



ELIGIBILITY ASSESSMENT

MEDICOVER SOCIAL FINANCE FRAMEWORK DATED NOVEMBER 2021

Prepared by: DNV Business Assurance Norway AS

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Disclaimer

Our assessment relies on the premise that the data and information provided by Medicovert to us as part of our review procedures have been provided in good faith. Because of the selected nature (sampling) and other inherent limitation of both procedures and systems of internal control, there remains the unavoidable risk that errors or irregularities, possibly significant, may not have been detected. Limited depth of evidence gathering including inquiry and analytical procedures and limited sampling at lower levels in the organization were applied as per scope of work. DNV expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Statement.

Statement of Competence and Independence

DNV applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17021:2011 - Conformity Assessment Requirements for bodies providing audit and certification of management systems, and accordingly maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the DNV Code of Conduct¹ during the assessment and maintain independence where required by relevant ethical requirements. This engagement work was carried out by an independent team of sustainability assurance professionals. DNV was not involved in the preparation of statements or data included in the Framework except for this Statement. DNV maintains complete impartiality toward stakeholders interviewed during the assessment process.

¹ DNV Code of Conduct is available on the DNV website (www.dnv.com)

DNV ELIGIBILITY ASSESSMENT

Scope and Objectives

DNV Business Assurance Services Norway AS (henceforth referred to as "DNV") has been commissioned by Medicover Holding S.A. (henceforth referred to as "Medicover" or "Issuer") to provide an eligibility assessment on Medicover's Social Finance framework (the "Framework"). Our methodology to achieve this is described under 'Work Undertaken'. We were not commissioned to provide independent assurance or other audit activities.

Medicover is a specialised provider of diagnostic and healthcare services, focusing on markets mainly in Central and Eastern Europe and India, and other smaller markets primarily in Central and Eastern Europe.

Medicover supports employer's workforces with healthcare services in locations deemed underserved by the World Bank providing the full healthcare infrastructure in locations with poor, non-existent or failing Universal Health Coverage (UHC), and also where Medicover is part of the recognized infrastructure for provision of such UHC services.

The company operates services through a network of hospitals, clinics and laboratories and can be subdivided into two divisions – Diagnostic Services and Healthcare Services.

- Diagnostic Services offers a broad range of laboratory testing in all major clinical pathology areas. The business is conducted through a network of 97 laboratories, 733 blood-drawing points (BDPs) and 26 clinics. Largest markets are Germany, Ukraine, Romania and Poland.
- Healthcare Services that offers high-quality care based on an Integrated Healthcare Model. The basis for this is a network of 25 hospitals and 117 clinics and medical facilities. Largest markets are Poland, India and Romania.

Medicover supports the United Nations Sustainable Development Goals (UN SDGs) and UN Global Compacts principles, where the Company's material sustainability aspects and priorities are reflected. Medicover contribute positively to five SDGs, including SDG #3 Good Health and Well-being, #SDG 4 Quality Education and #SDG 8 Decent Work and Economic Growth. Medicover recognizes the key role the private sector needs to play towards UN goal achievement by 2030. Since its inception in 1995 Medicover has created equitable financing, made laboratory tests available in locations with no or highly limited access was previously available at affordable prices and supported online and offline support for medical education for the public, and staff training and development. To further catalyse capital to support its mission to improve and sustain health and wellbeing, Medicover is issuing social financial instruments such as but not limited to Schuldschein², bonds and other financing instruments and has developed a Social Finance Framework (the "Framework") to outline how it intends to meet the requirements of the International Capital Markets Association (ICMA), Social Bond Principles (SBP) 2021 and the LMA Social Loan Principles (SLP) 2021.

² A Schuldschein is a privately placed, typically unsecured medium to long-term debt obligation typically governed by German law, which fundamentally comprises of a loan agreement (a 'Schuldscheindarlehen' ("SSD")) and a certificate of indebtedness evidencing such loan agreement (a Schuldschein).

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The Framework enables Medicover to issue social financial instruments to finance Eligible Projects and describes its use of proceeds, process for project evaluation and selection, management of proceeds and reporting for Social Projects covering activities and investments within Medicover.

The use of Social Bonds and Social Loans proceeds will finance investments dedicated to:

- Healthcare infrastructure comprising land and buildings, as well as property adaptations, renovations, improvements and associated fixtures and fittings
- Healthcare machinery, equipment and related digital infrastructure
- Vehicles associated with health provision
- R&D expenditures for healthcare provision such as laboratory tests or genetic tests for cancer screening tests
- Refinancing of Eligible Projects

with eligible categories being **access to essential health services** – including health, health training, financing and financial services, as defined in the ICMA Social Bond Principles and LMA Social Loan Principles 2021 (referred to as “the Principles”).

Responsibilities of the Management of MEDICOVER and DNV

The management of Medicover has provided the information and data used by DNV during the delivery of this review. Our statement represents an independent opinion and is intended to inform Medicover’s management and other interested stakeholders in the Social Financing as to whether the Framework is aligned with the ICMA SBP 2021 and LMA SLP 2021. In our work, we have relied on the information and the facts presented to us by Medicover. DNV is not responsible for any aspect of the projects or assets referred to in this opinion and cannot be held liable if estimates, findings, opinions, or conclusions are incorrect. Thus, DNV shall not be held liable if any of the information or data provided by Medicover management and used as a basis for this assessment were not correct or complete.

Basis of DNV’s opinion

We have adapted our Social Finance eligibility assessment methodology, which incorporates the requirements of the ICMA and LMA Principles, to create a Medicover-specific Social Finance Eligibility Assessment Protocol (henceforth referred to as “Protocol”) - see Schedule 2. Our Protocol includes a set of suitable criteria that can be used to underpin DNV’s opinion. The overarching principle behind the criteria is that a social finance framework should “finance socially sound and sustainable projects that achieve greater social benefits” and is “designed to drive the provision of information needed to increase capital allocation to financings for social purposes”.

As per our Protocol, the criteria against which the Framework has been reviewed are grouped under the four core Principles:

- **Principle One: Use of Proceeds.** The Use of Proceeds criteria are guided by the requirement that an issuer of a Social Finance instruments must use the funds raised to finance eligible activities. The eligible activities should produce clear social benefits.
- **Principle Two: Process for Project Evaluation and Selection.** The Project Evaluation and Selection criteria are guided by the requirements that an issuer of Social Finance instruments should outline the process it follows when determining eligibility of an investment using Social Bond and Social Loan proceeds and outline any impact objectives it will consider.
- **Principle Three: Management of Proceeds.** The Management of Proceeds criteria are guided by the requirements that a Social Finance instruments should be tracked within the issuing organization, that separate portfolios should be created when necessary and that a declaration of how unallocated funds will be handled should be made.
- **Principle Four: Reporting.** The Reporting criteria are guided by the recommendation that at least annual reporting to the Social Finance instruments investors should be made of the use of instrument proceeds and that quantitative and/or qualitative performance indicators should be used, where feasible.

Work undertaken

Our work constituted a high-level review of the available information, based on the understanding that this information was provided to us by Medicover in good faith. We have not performed an audit or other tests to check the veracity of the information provided to us. Scope of this work includes only the pre-issuance second party opinion as of the SBP 2021 and SLP 2021. The work undertaken to form our opinion included:

- Creation of an Medicover-specific Protocol, adapted to the purpose of the Social Finance Framework (The "Framework"), as described above and in Schedule 2 to this Assessment;
- Assessment of documentary evidence provided by Medicover on the Social Bonds and Social Loans, and supplemented by a high-level desktop research. These checks refer to current assessment best practices and standards methodology;
- Discussions with Medicover's management and review of relevant documentation and evidence related to the criteria of the Protocols;
 - Discussions with the Medicover Chief Financial Officer and Head of Investor Relations on the company's Sustainability strategy, business strategy;
- Documentation of findings against each element of the criteria. Our opinion as detailed below is a summary of these findings.

Findings and DNV's opinion

DNV's findings are listed below:

1. Principle One: Use of Proceeds.

Medicover intends to use the proceeds of the Bond and Loan to finance or refinance Eligible Projects. The use of the proceeds will finance Social Projects within the following categories as outlined in the Framework:

- **Healthcare infrastructure:** Investments and expenditures related to land and buildings, as well as property adaptations, renovations, improvements and associated fixtures and fittings
- **Healthcare machinery:** Investments and expenditures related to equipment and related digital infrastructure
- **Vehicles:** Investments and expenditures associated with health provision
- **R&D expenditures:** Cost for R&D related to development of healthcare provision such as laboratory tests developed for pharmaceutical research or genetic tests for cancer screening tests

These projects will be designed to provide the following social benefits: a) Access to safe, qualitative convenient, affordable and dignified healthcare service infrastructure. b) Financing structures to share risk and promote employer funding and participation of health care. c) Fair and respectfully remunerated employment training and development for clinicians. d) Provision of quality and curated education and information to local populations on health issues and conditions in their own languages to improve understanding, lifestyles, treatment and health status.

In DNV's opinion the Eligible Projects will deliver clear social benefits as mentioned above to a number of the Target Populations as defined by the ICMA SBP and LMA SLP 2021 such as, but not exclusively, people who are underserved in their locality and lack quality access to essential services, and also where Medicover is part of the recognized infrastructure for provision of such services.

Medicover will apply a maximum five year lookback period to the Eligible Projects.

DNV concludes that the above Use of Proceeds fall within the defined category of Access to essential health services – *such as health, health training, financing and financial services* – as defined in the ICMA Social Bond Principles and Social Loan Principles 2021.

2. Principle Two: Process for Project Evaluation and Selection.

The evidence reviewed by DNV demonstrates that Medicover has put in place a process that is appropriate for selecting and evaluating the eligibility of Social Projects against the set of Social Project Criteria specified in the Framework. Medicover has established a Social Financing Committee (SFC) comprised of the medical experts and Medicover representatives that will select and evaluate potential Social Projects, assess the Social Project compliance with criteria, exclusions and applicable laws and Medicover's

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long-term established goals for social and environmental sustainability. For a project to qualify as Social Project under the Social Project Criteria, the Social Financing Committee (SFC) must reach consensus. All decisions will be documented and filed.

DNV concludes that these procedures for the evaluation and selection of activities to be financed or refinanced by the Framework are robust, appropriately described, and aligned with the the ICMA SBP 2021 and SLP 2021.

3. Principle Three: Management of Proceeds.

DNV concludes that the Social net proceeds will be tracked in an appropriate manner by the general liquidity management policy. Medcover's Group Treasury team is responsible for the tracking of funds and the allocation of proceeds. Further, DNV confirms that the management of the Social Finance net proceeds, including the internal tracking procedure and allocation of funds will be reviewed by an external auditor. It is Medcover's ambition to allocate net proceeds in line with arising Eligible Projects, and at least within 24 months of the issuance date. Proceeds not designated for immediate financing will be managed through Medcover's general liquidity management policy and may be invested in short-term interest bearing securities, such as treasury bills or municipal notes.

DNV can confirm Medcover has committed to appropriately managing the net proceeds with an established internal governance process in line with the Principles.

4. Principle Four: Reporting.

DNV can confirm that Medcover will provide a Social Finance Investor Report on an annual basis until the maturity of the financing instrument. The report will cover allocation of proceeds and social impact and output achieved of the Eligible Projects financed under the Framework. The output (and impact reporting, when possible) will be based on Key Performance Indicators (KPIs). The suggested outputs of the projects may include:

- Number of individuals who receive Medcover services during the year
- Number of diagnostic tests provided
- Number of hospitals and healthcare facilities & m²
- Number of patients vaccinated for Covid-19
- Number of medical staff trained and hours
- Number of unique individuals accessing online resources
- Number of doctors & medical staff training attending educational conferences

DNV concludes that the suggested KPIs provide quantified performance measures relevant to the ICMA's Social Bond Principles (SBP) and Social Loan Principles (SLP) 2021 and in line with ICMA's suggested indicators³ for reporting under SDG 3: Ensure healthy lives and promote well-being for all at all ages.

³ Green, Social and Sustainability Bonds: A high-level mapping to the Sustainable Development Goals, ICMA, June 2020 ([link](#))

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Based on the information provided and the work undertaken, it is DNV's opinion that the Framework meets the criteria established in the Protocol and that it is aligned with the stated definition of Social bond and Social Loan Principles 2021. It is DNV's opinion that the Framework ensures that net proceeds will solely benefit eligible Social Projects with clear social benefits, thereby leading to greater social sustainability through specific eligible projects.

for DNV Business Assurance Norway AS

Oslo, 12th of November 2021

A handwritten signature in blue ink, appearing to read "D. Sukhinin", written over a horizontal line.

Dmitry Sukhinin
Senior Consultant

A handwritten signature in black ink, appearing to read "I. Finnebråten", written over a horizontal line.

Ingebjørg Nueva Finnebråten
Senior Consultant

A handwritten signature in black ink, appearing to read "M. Robinson", written over a horizontal line.

Mark Robinson
Senior Reviewer

About DNV

Driven by our purpose of safeguarding life, property and the environment, DNV enables organisations to advance the safety and sustainability of their business. Combining leading technical and operational expertise, risk methodology and in-depth industry knowledge, we empower our customers' decisions and actions with trust and confidence. We continuously invest in research and collaborative innovation to provide customers and society with operational and technological foresight.

With our origins stretching back to 1864, our reach today is global. Operating in more than 100 countries, our 12,000 professionals are dedicated to helping customers make the world safer, smarter and greener.

1 SCHEDULE 1: DESCRIPTION OF ACTIVITIES TO BE FINANCED THROUGH THE BOND

Social Finance Principles Category	Example Social Projects
<p>Access to Essential Services</p>	<p>Description: Healthcare</p> <p>Target population:</p> <ul style="list-style-type: none"> Underserved population in their locality, either due to poor, non-existent or failing universal health coverage (UHC) as defined by the World Bank. Specifically, Poland, Romania, India, Ukraine, Belarus, Moldova, Bulgaria, Serbia, Turkey and Hungary (other countries may be added to this list in future). Populations served under effective UHC systems where Medcover is part of the recognised infrastructure for provision of such services. Specifically, Germany, Poland, Denmark and Norway (other countries may be added to this list in future expansion). <p>UN SDG: #3 - Ensure healthy lives and promote well-being for all at all ages</p>

2 SCHEDULE 2: MEDICOVER – SPECIFIC SOCIAL FINANCE ELIGIBILITY ASSESSMENT PROTOCOL

2.1 Use of proceeds

Ref.	Criteria	Requirements	Work undertaken	DNV Findings
1a	Type of Financing	Social Financing Framework (the “Framework”) is a combination of Social Bond Principles (SBP) and Social Loan Principles (SLP) and must align with the four core components of the SBP and SLP.	<p>Discussions with MEDICOVER and review of the following documents:</p> <ul style="list-style-type: none"> MEDICOVER Social Finance Framework November 2021 Interview with MEDICOVER management 	<p>The type of financing is described in the Framework and falls within the category of a Use of Proceeds Financing in line with the ICMA Social Bond Principles (SBP) 2021 and the LMA Social Loan Principles (SLP) 2021.</p> <p>The Framework is established to issue financial instruments such as but not limited to Schuldschein (a privately placed, typically unsecured medium to long long-term debt obligation typically</p>

Ref.	Criteria	Requirements	Work undertaken	DNV Findings
				<p>governed by German law), bonds and other financing instruments where the proceeds will be exclusively allocated to finance, in whole or in part, Eligible Projects.</p> <p>As long as the Social financing instruments are outstanding (and the Portfolio has a positive balance) funds may be deducted from the internal account in an amount up to all disbursements from the Medicovert's lending pool made of Eligible Projects.</p>
1b	Social Project Categories	The cornerstone of a Social Finance Framework is the utilization of the proceeds which should be appropriately described in the legal documentation for the security.	<p>Discussions with MEDICOVER and review of the following documents:</p> <ul style="list-style-type: none"> • MEDICOVER Social Finance Framework November 2021 • Interview with MEDICOVER management Medicovert Environmental policy 	<p>Medicovert will use the net proceeds to finance or refinance projects related to provision of Access to Essential Services; specifically, provision of Healthcare services as set out below:</p> <ul style="list-style-type: none"> • Healthcare infrastructure <ul style="list-style-type: none"> - comprising land and buildings, property adaptations, renovations, improvements and associated fixtures and fittings • Healthcare machinery equipment and related digital infrastructure • Vehicles associated with health provision • R&D expenditures for healthcare provision such as laboratory tests or genetic tests for cancer screening tests <p>The Social Project categories outlined in the Framework are consistent with the category and the target populations outlined in the ICMA SBP 2021 and LMA SLP 2021.</p> <p>DNV concludes that the social project categories are appropriately described in the Social Finance Framework documentation.</p>

Ref.	Criteria	Requirements	Work undertaken	DNV Findings
1c	Social benefits	All designated Social Project categories should provide clear socially sustainable benefits, which, where feasible, will be quantified or assessed by the issuer.	Discussions with MEDICOVER and review of the following documents: <ul style="list-style-type: none"> MEDICOVER Social Finance Framework November 2021 Interview with MEDICOVER management Medicover Environmental Policy MEDICOVER Social bond appendix – SDG sub-goals 	<p>Medicover has selected projects for the which fall under the social category. The Eligible Projects aim to provide healthcare coverage and related infrastructure, additional financing instruments and employment opportunities.</p> <p>In addition, the Framework intends to bring a benefit of quality curated education and information to local population on health issues – localized to the cultural environment of the location.</p> <p>When operating in territories with effective UHC, Medicover provides additional healthcare capacity and infrastructure.</p> <p>Medicover has selected those activities for their contribution to the company’s social commitments, contributing to UN SDG #3: Ensure healthy lives and promote well-being for all at all ages.</p> <p>Medicover has provided a list of metrics for reporting outputs from the Eligible Projects: Number of individuals who receive Medicover services during the year, Number of diagnostic tests provided, Number of hospitals and healthcare facilities per square surface, Number of patients vaccinated for Covid-19, Number of medical staff trained and hours of training, Number of unique individuals accessing online resources and Number of doctors & medical staff attending educational conferences organised by Medicover.</p> <p>In DNV’s opinion Medicover’s Social projects will deliver clear social benefits to the designated Target Populations as defined in the ICMA SBP 2021 and LMA SLP 2021.</p>
1d	Refinancing share	If a proportion of the proceeds may be used for refinancing, it is recommended that issuers provide an estimate of the	Discussions with MEDICOVER and review of the following documents: <ul style="list-style-type: none"> MEDICOVER Social Finance Framework November 2021 	The allocation report component of the Social Finance Investor Report - provided to all investors on an annual basis until the maturity of the financing instrument - will include the total amount of the Social financing instruments allocated to new financing versus

Ref.	Criteria	Requirements	Work undertaken	DNV Findings
		share of financing vs. re-financing. Also clarify which investments or project portfolios may be refinanced, and, to the extent relevant, the expected look-back period for refinanced Eligible Projects	<ul style="list-style-type: none"> Interview with MEDICOVER management MEDICOVER Annual Report 2020 	<p>refinancing of Social Projects together with the year refinanced Social Project was taken into operation.</p> <p>The Framework defines a maximum five year lookback period to the Social Projects.</p> <p>DNV is of the opinion that there is a internal goveral process in place for managing the use of proceeds through the general liquidity policy of Medicover.</p>

2.2 Process for evaluation and selection

Ref.	Criteria	Requirements	Work undertaken	DNV Conclusion
2a	Investment-decision process	<p>The issuer should outline the decision-making process it follows to determine the eligibility of projects using Social Bond proceeds. This includes, without limitation:</p> <ul style="list-style-type: none"> A process to determine how the projects fit within the Eligible Projects categories identified in the Principles; The criteria making the projects eligible for using the Social Finance proceeds. 	<p>Discussions with MEDICOVER and review of the following documents:</p> <ul style="list-style-type: none"> MEDICOVER Social Finance Framework November 2021 Interview with MEDICOVER management Medicover Environmental Policy MEDICOVER Annual Report 2020 MEDICOVER Code of Conduct MEDICOVER Social bond appendix – SDG sub-goals 	<p>Medicover has established a Social Financing Committee (SFC) comprised of the CFO, the Head of Sustainability, the Group Treasurer and the Chief Medical Officer at Medicover, to regularly review and approve the activities included in the Eligible Social Project Portfolio.</p> <p>In the Framework Medicover has clearly described the process for evaluation of the project eligibility. Criteria for the project eligibility are provided in the Framework.</p> <p>DNV concludes that the activities financed by the financial insturments will be appropriately evaluated and selected, in line with the Principles.</p>
2b	Issuer's environmental, social and governance framework	In addition to information disclosed by an issuer on its Social Finance process, criteria and assurances, Social Bond investors may also take into	<p>Discussions with MEDICOVER and review of the following documents:</p> <ul style="list-style-type: none"> MEDICOVER Social Finance Framework November 2021 Interview with MEDICOVER 	<p>Medicover has made available to DNV it's annual reports, Environmental policies, Code of Conduct, described the strategy and relation to social projects.</p> <p>Medicover's material SDGs are SDG3 – Good Health and well-being, SDG 4 – Quality education, SDG 8 – Decent work and economic</p>

Ref.	Criteria	Requirements	Work undertaken	DNV Conclusion
		<p>consideration the quality of the issuer’s overall framework and performance regarding social sustainability.</p> <p>The issuer of a Social Bond should clearly communicate to investors:</p> <ul style="list-style-type: none"> • The social objectives of the Social Projects; • The process by which the issuer determines how the projects fit within the eligible Social Project categories; • Complementary information on processes by which the issuer identifies and manages perceived social and environmental risks associated with the relevant Project(s). 	<p>management</p> <ul style="list-style-type: none"> • Medicover Environmental Policy • MEDICOVER Annual Report 2020 • MEDICOVER Code of Conduct • MEDICOVER Social bond appendix – SDG sub-goals 	<p>growth, SDG 13 – Climate action and SDG 16 – Peace Justice and strong Institutions.</p> <p>These procedures provided by Medicover describe approaches for monitoring the effectiveness of its social and governance commitments, results and plans for the future.</p> <ul style="list-style-type: none"> • The social objectives of the financing are to increase affordable healthcare in the locality where Medicover is present, to extend access to care for our customers and for the communities as a whole, to achieve healthier lives, availability to quick, convenient and affordable care and access to care providers equipped, trained and empowered to do their professional jobs • Medicover have a process to determine whether the potential project will fit the eligible Social Project categories lead by the Social Financing Committee (SFC). The Committee is comprised of the CFO, the Head of Sustainability, the Group Treasurer and the Chief Medical Officer and perform a full assessment cycle including the alignment of the projects with the long-term strategic goals of Medicover. • Medicover have a process for identification and management of pervieued environmental risks associated with the project demonstrated in the Medicover Environmental Policy document. The policy describes Medicover’s commitment to continuous improvement and management its environmental impacts throughout the full life cycle of delivering its products and services. The social risks associated with the Projects are managed by the SFC that evaluate the compliance of the proposed Eligible Projects with the eligibility criteria outlined in the Use of Proceeds section, compliance with applicable laws and regulation and Medicover’s established long-term goals for social and

Ref.	Criteria	Requirements	Work undertaken	DNV Conclusion
				<p>environmental sustainability.</p> <p>DNV concludes that, from the information provided, the Framework is in line with Medicover's Strategy.</p>

2.3 Management of proceeds

Ref.	Criteria	Requirements	Work undertaken	DNV Conclusion
3a	Tracking procedure	<p>The net proceeds of Social Bonds / Social Loans should be credited to a sub-account, moved to a sub- portfolio or otherwise tracked by the issuer in an appropriate manner and attested to by a formal internal process that will be linked to the issuer's lending and investment operations for Social Projects.</p> <p>Where a social loan takes the form of one or more tranches of a loan facility, each tranche applicable to the Social Project must be clearly labelled, with proceeds of such tranche(s) credited to a separate account or tracked by the borrower in an appropriate manner.</p>	<p>Discussions with MEDICOVER and review of the following documents:</p> <ul style="list-style-type: none"> • MEDICOVER Social Finance Framework November 2021 • Interview with MEDICOVER management • Medicover Environmental Policy • MEDICOVER Annual Report 2020 	<p>DNV concludes that the net proceeds of any Social financing instruments will be tracked in an appropriate manner by crediting an amount that is equal to that of the net proceeds to an internal account.</p> <p>Medicover's Group Treasury team is responsible for the tracking of funds and the allocation of the proceeds. All transfers from the internal account will be documented, ensuring a full audit trail.</p> <p>The management of proceeds will be reviewed by an independent auditor.</p> <p>DNV finds that the tracking will be done in an appropriate manner by an established governance process with clear responsibilities.</p>
3b	Tracking procedure	So long as the Social Bonds are outstanding, the balance of the tracked proceeds should be	<p>Discussions with MEDICOVER and review of the following documents:</p> <ul style="list-style-type: none"> • MEDICOVER Social Finance 	So long as Social financing instruments are outstanding, and portfolio has a positive balance, funds may be deducted from the segregated account and added to Medicover's lending pool in an amount up to all

Ref.	Criteria	Requirements	Work undertaken	DNV Conclusion
		periodically reduced by amounts matching eligible Social investments or loan disbursements made during that period.	Framework November 2021 <ul style="list-style-type: none"> • Interview with MEDICOVER management 	disbursements from that pool made in respect of Eligible Projects. DNV concludes that there is a process in place for the tracking of the balance taking into account disbursements.
3c	Temporary Holdings	Pending such investments or disbursements to Eligible Projects, the issuer should make known to investors the intended types of temporary investment instruments for the balance of unallocated proceeds.	Discussions with MEDICOVER and review of the following documents: <ul style="list-style-type: none"> • MEDICOVER Social Finance Framework November 2021 • Interview with MEDICOVER management • MEDICOVER Annual Report 2020 • MEDICOVER Code of Conduct 	Proceeds not designated for immediate financing will be managed through Medicover's general liquidity management policy and may be invested in short-term interest bearing securities, such as treasury bills or municipal notes, with assurance that no short term liquidity investments shall be in areas that are deemed to be harmful to sustainability until such time as identified and allocated to financing of Eligible Projects. Medicover's ambition is to use the proceeds within one year and no later than two years from the time of issuance of the Social financing instrument.

2.4 Reporting

Ref.	Criteria	Requirements	Work undertaken	DNV Conclusion
4a	Periodical reporting	In addition to reporting on the use of proceeds and the temporary investment of unallocated proceeds, issuers should provide at least annually a list of projects to which Social Bond proceeds have been	Discussions with MEDICOVER and review of the following documents: <ul style="list-style-type: none"> • MEDICOVER Social Finance Framework November 2021 • Interview with MEDICOVER management • MEDICOVER Annual Report 2020 	Medicover has committed to provide information to investors on the allocation and outputs of the eligible projects in a public report on annual basis. Allocation Reporting will include: <ul style="list-style-type: none"> • The total amount of Social financing instruments issued and outstanding and the amount of proceeds allocated at the end of the reporting period, by period and category of investment.

Ref.	Criteria	Requirements	Work undertaken	DNV Conclusion
		allocated including - when possible with regards to confidentiality and/or competitive considerations - a brief description of the projects and the amounts disbursed, as well as the expected socially sustainable impact.	<ul style="list-style-type: none"> MEDICOVER Social bond appendix – SDG sub-goals 	<ul style="list-style-type: none"> A description of the portfolio of approved Eligible Projects Geographical distribution of Eligible Projects, on a country level. Ratio of new and refinancing together with the year refinanced Eligible Project was taken into operation. Information about any unallocated balance standing to the credit of the internal account. <p>DNV concludes that Medicover has made appropriate plans to produce reporting on the allocation and outputs of the eligible projects.</p>