

**CORPORATE POLICY**  
**ANTI-BRIBERY POLICY OF**  
**MEDICLINIC INTERNATIONAL PLC**

## 1 INTRODUCTION

- 1.1 This document describes the Anti-Bribery Policy (the “**Policy**”) of Mediclinic International plc (the “**Company**”), its Operating Divisions, and subsidiary companies (which means owned and controlled by the Company), internationally (“**Mediclinic Group**” or the “**Group**”).
- 1.2 The Company is committed to doing business ethically. Even the suggestion of corruption may damage the Company’s reputation and may also bring the personal integrity of individuals into question. The Company will comply with all applicable anti-bribery and anti-corruption laws in all jurisdictions in which it operates.
- 1.3 This Policy is sponsored by the Company’s Chief Executive Officer and the Board of Directors.

## 2 PURPOSE

The purpose of this Policy is to communicate the Company’s commitment to ensure full compliance with all anti-bribery and corruption laws and regulations including the UK Bribery Act 2010; and set forth principles and rules that the Company and Employees must comply with to prevent Bribery in all forms, as well as the procedure/s to be followed by Employees in instances where Gifts are offered to Employees by Suppliers or Third Parties.

## 3 POLICY STATEMENT

The Company does not tolerate Bribery of any kind without exception and commits itself to:

- 3.1 carry out business fairly, honestly and transparently;
- 3.2 a zero tolerance attitude towards Bribery;
- 3.3 not offer or pay bribes to gain business advantages;
- 3.4 not take or accept bribes to give business advantages;
- 3.5 avoid doing business with others who do not accept our values and who may harm our reputation;
- 3.6 make sure everyone in our business and our business partners know about our principles and the rules we have established; and
- 3.7 develop and implement a program to support these commitments.

## 4 SCOPE

This Policy:

- 4.1 applies to the Mediclinic Group and its Employees and should be adopted by the Executive Committee of each Operating Division; and
- 4.2 relates to all business activities carried out by the Mediclinic Group or its Employees, on behalf of the Company, with any individual, legal entity, government body (national or foreign), public sector entity, private commercial organization, non-profit organization and/or international body.

## 5 DEFINITIONS

- 5.1 **“Benefit register (Unit)”**: A detailed register maintained by the relevant hospital manager, regional manager, corporate office department heads per hospital, region or corporate office department reflecting the details and true nature of all Gifts, Hospitality and Entertainment (irrespective of the value thereof) received by Employees in that hospital, region or department, an example of which is attached hereto as **Annexure A**.
- 5.2 **“Benefit register (Group)”**: A detailed register maintained by the Company Secretarial and Legal Department of Mediclinic or the relevant Company Secretary of the concerned Operating Division, as applicable, in respect of Gifts, Hospitality and Entertainment reflecting the details and nature of all Gifts, Hospitality and Entertainment that exceed the Permitted Value, an example of which is attached hereto as **Annexure B**.
- 5.3 **“Bribery”**: Bribery is offering, promising, giving, receiving or soliciting anything of value in order to influence how someone carries out a public, commercial or legal duty.
- 5.4 **“Company” or “Mediclinic”**: Mediclinic International plc.
- 5.5 **“CPD Events”**: Continuing medical education or continuing professional development Events organised by Mediclinic.
- 5.6 **“Employees”**: Such persons to whom this Policy applies, as set out in clause 4, including an Employee’s spouse, his/her children and any legal entity under the Employee’s control...
- 5.7 **“Entertainment”**: Entertainment covers any form of entertainment offered by one party to another including attendance at plays, concerts, social events (whether public or private) and sport events, but exclude business breakfast, lunch or dinner.
- 5.8 **“Event(s)”**: Any congress, conference, seminar, exhibition, factory visit or other event.
- 5.9 **“Facilitation Payments”**: Facilitation payments are unofficial payments usually (but not necessarily) made to a Public Official to facilitate approval of or to expedite business transaction/activity. These payments are intended to influence the recipient or a third party and to facilitate performance of non-discretionary duties. Such duties include clearing goods through customs, expediting visa approvals, providing police protection and providing power and water supply. This list is not exhaustive.
- 5.10 **“Grants and Donations”**: Grants and donations are benefits in cash or kind given or received by an Employee, the Company or any of its affiliates, subsidiaries, business partners or associated persons in cash or in kind including providing services free of charge or at a reduced rate.
- 5.11 **“Gift/s”**: Any gift, invitation, payment, favour, service, benefit, item or action of any kind given without expectation of payment or receiving anything in return. Gifts are meant to be free and should not place the recipient under any obligation.

- 5.12 **“Government Authority”**: Under this Policy, a Government Authority includes:
- National governments, political subdivisions or local jurisdictions;
  - Civil or military government agencies and their instrumentalities;
  - government-owned or government-controlled associations, organizations or enterprises, including state-owned companies;
  - legislative, administrative or judicial offices;
  - political parties; or
  - supra-national organizations (such as, for example, the World Bank, United Nations, International Monetary Fund, OECD).
- 5.13 **“Hospitality”**: Hospitality means legitimate business expenditure for purposes of the reception and entertainment of guests, visitors and any other third party, and generally includes refreshments, meals, travel tickets, holiday packages and accommodation.
- 5.14 **“Industry Codes”**: Industry Codes collectively refer to the MedTech Europe’s Code of Ethical Business Practice, 2016, SAMED Medical Device Code of Ethical Marketing and Business Practice, November 2017 and UAE Ministry of Health and Prevention Code of Ethical Practices for the Promotion and Distribution of Medical Products, November 2017, with any of the codes being referred to as “an/the Industry Code” as the context may indicate.
- 5.15 **“Mediclinic Group Services”**: Mediclinic Group Services (Pty) Ltd.
- 5.16 **“Operating Division”**: Operating Division means the operating divisions of Mediclinic, including all subsidiaries companies, currently in (i) Southern African and Namibia (Mediclinic Southern Africa), (ii) Switzerland (Hirslanden), and (iii) the United Arab Emirates (Mediclinic Middle East).
- 5.17 **“Permitted Value”**: Permitted Value means:
- GBP400 (four hundred pound sterling) (in respect of the United Kingdom);
  - ZAR5 000 (five thousand rand) (in respect of Southern Africa);
  - CHF500 (five hundred Swiss franc) (in respect of in Switzerland); or
  - AED1 000 (one thousand dirham) (in respect of the UAE).

- 5.18 **“Public Official”**: Under this Policy, Public Officials include:
- any officer, employee or representative of, or any person otherwise acting in an official capacity for or on behalf of a Government Authority;
  - any employee of a government-owned or government-controlled entity;
  - a legislative, administrative or judicial official, regardless of whether elected or appointed;
  - an officer of, or individual who holds a position in, a political party;
  - a candidate for political office; or
  - a person who otherwise exercises a public function for or on behalf of any country.

This includes civil servants, inspectors, members of a political party, employees of a state university, judges, customs and immigrations officials, ambassadors and embassy staffs, and law enforcement personnel. This list is not exhaustive.

- 5.19 **“Political Contributions”**: Political Contributions include monetary or non-monetary contributions made to a politician, political campaign or a political party.
- 5.20 **“Supplier/s”**: Any supplier of goods or services of any kind, including future or potential suppliers, their directors, employees, owners or representatives.
- 5.21 **“Third Party/ies”**: Any person, group or organisation (other than a Supplier), including a legal entity, which may include patients and doctors.

## 6 PRINCIPLES AND RULES

### General

- 6.1 Employees must not bribe anyone and also must not use Third Parties/intermediaries, like agents, consultants, advisers, or any other business partners to offer, give or receive bribes.
- 6.2 Bribery in any form is not tolerated, irrespective of the recipient, whether they are a Public Official or a private person.
- 6.3 Before offering or accepting any monetary or non-monetary benefit, Employees should consider whether the reputation of the Company, their own, or the recipient of the benefit is likely to be damaged if the benefit would be disclosed to public domain. Employees must not offer or accept any benefit if such offer or acceptance could be construed as a bribe or have an adverse impact on the reputation of the Mediclinic Group or the parties involved.
- 6.4 No payment of referral fees or other payment to employed or supporting doctors of the Operating Divisions to reward the referral of patients to the Group’s facilities or services of other facilities is permitted under any circumstances.
- 6.5 Gifts, Hospitality and/or Entertainment must not be offered and/or accepted if these put or have the possibility of putting the recipient under any kind of obligation.
- 6.6 Gifts, Hospitality and/or Entertainment shall not be given, offered or received with the intent or prospect of influencing or determining a recipient’s decision-making or other conduct.
- 6.7 When Employees or Third Parties acting on behalf of the Company are considering offering, accepting or providing Gifts, Hospitality and/or Entertainment, they must ensure that they are acting in good faith and constitute a normal business courtesy.

- 6.8 It is expected from each Employee to decline/accept Gifts, Hospitality and/or Entertainment, with responsibility and to inform their hospital manager or relevant departmental head of such offers for recording in the Benefits Register.
- 6.9 All fees, expenses and commissions paid to Third Parties engaged to represent or provide a service to the Company must be commercially reasonable and justifiable in the circumstances and must be for legitimate services rendered.
- 6.10 All payments to Third Parties must be in their name or to their business accounts – payments must not be made to any intermediary or Third Party who does not have a contractual relationship with the Company.
- 6.11 The Mediclinic Group reserves the right to repossess any Gift and to re-allocate any Gift to any other employee.
- 6.12 It is recommended and preferred that there be a long-standing business relationship with a Supplier when accepting any Gifts, Hospitality and/or Entertainment.
- 6.13 No Employee may canvass for Gifts, Hospitality and/or Entertainment in any way.

#### Corporate marketing and communication

- 6.14 It is acknowledged that, as part of the Group's corporate marketing and communication, Gifts, Hospitality and/or Entertainment are offered from time to time, mainly to healthcare practitioners practising at the Group's facilities, but on occasion also to Third Parties (such as service providers), which are intended to acknowledge their support (for example birthday gifts or year-end gifts). Gifts, Hospitality and/or Entertainment so offered shall not influence or alter existing business relations, with no expectation of any reciprocity. Each Operating Division shall implement additional processes to govern the offering, approval and recording of such Gifts, Hospitality and/or Entertainment, provided that prior approval by the Chief Executive Officer of the Operating Division must be obtained (upon recommendation of the Operating Division's Chief Marketing Officer) if the value per individual exceeds the relevant Permitted Value.

#### Cash Gifts / equivalents

- 6.15 Cash Gifts and Gifts that are cash equivalent (such as gift vouchers, shares, precious metals and gems) by a Supplier to an Employee may **never** be accepted and must never be offered to any Third Party or Supplier, irrespective of the value thereof.

Cash / cash equivalent Gifts not exceeding 20% of the Permitted Value to hospital staff by a Third Party as a token of appreciation may be approved by the Hospital Manager if, after careful scrutiny, it is clearly not inappropriate.

Cash / cash equivalent Gifts received by any other Employee from a Third Party), irrespective of the value thereof, is subject to approval in terms of the approval process in paragraphs 6.23 to 6.24, which approval shall only be granted if, after careful scrutiny, it is clearly not inappropriate.

#### Events organised by Mediclinic (including CPD Events)

- 6.16 Participants to Events organised by the Mediclinic Group must never be provided Entertainment (unless it is an appropriate part of such Events) or any side or extended trips or activities.

Expenses of companions/guests of participants to Events organised by the Mediclinic Group must never be paid, unless pre-approved in terms of the Company's Travel Policy.

It is acknowledged that, as part of the Group's doctor engagement initiatives, CPD Events are organised by the Group. Any sponsorship or donation by any Third Party towards such an Event is subject to the prior written approval of the Chief Executive Officer and Head of Procurement of the Company or the relevant Operating Division. If the value exceeds the relevant Permitted Value, it is also subject to the approval process in paragraphs 6.23 to 6.24. No product promotions are allowed in any CPD meeting room, although Supplier-branded items are permissible. Any approach by Mediclinic or any of its Employees to a Supplier or other Third Party for donations for CPD Events or other Mediclinic Events is only permissible in accordance with the terms of this Policy and, in particular, the approval requirements set out in paragraphs 6.23 and 6.24.

Any request by a Supplier, actual or prospective, or any other Third Party to advertise their products and/or services at any Event organised by the Group, other than CPD's, must be forwarded by the relevant events management department/individual to the relevant Head of Procurement of the Company and the Operating Division. Once the relevant Head of Procurement has received such detailed motivation or application, the relevant Head of Procurement shall either support or decline such motivation for approval in terms of the approval process in paragraphs 6.23 to 6.24.

*Invitations to Employees/associated healthcare professionals to attend a Third-Party Event*

- 6.17 Any direct sponsorship of Third Party Events to an Employee or associated healthcare professional ("HCP") is prohibited outright. A Supplier may not pay registration fees, travel and/or hospitality expenses directly to individual HCP for their participation, as a delegate or speaker, in educational Third Party Events. Any such sponsorship, including all payments and travel fees, by a Supplier will be effected by way of an educational grant directed to a legal entity, which legal entity may be a healthcare organisation ("HCO").

Any invitation by a Supplier or other Third Party to sponsor or provide an educational grant relating to the attendance of a Third-Party Event by an Employee or an associated HCP must be addressed to the relevant company (being the employer of the Employee/s and/or HCP) within the Mediclinic Group and never to an individual director, officer or Employee. Such invitation may specify the type of recipient, but may in no way specify the individual recipient. The relevant hospital manager, regional manager or department head will, in consultation with the relevant Head of Procurement, consider the invitation and forward a detailed motivation for approval in terms of the approval process in paragraphs 6.23 to 6.24, and subject to any further guidelines issued by the Group Executive Committee or the Operating Division.

Any such sponsorship or educational grant shall be governed by a written agreement between the relevant entity within the Mediclinic Group and the sponsoring Third Party, in which agreement the Third Party shall warrant that it complies with the relevant Industry Code. All costs relating to such Event shall be paid by the Mediclinic entity receiving the sponsorship or grant, and not directly by the Supplier.

Invitations to attend Supplier-organised Events (such as procedure or product training) shall also be addressed to the relevant company within the Mediclinic Group and not to an individual director, officer or employee; and subject to the approval in terms of the approval process in paragraphs 6.23 to 6.24. For such Events, no written agreement is required with

the Supplier and the costs relating to such Event, as per the Supplier's Invitation, shall be paid directly by the Supplier.

Employees attending an Event will be required to provide written feedback to the relevant hospital manager, regional manager or department head after attendance of the Event.

All Suppliers should be informed of the Company's policy regarding invitations to Events.

Where an invitation is addressed to an individual employee in their capacity as a member of an association, society, federation or equivalent body and where any entity within the Mediclinic Group will also be represented by this employee, the invitation must also be declared and approved in the manner set out in this paragraph.

#### *Business entertainment of stakeholders*

- 6.18 As part of relationship building, the management of the Company and/or the Operating Divisions may entertain stakeholders. The average cost of such business entertainment shall not exceed the Permitted Value per head, or if the Permitted Value is exceeded subject to approval in terms of the approval process in paragraphs 6.23 to 6.24.

#### *Relationship with Public Officials*

- 6.19 Any relationship with Public Officials must be in strict compliance with the rules and also regulations to which they are subject to and also with this Policy. There are strict laws or regulations which prescribe what government officials may or may not accept.

Any benefit offered or given to a Public Official or any Third Party must be fully transparent, properly documented and accounted for.

#### *Requests for grants and donations by Mediclinic*

- 6.20 Requests for grants and donations must be handled with special caution and must only be given if the Company and/or the Operating Division does not receive, and is not perceived to receive, any benefit, whether tangible or intangible in return.

#### *Political Contributions prohibited*

- 6.21 Political Contributions must not be made with the expectation of a direct or indirect return for the Company. All Political Contributions must be:

- compliant with applicable laws and regulations;
- appropriately disclosed; and
- pre-approved by the Executive Committee of the relevant Operating Division and reported to the Group Executive Committee.

#### *Facilitation Payments prohibited*

- 6.22 The Company prohibits Facilitation Payments as these are bribes and illegal. This is applicable irrespective of the fact that local laws in some jurisdictions permit Facilitation Payments.



### Approval process

6.23 Any Gifts, Hospitality and/or Entertainment by any Supplier must be approved by the Employee's relevant line manager or the relevant head of department, as the context will indicate, who shall ensure any relevant ethical codes applicable to such Gifts, Hospitality and/or Entertainment are adhered to.

In addition, any Gift, Hospitality and/or Entertainment that exceeds the Permitted Value and any cash / cash equivalent Gifts, irrespective of the value thereof (other than the exceptions listed in paragraph 6.14), is subject to approval in terms of the approval process in paragraphs 6.23 to 6.24.

6.24 Any cash / cash equivalent Gift (irrespective of the value); and any Gift, Hospitality and/or Entertainment valued at more than the Permitted Value is prohibited, unless prior approval is obtained in accordance with the requirements below:

(i) **in respect of Mediclinic or Mediclinic Group Services:** the Chief Executive Officer or Chief Financial Officer of the Company or such other person delegated by either of them, a record of which shall be kept by the Company Secretarial and Legal Department of Mediclinic of the Company, **PROVIDED THAT:**

- any Gift, Hospitality and/or Entertainment **equal to or more than two times** the Permitted Value is discouraged and must, following approval by the aforementioned persons, also be pre-approved by the Group Executive Committee, which approval shall only be granted if there is a proper business case for such Gift, Hospitality and/or Entertainment; and
- any Gift, Hospitality and/or Entertainment made to members of the Group Executive Committee **equal to or more than three times** the Permitted Value is discouraged and must, following approval by the Group Executive Committee, also be pre-approved by the Company's Chairman or Senior Independent Director, which approval shall only be granted if there is a proper business case for such Gift, Hospitality and/or Entertainment.

(ii) **in respect of the Operating Divisions:** the Executive Committee or such other person delegated by the Executive Committee of the relevant Operating Division, a record of which shall be kept by the Company Secretary of the respective Operating Division, **PROVIDED THAT:**

- any Gift, Hospitality and/or Entertainment **equal to or more than two times** the Permitted Value (**excluding** invitations relating to the attendance by HCP's of medical Events, as dealt with below) is discouraged and must, following approval by the Executive Committee (or delegated person) of the relevant Operating Division, also be pre-approved by the Group Executive Committee, which approval shall only be granted if there is a proper business case for such Gift, Hospitality and/or Entertainment; and
- any invitations relating to the attendance by HCP's of medical Events **equal to or more than five times** the Permitted Value is discouraged and must, following approval by the Executive Committee (or delegated person) of the relevant Operating Division, also be pre-approved by the Group Executive Committee, which approval shall only be granted if there is a proper business case for such Event. For the avoidance of doubt, invitations to attend medical Events below five

times the Permitted Value, may be approved by the Executive Committee (or delegated person) of the relevant Operating Division. All such Events remain subject to the requirements of paragraph 6.16.

- 6.25 Any request for approval in terms of this Policy must be submitted by the relevant line manager or department head to the Secretarial and Legal Department of Mediclinic or the relevant Company Secretary of the concerned Operating Division, as applicable, which motivation must be accompanied by the following:
- (i) recommendation by the relevant line manager or department head;
  - (ii) in the case of a Gift, Hospitality and/or Entertainment by a Supplier, approval by the relevant Head of Procurement;
  - (iii) evidence of the required approvals, as contemplated in paragraph 6.23;
  - (iv) the written agreement with the Supplier or other Third Party relating to sponsorships or donations to Mediclinic-organised CPD Events, as contemplated in paragraph 6.15;
  - (v) the written agreement with the Supplier or other Third Party relating to invitations to Events, as contemplated in paragraph 6.16.

#### Benefits Register

- 6.26 All hospital managers, regional managers and corporate office department heads will implement and maintain a **Benefits Register (Unit)** reflecting the details and true nature of all Gifts, Hospitality and Entertainment (irrespective of the value thereof), which register will be available for internal audit, as per **Annexure A**.

The Company Secretarial and Legal Department of Mediclinic or the relevant Company Secretary of the concerned Operating Division, as applicable, will maintain a Benefits Register (Group) in respect of their respective groups, noting the details of all Gifts, Hospitality and Entertainment that exceed the Permitted Value, as per **Annexure B**.

## **7 GUIDELINES**

- 7.1 The Group Executive Committee is authorised to issue guidelines to provide further guidance on the implementation of this Policy, which guidelines shall be binding across the Group in the same manner as this Policy.
- 7.2 Further to any guidelines issued by the Group Executive Committee, nothing shall prevent any Operating Division to implement further policies, procedures or guidelines to adopt Division-specific measures or to ensure compliance with this Policy or any locally applicable laws, regulations or ethical codes, provided that any such policies, procedures or guidelines are not in contravention of the provisions of this Policy.

## **8 EXTORTION**

- 8.1 The Company and its Employees shall reject any direct or indirect request by any Third Party (including but not necessarily limited to a Public Official) for a bribe (including a Facilitation Payment), even if by rejecting such a request, the Company is consequently threatened with adverse actions.
- 8.2 The Company does, however, recognise that in some cases an individual's own welfare and safety could be at risk if they do not respond to such requests. If Employees find themselves in this situation, they should never put themselves in danger, but should promptly report the

request to the Chief Executive Officer. Only the Chief Executive Officer of the Company is authorised to deal with such situations.

- 8.3 As with other violations of this Policy, the offering or making of any Facilitation Payment and/or the failure to fulfil any reporting obligations under this Policy shall be a disciplinary matter subject to the Mediclinic Group's disciplinary process. However, the Company shall not take disciplinary action against any officer or employee who makes a payment in such circumstances if they genuinely believed that they or their family members would have been put in danger if they had not done so.

## **9 REFERENCES**

- 9.1 In case of any doubt, employees must seek advice from their respective line manager or department head or the Company Secretarial and Legal Department of Mediclinic or the relevant Company Secretary of the concerned Operating Division, as applicable.
- 9.2 The Company's Code of Business Conduct and Ethics.
- 9.3 Industry Codes.
- 9.4 The UK Bribery Act 2010.

## **10 RESPONSIBILITY**

- 10.1 All Employees are responsible for the prevention, detection and reporting of Bribery and any other forms of corruption. They must avoid any activity that is in breach of this Policy.
- 10.2 All Employees must:
- ensure that they have read, understood and comply with this Policy; and
  - report any breach of this Policy that they are aware of or which has come to their attention. This will include reporting the belief or suspicion that a conflict with this Policy has occurred or may occur in the future.

## **11 REPORTING**

- 11.1 The Company is committed to provide a safe, reliable and confidential way of reporting any breach of this Policy. It is the policy of the Company not to allow retaliation for reports of misconduct by others made in good faith by employees.
- 11.2 All reports, which may be done on an anonymous basis, should be made to the Company Secretarial and Legal Department of Mediclinic or the relevant Company Secretary of the concerned Operating Division, as applicable, , alternatively to the appropriate Ethics Contact Person, the contact details of which are included in the Company's Code of Business Ethics.
- 11.3 When in doubt, employees may check with their line manager or department head about the best course of action in a particular situation.

## **12 VIOLATION OF THIS POLICY**

- 12.1 Compliance with this Policy is **mandatory** and the Company will not tolerate any violations.
- 12.2 Breach of the Policy may result in individuals or the Company receiving civil and/or criminal fines and punishment. Individuals may also be subject to imprisonment for Bribery and corruption.

**ANNEXURE A: EXAMPLE OF BENEFITS REGISTER (UNIT)**

BENEFITS REGISTER (UNIT) OF THE LEGAL DEPARTMENT OF HIRSLANDEN AG IN TERMS OF THE ANTI-BRIBERY POLICY OF MEDICLINIC INTERNATIONAL PLC											
DATE DETAILED MOTIVATION RECEIVED	DETAILED MOTIVATION RECEIVED FROM (include full names and title)	EMPLOYEE / BENEFICIARY (include full names and title)	NAME OF SUPPLIER or THIRD PARTY	DESCRIPTION OF GIFT AND/OR INVITATION (include dates, venue and flight details, if applicable)	VALUE	APPROVED or DECLINED BY LINE MANAGER (include date)	APPROVED or DECLINED BY PROCUREMENT / OTHER RELEVANT MANAGER (if gift / invitation by a Supplier)	APPROVED or DECLINED BY DIVISIONAL EXCO (if Permitted Value exceeded)	APPROVED or DECLINED BY MCI EXCO (if 2 times or more than Permitted Value) (EXCL medical events)	APPROVED or DECLINED BY MCI EXCO (if 5 times or more than Permitted Value) (ONLY medical Events)	DATE RELEVANT EMPLOYEE INFORMED OF FINDING
DD/MM/YY	Mr John Johnson – Company Secretary	Ms Joan Mark – Assistant Company Secretary	ABC Services (Pty) Ltd	Gift - Barbeque set	R300,00	Approved DD/MM/YY	Approved DD/MM/YY	Approved DD/MM/YY	Approved DD/MM/YY	Approved DD/MM/YY	DD/MM/YY
DD/MM/YY	Mr John Johnson – Company Secretary	Ms Jane Smith	DEF Supplies (Pty) Ltd	Attendance of National Health Summit in London, UK from DD/MM/YY - DD/MM/YY	R8 000,00	Approved DD/MM/YY	Approved DD/MM/YY	Approved DD/MM/YY	Approved DD/MM/YY	Approved DD/MM/YY	DD/MM/YY

Maintained by: [NAME]

Position held: [POSITION]

Location: [LOCATION]

Last updated: [DATE]

## ANNEXURE B: EXAMPLE OF BENEFITS REGISTER (GROUP)

Maintained by: [NAME]

BENEFITS REGISTER (GROUP) OF MEDICLINIC SOUTHERN AFRICA (PTY) LTD IN TERMS OF THE ANTI-BRIBERY POLICY OF MEDICLINIC INTERNATIONAL PLC														
DATE DETAILED	MOTIVATION RECEIVED	RECEIVED FROM (include full names, title, department and location)	EMPLOYEE / BENEFICIARY (include full names, title, department and location)	NAME OF SUPPLIER or THIRD PARTY	DESCRIPTION OF GIFT AND/OR INVITATION (include dates, venue and flight details, if applicable)	VALUE	APPROVED or DECLINED BY LINE MANAGER (include date)	APPROVED or DECLINED BY (if gift/invitation by a Supplier)	APPROVED or DECLINED BY DIVISIONAL EXCO (if Permitted Value exceeded)	APPROVED or DECLINED BY MCI EXCO (if 2 times or more than Permitted Value) (EXCL medical Events)	APPROVED or DECLINED BY MCI EXCO (if 5 times or more than Permitted Value) (ONLY medical Events)	DATE APPROVED BY EXCO (if Permitted Value exceeded)	COMMENTS	DATE RELEVANT OF EMPLOYEE INFORMED OF FINDING
DD/MM/YY	Ms Joan Johnson, GM: Legal Services, Corporate Office	Mr Mark Joans, Junior Legal Advisor, Corporate Office	ABC Services (Pty) Ltd	Attendance of National Health Act Conference from DD/MM/YY - DD/MM/YY at Sun City (includes return flight from Cape Town to Johannesburg, hotel accommodation, meals and car rental)	± R 9 500	Yes	N/a	Approved	Approved	DD/MM/YY	DD/MM/YY	DD/MM/YY	Approved, subject to requirement that a presentation must be made to the board of Mediclinic Limited at their next board meeting.	DD/MM/YY
DD/MM/YY	Mr Joe Soap - GM: Pharmacy Services	Ms Patsy Smith	DEF Pharmaceuticals CC	Factory visit on DD/MM/YY in Durban (includes return flights from Cape Town to Durban)	± R 3 500	Yes	Yes	Declined	Declined	DD/MM/YY	DD/MM/YY	DD/MM/YY	Declined due to suspected undue influence.	DD/MM/YY

Position held: Company Secretary

Group / Operating Division: [e.g. Hirslanden / Mediclinic Middle East]

Last updated: [DATE]