

Code of Conduct

FOR BUSINESS PARTNER



WHO WE ARE

Fresenius is a global healthcare group offering high-quality products and services for dialysis, hospitals, and outpatient treatment. The Fresenius Group includes four business segments, each market leader in a major growth area of healthcare. **Fresenius Medical Care** is the world leader in treating people with chronic kidney failure. **Fresenius Kabi** supplies essential drugs, clinical nutrition products, medical devices, and services to help critically and chronically ill patients. **Fresenius Helios** is Europe's largest private hospital group. **Fresenius Vamed** is specialized on planning, constructing, and managing healthcare facilities.

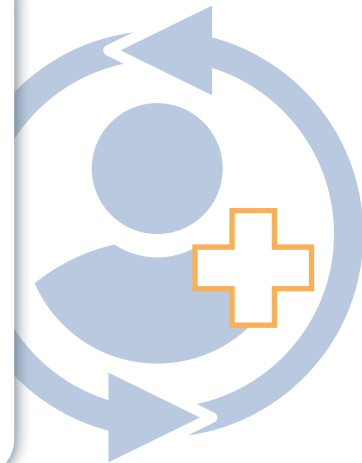
WHAT IS IMPORTANT TO US

The wellbeing of the patient

At Fresenius, the wellbeing of the patient always comes first. For more than 100 years now we have been working to save lives, promote health and improve the quality of life of our patients.

Every business decision we make is consistently guided by the wellbeing of our patients. Economic success is thus not an end in itself; it rather enables us to keep investing in better medicine.

We never get complacent about our successes. We are constantly looking for even better solutions. That is how we contribute to medical progress. "Forward thinking healthcare" captures our commitment: **better medicine for more people**.



Quality

The health of our patients depends on the quality of our products, services and therapies. That's why we are dedicated to providing the highest standards.

Only high quality in medical care can ensure our economic success. At the same time, a company must be economically healthy in order to enable sustainable investment: **in superbly qualified personnel, innovative therapies and high-quality products**.

We do our part to improve the quality and efficiency of healthcare as a whole in all our business units. This enables us to make high-quality healthcare accessible to a steadily increasing number of people.



Responsibility

With our products and services we make a decisive contribution to a future-oriented healthcare.

We thereby focus not only on the present, but also on the long term. That is especially relevant for the development of better products and therapies. And for the responsible use of both natural and financial resources. We take great care in handling the funds from the healthcare sector and our investors.

We make corporate decisions by exercising business prudence and with the aim of sustainable growth.

Integrity

In more than 100 years Fresenius has evolved from a small pharmacy into a global healthcare group.

We act in a highly professional manner. At the same time, we remain down-to-earth. Commitment, honesty and close contact with people are what distinguishes us: **in the way we treat our employees as well as our patients, business partners, and shareholders.**

Trust is a precious asset that we want to earn every day - through outstanding services as well as behaving with integrity. Therefore, we maintain high ethical standards and rules of good corporate governance that exceed the legal requirements.



Reliability

Fresenius supplies essential pharmaceuticals and medical devices, offers vital healthcare services and also successfully and efficiently implements large-scale projects. In short: **We are a reliable partner for healthcare systems worldwide.**

We make every effort to ensure the care of our patients. Supply and service capabilities are our first priority. And we find solutions where others do not.

Reliability also results from our open and transparent communication. Our word is our bond. Our statements provide orientation. Patients, employees, business partners, and shareholders can be sure: **We say what we do. And we do what we say.**

WHAT WE EXPECT FROM OUR BUSINESS PARTNERS

Fresenius obliges its business partners to comply with all applicable international and national laws, regulations and internationally recognized standards in regard to the quality of products and services, environment, human rights, labour, safety, data protection and corporate compliance. Business partners should understand the above laws and standards and apply them accordingly, including, but not limited to, those mentioned in this Code of Conduct.¹⁾

In cases where national laws are not compatible with internationally recognized standards, business partners are encouraged to respect the principles behind the international standards without conflicting with national laws.

Business partners shall implement appropriate procedures to ensure the adherence to the relevant laws and standards mentioned and take appropriate measures to provide for a Human Rights due diligence process appropriate to its size and business and/or risk profile. Existing procedures should be regularly reviewed and updated.

At Fresenius, we also expect our business partners to ensure their subcontractors align their practices with principles contained in this Code along its supply chain and to encourage their subcontractors to comply with them.

QUALITY

Ensuring Quality of products and services

The wellbeing of our patients cannot be ensured without high quality of our products and services. Therefore, Fresenius requires its business partners to comply with highest quality and safety standards in all processes. We set the highest quality standards for all our processes. If deficiencies and limitations in products, therapies or processes are recognized, they must be made transparent and necessary actions need to be taken to prevent any impact on patients.

We continuously accompany medical progress and consider relevant evidence for our products and therapies. If it is necessary or helpful we adjust them accordingly. To constantly improve our products and therapies, we also conduct clinical trials. Also here, the safety of our patients is our top priority. We observe applicable ethical, medical and legal requirements when conducting such studies. Our business partners commit to also comply to these requirements.



¹ By way of illustration and not limitation we, at Fresenius, are guided by: the United Nations Guiding Principles on Business and Human Rights (UNGPR); OECD Guidelines for Multinational Enterprises on "Responsible Business Conduct in a Global Context"; the United Nations Universal Declaration of Human Rights; the UN International Covenant on Economic, Social and Cultural Rights and Protocols thereto; the UN International Covenant on Political and Civil Rights and Protocols thereto; the UN Convention Against Corruption; the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and other relevant conventions (such as Conventions Nos. 29; 87; 98; 100; 111; 138; 182; and 203; the 2015 Paris Agreement; the Convention on Biological Diversity the Minamata Convention on Mercury; the Stockholm Convention on Persistent Organic Pollutants; the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal; the Conflict Minerals Regulation.

RESPONSIBILITY

Prohibiting child and forced labor

We do not tolerate child, forced labour or any other form of modern slavery in our supply chain. All business partners of Fresenius are obliged to prohibit any type of child labor, forced labor or any form of modern slavery and slavery like practices, including involuntary labor, debt bondage, forced marriage, and human trafficking, in their companies.

Business Partners shall not employ persons under the age at which compulsory education ends under the law of the place of employment, provided that the age of employment is at least 15 years, unless the applicable national law provides for exceptions in accordance with ILO Convention 138.

Furthermore, young workers between 15 and 18 years of age shall not be employed in work which is harmful to their health, safety or morals, and interferes with their education. Special protective regulations shall be observed.

Employment must be freely chosen and may be terminated by employees at any time of their own free will and with a reasonable notice, in line with applicable local laws. Salaries shall not be unlawfully withheld.

Furthermore, business partners shall treat their employees with respect and dignity. There shall be no threats, violence, coercion, deception, and/or abuse of power, including but not limited to sexual harassment, sexual abuse, physical punishment, mental or physical coercion, or personal harassment and humiliation.

Promoting equal treatment and avoiding discrimination

We urge our business partners to support equal opportunities and equal treatment and to prevent any type of discrimination. Nobody shall be discriminated against on the ground of age, ethnicity, color, national origin, citizenship, disability status, gender, gender expression, gender identity, marital and/or family status, pregnancy, religion, sex, sexual orientation, and any other criteria as protected by local laws and regulations.

Equal work must be remunerated equally. An unequal treatment may be justified if it is necessary to fulfil the specific working requirements.

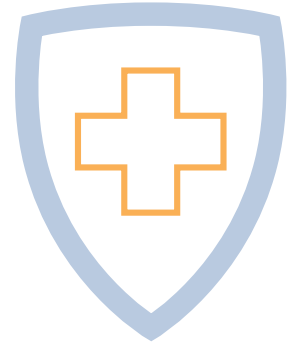
Business Partners are also encouraged to create a respectful workplace with fair and safe working conditions.



Ensuring occupational health and safety

Business partners of Fresenius shall set-up and implement an appropriate system for occupational health and safety in line with the national legislation and relevant international regulation. The workplace must not put health or safety of employees at risk; employees must always work in safe work environments. Business partners need to identify, evaluate and control workers' exposure to chemical, biological, and physical agents and physically demanding tasks. They have to mitigate these risks through effective measures, including management processes and protective equipment.

Business partners shall implement measures to avoid excessive physical and mental exhaustion of their employees. Business partners shall provide employees with safety information on identified risks in the workplace and train them accordingly to ensure that accidents, unsafe processes and resulting sick leaves are avoided as best as possible.



Respect freedom of association and collective bargaining

At Fresenius, we expect from our business partners to respect the rights of their employees in accordance with national laws. This includes the right to decide for themselves whether or not to join trade unions, to freely assembly and strike, to form a workers' council and to engage in collective bargaining. If national law prohibits the exercise of these rights, the business partners are expected to respect them as far as possible without violating national laws, for example by implementing alternative measures of workers involvement.

In any case, business partners must not discriminate against employees who are engaged in workers councils or trade unions as employee representatives.

Determining working hours and living wage

At Fresenius, we expect our business partners to comply with national laws regulating working hours. We also expect our business partners to pay wages and benefits in accordance with applicable national laws and to provide a living wage that is not lower than the national, industry or collective bargained minimum standard. Wages shall be paid at regular intervals. Unlawful or retaliatory wage suspension, wage withholding, or wage deduction shall not be tolerated.

At Fresenius, we encourage our business partners to make the remuneration system, salary, benefits, bonus, clear and understandable and to disclose it regularly to their employees.



Respecting land rights and security

In connection with the business partner's acquisition, construction or other use of living land, water and resources, which support a person's livelihood, business partners have to respect all relevant local, national, international regulations and traditional land, water and resource rights, especially those of indigenous communities. In the case of legally permitted changes in land use, or use or damage to water or resources of local communities, business partners must obtain the free, prior and informed consent of the indigenous communities concerned and document this process. Business partners shall avoid using land that has been subject to unlawful and/or forced evictions.

When contracting or requesting usage of private or public security personnel to protect a project or site, reasonable and effective measures need to be applied to minimize the risks of violations of human rights.

Observing environmental protection

Business partners must comply with relevant national and international environmental laws, regulations and standards. Business partners are encouraged to establish a management system applicable to their activities, products, and services to improve environmental protection and to preserve and protect natural resources. Natural resources, such as water and energy, should be used economically and pollution and environmental risks should be minimized.

Business partners must refrain from damaging the soil, polluting water and air, emitting noise and consuming excessive amounts of water, if doing so would harm human health, significantly impair the natural bases for the production of food or prevent people from having access to safe drinking water or sanitary facilities. Business Partners must ensure that all relevant limits for harmful noise emissions and contamination of soil, water and air, as well as for water consumption respected, based on the limits recognized by WHO and EU.

Business partners must label, monitor and control its hazardous materials, chemicals and substances and ensure their safe handling, movement, storage, recycling and disposal. Business partners must ensure the safe handling, movement, storage, recycling, disposal and management of waste. Any activity that may have an impact on human health and the environment must be adequately assessed and negative impacts minimised or eliminated.

Protecting personal data

Our business partners shall protect the right to privacy of their personnel, customers and all persons whom they do business with. They are obliged to meet the reasonable expectations of their clients, subcontractors, customers, consumers and employees with regard to the protection of private information. Our business partners shall comply with data protection and information security laws and government regulations when collecting, storing, processing, transferring and disclosing personal information.

INTEGRITY

Prohibiting corruption and bribery

At Fresenius, we require our business partners to prohibit and neither use nor tolerate corruption, extortion as well as breach of trust. Our business partners are required to ensure the adherence to the conventions by the United Nations and the Organization for Economic Cooperation and Development (OECD) on combating anti-corruption, as well as the relevant anti-corruption laws. Furthermore, they have to guarantee that their employees, subcontractors and agents do not offer, promise or grant any kinds of benefit to employees or related parties of Fresenius with the objective to obtain business or preferential treatment in business.

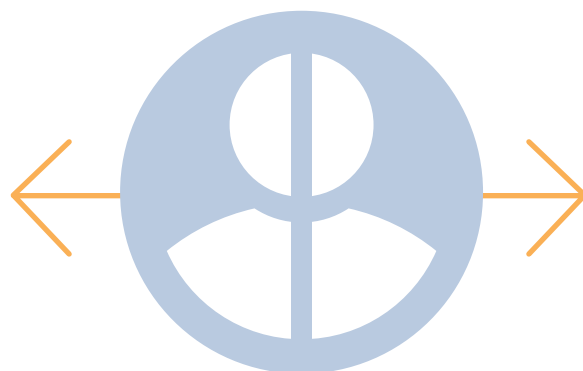
Granting invitations and gifts appropriately

Invitations and gifts shall not be misused for influencing employees of Fresenius. They can only be granted to employees of Fresenius or related parties if occasion and value do not serve any personal benefit and do not create the impression that a benefit in return is expected by the party granting the invitation or gift.

Grants towards public officials require special diligence. In a large number of countries, offering or providing a benefit to public officials or healthcare professionals is a violation of laws or industry codes. These regulations have to be observed by our Business Partners.

Preventing conflicts of interest

Fresenius requires its business partners to take decisions on their business based on objective criteria. Even potential conflicts of interest caused by other business relationships, financial involvements or political engagement of the business partner, their relatives or other related parties or organizations need to be made transparent.





Acting fair in competition

Business Partners are required to act fair in competition and to comply with antitrust laws. They neither become involved in cartel agreements for a better in the market nor abuse a potential dominant market position.

Preventing Money laundering/ terrorist financing

Relevant legal obligations on the prevention of money laundering and terrorist financing need to be observed by our business partners.

Observing trade controls

Fresenius expects their business partners to comply with relevant national and international legal obligations regarding trade controls.

Protecting company secrets and confidential information

Business partners are required to protect obtained confidential information as well as company secrets of Fresenius and to use them only in legitimate ways. Our business partners have to ensure that all sensitive data is treated appropriately.

RELIABILITY

Documenting transparently

At Fresenius, we expect our business partners to document, bill and account all business transactions properly. It is important that generally accepted accounting principles are observed not only by Fresenius but also its business partners.



Are you aware of any possible misconduct and would like to inform about it?

**Then please refer to:
Fresenius SE & Co. KGaA
Business Integrity/Corporate Compliance
corporate-compliance@fresenius.com**

or report anonymously here:

**Internet address BKMS system:
<https://bkms-system.net/fse-compliance>**

**Telephone number BKMS system:
Toll-free number +49 (0) 800 1401519**

Toll number +49 (0) 30 8943054

We treat all questions and reports confidentially.

**Should you have any questions,
please contact:**

**Fresenius SE & Co. KGaA
Business Integrity/Corporate Compliance
corporate-compliance@fresenius.com**

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