



# **NETCARE LIMITED**

**Registration Number 1996/008242/06**

**UN GLOBAL COMPACT ACTIVE COMMUNICATION ON  
PROGRESS FOR THE PERIOD NOVEMBER 2013 TO NOVEMBER 2014**

**(“UN GLOBAL COMPACT ACTIVE COP”)**

## **Company's Profile and context of operation**

Netcare Limited operates a private hospital network in South Africa and the United Kingdom. The company's Hospital division owns and manages 55 private hospitals, including 9,289 registered beds, and 1,548 intensive care and high care beds, as well as 48 retail pharmacies across South Africa; and operates 1 hospital and 4 clinics through a public private partnership with government of Lesotho. This division comprises a mix of full service tertiary, high-tech hospitals, and same-day surgical units. It also provides emergency medical services under the Netcare 911 name consisting of emergency medical assistance, evacuation by road or air transportation, inter-hospital transfers, planned patient transport, and telephonic medical advisory services. The company's Primary Care division offers medical and dental, and managed care services. This division comprises 68 Medicross medical and dental centers; 19 Prime Cure clinics; and 6 Netcare travel clinics. In addition, the company, through its interest in General Healthcare Group (GHG) Limited, provides private acute care services comprising imaging, physiotherapy, oncology, orthopaedics, weight loss, and women's health services under the BMI Healthcare brand in the United Kingdom. GHG operates a network of 61 hospitals comprising 2,889 beds, 185 operating theatres, and 54 in-house pharmacies. Netcare Limited was incorporated in 1996 and is based in Sandton, South Africa.

## **CEO Statement of Continued Support**

Netcare is a listed company at the JSE. It is required to comply with relevant legislations including the JSE Listings Requirements, King III, and the Companies Act etc. The Companies Act of South Africa requires that public listed companies must have a Social and Ethics Committee that will oversee that the company has implemented and monitors its ethical values and ensure that the integrity of the company is not compromised.

The Social and Ethics Committee is responsible to ensure that the company complies and implements codes of best practice such as the; 10 principles set out in the UN Global Principles, OECD recommendations regarding corruption etc. Netcare became the signatory of the UN Global Compact since November 2012.

Since Netcare became the signatory of the UN Global Compact has done endeavours to comply with its principles by aligning them with its strategy. This has been done by completing the UN Global Survey, in assisting companies to assess their progress on implementing the ten principles. UN Global Compact Assessment Tool was used to measure, identify and monitor the gaps relating to the ten principles if the Netcare has implemented them accordingly.

Netcare completed and posted a Basic COP in November 2013, as a symbol of being committed to the ten principles, safeguarding the integrity of the UN Global Compact and the United Nations. We can confirm that Netcare has received an active stage status and will be completing the Active COP.

**Richard Friedland**  
**Chief Executive Officer**

## **Assessment of COP**

Netcare has undergone rigorous corporate governance surveys and assessments to ensure that it complies with the relevant regulations and international best practices. The surveys and assessments assessed the company's governance practices and regulatory frameworks across the economic, social and governance dimensions which encapsulate the ten principles of UN Global Compact.

Netcare was assessed by RobecomSAM's Corporate Sustainability Assessment for companies that have been included in the Dow Jones Sustainability Indices. The assessment focused on the economic, social and governance dimensions if they have been implemented accordingly and that the best practices of corporate sustainability have been adhered to. The JSE Socially Responsible Index ("JSE SRI") assessed the sustainability practices including the triple bottom line if they are being complied with.

Our sustainability information has been independently assured by Global Carbon Exchange SA (Pty) Ltd (GCX). The verification was performed in accordance with the principles of the WBCSD/WRI GHG Protocol Corporate Accounting Standard, 2nd Edition, 2004 (the GHG Protocol Corporate Standard). Netcare requested a limited level of assurance on the GHG Protocol Corporate Standard assertion.

### **The COP incorporates the following high standards of transparency and disclosure:**

- ✓ **Applies the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines**  
The ten principles of the UN Global Compact have been disclosed or reported on in the Annual Integrated Report including the GRI report. This will qualify Netcare for a level B or higher of the GRI application levels. The policies, processes and tools have been implemented to ensure that Netcare is aligned with best corporate governance practices. Netcare intends to apply GRI 4 reporting guidelines when reporting for the annual integrated report for the year ended 30 September 2014.

## ***Implementing the Ten Principles into Strategies & Operations***

### **Criterion 1: The COP describes mainstreaming into corporate functions and business units**

*The following are best practices:*

- ✓ **Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring no function conflicts with company's sustainability commitments and objectives.**

The Board is satisfied that the Group has in all material respects applied the King Code of Governance Principles for South Africa (King III), complied with the mandatory corporate governance provisions in the JSE Listings Requirements and codes of best practices of which certain are voluntary including but not limited to the principles of the UN Global Compact, OECD recommendations and the Millennium Development Goals. The Board also requires all business units, departments and subsidiaries to conform to applicable laws.

- ✓ **Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy.**

The remuneration policy aims to encourage sustainable performance based on a values-driven organisational culture, and provide incentives for employee attraction, motivation and retention. The demands of the business dictate that Netcare should, at all times, attract and have in its employ exceptional individuals who perform at the highest level. Remuneration, reward and recognition practices play a key role to meet this demand, and they are inculcated in the objectives of the remuneration policy outlined below. The policy ensures that executives are compensated according to their performance, which is measured in terms of financial and strategic delivery as well as non-financial objectives.

- ✓ **Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary.**

The Social and Ethics Committee is responsible to monitor Netcare's activities in compliance with the national regulations and oversight of social and economic development and good corporate citizenship. The Board of directors and board committees also delegated responsibility to executive management and business units to implement the corporate sustainability strategy.

### **Criterion 2: The COP describes value chain implementation**

*The following are best practices:*

- ✓ **Communicate policies and expectations to suppliers and other relevant business partners.**

Netcare has participated in a pilot project in 2011 to assess and gauge how best we improve stakeholder relationships conducted in conjunction with the Institute of Directors. This will assist in stakeholder engagement generally.

- ✓ **Implement monitoring and assurance mechanisms for compliance within the company's sphere of influence.**

Suppliers are invited to survey Netcare's performance pertaining to procurement and payment. Netcare Rating Questionnaires assess our interactions with suppliers from procurement to payment. A supply chain methodology with due regard to sustainability and governance issues would be implemented.

A host of stakeholders have been identified which are outlined in detail in Integrated Report. Netcare also participated in a stakeholder relationship assessment pilot study conducted by the IOD and Stakeholder Relationship Assessments (Pty) Ltd. A detailed review of processes accompanying stakeholder engagement was undertaken.

Regular review of targets set by the Operational Transformation Committee and Social and Ethics Committee which are tracked in accordance with pre-approved Report and a desire to retain current status, and comply with applicable legislation.

- ✓ **Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners.**

Local, national CSI projects and new business endeavours. We provided medical services to indigent patients and initiatives to broaden healthcare access such as the Cleft Lip and Palate programme and Elephantiasis programme. Moreover the focus is on increasing procurement spend on Qualifying Small Enterprises & Exempt Micro Enterprises 50% Black Owned Enterprises and 30% Black Female Owned Enterprises.

## **PRINCIPLE: HUMAN RIGHTS**

### ***Robust Human Rights Management Policies & Procedures***

**Criterion 3: The COP describes robust *commitments, strategies or policies* in the area of human rights**

*The following are best practices:*

- ✓ **Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates.**

Netcare, we have always aligned our operations and strategies to principles encapsulated within the Constitution which is commensurate with the aforementioned universally accepted principles. We further strengthen this practice through human resources policies which emphasise the existing commitment in place to respect human rights.

- ✓ **Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.**

At Netcare, our core value is *care*. We care about the *dignity* of our patients and all members of the Netcare family. We care about the *participation* of our people and our partners in everything we do. We care about *truth* in all our actions. We are *passionate* about quality care and

professional excellence.

#### **Criterion 4: The COP describes effective *management systems* to integrate the human rights principles**

*The following are best practices:*

✓ **Process to ensure that internationally recognized human rights are respected.**

At Netcare, we have always aligned our operations and strategies to principles encapsulated within the Constitution which is commensurate with the universally accepted principles. We further strengthen this practice through human resources policies which emphasise the existing commitment in place to respect human rights.

Internal awareness-raising and training on human rights for management and employees. The human resource development policy is in place to provide training and development to management and employees which include UDHR principles.

✓ **Operational-level grievance mechanisms for those potentially impacted by the company's activities. Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action.**

Employees are able to access these documents via the company's intranet and all new employees are given a hard copy of the documents at orientation and induction. The induction process has been updated and renewed to ensure a heightened focus on all policies, processes and importance of adherence including the Universal Declaration of Human Rights. An induction pack containing updated policies is provided. The On-boarding and Orientation Policy in terms of Clause 9 includes a detailed overview of policies and procedures. Specific reference is made to the Code of Ethics and related policies. This is also addressed by the grievance procedure and disciplinary code and procedure. And On-boarding and Orientation Policy.

✓ **Allocation of responsibilities and accountability for addressing human rights impacts.**

The Group HR Director is responsible for addressing the human impacts and assisted by relevant divisions within Netcare.

#### **Criterion 5: The COP describes effective *monitoring and evaluation mechanisms* of human rights integration**

*The following are best practices:*

✓ **System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3).**

Head of Group Risk; Audit and Forensic Services and the internal audit function in conjunction with the Board acting collectively. The HR department facilitates training on the policies during orientation and on-boarding of new employees. The Group Secretariat is responsible for updating

the Code of Ethics Policy. Moreover the Board Audit, Social and Ethics Committees ensure that the code of ethics including the combined assurance model are being complied with, monitored and reported by the senior management. There are additional codes of ethics within the group that are specifically tailored for the board members, internal audit and medical professionals. Extensive medical and ethics training is provided.

✓ **Monitoring drawn from internal and external feedback, including affected stakeholders.**

Group Risk, Audit and Forensic Services is one of the combined assurance providers responsible for monitoring compliance within Netcare Limited. A combined assurance model was approved by the Audit Committee, as per the King III recommendation. Subsequently a Combined Assurance Committee was established to ensure implementation of the model. Internal Audits are conducted based on a 3 year cycle. Rectification on audit findings is managed through a fully automated Follow-Up Database system that is distributed monthly to the Responsible and Accountable control owners for feedback. The code of ethics policy was during 2014 and formal ethics survey and draft policy awareness was conducted to assess levels of awareness and concerns regarding the implementation and adherence to the relevant policies.

In accordance with Section 45 of the Auditing Professions Act, the Audit Committee has a process to review reportable irregularities. Moreover the committee members meet with the external auditors independent of management and detailed reports are tabled to the Audit Committee and Divisional Internal Audit Committee.

The external auditors report outlines the statutory obligations which include compliance to Section 45. In addition this is catalogued in the applicable terms of reference.

All findings are captured by GRAFS and the status of rectification is reported to the Board Audit Committee. The Combined Assurance Model, supported by detailed control self-assessments, was implemented in 2014. An additional Audit Committee meeting has been included to ensure an appropriate review of external audit fees and plan.

✓ **Leadership review of monitoring and improvement results.**

A formal compliance program and policy review programme are in place monitored through monitoring the legislative landscape, holding detailed committee compliance meetings and championing a policy review. The Group continues to enforce the management self-assessment process. This is an ongoing process through which management takes responsibility and ownership for maintaining the effectiveness of their internal control environment, including compliance to Policies and Procedures. The results of the management self-assessments are communicated at committees meetings and Board Risk Committees, and quarterly at the Board Audit Committees.

✓ **Process to deal with incidents the company has caused or contributed to for internal and external stakeholders.**

Key incidents of fraud are highlighted in the Group Risk Report as contained in the Integrated Report. There have been no key incidents of fraud that warrant highlighting. All issues have been

appropriately managed within suitable parameters. The minimal matters of concern have been tabled to the relevant parties.

- ✓ **Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.**

#### **Fraud and Ethics Hotline Policy**

The Fraud and Ethics hotline is a whistle blowing mechanism which is made available to all Netcare employees to report fraudulent and unethical behaviour of any nature, including any unethical medical behaviour, deviations from the procurement policy, financial and reporting irregularities and any other deviations. The hotline ensures the anonymity of the source of all information received and the protection of the employees reporting these incidents. The fraud and ethics hotline can also be used by external parties, including suppliers and patients, and posters are positioned at all Netcare business units to ensure awareness the hotline.

The Fraud and Ethics Hotline statistics are included in the Annual Integrated Report on an annual basis.

#### **Fraud Response Plan Policy**

The Fraud Response Plan deals with the responsibility and accountability in managing the whistle-blowing (Fraud and Ethics Hotline) process in the Netcare Group.

This policy requires that all employees report crimes and irregularities at the workplace in good faith and in a proper manner, and in so doing be protected against occupational detriment in accordance with the provisions of the applicable legislation.

The Group has a zero tolerance approach towards fraud and corruption. Accordingly, all identified cases are reported to the South African Police Services and any other appropriate body.

## **PRINCIPLE: LABOUR**

### ***Robust Labour Management Policies & Procedures***

#### **Criterion 6: The COP describes robust *commitments, strategies or policies* in the area of labour**

*The following are best practices:*

- ✓ **Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies**

Netcare has aligned its operations and strategies to principles encapsulated within the Constitution which is commensurate with the universally accepted principles. We have strengthened this practice through human resources policies which emphasise the existing commitment in place to respect human rights.

- ✓ **Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).**

Netcare has established a dedicated policy unit to inform health reform debates and partner with government to find solutions to broader healthcare issues. Netcare participated in the National Consultative Health Forum and the Ministerial Emergency Medical Services Committee. Netcare has and continues to engage with the National Department of Health on the National Core Standards. Netcare engages with the recognised unions on a monthly and quarterly basis.

- ✓ **Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners.**

The Company has adopted and endorsed voluntary standards namely the the millennium goals and Ruggie Framework in respect of its CSI initiatives and is the signatory to the UN Global Compact principles. It also monitors the OECD recommendations on corruption. The company does extensive debt financing and PPP work with Banks that are signatories to Equator Principles and which the company by virtue of its contractual arrangements is also obliged to abide by the Equator Principles. Netcare has voluntarily completed a Vigeo Rating and Dow Jones Sustainability Indices Assessment to ensure that it endeavours to adheres to international best practices.

- ✓ **Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation.**

The Company has an Employment Equity Policy, Plan and reports that are prepared on an annual basis. The Employment Equity Policy and Plan address the equal opportunities issues that individuals irrespective of gender, race, disability, sexual orientation, religion and based on government regulated age for employment are entitled to be employed by Netcare.

Having analysed barriers to employment of people with disabilities in South Africa and in our workplaces, we resolved to launch a programme called the “Sinako” project. We launched the project in Gauteng on the 26<sup>th</sup> of June 2012. The project focused on training and developing unemployed youth with disabilities from the communities surrounding our hospitals in Gauteng. We tied their recruitment with potential vacancies within Netcare to ensure employment thereof.

In the first phase of the project, we trained a total of fifty (50) learners on formal structured learnership programmes. Forty (40) were enrolled on the Business Administration learnership NQF level 4, five (5) were enrolled on a two (2) year Pharmacists Assistant learnership and another five (5) were enrolled on the National Youth Chef’s Programme. The latter was offered in partnership with the South African Chefs Association. In this first phase, we invested in excess of R1,3 million.

- ✓ **Participation and leadership in wider efforts by employers’ organizations (international and national levels) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).**

Between 2009 and 2012, we have trained 8762 aspiring and registered nurses and 93%, 8136 of these were Black. In line with our key priority of using training and development as a vehicle for

employment creation, 4369 (50%) of all trainee nurses were unemployed at the time of commencing training. We have placed transformation at the centre of our pipeline development programmes for pharmacist professionals. In the last 3 financial periods, we have developed 321 basic and post basic pharmacist assistants of which 92% were Black. Similarly, we have provided experiential learning through internships to 124 new pharmacy graduates of which 56% were Black.

We have skills development initiatives that have been designed to create internal capacity for enhanced organisational performance and for employee growth and development. We believe that skills development is a powerful tool through which we can create employment opportunities for South Africans who remain on the periphery of the system.

**Criterion 7: The COP describes effective *management systems* to integrate the labour principles**

*The following are best practices:*

- ✓ **Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards.**  
Netcare affords organisational rights on a site basis which implies that each Netcare hospital may be represented by a different trade union. The recognised trade unions are engaged on a monthly and quarterly basis.
- ✓ **Allocation of responsibilities and accountability within the organization.**  
The responsibilities and accountability within the organization is delegated to the board committees and executive management. The executive management ensure that the responsibilities are being carried out on the divisional level.
- ✓ **Internal awareness-raising and training on the labour principles for management and employees.**  
Netcare has documented objectives and targets for employee training and development. The targets include the number of targets for spending on training, the number of employees to be trained in specific programmes, plans for new training programmes, targets for training and development reviews.
- ✓ **Active engagement with suppliers to address labour-related challenges.**  
Suppliers are invited to survey Netcare's performance pertaining to procurement and payment. Netcare Rating Questionnaires assess our interactions with suppliers from procurement to payment. Implementing a supply chain methodology with due regard to sustainability and governance issues.

Funder Relations; Doctor / Specialist Relations; Analysts and Shareholders are all managed and interacted with regularly. Netcare has participated in a pilot project in 2011 to assess and gauge how best we improve stakeholder relationships conducted in conjunction with the Institute of Directors. This will assist in stakeholder engagement generally.

- ✓ **Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers.**

Communication Channels in regard to grievance and other procedures are in place with employees, as follows:

- ✓ Fraud and Ethics Hotline – 0860 372 831: All suspicious activity being any theft or fraud related activity;
- ✓ Fraud E-mail address – fraud@netcare.co.za : All suspicious activity being any theft or fraud related activity;
- ✓ Directly to Group Risk, Audit and Forensics Services; and Tracy Rakusin (Head of Group Risk, Audit and Forensics Services) – 011 217 9723.  
Randhir Singh (Forensic Audit Manager) – 011 301 0153.  
Gerrie Isaacs (Forensic Audit Manager) – 011 301 0050. All suspicious activity being any theft or fraud related activity

#### **Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration**

*The following are best practices:*

- ✓ **System to track and measure performance based on standardized performance metrics.**  
During the year in review we implemented our revised People Strategy to achieve greater alignment between all staff-related interventions, such as training and development, and human resources. To develop and finalise the strategy we consulted with all internal stakeholders to ensure that implementation of the various components of the strategy are in line with the practical needs of the operating divisions. The strategy provides for stronger interaction between the activities of line managers, human resources and education practitioners, and has provided for a more focused intervention approach and efficiencies across disparate areas within the broader Group.
- ✓ **Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.**  
A consultation process is undertake with the trade unions on a monthly and quarterly basis to review progress made and on future employee priorities.
- ✓ **Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices.**  
We have started reviewing the enterprise development strategy in the context of the revised B-BBEE Codes. The strategy is aimed at developing our suppliers to self-sufficient.

## **PRINCIPLE: ENVIRONMENT**

### ***Robust Environmental Management Policies & Procedures***

**Criterion 9: The COP describes robust *commitments, strategies or policies* in the area of environmental stewardship**

*The following are best practices:*

✓ **Written company policy on environmental stewardship.**

The environmental policy is in place and applies to the Group as a whole including operational activity, employee activism and environmentally friendly productive elements. The policy endeavours to address 100% of all activities.

The Policy has been drafted in accordance with a risk based methodology and the groups compliance framework and endeavours to establish key objectives and environmental standards which the group intends achieving. This has been reviewed internally and ratified by the Sustainability Committee and recommended for further approvals by the Social and Ethics Committee. It has during 2013 been expanded to account for further oversight and review. It was reviewed in 2014 and a new version with supplementing “subject specific policies” is published. Subject specific policies ready for publishing are water, waste and hazardous substances. The following is aimed for publication in FY2015; energy, green buildings and green procurement.

✓ **Specific commitments and goals for specified years.**

The Group started in 2008 with the first 5 year strategy in reporting carbon impact on the Carbon Disclosure Project. In 2013 the Group appointed an Energy Engineer to specifically take responsibility for the Environmental Sustainability reporting, strategy and reduction of environmental impact for the Group.

The Group also appointed a strategic Partnering Consultancy to aid in identifying and implementing optimisation initiatives that will result in both environmental impact reduction as well as operational cost savings. This team developed a new strategy that have a long 10 year plan, a medium 5 year plan and then a year on year activity approach, each period supported with specific targets to reduce environmental impact and cost.

Targets will be refined during FY2013 and FY2014 based on the detailed meterage systems and sustainability platform that has been installed. On Electricity clear targets have been identified with a short term target and growing till a total of 30% based on no growth in the business.

**Criterion 10: The COP describes effective *management systems* to integrate the environmental principles**

*The following are best practices:*

- ✓ **Environmental risk and impact assessments.**  
The Group appointed an external specialist consultancy as strategic partner to audit facilities and to identify, develop and implement solutions that will limit the Group's Environment Impact.
- ✓ **Assessments of lifecycle impact of products, ensuring environmentally sound management policies.**  
The Group is embarking on a nationwide Audit to establish adherence, application and compliance to the Environmental Policy and an Environmental Management System (EMS). The above outcomes will be reviewed to develop an EMS that will be tailored for the Group's specific needs.
- ✓ **Allocation of responsibilities and accountability within the organisation.**  
In 2013 the Group appointed an Energy Engineer to specifically take responsibility for the Environmental Sustainability reporting, strategy and reduction of environmental impact for the Group. This will enhance the functionality and efficiencies associated with the current environmental processes and responsibilities. In addition a detailed sustainability platform has been implemented at hospital sites which allow the tracking of water, waste and energy.
- ✓ **Internal awareness-raising and training on environmental stewardship for management and employees.**  
All policies, procedures and information relevant to the functioning, operating and compliance framework of the group is available on the intranet and investors relations website, where applicable. Key developments and highlights are communicated through the "Postmaster"-an internal regular updating service. Executives interact with key members of staff to ensure policy change is communicated and this in turn is tabled at committees. In 2014 the policy review process was undertaken and is aimed at raising further awareness of policies throughout the group supported by a series of Standard Operating Procedures and Controlled Self Assessments. The Quality Leadership and Clinical Governance team continue to host workshops and interactive sessions at hospitals.
- ✓ **Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts.**  
The grievance mechanism, communication channels and other procedures are as referenced in criteria 7.

**Criterion 11: The COP describes effective *monitoring and evaluation mechanisms* for environmental stewardship**

*The following are best practices:*

- ✓ **System to track and measure performance based on standardized performance metrics.**  
Netcare has a refined and defined environmental management system which is managed and

overseen by a specialised in-house Technical Services and Engineering team. Each hospital and division's carbon footprint is measured periodically and monitored monthly as part of the Technical reporting requirements and sustainability strategy to reduce the group's carbon footprint. The extent of the group's environmental impact is managed through a regional structure and to ensure accountability and enhanced attainability of key objectives certain deliverables pertaining to minimising environmental impact is inculcated into the Balanced Scorecard of hospital based Technical Managers, Regional Managers and the Group Technical Manager. Balanced Scorecard evaluations are directly linked to the remuneration evaluation and bonus reviews done on an annual basis. Executive responsibility is with the Managing Director of the Group Hospital Division.

Netcare started with a pilot site to develop a new Environmental Management System (EMS) that will be rolled out to all facilities and at the same time the pilot site is used to develop a Controlled Self-Assessment Audit Tool to enable facilities to prepare quicker and adopt faster to the new learnings from the pilot site.

✓ **Leadership review of monitoring and improvement results.**

The Group Energy Engineer is responsible for the Environmental Sustainability reporting, monitoring and improving the outcomes. The governance structure pertaining to environmental oversight includes an operational focus by the Sustainability Committee which reports into the Social and Ethics Committee. The chairperson is a non-executive independent director and the membership of the committee is supplemented by two other non-executive independent directors. These board members and the committee have direct oversight of the key issues of environmental awareness which is part and parcel of its terms of reference, which are also annexed for review and consideration.

✓ **Process to deal with incidents.**

- ✓ Strategic risk assessments are performed bi-annually and reported to the Board Risk Committee. The Group Risk Management function engages with key stakeholders from the major divisions and business units to identify key risks, and monitors the plans and processes to manage these risks. Together with the key stakeholders, the risk management function consolidates and assesses the key risks to identify the top risks affecting the Group. The top risks are assessed based on their potential influence on achieving strategic and business objectives and are managed at an executive level.
- ✓ Operational risk assessments are facilitated by the Group Risk Management function throughout the financial year in accordance with the Risk Management Policy and Methodology. The Risk Management Policy and Methodology has been approved by the Executive Committee (Exco) and the Board Risk Committee and takes into account international standards such as COSO, ISO 31000, King III and International Best Practice.

- ✓ The Group is continuing with the detailed risk based review of all policies. Internal Audits are conducted based on a three year cycle. Rectification of audit findings is managed through a fully automated “Follow-Up” Database system that is distributed monthly to the responsible and accountable control owners for feedback.
- ✓ The management self-assessment process is an ongoing process through which management takes responsibility and ownership for maintaining the effectiveness of their internal control environment, including compliance to Policies and Procedures. Management self-assessments are performed three times per annum and the results are communicated at the bi-annual Divisional Internal Audit Committees and Board Risk Committees, and quarterly at the Netcare Board Audit Committees.

✓ **Audits or other steps to monitor and improve the environmental performance of companies in the supply chain.**

An external assurer has been mandated to review internal processes for purposes of preparing the Integrated Report. The purpose is to enhance the group’s internal reporting processes. In addition Waste Management Audits have been conducted by Internal Audit and is currently being reviewed by the Quality Leadership Team. It should be noted that the recent amendments in the Waste Management Legislation has been reviewed and commented on to ensure that the most environmentally friendly waste management options are being reviewed. The Procurement division also has oversight of compliance with the relevant legislation in terms of disposal of waste and consultants have been employed to ensure compliance is at an optimum level. It is periodically reported on at Group Risk Meetings.

Navigator Risk Solutions has been appointed to develop review the pilot site and to assist in auditing the rest of the facilities to enable a faster update of the EMS. The EMS will be audited quarterly as per the Environmental policy and will receive third party audit once every 24 months.

✓ **Outcomes of integration of the environmental principles.**

We are actively driving the GRI indicators as indicated and that Netcare had no environmental incidents in the past year. This has been referenced in the GRI Indicators: EN 1-3(yes), 5-6(Yes), 8(Yes), 10(Yes), 13(No), 16(Yes), 18-20(yes), 26-27(No).

A specific drive has been embarked on to address our Scope of Emissions reporting and to expand the scope to be more representative. The enhancement of the Environmental Policy by adding the “Green Procurement” policy that is currently under development will address the supply chain comprehensively.

## **PRINCIPLE: ANTI-CORRUPTION**

### ***Robust Anti-Corruption Management Policies & Procedures***

**Criterion 12: The COP describes robust *commitments, strategies or policies* in the area of anti-corruption**

*The following are best practices:*

✓ **Publicly stated formal policy of zero-tolerance of corruption (D1)**

In managing the policy environment and managing a proactive response to anti-corruption Netcare has adopted the following strategic action plan, key elements of which are outlined below. Its core focus has been the review of its policies and a pro-active training process underpinning this. This is subject to ongoing review. The key elements to a successful policy review are as follows:

1. Publicly stated commitment and formal policy of zero-tolerance of corruption to work against corruption in all its forms, including bribery and extortion which an appropriate commitment from senior management and the board;
2. Clearly illustrated commitment to be in compliance with all relevant laws, including anti-corruption laws which are supported by the work of the Compliance Committee;
3. Statement of support for international and regional legal frameworks, such as the UN Global Compact supported by an internal governance structure; and
4. Carrying out risk assessment of potential areas of corruption through internal audit for review at Risk and Audit Committees.

The detailed case study on Netcare's anti-corruption is available on line.

✓ **Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes.**

This has been addressed in criteria 5, 6 and D1.

✓ **Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2),**

This has been addressed in criteria 5, 6 and D1.

✓ **Detailed policies for high-risk areas of corruption (D4).**

This has been addressed in criteria 5, 6 and D1.

✓ **Policy on anti-corruption regarding business partners (D5).**

This has been addressed in criteria 5, 6 and D1 and the anti-corruption policy is in place.

**Criterion 13: The COP describes effective *management systems* to integrate the anti-corruption principle**

*The following are best practices:*

- ✓ **Support by the organization's leadership for anti-corruption (B4).**  
This has been addressed in criteria 5, 6 and D1.
- ✓ **Carrying out risk assessment of potential areas of corruption (D3).**  
This has been addressed in criteria 5, 6 and D1.
- ✓ **Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8).**  
Netcare has aligned its operations and strategies to principles embedded within the Constitution which is in line with the UDHR accepted principles and UN Global Compact 10 Principles. The company has documented objectives and targets for employee training and development. The On-boarding and Orientation Policy in terms of Clause 9 includes a detailed overview of policies and procedures. Specific reference is made to the Code of Ethics and related policies.  
Employees are provided with a detailed set of documents and are obliged to confirm their awareness of the relevant documents/policies.
- ✓ **Internal checks and balances to ensure consistency with the anti-corruption commitment (B6).**  
This has been addressed in criteria 5, 6 and D1.
- ✓ **Actions taken to encourage business partners to implement anti-corruption commitments (D6).**  
Suppliers are required to confirm that they are complying with all relevant legislations and that have a detailed antifraud and corruption policy in place by completing a supplier declaration of compliance form.
- ✓ **Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7).**  
Head of Group Risk; Audit and Forensic Services and the internal audit function in conjunction with the Board acting collectively. The HR department facilitates training on the policies during orientation and on-boarding of new employees. The Group Secretariat is responsible for updating the Code of Ethics Policy. Moreover the Board Audit, Social and Ethics Committees ensure that the code of ethics including the combined assurance model are being complied with, monitored and reported by the senior management.
- ✓ **Communications (whistle blowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9).**  
This has been addressed in criteria 5, 6 and D1.

✓ **Internal accounting and auditing procedures related to anticorruption (D10).**

Group Risk, Audit and Forensic Services is one of the combined assurance providers responsible for monitoring compliance within Netcare Limited. A combined assurance model was approved by the Audit Committee, as per the King III recommendation. Subsequently a Combined Assurance Committee was established to ensure implementation of the model. Internal Audits are conducted based on a 3 year cycle. Rectification on audit findings is managed through a fully automated Follow-Up Database system that is distributed monthly to the Responsible and Accountable control owners for feedback.

**Criterion 14: The COP describes effective *monitoring and evaluation mechanisms* for the integration of anti-corruption**

*The following are best practices:*

✓ **Leadership review of monitoring and improvement results (D12) CSAs.**

The results of the follow-up database are communicated at the bi-annual Divisional Internal Audit Committees and quarterly Netcare Board Audit Committees. This process is further bolstered by a formal compliance program and policy review programme which is monitored through monitoring the legislative landscape, holding detailed committee compliance meetings and championing a policy review.

The Group continues to enforce the management self-assessment process. This is an ongoing process through which management takes responsibility and ownership for maintaining the effectiveness of their internal control environment, including compliance to Policies and Procedures. The results of the management self-assessments are communicated at the bi-annual Divisional Internal Audit Committees and Board Risk Committees, and quarterly at the Netcare Board Audit Committees.

✓ **Process to deal with incidents (D13).**

This has been addressed in criteria 5, 6 and D1.

✓ **Use of independent external assurance of anti-corruption programmes (D15)**

Bradford Consulting conducted a detailed case study regarding the anti-corruption policies and programmes. The case study is available online.

**Criterion 15: The COP describes core business contributions to *UN goals and issues***

*The following are best practices:*

✓ **Align core business strategy with one or more relevant UN goals/issues. Adopt and modify operating procedures to maximize contribution to UN goals/issues**

Netcare has made endeavours in identifying and addressing the gaps regarding the UN issues. This was done through the Global Compact Management Model assessment. The assessment was undertaken whereby the gaps identified had been addressed through policy review and complying with the external regulatory bodies.

#### **Criterion 16: The COP describes strategic social investments and philanthropy**

*The Following are best practices:*

- ✓ **Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy. Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups.**

Ongoing ad hoc contributions as and when required which includes Emergency Medical service to indigent patients, Initiatives that broaden access to health care, Community Health and Welfare Sponsorships, Academic Sponsorships or Bursary, Ad hoc sponsorships assistance with health care needs.

Netcare introduced sexual assault centres for rape survivors and for the women throughout the country. 37 Netcare sexual assault centres have been established and integrated into the emergency departments of Netcare hospitals in SA. In total, 9 561 survivors have been offered care and support (2013: 949; 2012: 1 021). Out of the patients seen, 8 648 are women with 40.8% of those being under the age of 18. Netcare supports the Child Protection Unit.

#### **Criterion 17: The COP describes advocacy and public policy engagement.**

*The following are best practices:*

- ✓ **Publicly advocate the importance of action in relation to one or more UN goals/issues.**  
Netcare has publicly stated its commitment and formal policy of zero-tolerance of corruption to work against corruption in all its forms, including bribery and extortion which an appropriate commitment from senior management and the board.
- ✓ **Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues.**  
The Group Company Secretary and General Counsel as the mandated personnel to ensure the implementation of the UN Global Compact 10 Principles of Netcare attends and participates on the public policy interactions on the UN issues.

#### **Criterion 18: The COP describes partnerships and collective action**

*The following are best practices:*

- ✓ **Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain.**  
Netcare participates on the UN forums in relation to the 10 principles and millennium development goals.

## **Corporate Sustainability Governance and Leadership**

### **Criterion 19: The COP describes CEO commitment and leadership**

*The following are best practices:*

- ✓ **CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact.**

The CEO has confirmed that Netcare supports the ten principles of the Global Compact. Netcare is endeavouring in making the principles part of its strategy. We have disclosed in our Annual Integrated Report that we are signatories to the UN Global Compact and abide by its principles.

- ✓ **CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation.**

The CEO has delegated the implementation of the UN Global Compact 10 Principles to the executive management team. Who ensures that the 10 principles are being aligned with the operations of Netcare.

### **Criterion 20: The COP describes Board adoption and oversight**

*The following are best practices:*

- ✓ **Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance. Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.**

The Social and Ethics Committee has been mandated by the board of directors to monitor, guide and review the company's activities in regard to any relevant legislation, prevailing codes of best practice such as the 10 principles set out in the UN Global Compact, OECD recommendations regarding corruption, etc. The Social and Ethics Committee is being chaired by an independent non-executive director and the committee consists of independent non-executive directors. The committee delegates the responsibility and oversight of the corporate sustainability strategy and performance to the executive management. Who ensures its implementation thereof.

### **Criterion 21: The COP describes stakeholder engagement**

*The following are best practices:*

- ✓ **Publicly recognize responsibility for the company's impacts on internal and external stakeholders.**

Stakeholder Relationship have been formally apprised, Group Communications departments is reviewing its implementation in accordance with the Board's recommendation. The Board reviews stakeholder engagement on a quarterly basis and at Exco on a monthly basis.

- ✓ **Define sustainability strategies, goals and policies in consultation with key stakeholders. Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance. Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'.**

The eight stakeholder groups (which are Patients, Doctors, Employees, Funders, Government,

Investors, Suppliers and Communities) have been identified on the basis of the extent to which they are affected by the operations and decisions of the Group, as well as their ability to influence the performance or strategic direction of the Group.

**The stakeholders are being engaged in the following manner:**

Regular employee surveys	Internal staff survey annually – CRF Top Employer Survey. Detailed staff engagement survey with IPSOS four years in a row to identify and implement key staff engaging tools, Empowerment Awards and Green Building award participation.
Regular customer surveys	Patient Satisfaction Surveys across business units/ division. In 2012 and 2013 the IPSOS Employee engagement survey was completed.
Regular surveys of suppliers / service providers	Suppliers are invited to survey Netcare’s performance pertaining to procurement and payment. Netcare Rating Questionnaires assess our interactions with suppliers from procurement to payment. Implementing a supply chain methodology with due regard to sustainability and governance issues.
Consultations with trade unions	Monthly and quarterly with four recognised unions.
Consultations with Government and authorities	Netcare has established a dedicated policy unit to inform health reform debates and partner with government to find solutions to broader healthcare issues. Netcare participated in the National Consultative Health Forum and the Ministerial Emergency Medical Services Committee. Netcare has and continues to engage with the National Department of Health on the National Core Standards.
Consultations with regulators	Ongoing both as Netcare and under HASA. 2 significant contacts include the Competition Commission, Health Profession Council , Council for Medical Schemes and much contact with parties setting up quality standards (not formally a regulator yet.
Consultations with investors	1-on-1 meetings; Announcement of Financial Results biannually; Roadshows; IR conferences; regular phone calls; e-mails and SENS to keep all investors updated about the company’s financial and operational performance as well as the appropriate release and treatment of price sensitive information. Also see

	<a href="http://www.netcare.investor.co.za">www.netcare.investor.co.za</a> .
Media relations	Media releases including results; new services and new products etc. A communications director has been appointed to appropriately manage this process.
Consultations with local communities	Local, national CSI projects and new business endeavours. We provided medical services to indigent patients and initiatives to broaden healthcare access such as the Cleft Lip and Palate programme and Elephantiasis programme.
Relationship building with NGOs and other interest groups	Integrated Report 2013.
Newsletters	Internal monthly staff newsletters
AA1000 Assurance	Under review along with ISO 14001
Other forms of stakeholder engagement	Funder Relations; Doctor / Specialist Relations; Analysts and Shareholders are all managed and interacted with regularly. Netcare has participated in a pilot project in 2011 to assess and gauge how best we improve stakeholder relationships conducted in conjunction with the Institute of Directors. This will assist in stakeholder engagement generally.

### **ANNEX: Business & Peace**

**The COP describes policies and practices related to the company's core business operations in high - risk or conflict-affected areas**

*The following are best practices:*

- ✓ **Adherence to best practices even where national law sets a lower standard, including in the management of security services.**  
Netcare has subsidiaries in the United Kingdom and in foreign jurisdictions that the governance practices and frameworks are in place. Moreover a combined assurance model has been implemented as per the King III recommendation to ensure compliance with the regulatory frameworks, including the combined assurance model.
- ✓ **Management practices aimed at preventing corrupt relationships with government officials.**  
Netcare has established a dedicated policy unit to inform health reform debates and partner with government to find solutions to broader healthcare issues. Netcare engages actively with public sector quality leaders and clinicians in public hospitals to facilitate closer collaboration.

✓ **Stakeholder engagement mechanisms across company and contractor operations.**

Netcare Clinical Ethics Committee, which includes external academic ethics experts and clinical governance representatives from Netcare. The Committee advises on ethics, conduct, doctor training and development and clinical governance issues.

✓ **Actions toward constructive and peaceful company - community engagement.**

Our CSI efforts are delivered through the Netcare Foundation, which partners with government, corporates, suppliers, doctors, allied healthcare professionals and our staff to support the development of the communities in which Netcare operates.

✓ **Sustainable social investment projects.**

Our key CSI initiatives are:

- ✓ Emergency medical services to indigent patients;
- ✓ Healthcare accessibility initiatives;
- ✓ Community health and welfare sponsorships;
- ✓ Academic sponsorships and bursaries; and
- ✓ Discretionary spend (through applications to the Netcare Foundation for assistance).

## **Measurement Outcomes**

Measurement outcomes for all the principles have been addressed through the implementation and monitoring of policies, governance frameworks, training and development and compliance with relevant legislations.

## **Weblink reference:**

### **Criteria 2**

[http://www.netcareinvestor.co.za/reports/ar\\_2013/our-strategic-pillars.php](http://www.netcareinvestor.co.za/reports/ar_2013/our-strategic-pillars.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-people.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-people.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-transformation-report.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-transformation-report.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-transformation-report.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-transformation-report.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/gri-index.php](http://www.netcareinvestor.co.za/reports/ar_2013/gri-index.php);

### **Criteria 3**

[http://www.netcareinvestor.co.za/pdf/jse\\_sri/supporting\\_letter/udhr.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/supporting_letter/udhr.pdf)  
[http://www.netcareinvestor.co.za/over\\_vision.php](http://www.netcareinvestor.co.za/over_vision.php)  
[http://www.netcareinvestor.co.za/pdf/jse\\_sri/supporting\\_letter/udhr.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/supporting_letter/udhr.pdf)

### **Criteria 4**

[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)  
[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)  
[http://www.netcareinvestor.co.za/pdf/jse\\_sri/supporting\\_letter/udhr.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/supporting_letter/udhr.pdf)  
[http://www.netcareinvestor.co.za/over sa.php](http://www.netcareinvestor.co.za/over_sa.php)

### **Criteria 5**

[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)  
[http://www.netcareinvestor.co.za/sus\\_corp\\_gov.php](http://www.netcareinvestor.co.za/sus_corp_gov.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/pdf/corporate\\_governance](http://www.netcareinvestor.co.za/reports/ar_2013/pdf/corporate_governance)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/pdf/king\\_3\\_compliance\\_checklist\\_2013.pdf](http://www.netcareinvestor.co.za/reports/ar_2013/pdf/king_3_compliance_checklist_2013.pdf)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/fin-audit-committee-report.php](http://www.netcareinvestor.co.za/reports/ar_2013/fin-audit-committee-report.php)  
<http://surveyanalytics.com/t/AltPwZNRl>  
[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/pdf/corporate\\_governance](http://www.netcareinvestor.co.za/reports/ar_2013/pdf/corporate_governance)  
[http://www.netcareinvestor.co.za/sus\\_risk.php](http://www.netcareinvestor.co.za/sus_risk.php)  
[http://www.netcareinvestor.co.za/sus\\_corp\\_gov.php](http://www.netcareinvestor.co.za/sus_corp_gov.php)  
[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)

### **Criteria 6**

[http://www.netcareinvestor.co.za/pdf/jse\\_sri/supporting\\_letter/udhr.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/supporting_letter/udhr.pdf)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-health-policy-regulation.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-health-policy-regulation.php)  
[http://www.netcareinvestor.co.za/sus\\_corp\\_gov.php](http://www.netcareinvestor.co.za/sus_corp_gov.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-corporate-social-investment.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-corporate-social-investment.php)  
[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/pdf/netcare\\_limited\\_air\\_2013.pdf](http://www.netcareinvestor.co.za/reports/ar_2013/pdf/netcare_limited_air_2013.pdf)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-people.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-people.php)  
[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-transformation-report.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-transformation-report.php)

### **Criteria 7**

[http://www.netcareinvestor.co.za/over\\_sa.php](http://www.netcareinvestor.co.za/over_sa.php)

[http://www.netcareinvestor.co.za/reports/ar\\_2013/our-governance-structure.php](http://www.netcareinvestor.co.za/reports/ar_2013/our-governance-structure.php)

### **Criteria 8**

[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-people.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-people.php)

### **Criteria 9**

[http://www.netcareinvestor.co.za/pdf/jse\\_sri/environmental/E1\\_E5-E6\\_E10\\_CC1-CC2\\_Corporate\\_Governance\\_SUST02\\_Policy\\_Water\\_Management.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/environmental/E1_E5-E6_E10_CC1-CC2_Corporate_Governance_SUST02_Policy_Water_Management.pdf)

[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-environment-report.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-environment-report.php)

### **Criteria 10**

[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)

### **Criteria 11**

[www.netcareinvestor.co.za/jse\\_sri.php](http://www.netcareinvestor.co.za/jse_sri.php)

### **Criteria 12**

[http://www.netcareinvestor.co.za/pdf/jse\\_sri/governance/G16\\_G19\\_Blandford\\_Consulting\\_Case\\_Study.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/governance/G16_G19_Blandford_Consulting_Case_Study.pdf)

### **Criteria 13**

[http://www.suppliers.netcare.co.za/content/declaration\\_of\\_compliance.pdf?Session\\_ID=95d27e0207c05ec6ef13aa2a5abf4e52](http://www.suppliers.netcare.co.za/content/declaration_of_compliance.pdf?Session_ID=95d27e0207c05ec6ef13aa2a5abf4e52)

[http://www.netcareinvestor.co.za/pdf/jse\\_sri/governance/G16\\_G19\\_Blandford\\_Consulting\\_Case\\_Study.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/governance/G16_G19_Blandford_Consulting_Case_Study.pdf)

### **Criteria 14**

[http://www.netcareinvestor.co.za/pdf/jse\\_sri/governance/G16\\_G19\\_Blandford\\_Consulting\\_Case\\_Study.pdf](http://www.netcareinvestor.co.za/pdf/jse_sri/governance/G16_G19_Blandford_Consulting_Case_Study.pdf)

### **Criteria 21**

[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-stakeholder-engagement.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-stakeholder-engagement.php)

[http://www.netcareinvestor.co.za/reports/ar\\_2013/sao-corporate-social-investment.php](http://www.netcareinvestor.co.za/reports/ar_2013/sao-corporate-social-investment.php)