



GOVERNANCE

DOING THE RIGHT THING: COMPLIANCE, HUMAN RIGHTS, AND DATA PROTECTION IN FOCUS

At Fresenius, we believe that responsible and lawful behavior addresses our most important concern: the well-being of the patients we look after. Integrity, responsibility, and reliability form the foundation of the daily work of our employees, business partners and suppliers. That's why we're working continuously to prevent incidents that run counter to this objective, and to prevent violations.

ACTING LAWFULLY AND MAINTAINING STANDARDS

For Fresenius, compliance means doing the right thing. Our ethical values are based on more than just regulatory requirements. This means that we not only act in accordance with the law, but also according to applicable sector codices, our internal guidelines, and our values. Internal and external controls ensure that we adhere to the requirements and live up to the trust of our patients, employees, customers, suppliers, and investors.

Compliance violations have no place in our Group. These include, among others

- Bribery and corruption,
- Fraud and misappropriation of assets,
- Antitrust violations,
- Money laundering and financing of terrorism,
- Data protection violations,
- Trade restrictions,
- Insider trading and market manipulation,
- Reprisals, and
- Human rights abuses.

Our **compliance management system** is based on three pillars: **prevention, detection, and response**. We have aligned the system and our measures with the applicable international standards for compliance management systems (e.g. ISO standards, audit standards of the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany)), and national and international statutory frameworks.

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The **Fresenius Code of Conduct** forms the framework for all rules applicable within the Fresenius Group. The Code of Conduct lays out the principles of conduct for all employees, including managers at all levels and members of the Group Management Board.

Our principles:

- **We serve patients beyond expectations** – Bold in our ambitions. Turning ideas into actions.
- **We care for excellence** – No compromise on quality. True north in mind.
- **We bring healthcare innovation to people** – Learning with our customers and partners. Pushing therapies to the next level.
- **We live the power of One Team** – Respectful collaboration. Empowering responsibility.
- **We act today for a better tomorrow** – Over 100 years of heritage. Mindful of future needs and resources.

SUPPORT FOR CORRECT ACTION AND REPORTING SYSTEMS

In addition to our mandatory training courses, our employees can take advantage of various **offers** to generate stronger compliance awareness. You can receive comprehensive information from sources such as the thematic pages on the intranet, a podcast, or in a telephone consultation (anonymously, if necessary). Contact persons throughout the Group are ready to support you on issues of conduct.

Furthermore, we continuously emphasize to our employees, customers, suppliers, and partners how important their own behavior and the conduct of other people is. If they suspect misconduct in the Fresenius environment, e.g. violations against laws, regulations, or internal guidelines, they can report the potential compliance incident on **various channels**, for example:

- to their line managers,
- to the responsible compliance process owners,
- to specially established email addresses, but also
- by telephone in various languages via a local telephone number in 112 countries (anonymously, if necessary), or
- online (anonymously, if necessary).

Our responsible employees treat incoming reports as confidential to protect the reporting persons. We take all potential compliance violations seriously. An initial assessment focuses on the plausibility and possible severity level of potential violations.

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Once we have completed an investigation, we use the results of internal controls and reports to review our business processes. Where necessary, we introduce corrective or improvement measures which are intended to prevent similar misconduct in the future.

RESPECT FOR HUMAN RIGHTS

As a healthcare group with global operations, we regard respect for human rights as an integral component of our responsibility. Medical care for patients and the well-being of our more than 190,000 employees are among the most important engagement areas of our human rights due diligence.

We are aware that our commitment to human rights also extends beyond our own company operations and our core business. We take human rights aspects into account when selecting and cooperating with our **suppliers and business partners**. Among other requirements, we expect them to make a commitment to complying with the topics defined in our [Human Rights Statement](#). We specify and communicate these expectations in our [Code of Conduct for Business Partners](#).

We are working on increasing the transparency of our supply chains. The knowledge gained by doing so helps us to ensure secure supplies while addressing human rights risks in the procurement of important raw materials and supplies. In the Fresenius Group, we maintained business relationships with more than 58,000 suppliers in 2023.

We conduct **risk-based business partner reviews** before entering into new business relationships. If high risks are identified on the basis of risk analysis results or in the course of the business partner due diligence checks, we contact the supplier and evaluate the situation in more detail using further questionnaires on a risk-based approach.

Based on results of the risk analyses, we initiate preventive measures where necessary. If we become aware of a human rights violation in our own business area or in our supply chain, the goal is to take remediation action and avoid a future violation.

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PROGRAM FOR THE RESPECT OF HUMAN RIGHTS

Our human rights program is based on international standards, e.g. the [United Nations \(UN\) Universal Declaration of Human Rights](#), the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at work](#), the [OECD Due Diligence Guidance for Responsible Business Conduct](#) and the [United Nations Guiding Principles on Business and Human Rights](#) (UNGP).

Our program establishes preventive measures to help the Fresenius Group to identify and address human rights risks in its business processes, and to include human rights risks in our Group-wide risk management.

THE FIVE BLOCKS OF OUR HUMAN RIGHTS PROGRAM



PROTECTING SENSITIVE DATA: GROUP-WIDE DATA PROTECTION CONCEPT

Networked data and globalized corporate activities open up crucial opportunities for high-quality and future-proof patient care. At the same time, the highly digitalized work within the Fresenius Group requires particularly careful handling of personal data and sensitive medical data. For this reason, we maintain data protection organizations that are consistent with the respective organizational and business structure, and ensure the comprehensive protection of personal data. We are well positioned in the area of data protection with a secure IT infrastructure, clearly regulated data processing procedures, and comprehensive awareness of all employees – and we are working continuously to make further improvements.