

**Your gut  
tells you  
something  
is wrong.**

Let's do the right  
thing together.

**Code of  
Conduct**

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# Foreword



Dear colleagues,

Trust is our strongest currency. As a global healthcare company, our patients, customers, partners, investors and the public rely on us. Millions of people trust us with their health and their lives. It is therefore important that we act ethically and legally correct at all times in order to justify their trust in us. The Fresenius Code of Conduct is designed to help us do the right thing.

Our Code of Conduct applies to all employees of the Fresenius Group – namely the 175,000 colleagues who are active in more than 80 countries. We wish to achieve one thing with this: Wherever we work at Fresenius, each and every one of us should act according to the same standards.

The Code of Conduct is based on the 5 Fresenius Principles. These principles describe what Fresenius stands for. We are not only concerned with ensuring the quality of our products and services, but also with the way we treat each other and how we work together – both inside and outside the company.

In our Code of Conduct, we address important issues for society and the healthcare industry, including the responsible use of artificial intelligence.

We recommend that you read the Code of Conduct and familiarize yourself with the content. It is designed to support you in your daily work, especially in difficult situations. If you have any questions about the Code of Conduct, we encourage you to contact your Compliance department or use the available channels.

Your behavior helps to strengthen our corporate culture and ensures Fresenius' sustainable success on a lasting basis. Fresenius is **Committed to Life** – we improve people's lives. This document helps us to fulfil this high standard. Anytime and anywhere.

Your Management Board

# The Code of Conduct at Fresenius

## **What is our Code of Conduct and why do we need it?**

The Code of Conduct helps us to act ethically based on our corporate principles. It serves as a moral compass for our daily actions, especially in difficult situations. Together with our binding company policies, it serves to protect our employees and our company.

## **Who must adhere to the Code of Conduct?**

The content of this Code of Conduct applies to all of us: Employees, managers and board members of the Fresenius Group, the Fresenius Kabi Group and the Fresenius Helios Group, including all national and international Group companies controlled by them. Put simply, the term “Fresenius” in the Code of Conduct covers all of the aforementioned Group and company segments.

Managers have a special role to play. They serve as role models and bear responsibility for their employees and their actions.

As Management Board and managers at Fresenius:

- We exemplify compliant, honest and ethically correct behavior. We act as role models.
- We ensure that our employees comply with applicable rules and policies.
- We ensure that our employees participate in the relevant trainings.
- We promote an environment environment of appreciative communication in which questions are asked directly and concerns are expressed openly and we are available to our employees as trusted advisors for questions and concerns.

## **What happens if we do not follow the Code of Conduct?**

Employees and board members who act unlawfully or violate internal Fresenius policies harm themselves and Fresenius. Any violations of which we become aware of will therefore be investigated. Violations of legal requirements and internal Fresenius policies may have legal consequences.

## **Training & Policies**

We receive training on our corporate policies and rules where relevant to our business activities.

We also consult the Intranet for information on policies and rules, and if we have any questions we contact our manager, the Compliance department or other specialized functions.

# Our corporate principles



# FRESENIUS PRINCIPLES



## WE CARE FOR EXCELLENCE

No compromise on quality.  
True north in mind.



## WE LIVE THE POWER OF ONE TEAM

Respectful collaboration.  
Empowering responsibility.



## WE SERVE PATIENTS BEYOND EXPECTATIONS

Bold in our ambitions.  
Turning ideas into actions.



## WE BRING HEALTHCARE INNOVATION TO PEOPLE

Learning with our customers  
and partners.  
Pushing therapies to the  
next level.



## WE ACT TODAY FOR A BETTER TOMORROW

Over 100 years of  
heritage.  
Mindful of future  
needs and resources.

Our corporate principles play a decisive role in the success of our company: They embody what Fresenius stands for and what working for Fresenius is about. They are the joint maxims for our actions. They guide us on our way to becoming the trusted, market-leading healthcare company, that unites cutting-edge technology and human care to shape next-level therapies.

We serve  
patients beyond  
expectations



WE SERVE  
**PATIENTS BEYOND  
EXPECTATIONS**

# APPLICATION OF THE HIGHEST ETHICAL STANDARDS IN HEALTHCARE

Ethics in the medical field deals with moral values in medicine. Our patients trust that their health, well-being and privacy will be respected and protected. Adherence to ethical standards promotes the quality of medical care and contributes to better patient outcomes. By adhering to the **highest ethical principles**, we strengthen our credibility and our reputation as a reliable provider of patient health solutions.

## LET'S DO THE RIGHT THING TOGETHER

We integrate the principles of medical ethics into our daily work by treating patients with respect and approaching ethical conflicts sensitively.

We firmly anchor the principles of medical ethics in our daily work. This means that we treat patients with respect and compassion, honor their self-determination and always communicate appropriately and transparently. What is more, we constantly educate ourselves on ethical issues and best practices. Our aim is to make decisions that are based on scientific evidence and always prioritize the well-being of patients.

We recognize the potential for ethical conflicts and deal with ethical issues sensitively.

In conflict situations that can arise due to different values, we work together to find an understandable and fair solution for everyone. We have the option of utilizing the support of ethics committees.

We all contribute to ensuring excellent and sustainable patient care. For us, economic efficiency and ethics are not contradictory, but complementary. We use available resources responsibly and economically – always to the best of our knowledge and belief.

# CONSCIENTIOUS IN HANDLING PATIENT SAFETY AND HYGIENE

Patient safety and hygiene are two central pillars of the healthcare system that are closely linked. **Patient safety** is understood to mean all measures and practices aimed at protecting patients from avoidable harm while receiving medical care. **Hygiene**, on the other hand, includes all measures to prevent the spreading of infections and to ensure a clean and safe environment for patients and medical staff. The safety of patients in our clinics and the safety of all employees is our top priority. A high standard in these areas leads to better treatment outcomes, fewer complications and improved patient satisfaction and experience. The standards also make a significant contribution to reducing hospital-acquired infections. By adhering to strict hygiene protocols and safety standards, we can minimize the spreading of infections and ensure the health and safety of everyone involved. They also play an important role in protecting medical staff and contribute to our reputation and credibility as a healthcare company.

## LET'S DO THE RIGHT THING TOGETHER

In all decisions and actions, we ensure that they serve the well-being and safety of our patients. In return, we do what is good and sensible for patients based on evidence.

We always comply with legal and internal regulations on safety and hygiene standards. During invasive procedures, we ensure the safety of our patients by following the established procedures.

An open and transparent approach to security-related issues is very important to us. This also means that we talk about mistakes or critical events that could have led to accidents. We learn from mistakes and work to ensure that they are not repeated.

We are committed to proper and prompt reporting of all information we receive about product risks, adverse effects and product complaints, following established internal procedures.

In all our decisions, we are guided first and foremost by the safety and well-being of our patients.

Even the  
best of  
us make  
mitsakes.



Let's talk  
about them.

# NO COMPROMISES ON THE QUALITY OF MEDICINE, CARE, PRODUCTS AND SERVICES

Products and services need to comply with legal and quality requirements so that they can be used safely on our patients. These requirements can be global standards such as DIN, JCI or ISO/UNE standards or internally defined quality characteristics. Breaches of duty of care by our employees who work directly on the manufacturing and testing of products and the provision of medical services in the production facilities, care centers and clinics can have particularly serious consequences for our patients. Measures to ensure the **quality and safety of our products and services** are defined in procedural instructions and monitored accordingly.

## LET'S DO THE RIGHT THING TOGETHER

We strive for harmonized specifications and processes to ensure the highest standards along the entire value chain and throughout the entire treatment process.

If we discern defects in our products, services or processes, we make them transparent and quickly take the necessary measures to protect our patients.

Our patients receive all the important information about the treatment process so that they can make an informed decision. If necessary, we obtain their express consent and respect their living wills and decisions regarding their data.

We record clinical and non-clinical records and documents on time, completely and transparently in the designated systems.

We handle high-risk drugs and devices with the utmost care and treat our patients responsibly, based on what is good and sensible based on evidence.

Each sales organization shall ensure that the responsible persons are available in the event of an emergency, such as a product recall, or with regard to safety information. Besides this, we store and distribute all products in perfect quality.

We rely on harmonized processes, adhere to the highest quality standards and guarantee transparency in the event of defects.

# We care for excellence



WE CARE FOR  
EXCELLENCE

# NO INVOLVEMENT IN BRIBERY AND CORRUPTION

**Corruption** means that someone abuses their professional position or power to gain an unlawful benefit for themselves or others. **Bribery** is a form of corruption in which someone grants another person a benefit to be favored in a decision. Corruption has serious consequences – both for Fresenius and for our patients, employees, relatives and society. It wastes valuable resources instead of promoting sustainable development or high-quality treatment or research. Private interests are asserted at the expense of the company and our stakeholders. Bribery and corruption harm free competition and economic development and can have serious legal, financial and reputational consequences for Fresenius and its employees. To maintain and strengthen trust in us as a company, we reject all forms of corruption and do not engage in such activities. We avoid all situations in which even the appearance of corruption could arise.

## LET'S DO THE RIGHT THING TOGETHER

We do not offer, grant or accept any illegal or improper benefits for ourselves or others, whether financial or otherwise. Facilitation payments aimed at speeding up a business transaction are also strictly prohibited at Fresenius. The prohibitions apply to direct and indirect actions via third parties that are intended to improperly influence an activity or decision.

We exercise particular caution when dealing with public officials and healthcare professionals, as they are subject to special laws which are even stricter. We are committed to ensuring that decisions are made impartially and objectively, especially in sensitive business transactions that affect large groups of people.

The selection of our business partners is based on qualitative, economic and ethical criteria. We only work with partners whose values are in line with our corporate principles and whose cooperation has not been influenced by corruption.

To ensure that we always act correctly, we implemented various preventive measures. These typically include risk-based due diligence, policies and training.

If authorities or other competent bodies conduct investigations, we cooperate and coordinate with the responsible management and the Compliance department in advance.

We reject bribery and corruption and take our decisions objectively.

# COMBATING MONEY LAUNDERING AND TERRORISM FINANCING

**Money laundering** describes the process by which illegal proceeds from criminal offences are disguised as legal money and channeled back into the economy. **Terrorism financing** refers to the use of assets for the direct or indirect financing or support of terrorism activities.

As a healthcare company, Fresenius is affected by the applicable laws against money laundering and terrorism financing. We are therefore aware of the risks of money laundering and terrorism financing and are committed to actively countering these.

## LET'S DO THE RIGHT THING TOGETHER

We pay attention to unusual payment behavior and follow our internal policies and processes to prevent money laundering and terrorism financing. This also means that we prohibit certain cash transactions, carry out appropriate due diligence where necessary and report suspicious activities to the relevant authorities.

If we find indications of money laundering or terrorism financing in a business transaction, we immediately inform the Compliance department, which assesses the risks and takes measures to protect the company.

We participate in training on the safe handling of financial transactions and possible suspicious circumstances if this is important for our work.

We are committed to transparency in financial transactions.

# TRANSPARENT HANDLING OF SPONSORING ACTIVITIES AND DONATIONS

**Sponsoring activities** represent financial or in-kind support provided in exchange for benefits in order to increase brand awareness. **Donations**, on the other hand, are voluntary contributions in kind or in cash without expecting anything in return. Donations and other contributions to political organizations can damage the reputation of Fresenius. Sponsorship activities and donations can lead to considerable reputational damage as a result of supporting controversial or ineffective projects. Donations to political institutions, organizations or individuals entail the risk that the donation is intended to exert an unfair influence on them, which in turn can damage our reputation or result in legal disadvantages. Sponsorship of our business activities by third parties can have a negative impact on our business decisions if performance and consideration are not equivalent. This must also be considered when carrying out our sponsoring activities.

## LET'S DO THE RIGHT THING TOGETHER

We carefully assess sponsorship activities and donations and do not use them to inappropriately influence the sale or purchase of our products and services.

We carefully assess the acceptance and allocation of sponsorship activities and donations. We use donations exclusively for charitable purposes and not for operating expenses.

Our donations and sponsoring activities are never carried out with the aim of inappropriately influencing the sale or purchase of Fresenius products or services.

We do not make donations to political organizations, parties, politicians or other natural persons running for political or public office. The legitimate support for Political Action Committees (PACs) in the USA is still possible.

All donations must comply with the applicable internal and external regulations, in particular with regard to authorization, documentation and taxation.

# TRANSPARENCY IN DEALINGS WITH GIFTS AND INVITATIONS

Gifts are **tangible or intangible benefits** to which there is no legal entitlement and which are offered or made to us or which we offer to third parties. Gifts can be provided by either business or cooperation partners or by patients. Clear policies and transparency regarding gifts and invitations help to promote fair and professional business behavior. The acceptance of gifts can lead to conflicts of interest – and the unauthorized granting of benefits or bribery could be prosecuted under criminal law in many countries. It is therefore important to provide adequate rules on gifts and invitations to maintain trust in us, our business partners and the public.

## LET'S DO THE RIGHT THING TOGETHER

We do not allow ourselves to be unethically influenced by gifts or invitations and do not offer them in order to improperly influence business decisions.

We ensure to avoid inappropriate personal dependencies, obligations or commitments. We do not allow ourselves to be unduly influenced by gifts or other benefits in our business decisions and actions and refuse such benefits if they jeopardize the objectivity and independence of our decisions.

We do not offer gifts or benefits to unduly influence decisions. We also do not demand, accept or grant any benefits that are illegal, not socially acceptable or unethical.

Gifts, business meals or invitations to healthcare professionals or public officials are subject to particularly strict rules, which we always observe.

# DISCLOSURE OF CONFLICTS OF INTEREST

We define **conflicts of interest** as situations in which decisions to be made in the interests of patients or the company are inappropriately influenced by personal financial or non-financial interests. Conflicts of interest can have serious economic and legal consequences. They can undermine confidence in our decisions and damage our company's reputation in the long term.

## LET'S DO THE RIGHT THING TOGETHER

It is important to separate private interests such as personal, social, financial, religious or political convictions from the interests of the company so that we can make decisions objectively and without undue influence. In a conflict situation, the interests of Fresenius must always come first.

We should avoid situations in which our personal interests could conflict with those of Fresenius.

A conflict of interest can arise if we are distracted from the professional fulfilment of our duties by other activities, including activities outside the company, or if we use the company's time or resources for non-business purposes.

Our private activities should not conflict with our professional ones.

If we recognize potential conflicts of interest, we openly disclose them to our superiors or other responsible persons. Together we discuss how we can avoid these conflicts, resolve them or take them into account in our business decisions.

If a secondary employment or freelance work could conflict with Fresenius' interests, we obtain authorization in accordance with our employment contract or our internal policies – if required by local law.

Not all  
risks are  
obvious.

Show them to us.

# COMPLIANCE WITH ANTITRUST AND COMPETITION LAWS

**Antitrust and competition laws** prevent that illegal agreements or monopolistic practices eliminate or restrict effective competition and/or harm consumers. Violations of antitrust and competition laws can have serious legal, financial, reputational and personal consequences and significantly impair our ability to compete. Through fair behavior in competition, we all contribute to Fresenius being perceived as an honest partner.

## LET'S DO THE RIGHT THING TOGETHER

We achieve our success through high-quality products and services and through fierce competition in the market, while always complying with applicable laws on antitrust law and fair competition.

We determine our business strategies independently and do not participate in cartels, anti-competitive agreements or concerted practices that unlawfully restrict competition.

We always determine our business strategies independently and never participate in cartels, anti-competitive agreements or concerted practices that unlawfully restrict competition. This applies in particular when working with our competitors, customers and suppliers.

We do not abuse a dominant market position, for example by excluding competitors or exploiting customers. We are aware that we are exposed to antitrust risks, particularly in our dealings with other participants in the market. We therefore participate in training to recognize such risks and to deal with them appropriately.

We avoid exchanging commercially sensitive information directly or indirectly with competitors, unless this is permitted by law.

# COMPLIANCE WITH CUSTOMS AND TRADE REGULATIONS

All transactions, regardless of whether they are cross-border or take place within the same country, may be subject to national and international **customs and / or trade regulations** (including import and/ or export controls). Fresenius operates worldwide and handles imports, exports and transits of various goods on a daily basis. For goods to be cleared through customs on time, all consignments must be properly prepared under expert guidance to ensure compliance with national and international regulations. Customs laws and trade regulations apply regardless of the quantity, type of material and mode of transport. Failure to comply with these regulations may result in significant reputational damage to the company, civil and criminal liability and loss of import and/or export privileges.

## LET'S DO THE RIGHT THING TOGETHER

We ensure that we comply with national and international laws and regulations, including import and export controls and embargo regulations.

Before we get in contact with new business partners, we check whether they are on national or international sanctions lists.

Before importing or exporting goods, software or technology – whether physical or electronic – we also ensure that no special licenses are required and that there are no trade restrictions. Some countries are subject to comprehensive foreign trade controls – also known as embargoes or sanctions – which we consider before every transaction.

We ensure that all information we provide is accurate and complete.

In our day-to-day business and when adapting our processes, we ensure that we always comply with all customs and trade regulations.

We pay attention to and ensure compliance with all customs and trade regulations.

# ACCURATE AND TRANSPARENT ACCOUNTING

**Accounting** is used to record, organize and manage financial transactions. Our investors make their decision to support us as a company based on the published financial and non-financial information. In order to do this, they need a clear and transparent basis for decision-making.

## LET'S DO THE RIGHT THING TOGETHER

It is important that we properly document, settle and record all business transactions. Each and every one of us contributes to ensuring that the principles of proper accounting are complied with. We ensure compliance by clearly defining and adhering to the necessary responsibilities, processes and controls.

We ensure that all necessary declarations and financial reports are submitted correctly and on time to the relevant authorities. We must retain all documents used to prepare a statement or financial report in an appropriate manner. We are also transparent and cooperate with the relevant supervisory authorities and other public bodies.

We ensure the accuracy of the information we provide for inclusion in a financial report that is signed or certified by officials and disclose any suspicions or questions regarding the accuracy prior to signing and filing or finalizing such financial report. We refrain from making false or misleading statements to obtain a payment to which Fresenius is not entitled.

Incorrect information in an official application or financial report can have legal consequences for both individuals and Fresenius.

We comply with the principles of proper accounting.

We bring  
healthcare  
innovation to  
people



WE BRING HEALTHCARE  
INNOVATION TO PEOPLE

# PIONEER IN INNOVATION AND DEVELOPMENT

**Innovation** entails creating new ideas, products or processes or improving existing ones. Innovative approaches ensure better patient and healthcare provision, create added value or solve existing problems. **Development**, on the other hand, is the continuous process of growth and change in various areas. It involves expanding our range of products and services as well as refining and developing our existing products and therapies to meet the changing needs of patients and healthcare professionals. Innovation and development in the healthcare sector are subject to numerous legal and regulatory standards, including requirements relating to the ethically correct conduct of scientific and medical research and, in particular, clinical trials for the authorization of new and improved treatments, medical technology products, drugs and clinical nutrition.

## LET'S DO THE RIGHT THING TOGETHER

We ensure the best possible care by integrating new, relevant discoveries into our products and therapies in compliance with the applicable regulations.

We continuously monitor medical progress and integrate new, relevant findings into our products and therapies. Where necessary or useful, we adapt these to ensure the best possible care. To constantly improve our products and therapies, we conduct research, including clinical trials, to collect valuable data.

When developing our products and conducting studies, we always adhere to good clinical practice and all applicable laws, regulations and internal company policies.

It is particularly important to us to respect the intellectual property rights of others, such as patents, copyrights, design rights, utility model rights and trademark rights, and to use these only within the permitted scope.

# RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

**Artificial intelligence (AI)** is a technology that enables a machine to imitate and, in some cases, outperform human learning and understanding, human problem-solving, decision-making, creativity and autonomy. Responsible use means making the best possible use of this technology to enhance the quality of our products and services while fully respecting the dignity of our patients, customers, employees and business partners and ensuring a secure environment for the data processed. The capabilities of artificial intelligence make it possible to improve the quality of decisions and increase productivity. However, the incorrect use of the technology carries risks that can even have a direct impact on the lives of the people affected. Through binding principles for the responsible, ethical and safe use of artificial intelligence, we help to ensure that human dignity is our priority and that false, unfair, discriminatory or exclusionary outcomes are avoided.

## LET'S DO THE RIGHT THING TOGETHER

We ensure fair and non-discriminatory results from the AI systems used.

We are committed to ensure that the data sets and processes of the AI used are transparent, that its capabilities and purpose are openly communicated and that AI-supported decisions are – as far as possible – explainable to those directly and indirectly affected.

We minimize potential negative effects and take responsibility for the AI system used and its results throughout the entire life cycle.

We ensure that the AI systems used are resilient to hostile attacks and potential misuse of the system, and we provide safeguards to minimize and respond to unintended or even harmful behavior.

Our strong commitment to confidentiality and data protection is essential for the safe and responsible use of AI.

We understand the social impact of AI and promote its use for the benefit of our society.

We see artificial intelligence as an important tool for improving or enhancing the results of human decisions, but not as a substitute for them.

# We live the power of one team



WE LIVE THE POWER  
OF ONE TEAM

# RESPECT FOR HUMAN RIGHTS

**Human rights** are universal rights. They apply to all people – simply because they are people, everywhere and at all times, without distinction. They apply regardless of ethnic origin, skin color, gender, language, religion, political or other convictions, sexual orientation, origin or wealth. As a globally active healthcare company, we consider respect for **human rights to be an integral part of our corporate responsibility**. This applies to our supply chain, taking into account our possibilities for influence, to direct business partners and upstream in our supply chain. Our obligation and our strong commitment to this are expressed in our human rights declaration. The well-being of our employees is one of the central focus areas of our human rights due diligence. For us, this includes offering a safe and healthy working environment and respecting the right of freedom of association. We do not tolerate discrimination or exploitative working conditions and have zero tolerance for child or forced labor. As a global healthcare company, we rely on many suppliers worldwide. We also expect them to respect human rights and protect the environment through the efficient use of resources as the basis of our livelihood.

## LET'S DO THE RIGHT THING TOGETHER

We respect human rights and expect the same from our business partners and suppliers.

We respect human and labor rights, report any violations and are committed to a safe and healthy working environment. We expect the same from our business partners and suppliers.

Respecting human rights is a shared responsibility that affects everyone – from members of the Management Board to managers, who we expect to set a good example, and from all employees to our business partners and suppliers.

# PROMOTING OF EQUAL TREATMENT AND OPPORTUNITIES FOR ALL

**Equal treatment and opportunities for all** means that everyone has fair access to the opportunities, development, resources and information they need to do their job, grow and develop. It is important to us that our employees can realize their full potential and contribute their different knowledge, backgrounds, experiences and perspectives. This leads to better problem-solving, creativity and innovation; it enables us to make better decisions, increases our attractiveness as an employer and helps us to attract the talent we need to develop Fresenius further.

## LET'S DO THE RIGHT THING TOGETHER

We promote an atmosphere of mutual respect and appreciation for diversity of thought, culture, perspectives and experience.

We promote an inclusive corporate culture in which all employees are valued and have the opportunity to grow.

Our employees are important to us, which is why we want to support them in all phases of their career at Fresenius and provide equal opportunities. We promote equal opportunities by providing services and advice, for example in the fields of occupational medicine and occupational health management, and with the help of professional development programs. We therefore create flexible working environments that adapt to the individual needs of our employees at different stages of their lives.

# NO TOLERANCE OF DISCRIMINATION

**Discrimination** means that a person or group is treated unfairly or disadvantaged because of certain characteristics. This refers to actions that are offensive or threatening, as well as any form of sexual harassment or bullying. We want all employees to be able to work here without fear of harassment or discrimination. It should therefore be important to all of us that each and every one of us has a safe, respectful and pleasant working environment.

## LET'S DO THE RIGHT THING TOGETHER

We do not accept any discrimination in recruitment or employment based on ethnic origin, skin color, gender, language, religion, political or other convictions, sexual orientation, origin or wealth.

Nor do we tolerate any of the following behavior:

- violence, threatening people or aggressive behavior,
- intimidation or harassment of any person, including disrespectful, discriminatory, hostile, humiliating or offensive behavior,
- promising preferential treatment or threatening unfavorable treatment based on an employee's response to sexual demands,
- unlawful or harmful activities towards others,
- illegal substances and the misuse of drugs in the workplace.

We do not accept any form of discrimination in recruitment or in the workplace.

We promote:

- trust and open cooperation,
- respectful behavior,
- support for colleagues,
- appreciative communication,
- an environment in which everyone can voice their concerns without fear of retaliation.

Fresenius is committed to creating a working environment in which all employees feel safe, respected and supported. This is a responsibility that we all share.

~~Not~~ my  
problem.

It's time to take  
responsibility now.

# SAFE WORKING CONDITIONS

**Working conditions** refer to various factors that characterize an employee's working situation. These include the working environment, safety measures and ergonomics. As a healthcare company, we prioritize the well-being and safety not only of our patients, customers and business partners, but also of our employees. We have introduced numerous management systems and measures throughout the company to protect our employees from accidents and work-related illnesses. A safe, healthy and productive workplace is therefore essential for us. The sustainable and safe organization of workplaces in accordance with applicable laws on occupational safety and our company policies create a healthy climate for our employees.

## LET'S DO THE RIGHT THING TOGETHER

We have established company policies and working conditions to protect our employees from potential health risks in the workplace. As a company, we will always comply with the legal and company regulations on occupational safety and continuously improve them to create a safe working environment.

We contribute to the creation of a secure workplace.

We contribute to creating a safe workplace and behave responsibly ourselves, which includes the following:

- We carry out our work in a safe, competent and professional manner.
- We comply with all legal requirements and company principles and policies relating to safety in the workplace.
- We familiarize ourselves with the safety regulations and emergency plans applicable to our workplace in order to be able to react appropriately in the event of an emergency or other incident.

# TRANSPARENT COMMUNICATION – BOTH INTERNAL AND EXTERNAL

**External communication** includes all ways in which Fresenius communicates with the public and other stakeholders, such as through press releases, digital platforms, advertising or **social media**. Our **internal communication**, such as events or intranet campaigns, addresses our employees. It is very important that we all communicate in a transparent and respectful way – both internally and externally. In this way, we protect Fresenius' good reputation and contribute to its long-term success. Everything that is said or written about Fresenius can have a positive or negative impact on our image. Even if we are privately active on social media with reference to Fresenius, it can often be recognized that we work for Fresenius. It is therefore important to be aware that private posts on social media can also have an impact on Fresenius' reputation.

## LET'S DO THE RIGHT THING TOGETHER

Enquiries from journalists will only be answered by authorized company spokespersons. Questions from investors and analysts are answered by the Investor Relations team. We therefore forward these requests immediately in order to enable reliable, consistent statements and to protect confidential information.

We never communicate with external stakeholders or the public on behalf of Fresenius unless we are instructed and authorized to do so. When we speak publicly as private individuals about Fresenius or

work-related matters, we protect confidential information and make it clear that we are expressing our personal views. We do not use the name or company logos for private purposes.

Fresenius has official accounts in social networks. The accounts are managed by editorial teams. We can interact with these accounts and share or comment on posts.

When we are active on social media or internal communication platforms, we act responsibly and consider the consequences for ourselves and for Fresenius before we publish a post.

We do not use or engage in hate speech, offensive, derogatory, harassing, discriminatory, racist and inhuman statements.

We communicate responsibly both internally and externally.

We act today  
for a better  
tomorrow



WE ACT **TODAY**  
FOR A BETTER  
TOMORROW

# RESPONSIBLE INTERACTION WITH THE ENVIRONMENT

A healthy planet is the basis for a healthy life. **As a healthcare company, we bear responsibility – for the well-being of people and hence also for our planet.** Because our health starts with a healthy home. We are actively committed to the efficient and responsible use of natural resources and take precautionary measures in order to avoid potentially negative environmental impact of our business activities. Where we cannot avoid them, we take action to minimize them. Standards such as ISO 14001 form the basis of our environmental management systems.

## LET'S DO THE RIGHT THING TOGETHER

In all our activities, we not only ensure compliance with applicable environmental rules and regulations, but also create a culture in which each and every one of us should feel responsible for reducing our ecological footprint as much as possible. We also encourage our employees to develop approaches to improve our environmental management performance.

We are committed to energy efficiency and climate protection and are working to develop sustainable solutions for our business, our facilities and our customers.

Water is an element of life and one of our most valuable resources, as well as a resource that ensures the high-quality standard of our products and compliance with hygiene regulations in healthcare facilities. That is why we are committed to holistic water management at our locations.

We support the transition to a circular economy. We strive to maximize the lifespan of materials, reduce waste and increase the proportion of recyclable materials in our waste streams. Proper and legally compliant waste disposal is a matter of course for us.

We have set for ourselves ambitious targets in the areas of environmental and climate protection and are developing measures and plans to counter and adapt to climate change within our power. We expect the same from our business partners. We rely on our suppliers in particular to also commit to these goals and are working with them to improve their sustainability performance.

We feel responsible for reducing our ecological footprint as much as possible.

# STRENGTHENING CONFIDENCE THROUGH DATA PROTECTION

Where innovative, data-based technologies are revolutionizing the healthcare sector, strong data protection is necessary. It is necessary to give all people who are in contact with Fresenius on a daily basis a secure feeling that not only their health but also their personal data are in trustworthy hands with us.

**Because data protection is protection of trust.** Successful treatment begins with trust in an institution and its employees – in the medication, nutrition or medical products that we produce. However, data protection does not end with patients, but includes everyone who entrusts us with their data – employees, customers, suppliers, healthcare professionals and other business partners.

## LET'S DO THE RIGHT THING TOGETHER

We take part in data protection trainings, integrate the knowledge we have acquired into our work processes and never lose sight of the people behind the data.

We assign responsibilities and implement internal rules, policies and SOPs to ensure the protection of people and their personal data.

We protect personal data in accordance with the applicable data protection laws and data protection principles:

We live data protection and demonstrate a high degree of sensitivity when handling personal data.

- We have a documented legal basis for the collection, use and processing of personal data.
- We handle personal data in a fair and transparent manner.
- We only use personal data for the stated, explicit and legitimate purposes for which it is collected.
- We only collect and use personal data that is necessary for the defined purpose communicated to the individual.
- We keep personal data accurate and up to date.
- We do not store personal data for longer than is necessary for the purpose for which it was collected, unless this is required by law.
- We take appropriate technical and organizational measures to protect personal data from destruction, loss, unauthorized modification, disclosure or unauthorized access.
- We only commission processors who offer sufficient guarantees for the implementation of suitable technical and organizational measures.

# PROTECTING THE DIGITAL ENVIRONMENT THROUGH CYBER SECURITY

Cyber security refers to the protection of our digital ecosystem (including information, computer systems, networks, medical devices, production facilities and more) from cyber risks and attacks. These include threats such as unauthorized access, data loss, manipulation or sabotage. **The aim of cyber security is to continuously guarantee the confidentiality, integrity and availability of our digital ecosystem.** Cyber risks and attacks can negatively impact and restrict the production and distribution of our products. They can impair the functioning of our medical devices and jeopardize our ability to care for patients in healthcare facilities. Our constant aim is to ensure a strong line of defense against cyber risks and attacks. We also ensure that all requirements of the applicable safety-related legislation for medical devices, critical infrastructure and essential businesses are met. If necessary, we work together with the authorities.

## LET'S DO THE RIGHT THING TOGETHER

We think before we click on a link or open an attachment. Our caution is the first line of defense against potential cyber threats.

We follow our policies, which serve to protect our information and systems. Consistent compliance with the policies ensures that together we build a strong defense against cyber risks.

We use our wide range of education and training programs to keep up to date with increasing cyber risks, such as social engineering, hacking, computer malware, ransomware and phishing messages.

We are vigilant and report any anomalies. If we notice something unusual or suspect a possible security incident, we report it immediately – thereby making a significant contribution to the security of our digital ecosystem.

We protect our login data. Strong, secret and unique passwords and multi-factor authentication (MFA) are the key to preventing unauthorized access and thus protecting the entire organization.

We handle information responsibly. Every piece of information is valuable and requires careful handling. The appropriate protection of this information is a commitment to the trust of our stakeholders.

We protect our digital ecosystem by making smart decisions.

# PROTECTION OF CONFIDENTIAL COMPANY INFORMATION

Protecting confidential company information is critical to ensure that Fresenius' sensitive data and trade secrets are protected from unauthorized access, misuse or disclosure. It is important to protect the confidentiality of business secrets as well as financial, strategic and health-related information. Unauthorized disclosure or misuse of such information could damage our competitiveness and reputation and undermine confidence in us. **Confidential information** is all data that is not contained in publicly accessible documents such as annual reports or official publications. This typically includes strategic and commercial information, business plans, sales data, supplier and customer information, pricing, inventions, new products in development, personnel data or financial information.

## LET'S DO THE RIGHT THING TOGETHER

We only share confidential information with people who need it for their work, always in accordance with the need-to-know principle.

Business secrets constitute all information that is identified as confidential, for which appropriate measures are taken under the given circumstances to maintain confidentiality and which can be assumed not to be publicly known or readily accessible and should not be published. Confidential information and business secrets may not be used to gain a personal or commercial advantage for oneself or third parties.

We respect the confidentiality obligations set out in our employment contracts and take all necessary precautions to protect confidential information from inadvertent use or disclosure. This means that we do not discuss confidential matters with unauthorized persons, such as family members.

We never disclose confidential company information or business secrets and protect such from unauthorized access.

Insider information – namely unpublished information that could influence the stock market price of Fresenius or the securities of a business partner – is subject to strict legal regulations. We may not use this insider information for personal gain when buying or selling securities and treat it with the greatest discretion.

# PROTECTION OF COMPANY ASSETS

The **protection of corporate assets** ensures that Fresenius' tangible and intangible assets are protected against loss, theft, misuse or damage. Responsible behavior also includes the sustainable use of work equipment, the protection of intellectual property and the conscientious handling of our financial resources. Responsible behavior ensures that company resources are used efficiently.

## LET'S DO THE RIGHT THING TOGETHER

We protect our assets, such as physical, financial, technical and intellectual property, as well as know-how, against loss, theft, destruction or unauthorized use. This also means that we treat company property and the property of third parties that is made available to us with due care and utilize it in accordance with the company's objectives, business tasks and applicable regulations.

We protect our assets against loss, theft, destruction or unauthorized use.

We use the company's own resources entrusted to us carefully and economically and in line with the company's objectives. We endeavor to avoid loss, waste and premature wear and tear.

It may be a criminal offence if we use company property inappropriately for private purposes, waste company funds or fail to reclaim money spent without a legal basis.

We therefore use company funds and other company assets responsibly and only for legitimate and justified purposes. We manage the budget conscientiously and handle the company's financial resources responsibly. We take an appropriate approach in pursuing potential claims for reimbursement of unjustified payments that may have been lost.

Your gut  
tells you  
something  
is wrong.

Tell us  
what's right.

# Speak-up

-

## Our reporting channels

# REPORTING CHANNELS

Indications of **possible misconduct** – whether within our company or in the supply chain – are important for us to ensure a corporate culture characterized by integrity. That is why we have set up easily accessible whistleblower reporting systems.

For us as a company, it is crucial to learn about possible misconduct at an early stage in order to prevent it effectively and respond appropriately.

We provide comprehensive protection for whistleblowers. Our whistleblower reporting systems ensure that reports are submitted confidentially and anonymously. Investigations are conducted objectively by independent experts. We do not tolerate any discrimination against persons who in good faith report possible misconduct or support investigations in this connection. This also means that we consistently pursue all cases of discrimination against such whistleblowers. Reports in which others are wrongly accused in bad faith constitute a violation of our Compliance rules.

## LET'S DO THE RIGHT THING TOGETHER

In addition to familiar points of contact like our manager, the HR department, or the works council, the following confidential and secure reporting channels are available to us:

We use our reporting channels if we have indications of possible misconduct in connection with our business activities.

### Whistleblower Hotline:

Web Intake: [freseniusgroup.ethicspoint.com](http://freseniusgroup.ethicspoint.com)  
Mobile Intake: [freseniusgroup.navexone.eu/](http://freseniusgroup.navexone.eu/)  
E-mail: [integrityline@fresenius.com](mailto:integrityline@fresenius.com)

### Fresenius Kabi:

Web Intake: [complianceactionline.ethicspoint.com](http://complianceactionline.ethicspoint.com)  
E-mail: [compliance@fresenius-kabi.com](mailto:compliance@fresenius-kabi.com)

### Helios:

Communication channels:  
[helios-gesundheit.de/compliance/kontakt/](http://helios-gesundheit.de/compliance/kontakt/)

### Quirónsalud:

Web Intake: [canaldedenuncias-quironsalud.ethicspoint.com](http://canaldedenuncias-quironsalud.ethicspoint.com)  
E-mail: [canaldedenuncias@quironsalud.es](mailto:canaldedenuncias@quironsalud.es)

**Let's do the right  
thing together.**

# Imprint

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