

GROUP SUSTAINABLE DEVELOPMENT POLICY

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| 1. | PURPOSE | |
| | This policy formally documents the Group’s commitment, strategy, reporting standards and governance approach to manage its economic, social and environmental impacts. | |
| 2. | SCOPE | |
| | This policy applies to each Operating Platform of Mediclinic International and shall be adopted and implemented by the EXCO of each Operating Platform. | |
| 3. | DEFINITIONS | |
| | <p>“Board”</p> <p>“EXCO”</p> <p>“GRI G3”</p> <p>“Group SDM”</p> <p>“King III”</p> <p>“Mediclinic International”</p> <p>“Mediclinic Group” or “the Group”</p> <p>“Operating Platform(s)”</p> | <p>means the board of directors;</p> <p>means Executive Committee of either Mediclinic International or an Operating Platform, as the context may indicate;</p> <p>means the third revision of the Global Reporting Initiative’s Sustainable Development Guidelines;</p> <p>means the Group Sustainable Development Manager of Mediclinic International;</p> <p>means the King Code of Governance Principles for South Africa 2009 and the King Report on Governance for South Africa 2009;</p> <p>means Mediclinic International Limited;</p> <p>means Mediclinic International and the Operating Platforms; and</p> <p>means Medi-Clinic Southern Africa Limited, Medi-Clinic Switzerland AG and Emirates Healthcare Holdings Limited and each of their respective subsidiaries and associated entities.</p> |
| 4. | OUR SUSTAINABLE DEVELOPMENT PHILOSOPHY | |
| | <p>The Mediclinic Group is focused on its core business of providing acute, specialist-orientated hospital 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, <i>inter alia</i>, continuously monitoring and managing its economic, social and environmental impacts.</p> <p>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 hereby confirms its commitment to manage and continuously review and improve its:</p> <ul style="list-style-type: none"> • direct and indirect economic impacts; • market presence; • impacts on the environment; • labour practices; | |

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| | <ul style="list-style-type: none"> • human rights protection; • impacts on society; and • product responsibility. <p>Mediclinic International is committed to continuously review, develop and improve its sustainability strategy, governance approach and public reporting.</p> <p>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. Our dedication to excellence in healthcare is evidenced by the quality of care and our facilities provided. This and various other sustainability considerations are entrenched in our vision and values.</p> <p>Mediclinic International recognises that it is accountable to our stakeholders and is committed to effective and regular engagement with them and to publicly report its sustainability performance in accordance with GRI G3.</p> <p>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 our integrated approach, Mediclinic International believes that we will continue to achieve financial growth, effectively manage our risks, protect the environment and enhance social wellbeing at the same time, resulting also in the maintained trust and respect of all our stakeholders.</p> |
| 5. | OBJECTIVES |
| | <p>Mediclinic International aims to achieve the following key objectives through our focus on sustainability:</p> <ul style="list-style-type: none"> • meeting our duty as corporate citizen to effectively manage all three pillars of our triple bottom line (economic, social and environmental performance); • maintaining and strengthening the respect and trust of our stakeholders, including the financial markets; • increasing shareholder value by creating a responsible investment proposition for shareholders and potential investors; • building the Group's brands and reputation; • improving and building on our market position; • being recognised as an employer of choice; and • early identification and response to non-financial risks. |
| 6. | KEY SUSTAINABILITY COMMITMENTS |
| | <p>The Mediclinic International EXCO will determine and annually review the Group's key sustainability commitments as our material and key focus areas.</p> <p>These impacts will be the focus point of our sustainable development initiatives and our performance will be monitored through the governance structures envisaged in this policy.</p> |
| 7. | GOVERNANCE OF SUSTAINABLE DEVELOPMENT |
| | <p>7.1 <u>Responsibility</u></p> <p>The Mediclinic International EXCO is responsible for the management of sustainable development throughout the Mediclinic Group, with delegated responsibilities to the Group SDM. The role of the Group SDM will be to assist Mediclinic International to discharge its responsibilities as a good corporate citizen and to ensure the implementation of this policy throughout the Group.</p> |

7.2 Setting of key sustainability commitments

The Mediclinic International EXCO shall annually determine the key sustainability commitments for the Mediclinic Group, after feedback from the Operating Platforms, specifically also after considering the results of the Group's stakeholder engagement.

7.3 Duties and responsibilities of Group SDM

The Mediclinic International EXCO shall appoint a Group SDM. The duties and responsibilities of the Group SDM shall, with regards to sustainability include:

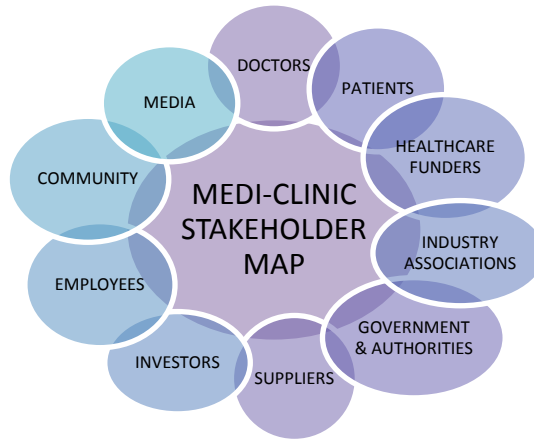
- development, review and implementation of the Group's strategy and governance procedures;
- liaison with the Operating Platforms to ensure consistent adoption and implementation of Group's strategy and procedures;
- provide guidance to the Operating Platforms regarding the implementation of the Group's strategy and procedures;
- keep up to date with international sustainable development trends and reporting standards;
- prepare the stakeholder engagement survey and coordinate the process with the Operating Platforms;
- coordinate the feedback of the Operating Platforms to the Mediclinic International EXCO;
- coordinate the feedback of the Mediclinic International EXCO to the Mediclinic International Board;
- coordinate the information required in order to participate in any survey relating to the Group's sustainability;
- manage the preparation of the annual Sustainable Development Report.

7.4 Internal Reporting

Any significant sustainability issues shall be reported to the Mediclinic International Board. The Group SDM shall include a report for the Mediclinic International Board, at least annually to confirm the Group's annually reviewed key sustainability commitments. The annual Sustainable Development Report to be included in the annual report of Mediclinic International shall be presented to the Mediclinic International Audit & Risk Committee for review and recommendation to the Mediclinic International Board.

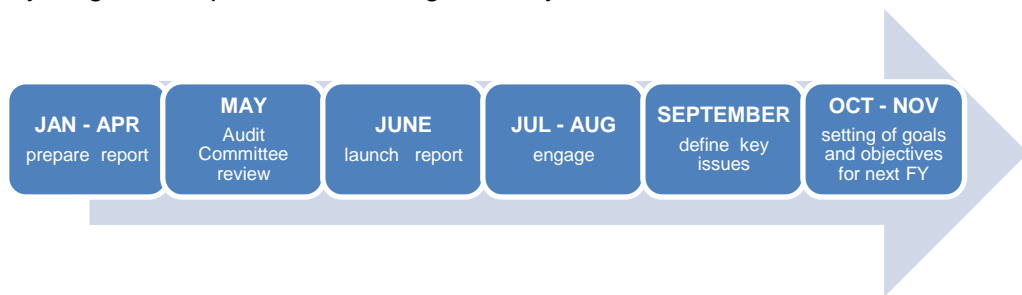
7.5 Stakeholder Engagement

The nature of our 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 our stakeholder engagement shall be taken into consideration when determining or confirming the key sustainability commitments of the Group, as referred to in 7.2 above.



7.6 Management Cycle

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



8. PUBLIC REPORTING & SURVEYS

Mediclinic International is committed to publicly report on its sustainable development performance in order to provide our stakeholders with relevant information on the Mediclinic Group’s non-financial aspects of corporate practice that, in turn, create economic, social and environmental value. A Sustainable Development Report will be prepared annually and reported on in an integrated manner with the annual financial results of the Group in the annual report of Mediclinic International.

The annual Sustainable Development Report shall as far as reasonably possible adhere to the recommendations of King III, GRI G3 or other standards as may be decided by the Mediclinic International EXCO.

The Group SDM will annually make a recommendation to the Mediclinic International EXCO on the GRI G3 application level as well as whether the annual Sustainable Development Report should be externally assured.

The annual Sustainable Development Report shall be published on the intranets and the websites of Mediclinic International and the Operating Platforms.

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

- the JSE Socially Responsible Investment (SRI) Index – an initiative by the JSE Limited, the South African securities exchange, measuring JSE-listed companies’ economic, social and environmental performance;
- verification of our carbon footprint and publishing of relevant information in this regard; and
- any other survey deemed appropriate by the Group SDM.

9. PUBLICATION OF POLICY

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| | This policy or a summary thereof shall be available to all employees of the Mediclinic Group and published on the intranets of the Operating Platforms and to the public through the websites of Mediclinic International and the Operating Platforms. |
| 10. | REVIEW |
| | This policy shall be reviewed as and when deemed necessary, but at least annually by the EXCO of Mediclinic International. |
| 11. | QUESTIONS ON INTERPRETATION |
| | Any questions regarding the interpretation and/or implementation of this policy should be addressed to the Group SDM. |