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ACTING ETHICALLY AND LAWFULLY: COMPLIANCE AND HUMAN RIGHTS

Fresenius Kabi is committed to integrity, responsibility, and dependability in all matters relating to our business activity. We believe that our company can only guarantee the safety and efficacy of our products through responsible corporate governance. Such integrity is essential if we are to ensure the well-being of our patients. That's the reason we foster a compliance culture at Fresenius Kabi which supports an ethical approach in all our activities, and conformity with the rule of law. Lawfulness covers a wide spectrum from compliance with statutory regulations to upholding human rights in our supply chain.

DOING THE RIGHT THING TOGETHER: RESPONSIBLE CORPORATE GOVERNANCE IN THE GROUP

We are continually working to save lives, promote healthy living, and improve the quality of life for patients. This guides our aspiration to act responsibly and in accordance with the law. Our compliance culture follows the Group-wide approach of Fresenius to business ethics.

Fresenius believes that compliance means doing the right thing. Our ethical values are therefore based on more than just regulatory requirements. As far as we are concerned, this means acting in accordance with the law, and complying with the applicable sector codices, our internal guidelines, and our values. Internal checks and balances ensure that we adhere to the applicable requirements. Compliance also forms the foundation for all the activities carried out by our employees. Our approach is all about ensuring that everyone can rely on us as a partner of trust and integrity.

One of our key ambitions is to prevent corruption and bribery in our business environment. Other key areas we address through our compliance measures are violations of antitrust law, data protection, trade restrictions and international trade, anti-money-laundering laws, preventing the finance of terrorism, and protecting human rights.

You will find more on the Group-wide compliance approach at Fresenius [here](#).

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PREVENTIVE: GROUP-WIDE COMPLIANCE MANAGEMENT SYSTEM

We oppose any form of corruption or anti-competitive behavior. This is because fair competition is ideally suited to fostering positive market development and innovation.

We have established the Group-wide Compliance Management System (CMS) to ensure that all the employees at Fresenius Kabi comply with laws, standards, internal guidelines, and our strict anti-corruption rules. The system comprises three pillars: **Prevent, Detect, and Respond**. Our measures to prevent compliance violations have particular priority in this context.

You can find out more about our Group-wide Compliance Management [here](#).

REPORTING PATHS: DUE DILIGENCE IN DEALING WITH NOTIFICATIONS

We encourage our employees, customers, suppliers, and other third parties to report potential compliance violations or human rights concerns in connection with our business activities. Fresenius-Kabi has set up global reporting channels specifically for this purpose.

Stakeholders can ask questions and report potential compliance breaches or human rights violations by sending a mail to a dedicated email address and filing a report on a reporting platform 24/7. Reports can also be submitted anonymously. Translation services are available, and assist in eliminating potential language barriers.

Compliance experts in the Global Risk & Compliance division department deal with any question or report confidentially and carefully. This specialist independent body is made up of experienced investigators who operate worldwide and report to the Chief Compliance Officer of Fresenius Kabi.

We do not tolerate actions of reprisal against whistleblowers. These are consistently handled as compliance violations. You will find further detailed information on our case management process and other possible reporting channels in our [Speak Up Policy](#).

COMMITMENT TO HUMAN RIGHTS RESPONSIBILITY

In line with the entire Fresenius Group, Kabi is committed to upholding all internationally recognized human rights. This commitment is enshrined in the Fresenius Kabi [Statement](#). All our business activities are based on the relevant human rights standards and frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPR). This principle applies to our work every day, and to our dealings with employees,

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patients, business partners, suppliers, customers, all healthcare professionals, and other partners. All our business activities are based on the relevant human rights standards and frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGP). This principle applies to our work every day, and to our dealings with employees, patients, business partners, suppliers, customers, all healthcare professionals, and other partners.

In line with our Group-wide human rights due diligence program ([Human Rights Program](#)), we also take human rights aspects into account in our own business units, and when selecting and cooperating with our suppliers and business partners. We expect them to respect human rights in their value chain as well. Kabi specifies and communicates these expectations in its [Third-Party Code of Conduct](#) and in applicable contractual clauses.

The Management Board of Fresenius monitors the Group-wide human rights program. An overarching governance structure and clearly defined responsibilities within our business segment determine the operational implementation of the program.

ASSESSMENT OF HUMAN RIGHTS RISKS IN OUR SPHERE OF INFLUENCE

Our Human Rights Risk Assessment methodology is also integrated in the Group-wide risk management of Fresenius. As part of this continuous risk analysis focused on human rights, we consider potential human rights risks based on specific aspects relating to country, sector, and business segment. We assess potential human rights risks taking into account the possibility of impact, and the probability of the risk occurring. This also takes into account the influence we exert as a company on the probability of occurrence. On the basis of the results, we define preventive and – if necessary – remedial measures.

You will find more information on the management and assessment of human rights risks [here](#).

IN ACCORDANCE WITH THE SUPPLY CHAIN DUE DILIGENCE ACT

For the first time in March 2024, Fresenius Kabi published its [Report in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains \(Lieferkettensorgfaltspflichtengesetz\)](#). This report provides detailed information on anchoring the human rights due diligence obligation within the company, and on risk analyses, remedial measures, and grievance procedures.

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CLEARLY DEFINED: DATA PROTECTION AND INFORMATION SECURITY

Increasingly digitalized healthcare demands require particularly careful handling of personal data and sensitive medical data at Fresenius Kabi. Our data protection concept follows the Group-wide approach of Fresenius on protecting the data of patients, employees, customers, and suppliers and business partners. A secure IT infrastructure, clearly defined data processing workflows, and comprehensive sensitization of all employees help us to ensure that data are professionally processed and protected appropriately.

You will find more information on our data protection concept, reporting pathways, and rights of data subjects [here](#).

OUR DATA PROTECTION COMPETENCE CENTER: GUARANTEE OF HIGH STANDARDS

At Fresenius, the company segments are responsible for implementing governance structures relating to data protection, and putting data protection measures into operational practice. Fresenius Kabi has set up a central Data Protection Competence Center for this purpose. This competence center organizes our data protection management.

The aim of the Competence Center is to ensure uniform and consistent procedures for processing personal data in all the companies of Fresenius Kabi. It defines the principles, procedures, and standards for data protection. The center also provides the tools and processes, and training and information material to sensitize employees for data protection and information security. The Data Protection Competence Center also contributes its expertise from product development to administration on a day-to-day basis. Our data protection officer monitors progress in relation to compliance on data protection law.



RELATED LINKS

[Fresenius Code of Conduct](#)

[Compliance Management System](#)

[Human Rights](#)

[Report in accordance with the
Act on Corporate Due Diligence](#)

[Obligations in Supply Chains](#)

(Lieferkettensorgfaltspflichtengesetz)

[Data Protection](#)

(German language only)