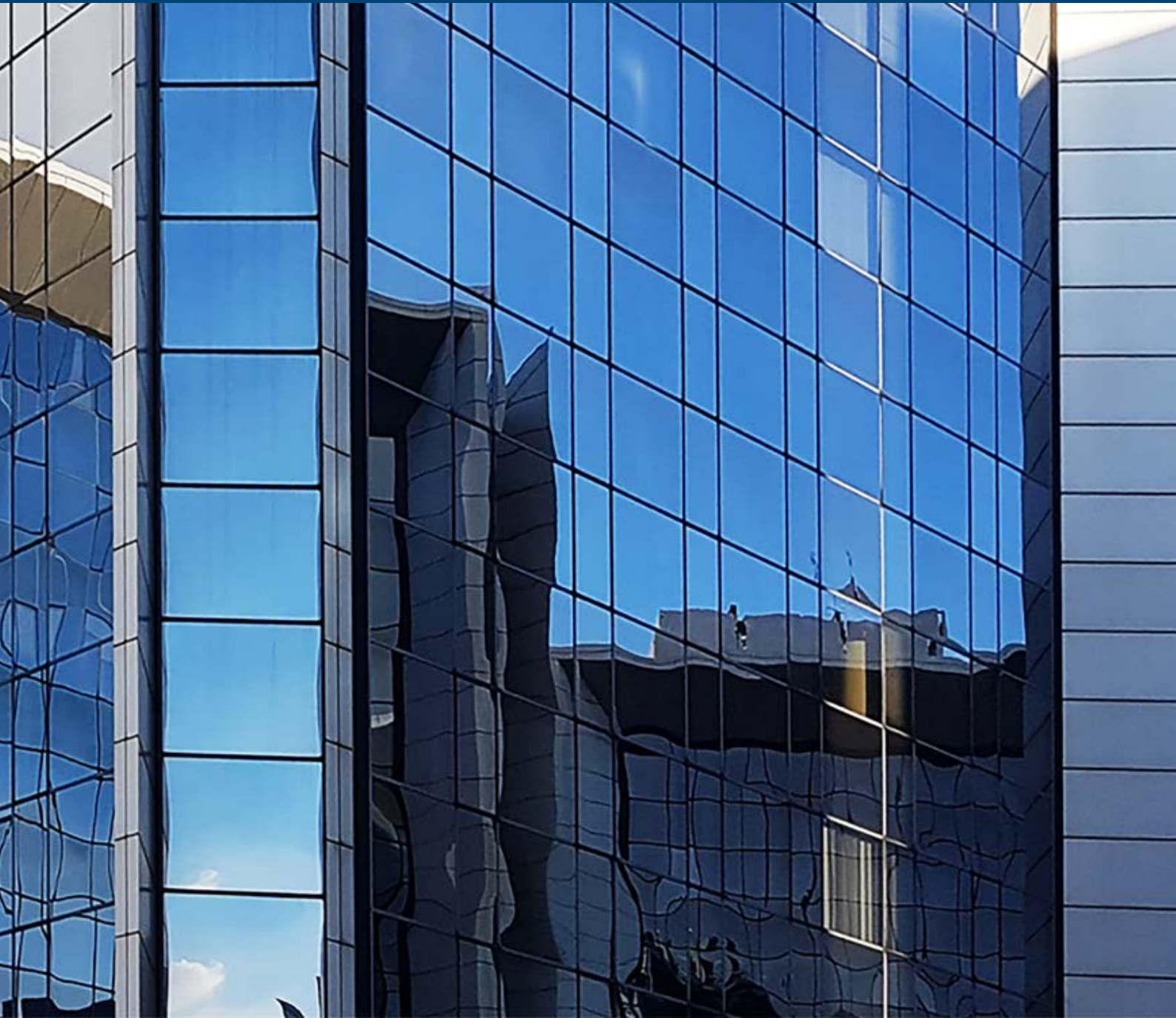


**2021
GRI STANDARDS
DISCLOSURE
INDEX**



GRI STANDARDS DISCLOSURE INDEX

This disclosure index ('**GRI Index**') identifies the location of the general and specific standard disclosures required by the Sustainability Reporting Standards developed by the Global Reporting Initiative ('**GRI Standards**'). The 2021 Sustainable Development Report has been prepared in accordance with the GRI Standards: Core option.

The references included in this **GRI Index** refer mainly to sections of the Company's **2021 Annual Report**, relating to the financial year ended 31 March 2021, and the **2021 Sustainable Development Report**, relating to the calendar year ended 31 December 2020, and published on the Company's website at annualreport.mediclinic.com.

Although many of the GRI Standards' disclosures have been reported on by the Company, this GRI Index includes the Group's general standard disclosures and the material-specific standard disclosures, based on the Company's materiality assessment referred to on page 9 of the **2021 Sustainable Development Report**.

Reference to the assurance of the various aspects is not included in this GRI Index. Please refer to pages 68–69 of the **2021 Sustainable Development Report** explaining the Group's independent assurance, as referred to in the index next to *GRI Standard 102-56 (External assurance)*.

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GRI 102: GENERAL DISCLOSURES			
ORGANISATIONAL PROFILE			
102-1 102-2 102-3 102-4 102-5 102-6 102-7	Name; Activities, brands, products and services; Location of headquarters; Location of operations; Ownership and legal form; Markets served; Scale of the organisation	Annual Report: • At a glance • Business model	8 40
102-8	Information on employees and other workers	Annual Report: • COVID-19 overview • Strategy overview • Sustainable development overview Sustainable Development Report: • Material issue 2: Building stakeholder trust	12 32 60 34
102-9	A description of the organisation's supply chain, including its main elements as they relate to the organisation's activities, primary brands, products and services	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Optimised supply chain)	57
102-10	Significant changes to the organisation and its supply chain	Annual Report: • Chair's Review • Group Chief Executive Officer's Report	4 24
102-11	Precautionary principle or approach	Annual Report: • Risk management report	96

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GRI 102: GENERAL DISCLOSURES CONTINUED			
ORGANISATIONAL PROFILE CONTINUED			
102-12	External initiatives	Sustainable Development Report: <ul style="list-style-type: none"> Guidelines Independent assurance 	1 68
102-13	Membership of associations	Sustainable Development Report: <ul style="list-style-type: none"> Significant stakeholders (Industry associations) 	20
STRATEGY			
102-14	Statement from senior decision-maker	Annual Report: <ul style="list-style-type: none"> Chair's Review Group Chief Executive Officer's Report Sustainable Development Report: <ul style="list-style-type: none"> Safeguarding the future For people and planet 	4 24 5 6
102-15	Description of key impacts, risks and opportunities	Annual Report: <ul style="list-style-type: none"> Group Chief Executive Officer's Report Strategy overview Clinical services overview Risk management report Audit and Risk Committee Report Clinical Performance and Sustainability Committee Report Sustainable Development Report: <ul style="list-style-type: none"> Materiality assessment ESG index 	24 32 68 97 142 154 9 10
ETHICS AND INTEGRITY			
102-16	Values, principles, standards and norms of behaviour	Annual Report: <ul style="list-style-type: none"> Corporate Governance Statement Sustainable Development Report: <ul style="list-style-type: none"> Material issue 3: Being an ethical and responsible corporate citizen (Preventing bribery and corruption) 	116 64
102-17	Mechanisms for advice and concerns about ethics	Annual Report: <ul style="list-style-type: none"> Corporate Governance Statement Audit and Risk Committee Report Sustainable Development Report: <ul style="list-style-type: none"> Material Issue 3: Being an ethical and responsible corporate citizen (Preventing bribery and corruption) 	116 142 64

GRI Standard disclosure reference	Description	Section of report	Page reference
GRI 102: GENERAL DISCLOSURES CONTINUED			
GOVERNANCE			
102-18 102-19 102-20 102-21 102-22 102-23 102-24 102-25	Governance structure of the organisation, including any committees responsible for decisions on economic, environmental and social impacts; Process for delegating authority for economic, environmental and social topics; Executive-level person responsible for economic, environmental and social topics; Process for consultation between stakeholders and highest governing body on economic, environmental and social topics; Composition of highest governance body and its committees; Chair of the highest governance body; Nomination and selection process for highest governance body; Processes of highest governance body for management of conflicts of interest	Annual Report: • Corporate Governance Statement Sustainable Development Report: • Sustaining effective and transparent governance (Governance structures)	116 3, 65
102-26	Highest governance body's and senior executives' role in the development, approval, and updating of the organisation's purpose, value or mission statements, strategies, policies and goals related to economic, environmental and social topics	Annual Report: • Investment case • Strategy overview • Business model • Corporate Governance Statement (Board structure and roles) • Clinical Performance and Sustainability Committee Report Sustainable Development Report: • Sustaining effective and transparent governance (Management)	10 32 40 118 154 3, 65
102-27 102-28	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics; Processes for evaluating highest governance body's own performance, particularly with regard to economic, environmental and social topics	Annual Report: • Corporate Governance Statement (Evaluation of the Board, committees and Chair) • Clinical Performance and Sustainability Committee Report • Nomination Committee Report (Evaluation of the composition, structure and functioning of the Board)	134 154 163

GRI Standard disclosure reference	Description	Section of report	Page reference
GRI 102: GENERAL DISCLOSURES CONTINUED			
GOVERNANCE CONTINUED			
102-29 102-30 102-31	Highest governance body's role in identification and management of economic, environmental and social impacts, risks and opportunities; Review of the effectiveness of the organisation's risk management processes; Frequency of review of impacts, risks and opportunities	Annual Report: • Risk management report (Principal risks and uncertainties) • Audit and Risk Committee Report • Clinical Performance and Sustainability Committee Report	97 142 154
102-32	Highest committee or position that formally reviews and approves the organisation's sustainability report and ensures that all material topics are covered	Annual Report: • Clinical Performance and Sustainability Committee Report Sustainable Development Report: • Governance structure	154 3
102-33 102-34	Process for communicating critical concerns; Nature and total number of critical concerns communicated to the highest governing body	Annual Report: • Clinical Performance and Sustainability Committee Report Sustainable Development Report: • Governance structure	154 3
102-35 102-36 102-37 102-38 102-39	Remuneration policies and linkage between performance criteria in remuneration policies and highest governance body's and senior executives' economic, environmental and social topics; Process for determining remuneration; How stakeholders' views are sought and taken into account regarding remuneration, including the results of the voting on remuneration policies; Ratio of annual total compensation of highest paid individual to the median annual total compensation for all employees per country; Percentage increase in annual total compensation ratio	Annual Report: • Remuneration Committee Report Sustainable Development Report • Material issue 2: Building stakeholder trust (Remuneration, benefits and rewards)	164 43, 52
STAKEHOLDER ENGAGEMENT			
102-40 102-42 102-43 102-44	List of stakeholder groups engaged by organisation; Basis for identification and selection of stakeholders with whom to engage; Approaches to stakeholder engagement; Key topics and concerns that have been raised through stakeholder engagement and how organisation responded	Annual Report • Corporate Governance Statement (Stakeholder interests and Board engagement) Sustainable Development Report: • Significant stakeholders	127 16

GRI Standard disclosure reference	Description	Section of report	Page reference
GRI 102: GENERAL DISCLOSURES CONTINUED			
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102-41	Collective bargaining agreements	Sustainable Development Report: <ul style="list-style-type: none"> • Material issue 2: Building stakeholder trust (Labour relations) 	49
REPORTING PRACTICE			
102-45	Entities included in the consolidated financial statements; Defining report content and topic boundaries; List of material topics; Restatements of information; Changes in reporting; Reporting period; Date of most recent report; Reporting cycle; Contact point for questions regarding the report; Claims of reporting in accordance with the GRI Standards; GRI content index; External assurance	Annual Report: <ul style="list-style-type: none"> • Report profile 	3
102-46		Sustainable Development Report: <ul style="list-style-type: none"> • About this report • Governance structure • Independent assurance 	1
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GRI 103: MANAGEMENT APPROACH			
103-1	Explanation of the material topic and its boundary	Sustainable Development Report <ul style="list-style-type: none"> • Materiality assessment 	9
103-2	The management approach and its components	Annual Report: <ul style="list-style-type: none"> • Risk management report 	96
		Sustainable Development Report: <ul style="list-style-type: none"> • Governance structure • Materiality assessment 	3 9
103-3	Evaluation of the management approach	Annual Report: <ul style="list-style-type: none"> • Corporate Governance Statement (Evaluation of the Board, committees and Chair) 	134
		Sustainable Development Report: <ul style="list-style-type: none"> • Governance structure 	3
MATERIAL-SPECIFIC STANDARD DISCLOSURES			
MATERIAL ISSUE 1: NEUTRALISING ENVIRONMENTAL IMPACT			
Aspect: Emissions			
305-1	Direct greenhouse gas ('GHG') emissions (scope 1); Indirect GHG emissions (scope 2); Other indirect GHG emissions (scope 3)	Annual Report: <ul style="list-style-type: none"> • Sustainable development overview (Carbon emissions) 	56
305-2		Sustainable Development Report: <ul style="list-style-type: none"> • Material issue 1: Minimising environmental impact (Carbon emissions) 	26-27, 72
305-3			

GRI Standard disclosure reference	Description	Section of report	Page reference
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MATERIAL ISSUE 1: NEUTRALISING ENVIRONMENTAL IMPACT CONTINUED			
Aspect: Emissions (continued)			
305-4 305-5 305-6 305-7	GHG emissions intensity; Reduction of GHG emissions; Emissions of ozone-depleting substances (ODS); NO _x , SO _x and other significant air emissions	Sustainable Development Report: • Material issue 1: Minimising environmental impact (Carbon emissions)	26-27, 72
Aspect: Energy			
302-1 302-3 302-4	Energy consumption within the organisation; Energy intensity; Reduction of energy consumption	Annual Report: • Sustainable development overview (Energy usage) Sustainable Development Report: • Material issue 1: Minimising environmental impact (Energy usage)	57 26, 28, 73
Aspect: Water			
303-1 303-2 303-3	Total water withdrawal by source; Water sources significantly affected by withdrawal of water; Percentage and total volume of water recycled and reused	Annual Report: • Sustainable development overview (Using and reusing water resources sustainably) Sustainable Development Report: • Material issue 1: Minimising environmental impact (Water)	59 26, 32, 74
Aspect: Effluents and waste			
306-1 306-2 306-3 306-4 306-5	Total water discharge by quality and destination; Waste by type and disposal method; Significant spills; Transport of hazardous waste; Water bodies affected by water discharges and/or runoff	Annual Report: • Sustainable development overview (Having zero waste to landfill) Sustainable Development Report: • Material issue 1: Minimising environmental impact (Waste)	58 26, 31, 74
Aspect: Compliance			
307-1	Monetary value of fines and number of non-monetary sanctions for non-compliance with environmental laws and regulations	Annual Report: • Sustainable development overview (Conserve) Sustainable Development Report: • Material issue 1: Minimising environmental impact	55 26

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MATERIAL-SPECIFIC STANDARD DISCLOSURES CONTINUED

MATERIAL ISSUE 2: BUILDING STAKEHOLDER TRUST

Aspect: Diversity and equal opportunity

405-1	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership and other indicators of diversity	Annual Report	
		<ul style="list-style-type: none"> Corporate Governance Statement (Board composition and diversity) Nomination Committee Report (Organisational diversity) 	121 162
		Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Diversity and inclusion) 	50

Aspect: Employment

401-1	Total number and rate of new employee hires and terminations, and employee turnover by age group, gender and region	Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Recruitment; Retention) 	39, 42
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Aspect: Training and education

404-2	Type and scope of programmes implemented and assistance provided to upgrade employee skills, and transition assistance programmes provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment	Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Training and development) 	48
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Aspect: Occupational health and safety

403-2	Type of injury and rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities by region and by gender	Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Wellness and safety) 	54, 79
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Aspect: Non-discrimination

406-1	Incidents of discrimination and corrective actions taken	Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Human rights) 	62
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Aspect: Local communities

413-1	Operations with local community engagement, impact assessments, and development programmes	Sustainable Development Report:	
		<ul style="list-style-type: none"> Significant stakeholders (Communities) Material issue 2: Building stakeholder trust (Corporate social investment) 	17 62

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MATERIAL-SPECIFIC STANDARD DISCLOSURES CONTINUED

MATERIAL ISSUE 3: BEING AN ETHICAL AND RESPONSIBLE CITIZEN

Aspect: Anti-corruption

205-3	Confirmed incidents of corruption and actions taken	Annual Report:	
		• Corporate Governance Statement (Fraud and corruption)	136
		• Audit and Risk Committee Report	142
		Sustainable Development Report:	
		• Material issue 3: Being an ethical and responsible corporate citizen (Preventing bribery and corruption)	64

Aspect: Anti-competitive behaviour

206-1	Total number of legal actions for anti-competitive behaviour, anti-trust and monopoly practices	Annual Report: • Corporate Governance Statement (Competition legislation)	136
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Aspect: Socio-economic compliance

419-1	Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area	Annual Report: • Sustainable development overview (Preventing bribery and corruption)	66
		Sustainable Development Report: • Material issue 3: Being an ethical and responsible corporate citizen (Preventing bribery and corruption)	64

Aspect: Customer privacy

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Annual Report: • Corporate Governance Statement: (ICT governance)	136
		Sustainable Development Report: • Material issue 3: Being an ethical and responsible corporate citizen (Protecting information assets)	66

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CATEGORY: ECONOMIC

Aspect: Economic performance

201-1	Direct economic value generated and distributed	Annual Report: • Value added statement	42
201-2	Financial implications and other risks and opportunities for the organisation's activities due to climate change	Sustainable Development Report: • Material issue 1: Minimising environmental impact (Climate change)	29

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CATEGORY: ECONOMIC CONTINUED			
Aspect: Economic performance (continued)			
201-3	Coverage of the organisation's defined benefit plan obligations and other retirement plans	Annual Report: • Group Chief Financial Officer's Report (Swiss pension benefit obligation) Sustainable Development Report: • Material issue 2: Building stakeholder trust (Remuneration, benefits and rewards)	93 44
201-4	Financial assistance received from government	Annual Report: • Notes to the consolidated financial statements (Note 2.20: Revenue recognition); (Note 24: Operating profit/[loss] [continued]) Sustainable Development Report: • Significant stakeholders (Governments and authorities)	214, 263 19
Aspect: Market presence			
202-1	Ratios of standard entry-level wage by gender compared to local minimum wage at locations of significant operation	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Remuneration, benefits and rewards)	43
202-2	Proportion of senior management hired from the local community at locations of significant operation	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Local hiring and global sourcing)	41
Aspect: Indirect economic impacts			
203-1	Infrastructure investments and services supported	Annual Report • Chair's Review • Investment case • Group Chief Financial Officer's Report (Divisional results) Sustainable Development Report: • Significant stakeholders (Communities) • Material issue 3: Being an ethical and responsible corporate citizen (Maintaining high-quality healthcare infrastructure)	4 10 88, 94 17 65
203-2	Significant indirect economic impacts, including the extent of impacts	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Training and development; Corporate social investment)	48, 62
Aspect: Procurement practices			
204-1	Proportion of spending on local suppliers at significant locations of operation	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Optimised supply chain)	57

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Aspect: Materials

301-1 301-2	Materials used by weight or volume; Recycled input materials used	Not reported	-
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Aspect: Energy

302-2 302-5	Energy consumption outside the organisation; Reductions in energy requirements of products and services	Annual report: • Sustainable development overview (Energy usage) Sustainable Development Report: • Material issue 1: Minimising environmental impact (Energy usage)	57 28, 73
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Aspect: Biodiversity

304-1 304-2 304-3 304-4	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas; Significant impacts of activities, products and services on biodiversity; Habitats protected or restored; Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations	Sustainable Development Report • Material issue 1: Minimising environmental impact: (Protecting biodiversity)	29
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Aspect: Materials

301-3	Percentage of products sold and their packaging materials reclaimed	Not applicable	-
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Aspect: Supplier environmental assessment

308-1 308-2	New suppliers that were screened using environmental criteria; Negative environmental impacts in the supply chain and actions taken	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Optimised supply chain)	57
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CATEGORY: SOCIAL (LABOUR PRACTICES AND DECENT WORK)

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401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Remuneration, benefits and rewards)	43
401-3	Return to work retention rates after parental leave	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Recruitment; Retention)	39, 42

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402-1	Minimum notice period(s) regarding operational changes	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Labour relations)	49
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403-1 403-3 403-4	Workers' presentation in formal joint management-worker health and safety committees; Workers with high incidence or high risk of diseases related to their occupation; Health and safety topics covered in formal agreements with trade unions	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Wellness and safety)	54, 79
Aspect: Training and education			
404-1 404-3	Average hours of training per year per employee; Percentage of employees receiving regular performance and career development reviews	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Training and development)	48
Aspect: Diversity and equal opportunity			
405-2	Ratio of basic salary and remuneration of men to women by employee category	Not reported	-
Aspect: Freedom of association and collective bargaining			
407-1	Operations and suppliers in which the right to exercise freedom of association and collective bargaining may be at risk	Sustainable Development Report: • Material issue 2: Building stakeholder trust (Labour relations)	49

GRI Standard disclosure reference	Description	Section of report	Page reference
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CATEGORY: SOCIAL (HUMAN RIGHTS)			
Aspect: Investment			
412-3	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that have undergone human rights screening	Not reported	-
412-2	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	Not reported	-
Aspect: Child labour and forced/compulsory labour			
408-1 409-1	Operations and suppliers at significant risk for incidents of child labour; Operations and suppliers at significant risk for incidents of forced or compulsory labour	Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Human rights) Material issue 3: Being an ethical and responsible corporate citizen Website: <ul style="list-style-type: none"> Modern Slavery and Human Trafficking Statement 	62 63
Aspect: Security practices			
410-1	Security personnel trained in human rights policies or procedures	Not applicable	-
Aspect: Rights of indigenous people			
411-1	Incidents of violations involving rights of indigenous people	Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Human rights) 	62
Aspect: Human rights assessment			
412-1 412-2	Operations that have been subject to human rights reviews or impact assessments; Employee training on human rights policies or procedures	Sustainable Development Report: <ul style="list-style-type: none"> Material issue 2: Building stakeholder trust (Human rights) Website: <ul style="list-style-type: none"> Modern Slavery and Human Trafficking Statement 	62

GRI Standard disclosure reference	Description	Section of report	Page reference
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Aspect: Local communities			
413-2	Operations with significant potential or actual negative impact on local communities	Not applicable	-
Aspect: Anti-corruption			
205-1 205-2	Operations assessed for risks related to corruption; Communication and training about anti-corruption policies	Annual Report: • Corporate Governance Statement (Fraud and corruption) Sustainable Development Report: • Material issue 3: Being an ethical and responsible corporate citizen (Preventing bribery and corruption)	136 64
Aspect: Public policy			
415-1	Political contributions	Annual Report: • Corporate Governance Statement (Political donations) Sustainable Development Report: • Significant stakeholders (Governments and authorities)	139 19
Aspect: Supplier social assessment			
414-1	Percentage of new suppliers screened using social criteria	Not reported	-
414-2	Negative social impacts in the supply chain and actions taken	Website: • Modern Slavery and Human Trafficking Statement	-
Aspect: Socio-economic compliance			
419-1	Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area	Annual Report: • Corporate Governance Statement (Ethics and compliance) • Audit and Risk Committee Report (Governance, compliance and ethical conduct) Sustainable Development Report • Material issue 3: Being an ethical and responsible corporate citizen (Preventing bribery and corruption)	135 151 64

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		Website: • Clinical Services Report (Assurance)	61
416-2	Incidents of non-compliance concerning health and safety impacts of products and services	Annual Report: • Corporate Governance Statement (Ethics and compliance)	135
		• Audit and Risk Committee Report (Governance, compliance and ethical conduct)	151
Aspect: Marketing and labelling			
417-1 417-2 417-3	Requirements for product and service information and labelling; Incidents of non-compliance concerning product service information and labelling; Incidents of non-compliance concerning marketing communications	Sustainable Development Report: • Material issue 3: Being an ethical and responsible corporate citizen (Governance of advertising)	65

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