



# COMPLIANCE.

BECAUSE IT MATTERS.

[www.fresenius.ethicspoint.com](http://www.fresenius.ethicspoint.com)

One of the key priorities of our business is to foster a healthy Speak Up culture. We therefore maintain an open and supportive environment that encourages each and every one of us to challenge anything that does not conform with what is right. There are various reporting channels for raising something that may not feel right to you. Typically, employees can raise any concern with their respective line manager, HR, Legal or the Local Compliance Officer, depending on the nature of the concern.

If for some reason these avenues are not appropriate or the concern could not be resolved, employees can raise their concern with a more senior employee / manager. We hope that most of the concerns that employees may have can be resolved this way.

However, sometimes there may be serious concerns regarding potential violations of laws and regulations, the Code of Conduct, internal policies / guidelines. In this case and in line with FME's Policy of Reporting Potential Violations, these concerns can also be raised through the FME Compliance Action Line (CAL) in addition to the above departments. This also applies to our business partners. Anyone who reports a concern through the CAL can do so confidentially and, if so desired and legally permitted, anonymously.

### **What is a potential violation?**

Such perceived violation may include potentially unethical or inappropriate business practices and potential misconduct such as for example offering or accepting a bribe, fraud, money laundering or appropriation of funds, illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property, breach of trust and breach of duty, improper state of affairs or circumstances, and engaging in or threatening to engage in detrimental conduct against a person who has made a report or is believed or suspected to have made, or be planning to make, a report.

Other issues may include:

- a perceived violation of FME's Code of Ethics and Business Conduct or FME's guidelines and policies;
- a perceived violation of internal accounting rules or accounting controls;
- inappropriate disclosures of patient or company information,
- any perceived effort to conceal evidence of any of the above; or
- any other matter for which reasonable grounds exist to believe that it could cause substantial harm to the business or integrity of FME (including breach of confidentiality).

## **Can I stay anonymous?**

Of course, but please do understand that in some countries anonymous reports may not be allowed according to local law.

If you want to make an anonymous report, there are effective measures in place to protect your anonymity:

- The telephone reporting system as well as the electronic platform is operated by an independent certified external vendor commissioned by Fresenius Medical Care who is specialized on the secure and confidential processing of reports.
- When you use the telephone reporting system or the electronic platform, you will be asked whether you wish to state your name. You may choose not to.
- Regardless of whether you use the telephone reporting system or the electronic platform, you will always receive a personal reference number, and you can set up a secure mailbox. Thus, your anonymity is protected and any future contact and communication with you will be facilitated.
- Fresenius Medical Care will not make any effort to identify an individual who has requested anonymity and prohibits retaliation against any individual who has made a report based on good faith.

Even if you state your name, we will make every effort to protect your confidentiality as far as possible. In the event this seems not to be possible for the purpose of investigating a report, we will, if possible and legally allowed, consult with you in advance.

## **How can I reach the telephone reporting system?**

You can call the Fresenius Medical Care telephone reporting system operated by an independent certified third-party vendor commissioned by Fresenius Medical Care using the toll-free number for your country. Operators of the Compliance Action Line (CAL) are standing by, 24 hours a day, to take your call. Or you can access the electronic platform operated by an independent certified third-party vendor commissioned by Fresenius Medical Care over the following link [Compliance Action Line](#).

## **What happens if I call the telephone reporting system?**

Once you have contacted the hotline you will be connected with an agent you can share your impressions and observations about a potential violation of laws, regulations, and/or internal rules with. As this hotline is available 24 hours a day,

internationally, a translator may be called in to assist in the translation process. The agent will take notes of your described impressions and observations in order to draft a short report so that the matter can be further dealt with in a qualified way. To this end, you may be asked to provide more details on your observations or, if necessary, provide additional documentation. At the end of your call the agent will provide you with a unique reference number with which you can access your report at any time, via either the hotline, or the online platform.

### **Some things to remember, when reporting**

There are a few things that we would like to highlight:

- Any concerns raised through the CAL will be independently assessed and reviewed. Please provide sufficient information and as many details as possible so that the concern can be properly assessed and reviewed.
- The CAL allows anonymity. However, FME encourages individuals to identify themselves to allow better handling of the concern and any potential follow up that those receiving the concern may have.
- Any concerns raised through the CAL must be made on reasonable grounds and without fear of reprisal. Should those reporting a concern fear potential retaliation or intimidation, please say so immediately. FME operates an anti-retaliation policy protecting those that raise concerns in good faith.

### **What happens with my report?**

The information reported will be confidentially examined by a select group of Fresenius Medical Care employees who will ensure that investigations are initiated as discreetly as possible and will be conducted in a confidential manner, taking into account the nature and complexity of the issue(s) reported.

Subsequent to this, further measures will be initiated at the affected business units to clarify the reported facts or to initiate and ending of the misconduct. For example, the Legal, HR, Compliance and Audit Department can be consulted to assist in doing so.

During this process investigation updates of the matter investigated are regularly reported to the Chief Compliance Officer, so that the investigation can be reviewed, and the process can be completed in a timely manner.