



WHO RECEIVES MY REPORT?

Global Investigation Department

For the purpose of investigating matters properly, Fresenius Medical Care maintains within Compliance the independent Global Investigation Department (GID) an independent and impartial function within Compliance.

GID is mandated by resolution of the Management Board for receiving, assessing, processing, and/or investigating – with the support of other departments within the Fresenius Medical Care Group, as the case may be – and remedying reports. The employees of GID shall perform these tasks independently and impartially according to their due discretion, in compliance with legal requirements, the procedural principles of the Fresenius Medical Care Reporting Potential Violations Policy and the interests of Fresenius Medical Care as well as its subsidiaries. In this respect, the employees of GID are expressly not subject to any instructions from other bodies within the Fresenius Medical Care Group, including the Management Board of Fresenius Medical Care and its members. Our professionals attend to matters swiftly, discreetly and without any bias. Investigations are handled with the highest level of confidentiality.

GID is guided above all by the fundamental principles of independence, impartiality, confidentiality, professionalism and protection.

Independence: The purpose of an investigation is to determine the facts based solely on the evidence and without bias, or the perception of bias, on the part of the decision-maker. The person investigating an allegation must be independent from the events at issue or the individuals involved and must have no stake in the outcome of the investigation.

To warrant integrity, it is crucial to separate the roles and responsibilities of GID from the Compliance or legal officers' day-to-day work. As a separate, independent and central department within the Fresenius Medical Care Compliance organization, GID ensures that all internal investigations are conducted in a proportionate, professional and consistent manner.

Impartiality: It is vital that investigations are conducted in an objective and impartial way which is free of any outside influence and is based on objective facts and evidence. Just as an investigation team must be independent, they must also be seen to be objective in their work approach.

Confidentiality: Maintaining confidentiality is paramount to the investigative process, because failure to do so can impact the reliability of the findings and expose individuals to Retaliation. Therefore, information gathered in the course of an investigation should only be circulated within a previously agreed “need to know” group. Confidentiality will be maintained even after the completion of an investigation, unless details must be shared with government regulators or courts. Requests for anonymity will be honored where allowed by local law and will always be considered and handled with care.

Professionalism: The investigation team is committed to treating all participants in the investigation process with courtesy, respect and integrity. We strive to maintain the proper demeanor and attire during our work wherever we are, in line with the local/cultural sensitivities of the many different countries in which the Company conducts business.

Protection: Individuals who raise a concern or allegation and those who provide assistance to the investigation of those concerns must be protected from any form of retaliation, harassment or intimidation. GID will strive to ensure fair treatment for all individuals involved in the investigations process, including those mentioned in or impacted by the resulting report.

For example (and not exhaustively),

- all reports will be handled and investigated by qualified staff in the Global Investigation Department;
- only a restricted number of people who are directly involved in handling and investigating a Report will be made aware of a Reporting Person’s identity, if at all;
- each person who is involved in handling and investigating a Report will be reminded of the confidentiality requirements;
- the Reporting Person will be referred to in a gender-neutral context; and
- where possible, you, the Reporting Person, will be contacted to help identify certain aspects of your Report that could inadvertently identify you.

CONFIDENTIALITY & NON-RETALIATION

You should not worry too much about whether your topic falls under one of the mentioned areas or satisfies certain conditions. In turning to us with your complaint, you are enabling us to assess the relevance of the matter and to follow up appropriately.

Fresenius Medical Care has a zero-tolerance policy against retaliation.



Non-Retaliation: Protection Measures of Reporting Persons and Subjects Named in a Report

No unjustified detrimental action to a Reporting Person who has made a report based on Reasonable Grounds

Fresenius Medical Care prohibits Retaliation (i.e., adverse action) that causes or may cause unjustified detriment to a Reporting Person who has made a report based on reasonable grounds. Neither Fresenius Medical Care nor any of its officers or employees must not engage in conduct that causes detriment to a Reporting Person, if a.) the person believes or suspects that the Reporting Person (or another person) made, may have made, proposes to make or could make a Report that qualifies for protection; and b.) the belief or suspicion is the reason, or part of the reason, for the conduct.

Neither Fresenius Medical Care nor any of its officers or employees must not cause or threaten to cause detriment to a Reporting Person (or another person) in relation to a disclosure. A threat may be express or implied; conditional or unconditional. A Reporting Person (or another person) who has been threatened in relation to a Report does not have to actually fear that the threat will be carried out. The Company and its officers and employees are prohibited from taking any unjustified detrimental action against a Reporting Person in retaliation for the making of a report or cooperating with the investigation of a report. This does not prohibit actions taken in response to a Reporting Person's unsatisfactory work or service performance or his/her own misconduct unrelated to the report.

If a Reporting Person reports an issue on reasonable grounds, he or she shall not be subject to any detrimental conduct by Fresenius Medical Care for providing the report, even if the report is not confirmed by subsequent review or if their disclosure turns out to be incorrect. A Reporting Person who believes he or she is experiencing detriment may always contact the Compliance Department for assistance. Reporting Persons cannot, however, exempt themselves from the consequences of personal wrongdoing by reporting their own misconduct to Fresenius Medical

Care. In such cases, self-reporting may be taken into account by Fresenius Medical Care in determining the appropriate form of discipline imposed by Fresenius Medical Care, but it will not operate as a waiver of personal accountability. The protections do not grant immunity for any misconduct a Reporting Person has engaged in that is revealed in their report.

Ensuring fair treatment of individuals mentioned in a Report

Fresenius Medical Care will protect the rights and reputation of individuals accused of misconduct where possible and consistent with the Company's legal obligations. Fresenius Medical Care recognizes that some reports are unsubstantiated and that in those instances, employees can be harmed by unnecessary publication of allegations. If permitted by applicable law and not contrary to Fresenius Medical Care's ability to conduct a fair and complete investigation of a Report, persons named in a reported issue will be notified about: a.) the subject matter of the Reports, b.) the investigative findings (but investigative reports will not be provided) and c.) the potential remedial measures under consideration.



Confidentiality

Reviews will be conducted confidentially and discreetly, taking into account the nature and complexity of the Issue(s) raised.

In particular, information reported via the Compliance Action Line will be confidentially examined (when it is practical and appropriate in the circumstances) by a select group of Fresenius Medical Care employees within the Global

Investigation Department (GID) who will ensure that investigations are conducted in a confidential manner.

Even if you state your name, the Company will make every reasonable effort to protect your confidentiality. If this is not possible, due to government or court order, for example, the Company will notify you in advance if permitted and unless such information would jeopardize the related investigations. Where you otherwise requests that your identity be kept confidential, Fresenius Medical Care will honor your request during the course of a review to the extent reasonable and in accordance with local law and ensure your identity is not disclosed to anyone beyond the authorized staff members competent to receive or follow up on reports. This shall also apply to any other information from which your identity may be directly or indirectly deduced.