Human Rights Statement

fresenius.com/human-rights

Fresenius

Foreword

As a global healthcare company, we have a responsibility to people. We strive to uphold this responsibility in our hospitals and production sites, across our value chains, and in our business relationships. Respect for human rights is a fundamental principle that guides everything we do at Fresenius. It shapes our daily interactions, from health and safety to respectful treatment and positive working relationships.

With this Human Rights Statement, we reaffirm our commitment and explain how respect for human rights is embedded across our company: through clear governance and accountability, risk-based due diligence, preventive and remedial measures, accessible procedures for reporting misconduct, and transparent communication on our progress.

Our human rights program focuses on five priority areas. They help us concentrate our efforts on the topics most closely connected to our business activities and their potential impact on people:

- safe working conditions
- prevention of exploitation
- non-discrimination
- access to and quality of healthcare services and products
- a clean and healthy environment

We shape respect for human rights together. While policies and processes provide the framework, respect for human rights is ultimately reflected in how we work together and treat one another.

We expect all colleagues and business partners to read our Human Rights Statement, discuss it within their teams, and apply its principles in their day-to-day work.

Fresenius Management Board

Michael Sen
Sarah Hennicken
Dr. Michael Moser
Dr. Marc-Alexander Mahl
Dr. Christian Pawlu

Our Commitment

Our approach is guided by internationally recognized human rights standards and frameworks.[1] We are also committed to complying with applicable national legislation, including the German Act on Corporate Due Diligence in Supply Chains (LkSG), as well as other relevant legal requirements in the jurisdictions in which we operate.

We recognize that certain jurisdictions may have additional legal or regulatory requirements relating to specific human rights matters. Where applicable, these requirements are addressed through local policies and disclosures, approved in accordance with local governance requirements. Any such policies, disclosures, or statements complement this Human Rights Statement.

Where local legislation restricts the application of international human rights standards, we seek to uphold the underlying principles to the greatest extent possible while remaining consistent with national law.

The principles outlined in this statement are binding for Fresenius SE & Co. KGaA and all its subsidiaries, including the Operating Companies Fresenius Kabi and Fresenius Helios. The principles further apply to all employees and to all business activities and further define our expectations towards business partners and suppliers.

Scan the QR code to watch our **“Healthcare starts with people”** video.

[1]
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Due Diligence Guidance for Responsible Business Conduct
- UN Guiding Principles on Business and Human Rights
- UN Universal Declaration of Human Rights
- UN Covenant on Civil and Political Rights
- UN Covenant on Economic, Social and Cultural Rights

Our Human Rights Program

To put our commitment to respecting human rights into practice, we have established a Group-wide Human Rights Program built on five core elements. These elements help us translate our principles into processes and responsibilities throughout all operations.

Through this program, we identify and assess human rights risks, implement preventive and remedial activities, ensure transparent and accessible procedures for reporting misconduct, and continuously document and report on our progress. Together, these elements form the foundation of a consistent, effective, and accountable human rights due diligence approach.

Further details on the implementation of our Human Rights Program and human rights due diligence approach are provided in an internal Standard Operating Procedure.

Scan the QR code to watch our **"What are human rights?"** video.



Graphic: Group-wide Human Rights Program

Core element 1

Group-wide governance and responsibilities

The Fresenius Management Board oversees the Human Rights Program. Group-wide governance structures and clearly defined responsibilities support its implementation.

Group Human Rights Office:

The Group Human Rights Office is located within Group Sustainability and reports to the Head of Group Sustainability, who reports directly to the Fresenius Management Board. The Human Rights Office is responsible for the overall human rights due diligence approach, including developing and managing the human rights risk assessment methodology, supporting the Operating Companies in implementing relevant processes, and monitoring their activities.

Human Rights Function:

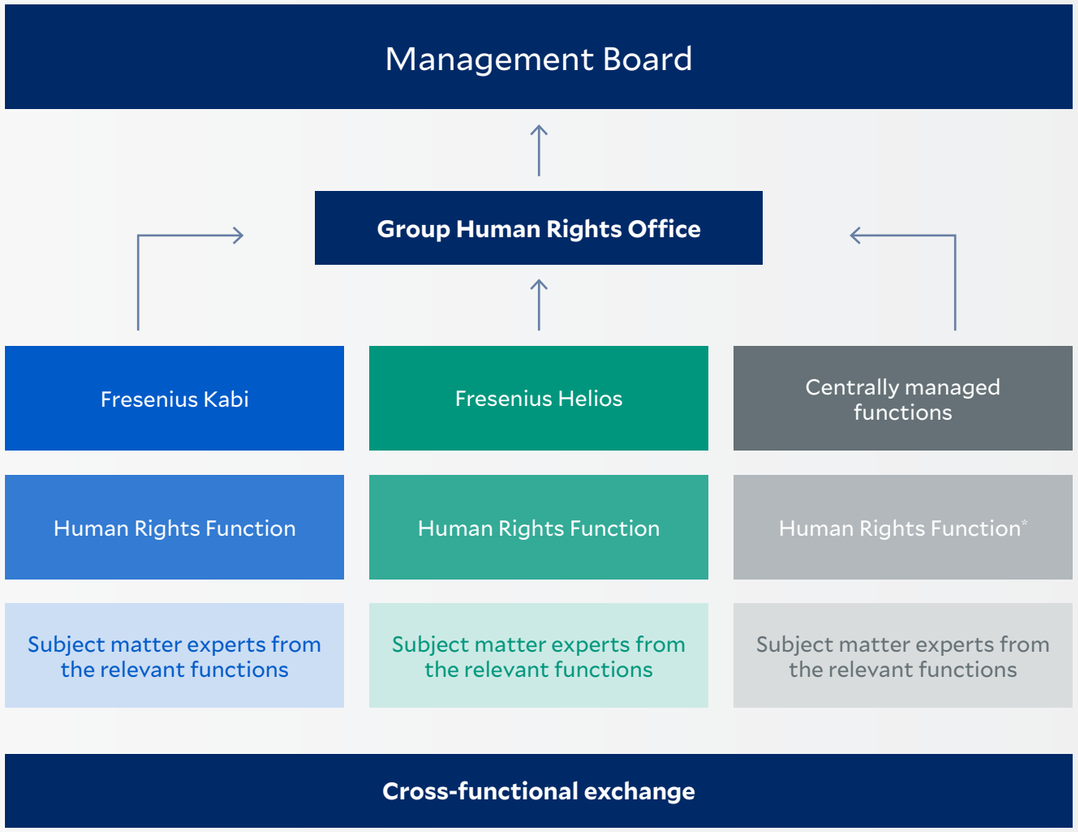
Each Operating Company has appointed a Human Rights Function that is responsible for implementing the Human Rights Program in its respective business. They functionally report to the Group Human Rights Office and the Operating Companies' Board or Management teams.

Subject Matter Experts:

In addition, each Operating Company designates subject matter experts in relevant departments. They contribute their expertise to risk analyses and support the implementation of preventive and mitigating activities.

Human Rights Council:

To facilitate an exchange on due diligence activities across the Group, we have established a Human Rights Council. It serves as a Group-wide platform and brings together representatives from the Group Human Rights Office, the Human Rights Functions, and relevant expert functions. External experts may be invited as needed to provide specialized insights and enrich discussions on specific topics.



Graphic: Group-wide governance and responsibilities

* Partially covered by the Group Human Rights Office

Core element 2

Risk assessment and impact analysis

Human rights risks can change over time. We therefore conduct annual and event-related risk analyses in case of substantiated knowledge in our own business locations and at our direct and indirect suppliers. As part of this regular process, we aim to identify human rights risks and impacts in accordance with the requirements of applicable legislation.

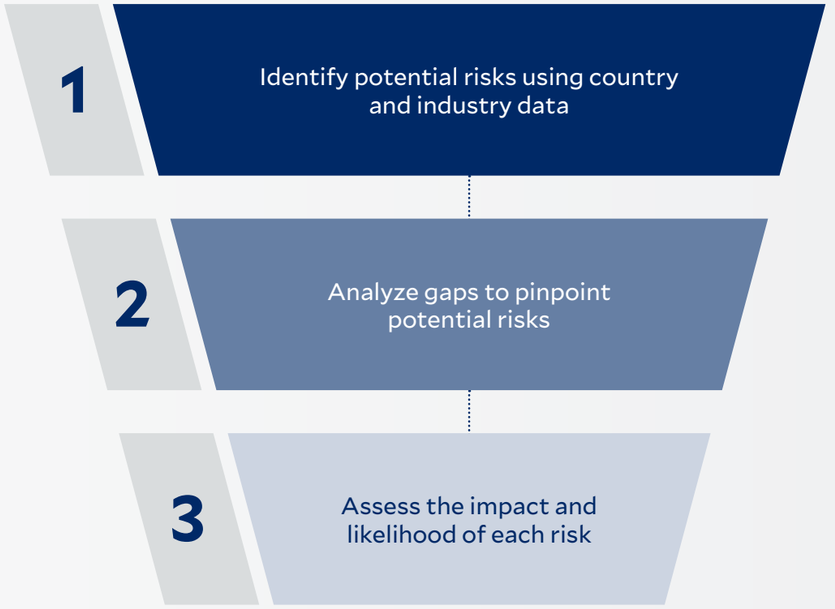
We follow a risk-based approach consisting of three phases.

- **Risk identification:** We conduct an abstract assessment using a range of qualitative and quantitative sources, including country- and industry-specific risk factors, audit findings, and case-related information, to identify potentially relevant human rights risks. For suppliers, procurement data is also considered.

- **Risk analysis:** We review which of these potential deficiencies or risks may be relevant in practice through a structured analysis. Various methodologies, such as interviews, questionnaires, and document reviews, help us understand existing processes, responsibilities, and controls.

- **Risk assessment and prioritization:** We assess relevant risks based on the severity of potential impacts on affected individuals and the likelihood of occurrence. This helps us prioritize risks and define an appropriate risk response.

This approach enables us to identify where our activities or value chains may cause, contribute to, or be directly linked to human rights risks, and supports targeted prioritization and follow-up. It may draw on input from relevant stakeholders and their representatives.



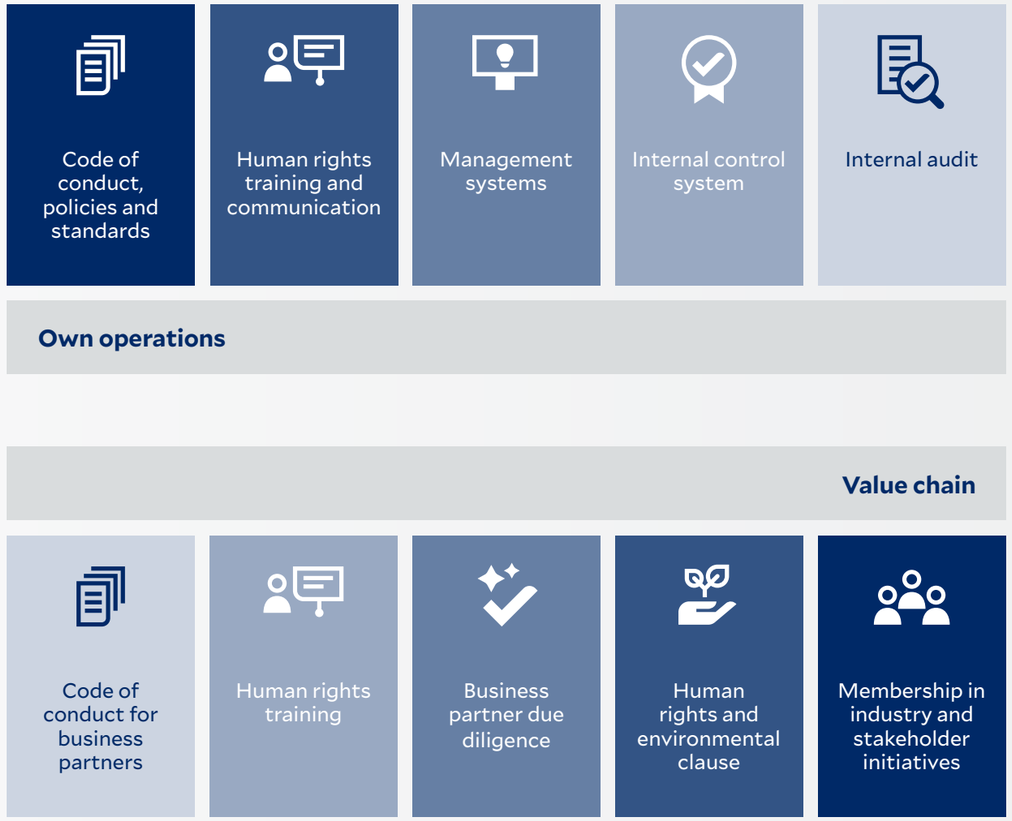
Graphic: Process for assessing risks and impacts

Core element 3

Prevention and remediation

To prevent or minimize human rights risks, we have established appropriate standardized preventive measures, including the adoption of codes and guidelines and the implementation of relevant training. In addition, each Operating Company may develop tailored preventive measures based on their specific business activities and value chain risks. Where our own business activities have caused or contributed to human rights violations, we seek to take immediate and appropriate remedial action.

We continuously review the effectiveness of preventive and remedial activities after implementation. This evaluation incorporates insights from our risk analyses and, where applicable, feedback from potentially affected stakeholders and their representatives. Based on the outcome of the review, existing activities may be adjusted to enhance their effectiveness. Where the review identifies gaps or additional needs, new activities may be implemented.



Graphic: Overview of standardized preventive and remedial measures

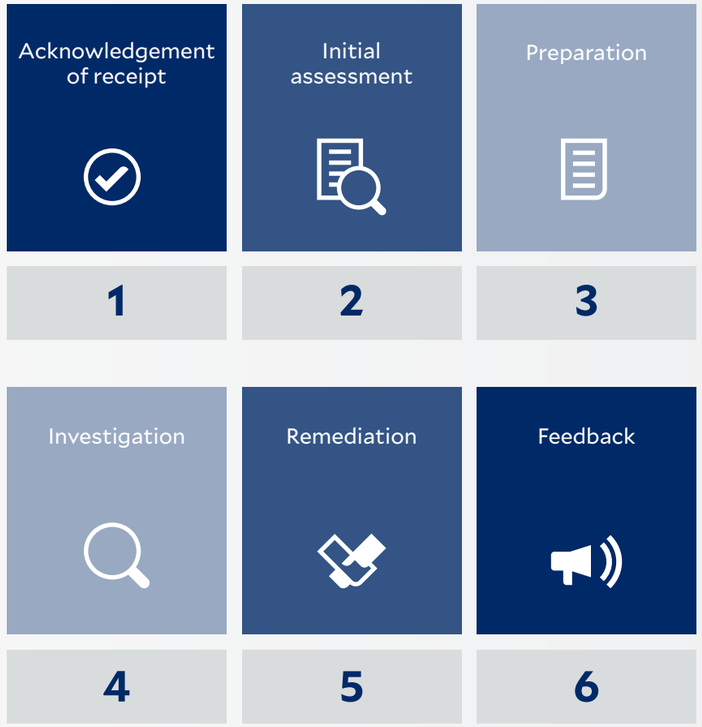
Core element 4

Systems and procedures for reporting misconduct

We value open communication and strive to create an environment in which all persons, including patients, employees, agency workers, members of local communities, contractors, suppliers, business partners, or other potentially affected individuals or their representatives can report concerns about possible human rights violations without fear of retaliation. To support this, we have established systems and procedures for reporting misconduct.

These systems are designed to enable submissions on an ongoing basis and regardless of location. All potentially affected groups, such as employees (including those of suppliers and service providers), suppliers, customers, patients, residents living near our sites, or other concerned parties may report their concerns anonymously. Human rights concerns can also be submitted via a dedicated email address (humanrights@fresenius.com).

Scan the QR code to watch our **“Your information counts!”** video.



Graphic: Procedure for reporting misconduct

Details on how reports are handled, reviewed, and investigated are available on our websites:

Fresenius Group
Fresenius Kabi
Helios Germany
Quirónsalud

Core element 5

Documentation and reporting

We document our human rights due diligence activities and retain related records in line with statutory retention periods. The Fresenius Management Board is informed at least annually about the Human Rights Program, identified risks, and related activities.

Relevant bodies, including the Audit Committee (as part of the Supervisory Board), the functions responsible for risk management and internal control systems, and works councils, also receive regular updates. In addition, we update the Management teams of the Operating Companies. Externally, we report on our human rights due diligence activities through our annual Sustainability Statement.

Monitoring effectiveness and driving continuous improvement

We continuously monitor and further develop our Human Rights Program. To assess its appropriateness and effectiveness, we regularly consider insights from human rights risk assessments, audit findings, internal control activities, systems for reporting misconduct, and regulatory developments. Based on these insights, we identify, prioritize, and implement improvement measures to enhance our processes, methodologies, and risk management activities.

Impact on people: Understanding who may be affected

Our business operations and wider value chains may be associated with adverse impacts on certain stakeholder groups, particularly those facing heightened vulnerability due to factors such as migration status, informal or low-skilled employment, gender, minority background, disability, age, indigenous status, or socio-economic conditions. In many cases, these factors may intersect, increasing the likelihood and severity of harm. We strive to engage with relevant stakeholders and their representatives and strengthen dialogue with them to ensure that their perspectives and interests are appropriately considered across all elements of our Human Rights Program.



Graphic: Non-exhaustive overview of relevant stakeholders

Human Rights

Priority Areas

We have identified five strategic human rights priority areas that are derived from the nature of our business models, procurement structures, and geographical footprint.

Fresenius' five priority areas:

- safe working conditions
- prevention of exploitation
- non-discrimination
- access to and quality of healthcare services and products
- a clean and healthy environment

These high-level topics highlight areas where human rights risks are most likely to arise and where our activities may have an impact. They represent overarching focus areas rather than individual risks and form the focus of our human rights due diligence.

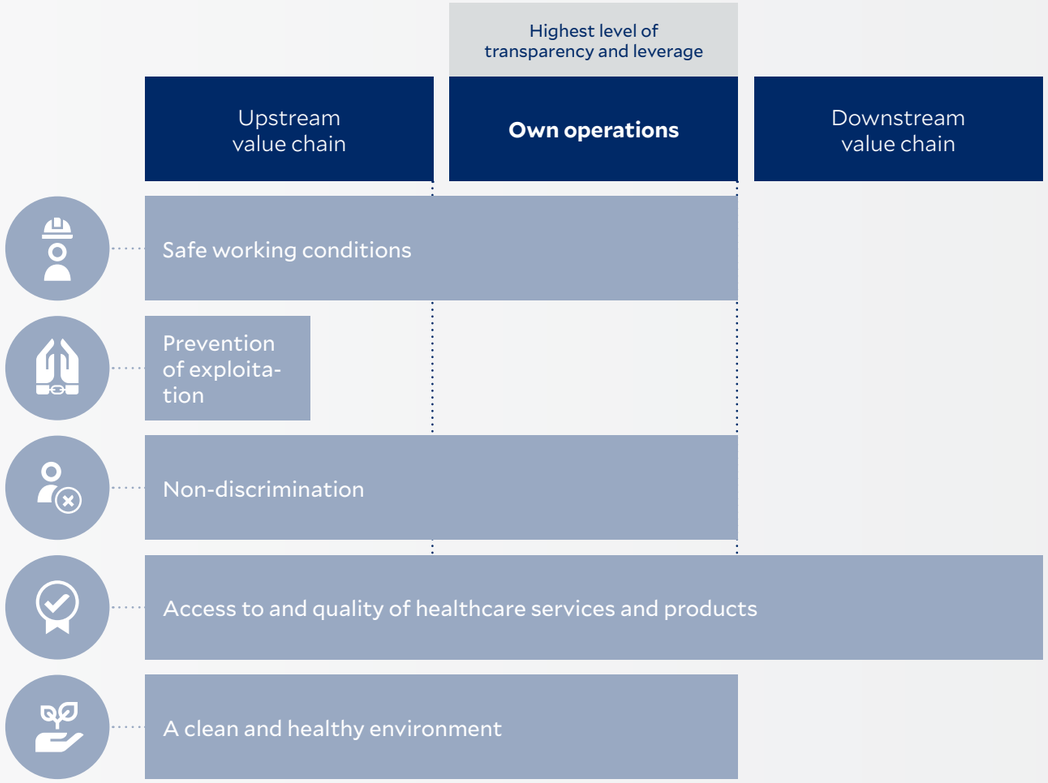
These priority areas were defined based on an assessment of potentially adverse impacts associated with our business models and value chains. Relevant human rights impacts were identified through structured engagement with internal and external stakeholders, including workshops and interviews with subject matter experts, advocacy organizations, industry initiatives, academia, business representatives, national and international trade unions as well as members of the external Fresenius Sustainability Advisory Board.

As our business activities and operating environment continue to evolve, these priority areas are subject to regular review.

In addition to these overarching priority areas, we have identified specific operational-level risks through our regular risk assessment processes at the level of individual entities and countries. In our own operations, we have identified occupational health and safety, discrimination and unequal treatment, as well as working hours and rest periods as priority risks.

Among our direct suppliers, we have prioritized risks related to compensation and wages, freedom of association, environmental pollution and waste, discrimination and unequal treatment, as well as occupational health and safety. For our indirect suppliers, based on our current assessments, forced labor has been identified as a prioritized risk.

The following pages outline each priority area and describe how we address them.



Graphic: Priority areas

Priority area 1

Safe working conditions

Understanding the priority area

We operate across complex global value chains involving a wide range of workers and activities. In some countries and sectors, workers may face heightened human rights risks, including unsafe working conditions, restrictions on freedom of association, excessive working hours, wages below the legal minimum, or harmful recruitment practices. These risks may affect both Fresenius employees and workers throughout our value chains, particularly in areas where transparency is more limited.

How we address the priority area

We are committed to fostering a respectful workplace with safe and healthy working conditions and wages that meet or exceed local requirements. We respect and uphold workers' freedom of association, in line with applicable laws. These commitments are embedded in our internal standards, including the Group Social Labor Standards Guideline and the Group Code of Conduct, and are supported through training and awareness-raising activities. We expect our business partners to uphold similar principles, as outlined in our Third-Party and Supplier Codes of Conduct. In addition, our sites may apply externally certified standards.

Priority area 2

Prevention of exploitation

Understanding the priority area

Forced labor and child labor remain significant human rights risks in global value chains, particularly in upstream supply chains where transparency may be limited. Depending on the country, sector, and workforce composition, workers may face coercion, deception, debt bondage, or other forms of exploitation. Children may be exposed to work that interferes with their education, development, or wellbeing. Such risks can arise in activities such as raw material extraction, manufacturing, or certain service sectors, and may be more prevalent where labor protections are weak or where low-skilled or migrant labor is common.

How we address the priority area

We categorically reject all forms of forced labor, child labor, coercion, and violence, and support adherence to applicable minimum age requirements. Employment must always be voluntary, and employees may terminate their employment with reasonable notice in accordance with local laws. These expectations are reflected in our internal standards, including the Group Code of Conduct and the Group Social Labor Standards Guideline. We continuously strengthen our controls and other preventive activities to support their implementation. We also expect our business partners to uphold comparable standards, as set out in our Business Partner and Third-Party Codes of Conduct.

Priority area 3

Non-discrimination

Understanding the priority area

Discrimination can occur in the workplace and in the provision of healthcare across Fresenius' operations and value chains. In certain regulatory, social, or sectoral contexts, workers, job seekers, and patients may face unequal treatment based on personal characteristics. Such risks may arise in processes such as recruitment, remuneration, working conditions, career advancement, and access to healthcare. Individuals from marginalized groups may be particularly affected.

How we address the priority area

We are committed to ensuring equal opportunities for all and oppose discrimination of any kind. Our approach is guided by applicable laws and anti-discrimination regulations, and we expect all workplace interactions to be guided by respect, fairness, and appreciation. Insults, harassment, and any other form of discriminatory behavior are not tolerated. These principles are reflected in our internal standards, including the Group Social Labor Standards Guideline and the Group Code of Conduct, and are supported through training and awareness-raising activities. We also expect our business partners to uphold comparable standards, as set out in the Third-Party and Supplier Codes of Conduct used by the Operating Companies.

Priority area 4

Access to and quality of healthcare services and products

Understanding the priority area

Our mission is to save and improve human lives through accessible, high-quality healthcare. Risks to the human rights of patients and clinical trial participants may arise if healthcare services, products, or related processes are unsafe, ineffective, inaccessible, or if personal health information is not adequately protected. Such risks may include inadequate clinical care as well as issues related to the safety, quality, or accessibility of products and services.

How we address the priority area

We are committed to providing patients with safe, effective, and high-quality care, as reflected in the Group Code of Conduct. We deliver medical products and healthcare services that are subject to rigorous quality and safety standards. Our Group-wide quality management systems support the safety, quality, and accessibility of our products and services across their life cycle and throughout our value chains. In both production and clinical settings, quality controls help reduce risks, prevent defects, and support the consistent delivery of products and services that meet applicable quality and safety requirements.

Priority area 5

A clean and healthy environment

Understanding the priority area

Our operations and value chains can have environmental impacts that may affect the health and wellbeing of people and local communities. These impacts can arise throughout the life cycle of pharmaceutical and medical technology products, including raw material extraction, manufacturing, transportation, use, and waste management. Relevant environmental topics include climate-related emissions, water use and resource consumption. In some cases, the release of antimicrobial substances into the environment may also contribute to antimicrobial resistance (AMR), creating broader public health risks.

How we address the priority area

We are committed to continuously improving our environmental performance and to preventing, reducing, and mitigating adverse environmental impacts. These commitments are reflected in our Environmental Policy and supported by environmental management systems, environmental targets, and adherence to applicable laws and regulations. We have our systems reviewed by external partners and regulatory bodies and continue to expand the number of sites certified according to ISO 14001 and ISO 50001. We also work to reduce antibiotic residues in wastewater and seek to achieve AMR Industry Alliance-certification for an increasing number of antibiotics across our sites.

This Human Rights Statement serves as our public commitment to respecting human rights. Further details on our human rights due diligence activities, ongoing initiatives, progress, and examples connected to our priority areas are reported annually in our Sustainability Statement.

We shape respect for human rights together – through the decisions we make, the actions we take, and the values we uphold every single day.

Contact

Connect with our
human rights teams

We welcome your questions, suggestions,
and contributions.

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