



**FRESENIUS
KABI**

caring for life

Code of Conduct

for Business Ethics and Compliance



Contents

3 Foreword	18 Our Business Ethics and Compliance Principles in the Workplace	26 Our Business Ethics and Compliance Principles on Social Responsibility
Message from the Management Board	19 7. Workplace Safety and Work Environment	27 14. Quality and Safety of our Products and Services
4 Our Values	20 8. Employment and Standards of Conduct	15. Environmental Responsibility and Sustainability
7 Introduction	21 9. Record Keeping of Company Information	28 16. Human Rights, Social Responsibility, Diversity, Equity and Inclusion
8 Who does the Code of Conduct apply to? How to use the Code of Conduct?	22 10. Protection of Confidential Company Information	30 How to report Misconduct
9 Management and Employee Responsibility	23 11. External Communications including Social Media	31 Reporting Integrity Concerns
10 Elements of the Compliance Management System	24 12. Protection of Company Assets	33 Contacts
13 Our Business Ethics and Compliance Principles in Interactions with Third Parties	25 13. Information Management and Security	
14 1. Anti-Bribery and Anti-Corruption		
15 2. Conflicts of Interest		
16 3. Antitrust and Competition		
4. Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT)		
17 5. Sales and Marketing		
6. Innovation and Development (Clinical Studies and Regulatory Affairs)		



Foreword

Message from the Management Board

Dear Colleagues,

Our products and services are used to help care for critically and chronically ill patients. Following our mission “caring for life”, we strive to make available high-quality products and services that improve patients’ lives and can always be used safely. To fulfil this mission, we need to live up to the highest integrity standards in all our endeavors.

This is why integrity is one of our company values. Conducting business in this way is not only the right thing to do. If we foster integrity, we will also gain trust, strengthen our reputation and drive sustainable performance.

The Fresenius Kabi Code of Conduct provides guidance when you face a compliance issue or an ethical dilemma in connection with your work. It is a framework that you can use to make the right decisions.

We all have a personal stake in the success of Fresenius Kabi. We must always respect laws and other rules, avoid conflicts of interest and protect Fresenius Kabi’s assets, while appreciating local traditions and cultures. Any violations of these obligations and any doubt in our integrity will undermine our credibility and can have significant legal, economic, reputational and personal consequences.

If you have any questions about the Code of Conduct, please use the channels we offer you. Thank you for ensuring Fresenius Kabi’s sustainable success by complying with this Code of Conduct!

The Fresenius Kabi Management Board

caring for life

Our Values



Our values are the DNA of our corporate culture – the essence of Fresenius Kabi. These represent what we stand for and should be considered for our daily work and decision-making. This Code of Conduct is built on our values, which describe how we aim to achieve our goals and sustainable success.

Customer Focus

We put customers first

In all aspects of our operations, from product development and production to delivery and customer support, we at Fresenius Kabi are focused on our customers' needs and expectations. Our success is dependent on helping our customers fulfil their mission: the best therapy and care of patients.

Quality

We demand excellence

We are committed to quality in everything we do. All our business practices and processes are designed to achieve excellence in quality along the entire value chain – from innovation and development through production to sales and marketing.

Integrity

We are trustworthy

We deliver on our commitments and act with high standards of ethics and compliance. We are committed to dealing fairly and honestly with employees, business partners, government authorities and the general public. Success in our business ventures depends upon maintaining the trust of these essential stakeholders.

Collaboration

We work well together

We treat one another as respected partners. Our success is based on a common understanding of our goals as well as the skills and commitment necessary to achieve them together.

Creativity

We deliver solutions

We find better ways to work and better solutions to customer challenges. We apply our unique expertise in medicines and technologies to create products and services that advance the therapy and care of critically and chronically ill patients worldwide.

Passion & Commitment

We care

We are dedicated to help improving patient outcomes and to creating value for our stakeholders. We set clear goals and work with passion to achieve them.

Introduction



Our success depends on us acting with integrity. This means doing the right thing, even beyond legal requirements. Acting responsibly and sustainably is an integral part of our culture and daily business at Fresenius Kabi.

Who does the Code of Conduct apply to?

This Code of Conduct applies to all of us working at Fresenius Kabi, including all colleagues working in subsidiaries and in affiliates in which Fresenius Kabi owns more than 50% of the voting shares or has management control. We are all responsible for abiding and upholding the Code of Conduct globally regardless of our location, role, or seniority. “We”/“Us”/“Our”/“Each other”/“You” refers to all Fresenius Kabi personnel. We are expected to familiarize ourselves with the content of this Code of Conduct and need to ensure we act in accordance with it.

How to Use the Code of Conduct?

Our Code of Conduct lays the foundation to ensure the Fresenius Kabi Group’s compliance with all laws, regulations, and applicable industry standards. Local laws may differ from this Code of Conduct. If local law sets higher standards than this Code, those must always apply. If, however, the Code of Conduct sets higher standards, the Code of Conduct’s standards must prevail.

In addition, Fresenius Kabi also implemented a set of internal company policies, standard operating procedures (SOPs), guidelines, and processes. They provide further details and procedures for specific topics and areas that we must comply with.

Existing policies and procedures should be compared with this Code of Conduct and amended, to the extent necessary.

We are highly encouraged to speak up and seek guidance when needed. We will take reports seriously and handle them confidentially. We will investigate failures to comply with the Code of Conduct and take remediation actions where necessary.

If we have any doubt as to the appropriateness of an action, we should seek advice from our direct supervisor, managers, Compliance, or other Fresenius Kabi resources. We can always contact [compliance\[at\]fresenius-kabi.com](mailto:compliance@fresenius-kabi.com) for guidance. Further details are outlined in the chapter “How to report misconduct”.

Management and Employee Responsibility

We foster entrepreneurship at Fresenius Kabi. This means that we continuously strive for excellent results. At the same time, we care about how we achieve such results. Therefore, compliance is an integral management responsibility within Fresenius Kabi, from the Management Board through all levels of management. Ultimately, we need to care for compliance at Fresenius Kabi within our allocated area of responsibility.

In our area of responsibility, every one of us must take care of:

- fostering a culture of integrity and mutual respect
- completing required trainings and understanding this Code of Conduct
- acting in accordance with the standards outlined in this Code of Conduct as well as with the company guidelines and procedures applicable in the area in which we work

- speaking up, by reporting any non-compliance to our immediate supervisor, our Compliance hotline, other Compliance channels or to other appropriate company representatives
- cooperating with internal and external auditing and compliance procedures and investigations
- never retaliating against any person who raises a concern in good faith about a violation of the Code of Conduct, policies, or guidelines.

Responsibility of Management

Those of us who are responsible for employees (e.g. management, supervisor) will:

- set the appropriate tone at the top and the middle in our words and actions
- lead by example by following the Code of Conduct, policies, and law in our business activities
- promote a positive environment where team members feel safe to raise concerns
- promote and make sure our team members understand the Code of Conduct, as well as their responsibilities and our expectations

- identify and manage potential risks in current and/or planned business processes and initiatives
- cooperate with auditing procedures that review the company's conformance with company and other applicable standards and regulations and compliance investigations
- set reasonable performance goals and expectations that can be achieved without compromising our company's integrity and specifically avoiding the creation of incentives to bypass applicable laws and company guidelines.

Management is responsible for ensuring that the content of this Code of Conduct is made available to all employees in relevant languages.

To strengthen integrity, Fresenius Kabi has implemented a Compliance Management System (CMS) which consists of three pillars: prevention, detection, and reaction.

Elements of the Compliance Management System

Prevention

Company Guidelines

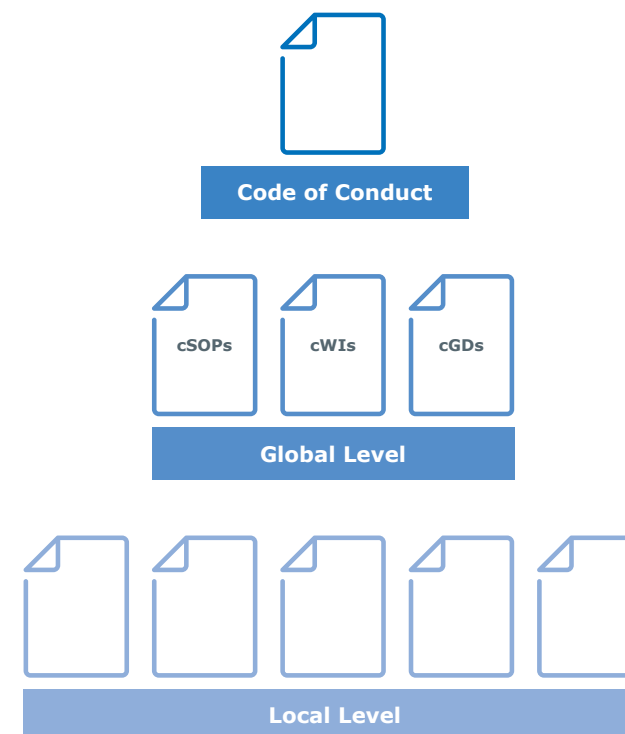
The Code of Conduct is the overall framework which comprises our company rules and guidelines.

Global Level (Policies, SOPs, Working Instructions (WIs))

Global documents apply in all Fresenius Kabi organizations, describe business processes, and provide the framework for further local implementation. Such documents are continuously updated, based on the changing legal environment and the need for governance.

Local Level

Local organizations have local guidelines and procedures providing detailed instructions on how to perform specific duties and functions. They are continuously updated based on the changing legal requirements and relevant needs.



Training and Implementation

We will be trained on company guidelines to the extent relevant for our business activities. Managers will ensure that within their area of responsibility, this Code of Conduct and all company guidelines are implemented, and all employees are trained appropriately.

We are responsible for keeping ourselves informed on the rules applicable to our tasks. Our Fresenius Kabi intranet, our supervisors, Compliance and other functions are available to help and answer in case of questions.

Risk Management

At Fresenius Kabi, we manage all relevant risks proactively. We run regular risk assessments from a top-down and bottom-up perspective, involving local management within their area of responsibility, regional management, and subject matter experts at a global level. With that, we want to detect potential risks for our business and achieve transparency of our overall risk situation.

We carefully assess risks to ensure that we monitor and mitigate them, to the extent possible. We keep our risk assessment up to date and report risks regularly to top management. Our Risk Management Team manages a comprehensive risk management tool and coordinates the key activities.

We consider lessons learned from incidents and improve our Compliance Management System and business activities accordingly.



Detection

Compliance Monitoring and Auditing

Our Internal Controls System (ICS) Team helps to monitor the adequacy of our training, implementation and remediation measures, which are reviewed by internal audits.

The ICS Team helps management to implement and conduct internal controls based on the control principles of the Fresenius Group.

Audits verify whether the company guidelines are implemented and followed, and whether internal controls are sufficient to conduct our business sustainably. Audits are planned on a rolling basis and are scheduled using a risk-based approach. These can be scheduled at any time and/or after information about a compliance violation becomes known.

Our compliance with applicable laws and company guidelines is audited on a regular basis by the following stakeholders:

Externally:

- Certified public accountants
- Certifying bodies, such as TÜV
- Government authorities

Internally:

- Internal audit team of Fresenius SE & Co. KGaA
- Audit program members of Fresenius Kabi, performed by various functions, e.g. the data protection officer and auditors of other functions, e.g. Quality

We will cooperate with any Fresenius Kabi authorized audit that is conducted in the area in which we work.

Reaction

Case Management and Continuous Improvement

Reported incidents and cases are reviewed and investigated thoroughly by appropriate case teams in accordance with our internal rules on case management. In the event of any detected violation, we take timely and commensurate action to remediate the situation. We contribute to the continuous improvement of our internal processes and compliance measures (please also refer to section "How to report misconduct").

Our Business Ethics and Compliance Principles in Interactions with Third Parties



1. Anti-Bribery and Anti-Corruption

Our reputation as a reliable business partner shall not be jeopardized by bribery or other forms of corruption. Corruption undermines free competition and economic development. It can have drastic legal, financial, and reputational consequences globally.

We do not engage in bribery and corruption and do not tolerate business which is carried out by unethical means. We follow the highest standards of integrity, applicable laws as well as our internal rules and industry guidelines for interactions with relevant stakeholders such as healthcare professionals.

We do not offer, grant, or accept any illegal or inappropriate benefit, or anything of value which has the purpose of unduly influencing any activity or decision, whether financial or personal, directly, or indirectly via third parties. We pay special attention when dealing with public officials and healthcare professionals who are subject to particularly strict laws.

As a preventive measure, we conduct risk-based due diligence on business partners and potential targets of mergers & acquisitions and joint ventures based on applicable company guidelines.

Within the marketplace, we make decisions objectively within the bounds of the relevant laws and regulations. In case of investigation requests for information triggered by public authorities or other third parties, we align with the responsible management and Compliance before responding.

Sponsoring Activities and Donations

We do not unduly influence governmental or private actions via donations; this is forbidden. For donations and sponsoring activities, we comply with the following key principles:

- We do not donate and/or sponsor activities with the intention to inappropriately influence the purchasing of goods and/or services from Fresenius Kabi

- We do not grant donations that are illegal under applicable law to political organizations, parties, politicians or other individuals, or organizations
- We conduct risk-based due diligence on donation recipients, donor agencies and event agencies where appropriate
- We do not donate and/or sponsor funds to individuals or private bank accounts and will only make them on a voluntary basis and without any expectation of reciprocal consideration
- All donations must comply with the applicable rules for approval, proper documentation, and taxation.

Gifts, Invitations and Meals

We ensure that no inappropriate personal dependencies, obligations, or commitments arise. We will not be unduly influenced in our business decisions and actions by gifts or any other type of benefit or incentive. We will not offer gifts or any other type of benefit or incentive with the intention to unduly influence decisions. We will not directly or indirectly demand, accept, offer, or grant any benefits that would be illegal or unethical.

Gifts, business meals or entertainment invitations provided to healthcare professionals or public officials are subject to even stricter and more special requirements that we need to consider.

2. Conflicts of Interest

We should avoid situations that may lead to a conflict between our personal interests and those of Fresenius Kabi. We keep private interests (personal, social, financial, religious, or political) and the interests of Fresenius Kabi strictly separate to ensure objective decision-making which is free from inappropriate influence. In a conflict situation, the interests of Fresenius Kabi must not be compromised.

A conflict of interest may arise if the demands of other activities, including outside business activities, distract us from performing our duties in a professional manner or cause us to use company time or resources for non-company purposes.

Our private activities must not conflict with our duties to Fresenius Kabi as our employer. If we detect a conflict situation, we should disclose it to our supervisor or Compliance contact and handle such conflicts appropriately and transparently in line with our internal guidelines.

In case of side-employment and freelancer activities outside Fresenius Kabi that may conflict with company interests, we obtain permission in accordance with our employment arrangements.



We stand against any anticompetitive behavior that can distort markets. Competition fosters market development and innovation.

3. Antitrust and Competition

Our success is achieved with high-quality products and services and by competing vigorously in the marketplace, while always complying with applicable laws on antitrust and fair competition. We will always determine our business strategies independently.

We will never participate in illegal cartels or pursue any illegal collusive practices with third parties which restrict competition. This applies particularly when we collaborate with competitors, customers, and suppliers. We do not abuse a dominant position in the market.

Violations of antitrust laws can have severe legal, financial, and personal consequences and can significantly impair our future ability to conduct business.

We are exposed to antitrust risks when interacting with third parties, and particularly when interacting with competitors. We will therefore avoid sharing commercially sensitive information with competitors unless such sharing is in line with antitrust laws.

If we become aware of a breach of antitrust laws, we will immediately notify the Compliance Department who will take the appropriate steps. Such steps can include a prompt leniency application to competition authorities to receive a discount on fines.

4. Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT)

As a healthcare company, Fresenius Kabi is also a trader of goods. Therefore, Fresenius Kabi could be exposed to risks of trade-based money laundering and/or terrorism financing and has an obligation to counter such risks.

We stand for transparency in financial transactions, in accordance with applicable laws. We are vigilant to any suspicious payment behavior and follow the applicable guidelines and company procedures to prevent illegal money laundering and terrorism financing activities. This includes that we prohibit certain cash transactions, conduct proper due diligence in relevant cases and report suspicious activities to the relevant authorities.

If we see any warning signs for money laundering or terrorism financing in a business transaction, we will raise it to Compliance without undue delay who will assess the risks to protect the company from any illegal business practices.

5. Sales and Marketing

We are responsible for providing accurate and non-misleading information and training on the use of our products to healthcare professionals, business partners, customers, and patients. We comply and abide by the relevant laws and requirements that apply to our marketing and sales activities. Our objective is to excel and achieve competitive advantages through superior quality and our ability to add value, but not through unethical business practices.



We monitor and have a worldwide practice of keeping healthcare professionals fully informed of the use, safety, contraindications, and potential side effects of our products. Where appropriate, we also inform about their operational requirements and characteristics.

We take pharmacovigilance and other vigilance procedures very seriously. Therefore, we commit ourselves to proper and timely reporting in accordance with defined company procedures about all information obtained concerning product risks, adverse effects, and product complaints.

Each sales organization must ensure that the responsible persons can be reached in case of an emergency, such as a product recall, and regarding field safety information. In addition, we store and distribute all products in a way that the quality is not impaired.

6. Innovation and Development (Clinical Studies and Regulatory Affairs)

Innovation and development in the pharmaceutical field are subject to many legal and regulatory standards, including standards related to the ethical conduct of scientific and medical research and particularly clinical studies. We develop all products and conduct studies in line with good clinical practices and relevant laws, regulations, and company guidelines.

It is essential that we respect the intellectual property rights of others, such as patents, copyrights, design rights, utility model rights and trademark rights and only use these when allowed.

In addition, we must carefully treat and protect the knowledge about new innovations, product developments and inventions and will not share sensitive information with unauthorized persons.

A diverse group of four people (three men and one woman) are smiling and looking at a laptop in a modern office setting. The woman in the center has braided hair and is wearing a blue and white striped blazer. The man to her right is wearing a white and brown striped shirt. The man in the foreground is wearing a light blue shirt. The background is a brick wall with some office equipment.

Our Business Ethics and Compliance Principles in the Workplace

7. Workplace Safety and Work Environment

As a healthcare company, we care for life and safety, not only that of our customers and business partners, but also of our own personnel. Thus, having a safe, healthy, and productive workplace is essential for us.

We have company guidelines and working conditions to protect employees from potential workplace hazards.

We as a company and as employees recognize our obligation to help create a safe workplace and to conduct ourselves in a safe manner; this includes:

- performing our job in a safe, competent, and professional manner
- complying with all company policies and guidelines concerning security in the workplace
- familiarizing ourselves with safety regulations and emergency plans applicable to our workplace to be able to react appropriately in the event of an emergency or other incident.

In instances where we see any safety concerns, we will directly raise it with our supervisor and local experts.



We are committed to fair and equitable human resources practices in relation to employees, including their recruitment, retention, development, and total compensation.

8. Employment and Standards of Conduct

To remain competitive, we must constantly adapt to changing global conditions. We know that our employees are key assets to the sustainable success of our business and that we want to demonstrate respect and appreciation for all employees and the different cultures they represent.

We are committed to providing equal access to opportunities for all employees. We do not tolerate discrimination in hiring or in the workplace based on ethnicity, ancestry, color, religion, biological gender or gender identity, national origin, age, marital status, citizenship, physical or mental disability, medical condition, pregnancy, sexual orientation, or any other characteristic protected by law.

We do not tolerate:

- violence, the threatening of persons or exposing them to aggressive behavior
- intimidation or harassment of anyone; this includes being disrespectful, discriminatory, hostile, degrading or offensive to others
- any unlawful or hazardous activities
- illegal substances and the abuse of drugs at work.

We promote:

- trust and open collaboration
- respectful treatment
- an environment where anyone is comfortable raising concerns without fear of retaliation.

In instances where we see any concerns about discrimination, harassment, or inappropriate behavior, we encourage employees to raise them with their supervisor and/or Human Resources.

The integrity and reputation of Fresenius Kabi's records and public disclosures depends on the accuracy, completeness and validity of the information supporting our finance and business documentation. Thus, creating and maintaining accurate business and financial records is essential.

9. Record Keeping of Company Information

Government Filings and Reports

We shall make all required filings and reports to competent authorities accurately and on time. We must store appropriately all back-up documentation used in the preparation of a filing or a report.

We ensure the accuracy of the information we provide for inclusion in a report which will be signed or certified by a responsible person and will disclose any issues or questions in relation to the accuracy prior to the signing and the filing or the completion of such report.

We refrain from providing false or misleading information for the purpose of receiving any payment to which Fresenius Kabi is not entitled, e.g. a tax or social security reimbursement.

False statements contained in a government filing or report may subject individuals and/or Fresenius Kabi to civil or criminal liability.

We as a company must store appropriately all back-up documentation used in the preparation of a filing or a report.

Accurate Business Records

We will ensure that all company records, documentation, accounts, and data entries are complete, duly prepared, correct, timely and in accordance with legal requirements and applicable accounting standards.

We cooperate fully with regular internal and external audits of billing and accrual practices, respond to the auditors' (see the above stakeholder groups) questions honestly, and provide them with complete and accurate information to ensure that our reporting is posted accurately and completely.

We achieve compliance through the necessary separation of duties and the implementation of appropriate business processes and controls. Our financial documentation shall meet the highest standards and accurately and fairly reflect, in reasonable detail, the assets, liabilities, revenues and expenses of Fresenius Kabi as well as all transactions and changes in assets and liabilities.

In case of any concerns or suspicion of inappropriate documentation or reporting practices, we will report these to a manager or Compliance.

10. Protection of Confidential Company Information

Keeping company trade secrets, as well as strategic and market information confidential is very important. Its improper use can seriously damage our competitiveness, reputation, and trust from others. Therefore, we will safeguard it and handle it with care.

Confidential information includes all information (whether in written or verbal form), which:

- is not included in the annual reports of our parent company Fresenius SE & Co KGaA or other public reports
- has not been published on our company websites following a proper review process
- is not included in public statements of company personnel who are authorized to make such public statements.

Some examples of (strictly) confidential information are e.g. strategic and commercial information, business plans, sales data, supplier and customer information, pricing, inventions, new products in development, personnel data, or financial information.

We will disclose information classified as confidential only for legitimate business purposes and to the extent necessary and only to those other employees or third parties who need the information to perform their work (need-to-know principle).

We will not disclose confidential information to procure an economic advantage for ourselves personally or for third parties. We will never disclose any confidential information to unauthorized persons. The rules of confidentiality continue to apply after we have left Fresenius Kabi.

We will perform our work in line with the duty of secrecy defined in our employment arrangements and take reasonable precaution to protect confidential information from unintended use and disclosure. We do not speak about confidential matters to unauthorized persons.

If confidential information has been requested by authorities or other third parties based on legal requirements, we will work with the responsible manager and relevant subject matter experts prior to such disclosures.

Before disclosing confidential information to contract partners for legitimate business purposes, we will ensure to put in place a confidentiality agreement and data protection arrangements as necessary and provided or reviewed by a legal expert.

Personal Transactions and Insider Trading

We do not share any non-public and/or confidential material information of our company for trading purposes.

Insider trading laws and regulations prohibit buying or selling Fresenius securities, such as shares, based on insider information.

Insider information is any unpublished information which, if published, could significantly affect the market price of Fresenius' securities, e.g. shares, or third-party securities. Thus, it is very important that we do not use insider information for personal gain when buying or selling securities, and do not enable others to do so.

This could include, but is not limited to, knowledge concerning:

- unpublished financial results
- projections of future earnings, losses or changes thereto
- planned mergers or acquisitions and divestitures
- significant changes in corporate objectives or structures
- research & development projects
- ongoing litigation
- planned product launches
- changes in company leadership.

We do not share insider information with other persons inside and outside the company unless such person has signed a confidentiality agreement in line with the respective project. This rule applies until the respective information has been published or is no longer relevant.

We also consider the rules of our respective stock option plan. Any questions about insider information should be addressed to the legal department.

11. External Communications including Social Media

Everything that is said or written about Fresenius Kabi can have a positive or negative impact on Fresenius Kabi's reputation. Everything we communicate externally reflects not only on us but also our company. Thus, we are mindful and careful when speaking and using online platforms and social media.

Everything that is said or written about Fresenius Kabi can have a positive or negative impact on Fresenius Kabi's reputation. Everything we communicate externally reflects not only on us but also our company. Thus, we are mindful and careful when speaking and using online platforms and social media.

We do not speak or communicate on behalf of Fresenius Kabi unless we are designated and authorized to do so. Whenever we speak publicly on Fresenius Kabi or work-related matters as an individual, we protect confidential information and always make it clear that we are expressing our own personal views, not Fresenius Kabi's. We will not use Fresenius Kabi's name, stationery, or logos for private communications or for expressing personal opinions.

When active on social media, we act responsibly and consider the consequences for ourselves and for Fresenius Kabi before making a post.

We forward all inquiries from the media regarding official Fresenius Kabi company statements that might have an effect on Fresenius Kabi's reputation or on the market price of Fresenius SE & Co. KGaA securities to Fresenius Kabi Corporate Communications & CSR ([communication\[at\]fresenius-kabi.com](mailto:communication[at]fresenius-kabi.com)).

We also forward external inquiries from the financial community (such as investors, analysts, shareholders etc.) to Investor Relations & Sustainability Fresenius SE & Co. KGaA ([ir-fre\[at\]fresenius.com](mailto:ir-fre[at]fresenius.com)) and Fresenius Kabi Corporate Communications & CSR ([communication\[at\]fresenius-kabi.com](mailto:communication[at]fresenius-kabi.com)).

12. Protection of Company Assets

We protect the company's assets, e.g. physical, financial, technical, and intellectual property and know-how against loss, theft, destruction, or unauthorized use. This also includes taking care of company property and third-party property and using it in line with the company's goals, business tasks and applicable regulations.

If we unreasonably use company property for private purposes, excessively spend company money or fail to claim a refund of money that has been spent without a legal basis, this can be a criminal offence.

Therefore, we spend company funds and use other company assets carefully and only for legitimate and justified purposes. We manage budget and handle company financial resources carefully. We reasonably follow up on potential claims for reimbursement of money that may have been lost.

13. Information Management and Security

Data Protection

We respect the importance of individuals' privacy. We will protect the fundamental rights and freedoms of employees, patients, and business individuals. We will protect their personal data they have entrusted in us against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure and access.



We collect, use, and process personal data in line with the data protection principles of the Fresenius Binding Corporate Rules and applicable laws.

We collect, use, and process personal data in a lawful, transparent and fair manner. We only collect data that is necessary and keep it accurate.

We share collected data on a need-to-know basis and with authorized persons only. We only keep personal data according to company defined- and legal retention periods.

Cybersecurity

We recognize that as a healthcare company, we are critical for the ability to care for patients and hence, for the functioning of the healthcare system and society in the countries we operate in (so-called "critical infrastructure" or essential entity). Therefore, we protect company information technology (IT) infrastructure, medical devices, other devices, and data from cyber threats and attacks, including the unauthorized access or use of our systems and data.

We implement appropriate technical and organizational measures to make our (IT) infrastructure, medical devices and other devices robust.

We will participate in mandatory trainings to keep ourselves updated on the constantly increasing cybersecurity risks, e.g. social engineering, hacking, computer malware, ransomware, and phishing messages.

In addition, we manage the requirements of applicable security-related legislation on medical devices and critical infrastructure and essential entities and work with authorities where required.

Our Business Ethics and Compliance Principles on Social Responsibility



The quality, security, safety and efficacy of our products and services are an essential basis of our business activities.

14. Quality and Safety of our Products and Services

We strive for harmonized standards and processes worldwide to ensure the highest standards across the entire value chain, from innovation and development to manufacturing, sales and marketing.

Within our area of responsibility, we ensure compliance with these principles and follow internal quality, security and safety regulations, without exception.

Quality, security and safety risks in our products are monitored and assessed by vigilance processes. We collect, analyze, and treat all concerns about adverse reactions of drugs or other products very carefully.

In addition, we maintain a quality management system that ensures full compliance with applicable laws and international requirements.

Our quality management system is based on the following principles:

- Clear assignment of responsibilities
- Educated and well-trained employees
- Continuous safety monitoring
- Transparent and documented procedures
- Controlled production processes
- Continuous improvement.

15. Environmental Responsibility and Sustainability

We are committed to protecting nature and climate as the basis of life and to using natural resources responsibly.

Our natural resources are not infinite. An efficient usage of them is key to reduce our environmental footprint and to limit negative environmental impact. Climate change and its effects are also impacting Fresenius Kabi. We comply with applicable laws on value chain due diligence and acknowledge that it is our responsibility to do our part to mitigate these risks and impacts.

Responsibly using, storing, transporting and disposing of all hazardous materials, including chemical and toxic waste, according to applicable requirements and regulations is essential to us.

We strive to avoid unnecessary consumption of energy and water and to reduce emissions of greenhouse gases as well as of waste and wastewater.



16. Human Rights, Social Responsibility, Diversity, Equity and Inclusion

For Fresenius Kabi, the dignity of every human being is untouchable, and our commitment to social responsibility, diversity, equity and inclusion (DEI), and human rights is grounded in this principle.

Fresenius Kabi and its employees promote an inclusive culture in which all employees are valued and have opportunities to develop and thrive. We foster an atmosphere of mutual respect and appreciation for diversity of thought, cultures, perspectives, and experiences in which employees can openly engage in teamwork, collaboration, effective communication, and continuous improvement. Such an environment relies on the conviction that our differences and similarities can broaden the range of ideas and solutions that allow us to be successful.

Human Rights

We uphold human rights in our own operations and the value chain.

In Our own Operations

We consider human rights part of our corporate responsibility. We respect and support them as they are defined by international standards, such as the United Nations Universal Declaration of Human Rights and the Fundamental Principles, as published by the International Labour Organization (ILO). We aim to uphold these standards in our area of responsibility. We do not exploit and do not discriminate people; we respect the freedom of association and privacy of people and safeguard the environment as a basis for peoples' lives.

We do not accept or condone any form of forced labor, including illegal child labor, modern slavery, or human trafficking. We are dedicated to conducting and growing our business in a legal and ethical manner consistent with our global values and international human rights laws and standards.

In Our Value Chain

We expect from our suppliers and contract partners the same level of commitment for human rights and work with them to achieve this goal by way of preventive steps, such as contractual arrangements, open communication, reviews and, if applicable, remediation steps.

We want to partner only with companies that are committed to those standards, trustworthy, qualified, reputable, and accountable.

We are committed to protecting human rights in the business throughout our value chain and expect our suppliers to do the same. Therefore, our suppliers are required to act in line with our ethical, social, security and environmental standards, to respect human rights, to ensure proper working conditions and to produce responsibly, e.g. as laid down in our Third-Party Code of Conduct.

We evaluate all bids and proposals fairly and objectively and review our partnerships on a regular basis to ensure the compliance of our agreements with our Code of Conduct.

We engage only with qualified suppliers that will fulfil the criteria that are specified in our quality management system and conduct transparent supplier selection processes according to our global purchasing policies.

How to report Misconduct



Reporting Integrity Concerns

We support and encourage all to speak up in case of concerns or seek guidance when required. We are responsible for promptly reporting any suspected misconduct, illegal activities, unethical behavior, or other violations of the law or of Fresenius Kabi's company guidelines. Doing so allows the company to investigate and take prompt corrective actions.

Reporting Procedures

Our company guidelines on reporting concerns and case management enable us to report integrity concerns without fear of retaliation. These guidelines ensure a confidential, timely and fair investigation, and if applicable, follow up on integrity issues identified in the process.

You can bring forward integrity matters via:

- your immediate supervisor
- a more senior manager, if the immediate supervisor is unable to resolve the issue or if you feel uncomfortable about speaking to the supervisor about the issue
- our global Compliance Action Line
- any local reporting channels that have been established
- Global Risk & Compliance directly, by writing an email to:

[Compliance\[at\]Fresenius-Kabi.com](mailto:Compliance[at]Fresenius-Kabi.com)



We will make all integrity reports in good faith and never use our reporting channels to spread untruthful information or accusations about other persons, threaten others, or for any other improper purpose.



We understand that integrity reports made in bad faith can result in disciplinary action, up to termination of employment, and damage claims.

We are aware that, to perform an efficient compliance investigation, it will be important to cooperate with the company and provide as much information and evidence as possible. We can always report anonymously, but are encouraged to provide our identity.

We can trust that our responsible investigators conduct internal investigations confidentially and protect our identity where appropriate.

Non-Retaliation Policy

We follow a strict non-retaliation policy. Any person, including supervisors or managers, irrespective of his or her position and role in the company, who is found to have engaged in or condoned an act of retaliation against an individual in response to a good faith report of a (suspected) violation will be subject to disciplinary action, up to termination of employment.

Contacts

A woman with dark hair, wearing a white lab coat, is shown in profile, looking slightly to the left while talking on a black telephone. The background is blurred, suggesting an office or laboratory setting.

If you have any general questions, please reach out to your responsible Compliance contact or use the Compliance email address: [Compliance\[at\]Fresenius-Kabi.com](mailto:Compliance[at]Fresenius-Kabi.com)

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Fresenius Kabi AG
Else-Kröner-Str. 1
61352 Bad Homburg/Germany
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