate the risk of human rights violations in their organisation and supply chain.

We also initiated a process to review suppliers. Based on the percentage annual spend, suppliers were selected for

desktop checks so we could familiarise ourselves with their environmental and social performance, especially in the case of those suppliers that are located in geographic areas considered as high risk for incidents of child labour. In the event where no policies or strategies to promote nature and people were found, further consultation was arranged to positively influence suppliers.

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

Should certain suppliers require training on modern slavery and human trafficking, we will provide assistance and guidance 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.

### **NEXT STEPS**

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 Boards of Manta Bidco Limited and Mediclinic Group Limited on 5 June 2025.

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**Jannie Durand**  
 Chair of Manta Bidco Limited and Mediclinic Group Limited