



**FRESENIUS  
MEDICAL CARE**



# **Code of Ethics & Business Conduct**

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# Applicability of the Code of Ethics and Business Conduct

*This Code of Ethics and Business Conduct (“Code”) applies to everyone, including officers, directors, employees, contract workers, and agents of Fresenius Medical Care and its direct and indirect majority-owned or controlled affiliates worldwide.*

*We supplement the general principles in this Code with more specific policies that address specific situations or all applicable local laws. If a local law or policy conflicts with our Code, you should contact your Legal and/or Compliance Department.*



# A Message from Fresenius Medical Care Management

*Every day, we strive to improve the lives of our patients through superior services and products. Our patients, employees, customers, and investors, as well as all other stakeholders, trust us to produce services and products that are of the highest quality and to conduct business with honesty, integrity, and respect for human rights and the interests of our employees. Our continued success and reputation depend on our commitment to the highest standards of behavior.*

## **This Code of Ethics and Business Conduct strives to outline our common principles.**

Patients are our top priority. Providing them with superior quality services and products is the responsibility of everyone within Fresenius Medical Care. We pledge to treat all patients with dignity and respect and to act ethically, fairly, courteously, competently, and in a timely manner.

We are committed to promoting inclusion and diversity and to providing a safe, healthy, fair, and productive workplace for our employees, and we expect the same from our business partners. We do not tolerate discrimination, harassment, or retaliation.

We are dedicated to conducting and growing our business in a legal and ethical manner consistent with our global values and international human rights standards. Our business is highly regulated and subject to several complex laws. Failure to comply with the law, this Code, or Company policy could expose Fresenius Medical Care or individuals to fines, loss of licenses, sanctions, or damage to our reputation. We must take compliance seriously, and we must do so as a team by following this set of common principles.

Our long-term success depends on every individual complying with this Code, laws, and policy in all aspects of our business. If we work together as a team and support one another in this effort, we can set the standard in our industry for medical quality, regulatory compliance, and ethical business performance.

## Our Vision

*Creating a future worth living.  
For patients. Worldwide. Every day.*

Decades of experience in dialysis, innovative research, the global leader in dialysis services and products - that is Fresenius Medical Care.

Patients with kidney disease can now look ahead with much more confidence thanks to our innovative technologies and treatment concepts. We give them a better future, one that offers them the best possible quality of life. We use the increasing demand for modern dialysis methods and work consistently to enhance the Company's growth. Together with our employees, we focus on pursuing strategies that will enable us to uphold our technological leadership. As a vertically integrated company, we offer products and services for the entire dialysis value chain.

The highest medical standards are our benchmark. This is our commitment to our patients, our partners in the health care system, and our investors, who trust in the reliable performance and the future of Fresenius Medical Care.

## Our Mission

*We provide the best possible care.  
Sustainably in diverse healthcare systems.  
For a growing number of patients around  
the world.*

Fresenius Medical Care achieves optimal sustainable clinical, quality, and technological standards in patient care through our commitment to developing innovative products and therapies.

The unique position of Fresenius Medical Care builds on many years of professional experience and continual innovation. Accordingly, the focus of our research and development effort is to maintain the technological and clinical edge needed to create innovative products and enhanced therapies. Our employees are united in our commitment to providing high quality products and services and bringing the optimal sustainable medical and professional practices to patient care.



## 1.0 Our Global Values

*We value being collaborative, proactive, reliable, and excellent. These values support our mission to develop high quality products and services, to have a positive impact on the health and wellbeing of patients, and to lead Fresenius Medical Care towards a successful, sustainable future. Our Global Values reflect our Company culture and they connect, encourage, and guide us to think and act as one global Company.*



### COLLABORATIVE

...means that we know how to work together for our shared purpose and to achieve our goals as one Company.

#### BEHAVIOR

*We team up*

We care about sharing information and experiences as this helps us learn from our mistakes and each other. We tackle challenges together by reaching out to colleagues both near and far. We communicate openly.



### PROACTIVE

...means that we are good at taking the initiative to make an impact with our work.

#### BEHAVIOR

*We get things done*

We challenge the status quo and show interest in what happens around us. We ask questions to clearly understand what needs to be done and take ownership of the results.



### RELIABLE

...means that we are a trusted companion to our patients, partners and colleagues.

#### BEHAVIOR

*We do what we say*

We live up to our own expectations, show respect and lead by example. We act with integrity and in line with our standards every day.



### EXCELLENT

...means that we continuously drive quality and progress to lead the business into a successful future.

#### BEHAVIOR

*We exceed expectations*

We make things better today than they were yesterday. We pitch ideas on how to improve and innovate.

## 2.0 Our Business

*We are committed to providing superior clinical care to patients and to manufacturing high quality products. We depend upon appropriate relationships with our patients and all stakeholders to be successful in achieving our goals and fulfilling our purpose.*





### 2.1. Patient Care

We strive to provide excellent and sustainable care to our patients. We endeavor to continually improve the quality of care and patient experience through research and scientific reviews. We amplify the voice of patients through patient suggestions, concerns, and complaints. Our policies reflect these principles.

#### We are committed to:

- 1 Respecting the integrity of the patient-physician relationship
- 2 Collaborating with care teams
- 3 Treating all patients with dignity and respect
- 4 Acting ethically, fairly, courteously, competently, and proactively
- 5 Informing our patients truthfully and addressing issues in a timely manner
- 6 Representing the nature and quality of our services, products, prices, and other information in an honest manner
- 7 Involving patients and families in treatment planning whenever appropriate
- 8 Collecting, recording, and transmitting patients' personal data in accordance with the applicable laws and policies
- 9 Protecting the confidentiality of patients' personal information
- 10 Never offering improper incentives to patients
- 11 Focusing on continuous quality improvement as science evolves

### 2.2. Quality and Innovation

The quality and safety of our services and products are the foundation of our business, and patient safety is our top priority. We sustain an environment of scientific advancement and continuous quality improvement by developing innovative products and therapies and by designing and deploying sophisticated quality systems. We are committed to the consistent application of clinical trials, and we respect ethical requirements, including our responsibility for bioethics standards. We strive to improve service and product quality by gathering and reviewing data and feedback. We proactively manage safety and quality along the complete lifecycle of our products through research, design, manufacturing and handling, recycling and disposal, as well as the standardized review of data, complaints, and feedback.

#### We are committed to:

- 1 Treating patient safety as a priority
- 2 Always providing quality services and products
- 3 Strictly following safety and quality law and our policy
- 4 Complying with the law and our policy regarding adverse event reporting and product complaints
- 5 Acting according to our scientific and ethical standards

## 3.0 Our People

*We are committed to hiring and retaining qualified employees and maintaining a respectful workplace with fair and safe working conditions.*



### **3.1. Respecting Human and Labor Rights**

We respect human rights and fair labor practices. We comply with applicable laws and are guided by the principles described in the United Nations Universal Declaration of Human Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

We condemn the use of exploitative and illegal child labor and do not accept any form of forced labor including modern slavery and human trafficking.

We respect the principles of freedom of association and the right to effective collective bargaining, including the rights of our employees to freely choose whether to be represented by a particular trade union, in accordance with applicable law.

We endeavor to perform our activities in a safe way and give top priority to the health and safety of our employees, of our business partners and their workforce who assist in our operations, and of the people who live and work near our sites. We foster a culture in which everyone feels responsible for reducing risks and promoting safe practices.

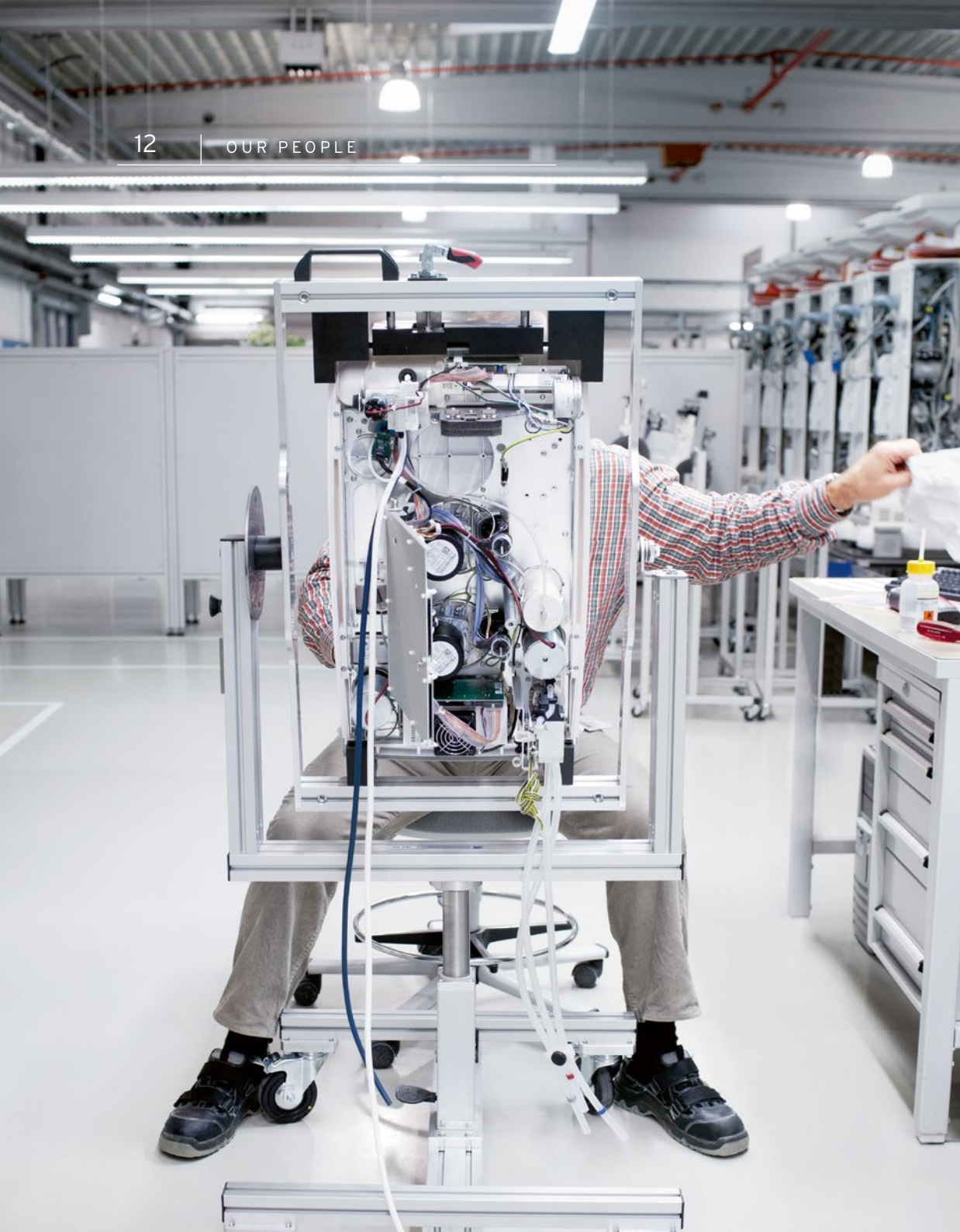
For further information on Human and Labor Rights, please consult the Fresenius Medical Care Global Statement on Human Rights, Workplace Rights and Labor and Employment Principles or related Company policies and guidelines.

### **3.2. Inclusion and Diversity**

We value inclusion and diversity. We promote inclusion as a sense of belonging and being valued. We can attain our potential and achieve higher levels of performance and innovation only if all employees at Fresenius Medical Care embrace diversity and contribute their perspectives, individual talents, and experiences.

### **3.3. Discrimination- and Harassment-free Work Environment**

Fresenius Medical Care supports equal opportunities for its employees and does not tolerate discrimination or harassment, including sexual harassment. We do not tolerate any form of discrimination based on race/ethnic origin, color, citizenship, sex, gender identity, gender expression, sexual orientation, physical/mental disability, religion, age, marital or familial status, or any other category protected by law.



**We expect our managers, employees, workforce, and our business partners to:**

- 1** Live up to our commitment to respect human and labor rights
- 2** Contribute to providing and maintaining a discrimination- and harassment-free work environment
- 3** Report actual or potential violations

### **3.4. Qualifications**

We are dedicated to hiring qualified employees. Some duties at Fresenius Medical Care require you to have a license (e.g. a nursing license), certification (e.g. a dialysis technician certification), or other professional credentials or health-related certificates. You are responsible for maintaining all required credentials to perform your work. You must promptly report to your supervisor if any needed credential is expired or revoked.

In some countries, government agencies may exclude certain individuals from participating in health care activities. If you receive notice that you are excluded from participating in any government program, you must promptly notify your supervisor.

## 4.0 Our Behavior

*We are committed to conducting business with honesty, integrity, and transparency. Promoting a culture of honesty, transparency, and integrity is vital to maintaining the trust of patients, regulators, business partners, and other stakeholders.*





#### 4.1. Anti-Corruption

As a global Company, we strive to comply with the anti-corruption laws of all countries in which we operate, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act, and the German Criminal Code.

Fresenius Medical Care does not tolerate bribery, corruption, kickbacks, or the provision of any improper benefits anywhere in the world, whether it involves health care professionals, government officials, or any other private party.

You should never offer, authorize, or provide a payment or anything else of value with the intention of improperly influencing any person. You should also never request, accept, or agree to accept anything of value from any person attempting to influence your business decisions.

#### 4.2. Anti-Money Laundering

Fresenius Medical Care is committed to complying with laws that prohibit money laundering. Money laundering is broadly defined as engaging in a transaction involving criminally derived property, structuring a transaction to avoid a reporting requirement designed to detect criminal conduct, or engaging in a transaction in furtherance of criminal conduct.

We take necessary steps, including risk-based due diligence, to conduct business with reputable business partners involved in legitimate business activities using funds derived from legitimate sources.

#### 4.3. Trade Governance

Fresenius Medical Care is dedicated to acting in compliance with trade laws that apply to our business. Trade laws are any laws that govern the trade, import, export, transfer, and movement of goods, services, technologies, and funds.

Fresenius Medical Care monitors trade laws and implements policies to make sure we follow them. Violations of trade laws can have profound consequences for Fresenius Medical Care and the persons involved.

#### 4.4. Competing Fairly

We pursue fair competition and must conduct our business in compliance with all applicable antitrust, competition, and fair dealing laws.

#### 4.5. Supplier Selection

Our business is dependent on a reliable supply of products and services and a focus on high quality, competitive cost and continuity of supply.

#### We are committed to

- 1 Offering our patients and customers the best range of products and services of the highest quality at competitive prices
- 2 Promoting efficiency, innovation, and customers' and patients' interests
- 3 Competing fairly and within the requirements of applicable law
- 4 Not seeking an unfair advantage through fraud or misrepresentation of material facts
- 5 Not disparaging a competitor or using a third party's trade secrets inappropriately

When selecting suppliers and contractors, we use transparent processes and consider sustainability criteria. Our procurement strategy includes striving for, where reasonably practicable, at least two sources both for supply-critical and price-critical products or services. We ask our suppliers to apply high ethical standards in their own operations and supply chains as defined in our Global Supplier Code of Conduct. Employees who order products and services must follow these standards, the law, and our procurement policies.

Consequences of violations can be severe for you and us. When in doubt, contact the Global Legal Function for advice and training.



#### 4.6. Conflicts of Interest

We act in the best interests of Fresenius Medical Care and seek to safeguard our reputation. From time to time, you may have relationships or arrangements outside Fresenius Medical Care that may conflict with the interests of the Company.

**For instance, a “conflict of interest” may arise if one of the following applies**

- You or a family member have a financial relationship with an organization with which Fresenius Medical Care has, or proposes to have, business dealings or with which Fresenius Medical Care competes. This financial relationship can take many forms, including employment, ownership, participation as a board member, or other relationships. For instance, if you are a manager and also employed by a competitor or a supplier to Fresenius Medical Care, a conflict of interest may exist
- You or a family member has any relationship that may influence your decision-making in your role as a Fresenius Medical Care employee. For instance, if your position enables you to recommend or refer business to a company in which you or a family member has an interest or relationship, you may have a conflict of interest.

We expect you to disclose any conflicts of interest to your supervisor as soon as you become aware of such conflict. The supervisor (with the support of Compliance) is responsible for taking appropriate measures to protect you and Fresenius Medical Care from harmful or inappropriate decision-making.







## 5.0 Our Information

*We are committed to maintaining accurate information and data and implementing appropriate safeguards to protect confidential information. We use Company information for Company and business purposes only. Keeping the Company's intellectual property and proprietary information confidential is essential to our business.*

### 5.1. Accurate Books and Records

Accurate business records are essential to our operations. They help us to fulfill our obligation to provide full, accurate, and timely financial reports and disclosures required by law. Accurate records are necessary to enable business decisions and to successfully direct our business.

All our books, records, and accounts must fully and accurately reflect our business transactions and be supported with sufficient and precise documentation. These records include financial statements, time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records, performance evaluations, and all other relevant Company data.

You must maintain all paper and electronic records in accordance with our policies and the law. You also must adhere to internal control requirements to ensure financial records and accounts are accurate.

### 5.2. Billing Practices

Fresenius Medical Care is committed to accurate, truthful, and complete billing for our products and services. In support of accurate billing, all records must provide reliable documentation of the services rendered or received or of the products purchased or sold. Accurate and timely documentation also depends on the diligence and attention of all personnel responsible for maintaining the records.

Each person is responsible for providing complete, legible, and accurate information in a timely manner.

### 5.3. Privacy and Personal Data

Fresenius Medical Care takes privacy and security seriously and respects the privacy of all stakeholders, whether they are patients, employees, customers, suppliers, or others. We will collect personal data only where we have a legal basis or legitimate business need to do so. We will be transparent and comply with laws and policies. Using personal data for any unlawful purpose or for pursuing personal benefit or interest is prohibited. Access to personal data, including patient and employee data, shall always be limited to a need-to-know basis.

#### It is your responsibility to:

- 1 Handle personal data with appropriate care and process personal data for specific legitimate purposes only
- 2 Share personal data with authorized recipients only and on a need-to-know basis
- 3 Ensure that relevant contractual safeguards with third parties and service providers are implemented

#### 5.4. Protection of Confidential Information and Trade Secrets

Company confidential information and trade secrets must always be kept confidential, regardless of whether the information is marked “confidential” or “restricted.” Your confidentiality obligations remain in effect even after your employment with Fresenius Medical Care has ended.

#### 5.5. Intellectual Property

Intellectual property (patents, trademarks, copyrights, trade secrets, technical and scientific knowledge, or know-how) are among the most important assets of the Company. Protecting our intellectual property is critical to fostering innovation that enables Fresenius Medical Care to deliver superior products and services to improve our patients' quality of life every day.

We respect the intellectual property of others, never misappropriating or duplicating without authorization, and ensure that Fresenius Medical Care is a trusted partner and avoids potential fines or penalties.

#### It is your responsibility to:

- 1 Use Company assets and data for business purposes only, for the proper performance of your duties, and to handle these with diligent care
- 2 Apply all necessary safeguards to protect your computer or other electronic devices from unauthorized use, access, or modification of software, especially when handling confidential Company information
- 3 Report any lost, stolen, damaged, or compromised Company-owned devices or devices containing Company information to your manager, your Local or Regional Compliance Officer, or the Global Legal Function
- 4 Report any suspicion of documents or data being concealed, altered, falsified, or destroyed
- 5 Follow the cybersecurity instructions of the Information Technology Department
- 6 Share information about projects, technical details, or other confidential Company information only with those people who have a legitimate need to know
- 7 Make transcripts and copies of data or circulate trade secrets only if required for fulfilling your job duties
- 8 Not use or disclose confidential information belonging to any prior employer or any third party while performing your role for Fresenius Medical Care

### 5.6. No Self-Dealing

As part of our commitment to acting in the best interests of the Company, you should never take personal advantage of business information gained through the performance of your duties. Any business opportunity you encounter in conducting business affairs on behalf of Fresenius Medical Care belongs to the Company and not you.

#### Examples of conduct in which you should not engage include:

- 1 Using Fresenius Medical Care's property, information, or your position at Fresenius Medical Care to obtain a personal benefit or advantage or to benefit a third party or any other form of undue self-enrichment
- 2 Personally pursuing a business opportunity that arises in the context of your work for Fresenius Medical Care and that, as such, belongs to the Company

### 5.7. Insider Trading

Fresenius Medical Care AG & Co. KGaA is listed with the Frankfurt Stock Exchange (DAX30) and with the New York Stock Exchange (NYSE) and follows the guiding principles relevant for managing stock-listed companies.

Fresenius Medical Care is fully committed to compliance with capital market and applicable securities laws. This includes the restrictions on insider trading with regard to inside information. Inside information is Company information that, if made public, is reasonably expected to significantly impact the price of securities. Typical examples include forecasts or financial figures materially deviating from market expectation, information about major mergers or acquisition activities, and serious breaches of laws.

Insider trading and the unlawful disclosure of inside information are criminal offences. By complying with the law and our policy, we protect both Fresenius Medical Care and each of us.

#### We ask you to:

- Use or disclose inside information only if expressly required for the performance of your job duties
- Abstain from selling or purchasing Fresenius Medical Care's shares or recommending others do so when you have inside information
- Refrain from sharing inside information unless related to Company activities and in compliance with our policies and laws

## 6.0 Our Communications

*We are committed to communicating with external entities in a transparent and honest manner. Our reputation depends on us being open and truthful in our communications.*



### 6.1. Information Requests from Governmental Authorities

Fresenius Medical Care does business in a transparent and compliant way. Accordingly, we respond to all government audits, reviews, and investigations in an appropriate manner. If you receive government requests that do not fall within your routine responsibilities, you should immediately contact your supervisor and the Global Legal Function. The Global Legal Function will coordinate all responses to such government requests. You are also asked to contact the Global Legal Function immediately upon receipt of any non-routine or potentially adverse request from any government agency or representative, such as subpoenas, warrants, and interview requests.

If employees are approached by any law enforcement agency outside Fresenius Medical Care grounds in connection with Fresenius Medical Care or their employment with or engagement by Fresenius Medical Care, employees are asked to immediately inform the in-house counsel responsible for their region or country, unless the agency has prohibited them by law from communicating this fact.

### 6.2. Communication with the Media

Open and honest communication is a prerequisite for maintaining the trust of our patients, customers, shareholders, and other stakeholders. Fresenius Medical Care

can ensure that this communication is consistent only if statements and information provided to the media are pre-approved by Fresenius Medical Care Corporate Communications. If you receive a request by the media for any information related to Fresenius Medical Care, you must refer the request to your manager. Each manager must forward such requests to the Corporate Communications Department.

### 6.3. Advertising and Promotion

Fresenius Medical Care's business activities and promotion of its products are highly regulated. We have developed specific policies to ensure business practices, marketing, and promotional activities comply with this Code and the law. All promotional material regarding Fresenius Medical Care products must be reviewed and approved in accordance with our policies.

#### When promoting our products and services, it is your responsibility to:

- 1 Always be truthful, accurate, and not misleading
- 2 Provide a fair and balanced description of the benefits and risks
- 3 Only make statements that are supported by appropriate clinical and scientific information
- 4 Make promotional statements that are consistent with the product uses approved or cleared by your country's government, and circulate such statements in compliance with the laws

#### 6.4. Use of Social Media

Social media forms an important part of today's business and the personal lives of our employees. Social media includes social networks, blogs, wikis, messaging apps, and video streaming websites.

When using social media, every user is responsible for keeping internal and confidential information secure.

##### It is your responsibility to:

- 1 Be honest and accurate when using social media
- 2 Express your own private opinions and comments in private social media using your own name, not Fresenius Medical Care's name or any Company identifier, such as a Fresenius Medical Care e-mail or mailing address, unless authorized to do otherwise
- 3 State that you are expressing your opinion as a private person when you mention Fresenius Medical Care
- 4 Adhere to our policy and this Code when you are identifiable as a Fresenius Medical Care employee (e.g. when posting on business social media)
- 5 Always be mindful of the rights of others, including others' privacy rights, brands, trademarks, and copyrights
- 6 Consider everything you post to the internet as potentially discoverable by anyone
- 7 Keep in mind that postings, both personal and professional, may ultimately be associated with Fresenius Medical Care, even if your affiliation with Fresenius Medical Care is not disclosed

##### We ask you not to:

- Use social media for any clinical or patient activity if not provided by or specifically authorized by Fresenius Medical Care for the performance of business
- Store/post/communicate/share/transfer internal or confidential data in social media
- Submit consumer reviews for Fresenius Medical Care products or services or competitive products and services (as employees of Fresenius Medical Care, we have a natural bias and are not simply consumers)
- Use social media for conducting the official business of Fresenius Medical Care (e.g. for recruiting or making official statements on behalf of Fresenius Medical Care) without pre-approval by your supervisor or manager
- Disclose any patient-related information or any personal data

### 6.5. Political Activities

The legislative and regulatory processes that impact our business are complex and diverse. It is appropriate for the Company to periodically engage in policy discussions with regulators and to engage and collaborate with third parties to assist in lobbying and similar efforts. All such activities should be conducted under the guidance of our internal governmental affairs experts and in compliance with applicable law. We also take society's interest in transparency and openness into account.

We recognize that individual employees engage in their own personal political activities. Such individual activities should be conducted separately and independently. Personal political activities by employees must not be or appear to be related to employment or engagement with Fresenius Medical Care. Employees must not use Company time, property, or equipment for their personal activities.







## 7.0 **Our Responsibilities as a Corporate Citizen**

*We are committed to having a positive impact on our industry and our communities.*

### 7.1. Environmental Protection

We are dedicated to developing, producing, and applying our products and services in a sustainable way. This means we pay attention to how our business impacts the environment. We implement standards to minimize environmental risks, comply with environmental laws, and report accordingly. We strive to use resources, such as energy, water, and raw materials efficiently, e.g. through recycling. We work continuously to reduce adverse effects of our activities on the environment and to increase awareness of environmental issues.

It is your responsibility to comply with applicable laws, adhere to this Code and our policies for environmental protection and take all necessary precautions to avoid environmental incidents.

### 7.2. Donations and Sponsorships

We aspire to be a good corporate citizen and use resources to advance health care and other worthy charitable causes. We may make donations, particularly those intended to advance medical care. We may also make donations to charities or civic organizations that provide services in the communities where we conduct business. We do not make donations or contributions to obtain or retain business, or to secure an improper advantage. Any donation or sponsorship must comply with all applicable laws and our policies and requires prior approval by our internal experts. We are committed to tracking and being transparent about donation and sponsorship activities.

We may provide funding for educational events organized by reputable health care organizations and event organizers where the purpose of the event is to promote medical education or the understanding of scientific, clinical, or health care issues that contribute to the improvement of medical care.



## 8.0 Our Compliance

*Everyone at Fresenius Medical Care is responsible for compliance. We all “own” compliance.*



**In making business decisions,  
please consider the following:**

- 1 Am I in doubt that the conduct is legal?
- 2 Is the business conduct consistent with this Code, laws, and Fresenius Medical Care policy?
- 3 Will the business conduct help or hurt Fresenius Medical Care's global reputation?

### 8.1. Overview

**The compliance program consists of the following fundamental elements:**

- Policies, procedures, and standards
- Compliance training and education
- Compliance officers and committees
- Various channels to communicate compliance concerns, including the confidential Compliance Action Line
- Internal auditing and monitoring
- Standard disciplinary guidelines
- Prompt responses and corrective action concerning identified violations

**If you are in doubt about what to do, or whether an action is appropriate, follow these steps:**

- Review this Code and Fresenius Medical Care policies
- Ask your immediate supervisor or other manager
- Contact your local or regional compliance officer, the corporate Compliance Department or the local or regional in-house counsel
- Call the respective Compliance Action Line if you are uncomfortable using any of the above resources or prefer to remain anonymous

### 8.2. Policies

Fresenius Medical Care provides you with information you need to perform your duties in a way that is legal and ethical. This includes the following resources:

#### **Code of Ethics and Business Conduct**

This Code addresses general compliance concepts and standards and gives a broad outline of expected behavior.

#### **Policies**

Fresenius Medical Care has developed policies to provide specific direction in how to conform your work to the general principles described in this Code. The policies are tailored to the specific operations of each country and in accordance with each country's local laws.

### 8.3. Training

Fresenius Medical Care provides training to help you do your job properly. The training discusses this Code and gives you information about the laws applicable to our business and your country.

Many functions within Fresenius Medical Care (such as sales and marketing, billing, and reimbursement, etc.) may have additional specialized training. You will be notified if your position requires this additional training.

Compliance training is mandatory.

### 8.4. Reporting Potential Violations

Fresenius Medical Care is firmly committed to conducting business ethically and in accordance with laws that govern our industry. As such, the Company will investigate all alleged violations of law, this Code, and Company policy.

You can report potential violations of law, this Code, policy, or potentially unethical or inappropriate business practices to your supervisors, the Compliance, Legal, or Human Resources teams at any time. You (as well as external third parties) may also report confidentially and anonymously (when permissible under local law) to our Compliance Action Line (CAL).

### Our principle of non-retaliation

The Company prohibits retaliation against any person who has made a report based on reasonable grounds of a suspected violation of law, this Code, or Fresenius Medical Care's guidelines or policies. If you believe you have been harassed or retaliated against for reporting or intending to report an actual or potential violation, report this matter to your Local or Regional Compliance Officer, the Corporate Compliance Department, your local Human Resources Department, or the Compliance Action Line.

#### If you have questions about reporting potential violations:

If you would like to file a report or have further questions, please visit → [www.fresenius.ethicspoint.com](http://www.fresenius.ethicspoint.com) or contact:

- [complianceactionline@fmc-ag.com](mailto:complianceactionline@fmc-ag.com) (globally except USA and Russia),
- [compliance.ActionLine@fmc-na.com](mailto:compliance.ActionLine@fmc-na.com) (USA) or
- [complianceactionline-russia@fmc-ag.com](mailto:complianceactionline-russia@fmc-ag.com) (Russia).

### 8.5. Compliance Officers - Support

The Compliance Department consists of experienced compliance professionals and provides support to all Departments of Fresenius Medical Care. You should make use of this resource if you face a situation that raises compliance concerns.

Fresenius Medical Care expects an open discussion of compliance issues. Often, asking a question is the best way to determine whether an action is appropriate. If you are unsure about whether a proposed action is appropriate, stop until you have asked and confirmed that you may proceed.

### 8.6. Our Expectations and Your Responsibilities

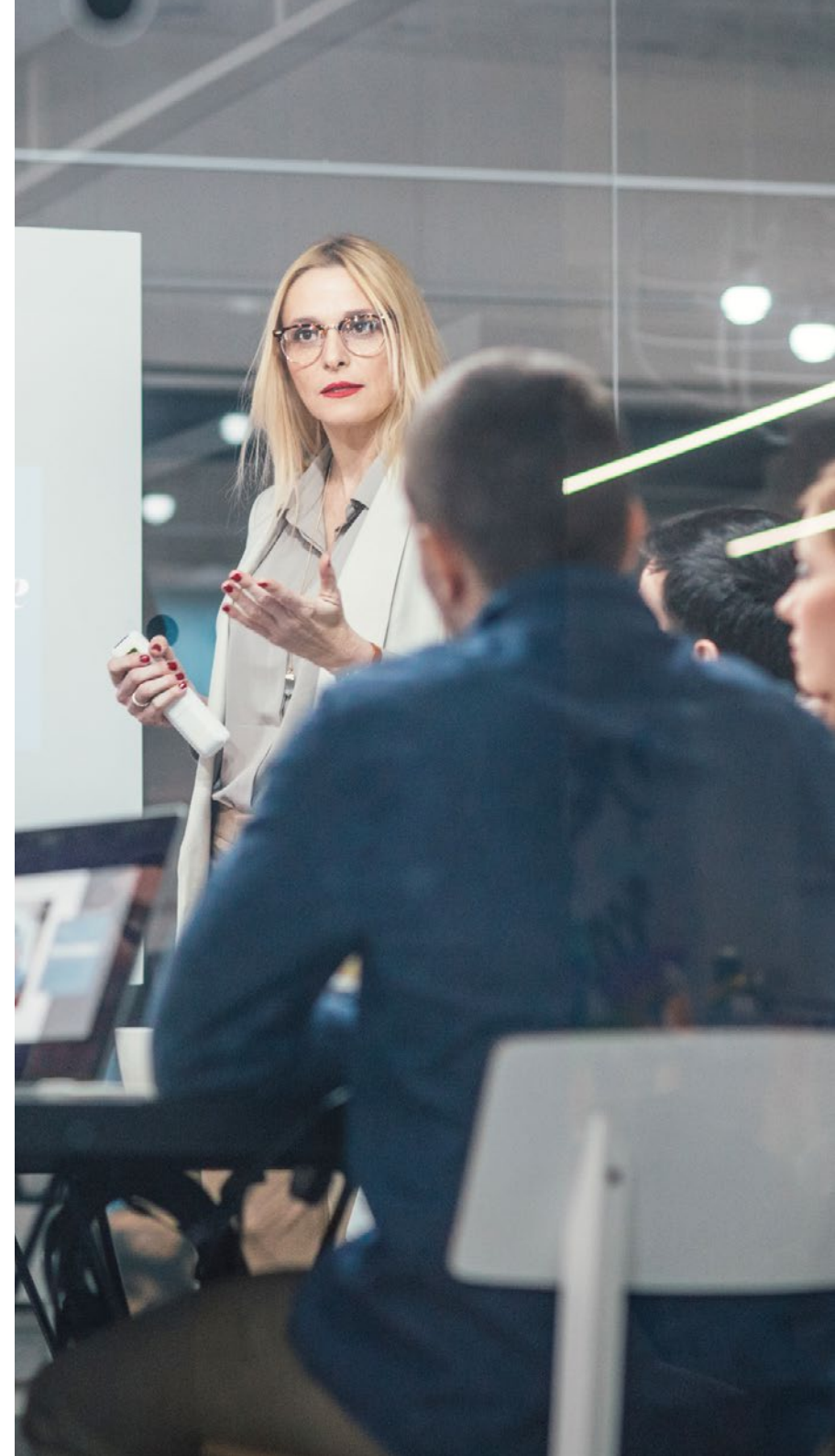
Fresenius Medical Care expects all employees to perform their duties in accordance with the Company's purpose, global values, policy, this Code, and the law.

#### We ask everyone at Fresenius Medical Care to adhere to the following:

- 1 Live our global values every day by being collaborative, proactive, reliable, and excellent
- 2 Understand and act in accordance with this Code, the law, and our policies that apply to your duties
- 3 Do not engage in or knowingly tolerate, encourage, or condone behavior or actions that violate this Code, our policies, or the law
- 4 Reach out to your supervisor or the resources described in this Code if there are doubts about a business practice or behavior
- 5 Inform your supervisors, your Local or Regional Compliance Officer, the Corporate Compliance Department, the local Human Resources Department, or the respective Compliance Action Line if you suspect a violation of this Code, our policy, or the law
- 6 Support and help in investigations, if asked

**Managers and supervisors are also encouraged to observe the following:**

- 1 Act as a role model
- 2 Ensure that employees reporting to you understand and act in compliance with this Code, our policies, and the law
- 3 Foster a work environment that encourages open, honest, and transparent communication
- 4 Promote a work environment that encourages questions to be asked, and address integrity issues that come to your attention
- 5 Initiate appropriate corrective action when this Code or our policy are not followed
- 6 Report any potential violations to Compliance or Human Resources, as appropriate
- 7 Ensure that acts of retaliation are not tolerated against any person who raises concerns or reports on reasonable grounds an actual or suspected violation of this Code, our policies, or the law



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