

29 September 2021

INTERNAL MEMORANDUM

Dear Colleague

MANDATORY VACCINATION POLICY

As one of the leading healthcare providers in South Africa and Namibia, Mediclinic Southern Africa has made an in principle decision to implement a mandatory COVID-19 vaccination policy for those working within all Mediclinic hospitals, offices and subsidiaries.

Our aim is to create a safe and positive environment for the treatment of our patients as well as our employees, associated doctors, healthcare professionals and other service providers. We strongly believe that this is the right decision based on the following key considerations:

1. IT IS THE RIGHT THING TO DO

- The COVID-19 pandemic has created unprecedented public health and workplace challenges and we are faced with a global crisis that necessitates decisive action.
- Factors that were taken into consideration when making this decision include:
 - The likely duration of the COVID-19 risk
 - The nature of healthcare as a frontline industry
 - The nature and severity of the potential harm
 - The likelihood that the potential harm will occur
 - The potential harm to patients
 - The availability of COVID-19 vaccines and their ability to curb the mutation of the virus
- We have to limit the impact of COVID-19. Continued review of leading studies that relate to the effectiveness of vaccination clearly show us that the vaccine reduces COVID-19 related hospitalisation, deaths, the severity and duration of the illness, and the virus's transmissibility to a significant degree. Vaccination will further relieve the pandemic's current burden on the healthcare sector.
- It is our moral obligation. As a frontline healthcare provider, Mediclinic needs to remain more vigilant than most other businesses in our endeavours to protect our patients, employees, associated doctors, other healthcare professionals, service providers who come onto our premises, as well as the general public entering our facilities.
- Professional organisations such as the South African Nursing Council, South African Committee of Medical Deans and the Health Professions Council of South Africa endorse the proposition that healthcare workers and organisations have a professional and ethical responsibility to help prevent the spread of infectious pathogens, including COVID-19, among patients, colleagues and their families, and related communities.
- Mediclinic's purpose is to enhance the quality of life. Implementation of this policy aims to support our core purpose by ensuring a safer environment for the treatment of our patients.
- In line with our value of mutual trust and respect and the current public health imperatives, we will implement this Mandatory Vaccination Policy to promote Mediclinic's obligation, as a healthcare organisation, to provide a safe environment for patients, employees as well as for associated doctors, healthcare professionals and all other stakeholders working in collaboration with Mediclinic; as well as protecting those coming onto our premises.
- Healthcare professionals are essential workers in society and being vaccinated, healthy and able

to continue working is critical to the health of our communities. Infection of our healthcare professionals is significantly reduced with vaccination, thereby allowing the already scarce resources of nurses and other healthcare professionals to continue providing care in the face of the COVID-19 pandemic.

- Similarly, those whose work functions are supportive to essential healthcare professionals are also considered by Mediclinic as essential to ensure that a holistic uninterrupted service is delivered to our patients.

2. LEGAL STANCE ON THE MANDATORY VACCINATION POLICY

- In the South African legal context, an employer is obliged to ensure a safe workplace.
- We believe that this Policy promotes the rights of all employees to a safe working environment and supports Mediclinic's legal obligation to provide a safe workplace in accordance with the South African Occupational Health and Safety Act ("OHSA").
- The Policy also supports our legal duty to provide a safe environment for our patients and all other persons coming onto our premises, including doctors and healthcare professionals.
- In addition to the aforementioned, on 11 June 2021, the South African Minister of Employment and Labour gazetted a Directive on COVID-19 vaccination in specific workplaces in the Consolidated Direction on Occupational Health and Safety Measures, requiring employers to assess and determine the necessity for mandatory vaccination policies taking into account the specific circumstances of their workplace and the requirements of the OHSA Regulations. It also stipulates that employers are required to consider reasonable accommodation in the event that employees refuse COVID-19 vaccinations on medical and/or constitutional grounds.
- The principle espoused by the Directive is that employers and employees should treat each other with mutual respect. Essential considerations are public health imperatives, employees' constitutional rights and efficient business operations.
- The position of a mandatory vaccination policy has been vetted extensively. Mediclinic engaged widely, obtaining input from various experts. Our intended Policy is justifiable given the public health crisis and the overwhelming proof that vaccination is the most effective step that we can take to protect ourselves and others against COVID-19.

3. IMPLEMENTATION AND SCOPE

- The Mandatory Vaccination Policy will be implemented on 1 October 2021 and will be rolled out in a phased approach with a due date for compulsory vaccination of 1 February 2022, which means all employees will need to be vaccinated in full by this date.
- This Mandatory Vaccination Policy applies to all employees (permanent, fixed-term, agency staff and relief workers) of Mediclinic and our subsidiaries, including all agency staff members placed at Mediclinic facilities. Provision will be made for individuals to apply for exemption as set out below. It is important to note that all relevant stakeholders at our facilities (including service providers, doctors and other healthcare professionals) are being considered as part of this Policy and future communication will follow as soon as consultations have been concluded in this regard.

4. PHASED APPROACH AND INCLUSIVE ENGAGEMENT PROGRAMME

The phased implementation of the Mandatory Vaccination Policy includes a comprehensive engagement plan that will kick off on 1 October 2021 with the announcement of the Policy. Thereafter Mediclinic will consult with employees and other stakeholders with a view to providing vaccination related education, counselling, logistical support and the opportunity for employees to consult with clinical experts, healthcare professionals and Mediclinic Human Resources practitioners. The objective of the

engagement is to offer compelling evidence and support during the remainder of the year so that employees vaccinate before the mandatory compliance date of 1 February 2022.

Phase 1: Voluntary phase of vaccinations (from Sisonke trial to 30 September 2021)

- Provision of education and information
- Assistance with registration
- Accommodation for any side effects through sick leave

Phase 2: Consultation (1 October 2021 – 31 December 2021)

- Stakeholder consultation on risk assessment and implementation plan
- Application process for exemptions available from 1 November
- Consideration of exemption applications
- Condition of employment for all new employees
- Provision of education and information
- Assistance with registration
- Accommodation for any side effects through sick leave

Phase 3: Finalisation of mandatory vaccination (1 January 2022 to 1 February 2022)

- Mandatory vaccination
- Proof of vaccination status will be required
- Reasonable steps to accommodate any exempted employees

Phase 4: Quarterly review of vaccination status

- Localised approaches to address any gaps based on data
- Execution of policy amendments as may be needed
- Vaccination status and policy considerations will be reviewed on an ongoing basis

5. GROUNDS FOR EXEMPTION FROM THE POLICY

- Mediclinic is cognisant of the religious and cultural freedoms of our employees. Mediclinic has endeavoured to balance our employees' rights by accommodating reasonable exceptions for those unwilling or unable to be vaccinated.
- This will require the completion of specific documentation as part of the exemption process. All applications will be reviewed by a committee, with appeal processes in place should this be necessary.
- Mediclinic recognises that, in certain instances, an employee might have valid reasons to be exempted from COVID-19 vaccinations, for example:
 - Medical reasons, such as an allergic reaction or past severe life-threatening reaction to receiving a vaccine.
 - Constitutional grounds such as firmly held religious and cultural beliefs.

We call on each Mediclinic employee to carefully consider the above information, and invite you to join us in creating a safer and healthier future within our Mediclinic communities.

If you have any further questions, please direct these to AskHR via email (AskHR@mediclinic.co.za) or phone (08000 AskHR). Applications for exemption can be submitted to your line manager and will be processed by the relevant Human Resources Business Partner.

As a company, we view this as a critical step for all people working in our company and our subsidiaries, whether they work in a hospital, corporative office or for ER24. Our first priority will be to address our

own employees and we are currently in the process of further developing our approach to include doctors, healthcare professionals and other service providers.

We value and appreciate everyone's positive support and cooperation in this process as we seek to make a significant impact in reducing the further effects of this pandemic on our society and our operations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Koert Pretorius', is centered on the page. The signature is fluid and cursive.

Koert Pretorius
Chief Executive Officer
Mediclinic Southern Africa