

Group Tax Policy

The tax strategy of Fresenius Medical Care ("FME") is aligned with its core values and aimed at safeguarding compliance with all tax laws and reporting obligations as well as enhancing shareholder value based on the principles set forth in this Policy.

1. We strive to maintain a culture in which all people in our organization are aware that observing rules and the correct handling of tax matters is essential to FME.
2. The Global Tax department of FME ("Global Tax") is in charge of creating awareness of tax compliance in the FME group, providing adequate information and training to employees who assume tax-related tasks, and facilitating the successful roll-out of this Group FME Tax Policy. The respective rules and procedures of this tax strategy have been adopted by the Management Board and are monitored regularly by the Internal Audit department.
3. We have to ensure that all applicable tax laws and reporting obligations are observed in a comprehensive and timely manner and that tax affairs are managed responsibly and transparently. We maintain an internal control system that meets existing standards and has to ensure that we comply with our tax and reporting obligations in all jurisdictions where we do business. Appropriate processes and efficient controls safeguard that tax risks are identified, systematically recorded and assessed considering their probability of occurrence and potential financial exposure and reported in our external financial reporting.
4. Global Tax and local tax functions act as partners of the operating business units rendering attention, support and advice for transactions as well as for day-to-day business.
5. Complying with applicable tax laws and upholding our reputation with governmental authorities and the public, we support the relevant business processes as well as sustainable growth of shareholder value with efficient tax planning. FME does not engage in tax arrangements without business purpose or commercial rationale. We routinely seek external professional guidance to reduce uncertainty when required.
6. Intercompany transfer pricing policies are set in accordance with arm's length's principles following international standards, i.e., taxes have to be paid on profits according to where value is created.
7. Communication and cooperation regarding tax issues is organized in a way that safeguards that all information is managed in a timely and appropriate manner. Global Tax reports to the

FME Group Chief Financial Officer (“FME Group CFO”) on a regular basis – and if appropriate ad hoc – on all relevant tax matters and the development of tax risks within the FME Group. The FME Group CFO ensures adequate resources for the tax function.

8. We support a cooperative, honest and respectful approach with tax authorities and other public bodies that we consider essential for efficient tax compliance and risk management.

9. We support initiatives such as the initiatives of the Organization for Economic Cooperation and Development (“OECD”) regarding Cooperative Compliance (whereby tax authorities and taxpayers benefit equally from more transparency) and Base Erosion and Profit Shifting (“BEPS”).

10. FME continuously monitors changes in tax laws and practices. We recognize the importance of participating in discussions on the development of new tax legislation either directly or through the respective interest groups.

11. FME is committed to employing and retaining excellent tax professionals long-term. FME continuously works on employer attractiveness, taking into account personal skills and provides a professional environment for personal development.