

Human Rights Policy Statement

Introduction

Fresenius Medical Care (“We”) is the world’s leading provider of products and services for individuals with renal diseases, of which around 4 million regularly undergo dialysis treatment. Dialysis is a vital blood cleansing procedure that substitutes the function of the kidneys in case of kidney failure. We offer products and services along the entire dialysis value chain from a single source. We care for approximately 300,000 patients in our global network of roughly 3,700 dialysis clinics. We also operate around 40 production sites on all continents, where we manufacture dialysis products such as dialysis machines, dialyzers, and related disposables. Our vision is to create a future worth living for patients – worldwide and every day.

We are dedicated to conducting and growing our business in a legal and ethical manner consistent with our global values, applicable laws, and international human rights standards, and respecting the rights and dignity of all people.

This Human Rights Policy Statement (“Statement”) builds on our commitment to respect human rights, also stipulated in our Code of Ethics and Business Conduct. It reflects our approach to embedding respect for human rights in our business activities – both in our own operations and in our supply chains. The Statement is guided by relevant international standards including the principles described in the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct as well as the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work, and applicable legislation such as the German Human Rights Due Diligence in Supply Chains Act (Lieferkettensorgfaltspflichtengesetz, “LkSG”). When faced with conflicting requirements, e.g., where national laws, rules, or customs deviate from international standards in a restricting or contradicting manner, we aim to apply our global approach and the principles of our Statement, to the extent possible without violating local laws.

This Statement applies to our operations globally, including all business segments and global functions and all our local operations and entities.

Table of Contents

Introduction	1
Table of Contents	2
1. Our fundamental principles, core commitments and expectations	3
1.1. Respect the rights of our patients	3
1.2. Provide fair and safe working conditions	3
1.3. Provide a discrimination- and harassment-free work environment	4
1.4. Respect the right to freedom of association and collective bargaining	4
1.5. No child labor, no forced or exploitative labor, no modern slavery, no human trafficking	4
1.6. Adhere to ethical principles in pre-clinical and clinical research	5
1.7. Protect personal data and respecting privacy	5
1.8. Protect the environment and respect the rights of local populations	5
1.9. Our commitments regarding our supply chain	6
2. How we implement our commitment	6
2.1. Our governance and strategic approach	6
2.2. Risk assessment	7
2.3. Action	8
2.4. Monitoring	9
2.5. Stakeholder engagement and transparent communication	10

1. Our fundamental principles, core commitments and expectations



In line with our commitment to respecting human rights and protecting the environment, we follow the principles outlined below in all aspects of our activities and operations. These principles guide the actions of our management and our employees. We also expect our business partners, including suppliers, to conduct their activities in line with these standards.

Our principles are designed to comply with relevant laws and regulations of each country or

place of employment and are guided by internationally recognized standards.

1.1. Respect the rights of our patients

As an international healthcare company, the health and well-being of our patients is our highest priority, and our commitment extends to everyone under our care. As part of this dedication to delivering safe, high-quality healthcare to individuals with kidney disease, we continuously monitor the performance of our services. In addition, our efforts include safeguarding patient privacy and protecting personal and sensitive information.

We believe every patient should have the opportunity to achieve their highest possible level of health. Across communities worldwide, we deliver care that supports a diverse patient population.

1.2. Provide fair and safe working conditions

We are committed to providing a respectful workplace with fair and safe working conditions and a work environment where employees can thrive, feel valued, and be heard, reflecting our core values – “we care”, “we connect”, “we commit”. We are committed to fair pay and compensation principles; we pay employees based on job-related qualifications. We follow the principle of equal pay for equal work, and we are committed to taking sound compensation decisions, ensuring our pay is market competitive, internally equitable, supportive of career progression, and designed to reward and motivate measurable performance. We pay wages that meet or exceed local industry conditions or local minimum wages.¹

We value work-life balance and help our employees to manage their working time responsibly. Overtime work, up to the legally allowed maximum working time, may be necessary, based on the company's determination of patients' and business' needs. When assigning working time, including overtime, we follow a consistent approach, taking employees' requests into consideration where

¹ Payment of a wage at least equal to the minimum wage established by the applicable law; guided by the International Labor Organization (ILO) Conventions No. 26 and 131.

possible. Overtime work is paid at a premium rate for eligible employees. We also respect rest periods, periods of leave and leave of absence, in accordance with local laws and practices. Our commitment to Occupational Health and Safety is a core element of our business. We are committed to identifying, mitigating, and preventing occupational health and safety-related hazards and risks, and we foster a culture that promotes a safe and secure work environment.²

We are committed to social responsibility in our transformation activities. This includes engaging in applicable information and consultation procedures with works councils and other employee representative bodies in good faith, consistently applying objective and non-discriminatory job-based criteria in all employment decisions (in alignment with local laws), and taking steps to mitigate the adverse effects of separation from employment.

We also take responsibility for the security of our workforce, our patients, our assets, and our sites. Where we hire security personnel, it is important to us that they act with high regard for human rights, always maintaining respectful behavior.

1.3. Provide a discrimination- and harassment-free work environment

We support equal opportunities and do not tolerate any form of discrimination or harassment based on national or ethnic origin, skin color, social origin, health status, citizenship, disability status, sexual orientation, age, gender or gender identity, gender expression, marital status, pregnancy, political opinion, religion or belief, and any other criteria as protected by local laws and regulations.³ We are committed to fostering a sense of belonging where every person feels they are an integral part of our shared communities and which allows all individuals to thrive and reach their full potential.

1.4. Respect the right to freedom of association and collective bargaining

We recognize the freedom of association and the right to collective bargaining, including the rights of our employees to freely choose whether or not to form, to join and/or be represented by a particular collective body or a union, in accordance with local laws.⁴

Where collective bodies are established to represent our employees, we are committed to following applicable information and consultation requirements, and to negotiating in good faith.

1.5. No child labor, no forced or exploitative labor, no modern slavery, no human trafficking

We do not tolerate the use or threat of violence, or any other form of coercion. We strictly forbid using, supporting, or approving any form of exploitative labor, child labor, forced labor or human trafficking.⁵ Employment relationships must be based on voluntary, non-threatened participation at individuals' own decision. We do not tolerate unlawfully withholding wages or salary elements, and

² Respect for occupational health and safety obligations under the law of the place of employment, where this creates a risk of accidents at work or work-related health hazards; guided by ILO Conventions 155.

³ Guided by the ILO Conventions 110, 111.

⁴ Guided by the ILO Conventions 87 and 98.

⁵ Guided by the ILO rules on the prohibition of child labor below the minimum age according to ILO Convention 138 and on the prohibition of the worst forms of child labor according to ILO Convention 182. Respect for the prohibition of forced labor, except for work and services as defined in ILO Convention 29 and 105 and in the 1966 UN International Covenant on Civil and Political Rights.

we prohibit the use of illegal worker-paid recruitment fees and confiscation of workers' original identification documents. Employees and workers should have the choice to end their employment of their own free will, respecting applicable procedures such as a reasonable pre-notification period.

1.6. Adhere to ethical principles in pre-clinical and clinical research

As outlined in our [Ethical Conduct in Pre-Clinical and Clinical Research Policy](#), we conduct clinical trials and other research studies adhering to strict ethical guidelines that demonstrate our respect for human and animal life. We are guided by international principles,⁶ best-practice guidelines,⁷ applicable laws, and recognized international quality and safety standards. We adhere to the ethical principles including respect for people, safeguarding the health, well-being and rights of participants. Also, we are committed to using alternatives to animal trials wherever scientifically valid and acceptable to regulators. If used for trials, animals must be treated respectfully with minimized pain and stress.

1.7. Protect personal data and respecting privacy

We value the trust of patients, employees, and other stakeholders and we are committed to respecting their privacy and protecting their personal and sensitive data. We follow our Global Privacy Principles and related policies, standard operating procedures and guidelines, and applicable laws⁸ when collecting, using, processing, or transferring the personal data of patients, clinical trial participants, employees and other individuals whose data is entrusted to us.

1.8. Protect the environment and respect the rights of local populations

We live up to our responsibility to protect the environment as the basis of life, to preserve resources, and to reduce our impact on the environment.

We are committed to refraining from damaging soil, polluting water and air, emitting harmful or excessive noise, and using excessive amounts of water. These commitments aim to preserve the health of people, the natural resources required for food production, and to ensure that our activities, including product development and investment decisions, do not limit the local population's access to safe drinking water and sanitary facilities. We consider these aspects important as we acknowledge the intrinsic connection between human rights and the environment. Moreover, we have established climate targets aligned with the Paris Agreement's ambition to limit global warming to 1.5 °C.

We do not engage in the unlawful eviction and takeover of land, forests or waters which secure the livelihoods of people.

⁶ Guided by Declaration of Helsinki and Belmont Report.

⁷ Guidelines of reference are: the ICH Guideline for Good Clinical Practice and ISO14155

⁸ Main legal requirements are: the European General Data Protection Regulation and the US Health Insurance Portability and Accountability Act.

1.9. Our commitments regarding our supply chain

While we hold ourselves to a high standard, we apply equally high standards to the suppliers and other third parties we are working with. We expect our suppliers and other business partners to comply with the principles set out in this Statement and outlined in our Global Code of Conduct for Business Partners. This includes the implementation of appropriate processes to respect human rights and labor rights and to protect the environment – within their own operations and business activities, as well as in their supply chains. Upon request, we expect them to show and explain how they comply with the human rights principles set out in this Statement.

2. How we implement our commitment

2.1. Our governance and strategic approach

Respecting human rights and acting with integrity is core to our global values and our commitment to ethical business practices and sustainability, whereby we conduct continuous human rights due diligence.

This includes establishing and implementing appropriate processes to identify, prevent, address, and mitigate negative impacts. In doing so, we consider the interests of patients, employees, communities, clinical trial subjects and other stakeholders – both within our own operations and across our supply chain.

Our robust governance facilitates our human rights due diligence, with a set of policies, processes, and defined responsibilities. These elements build the foundation of our strategic approach.

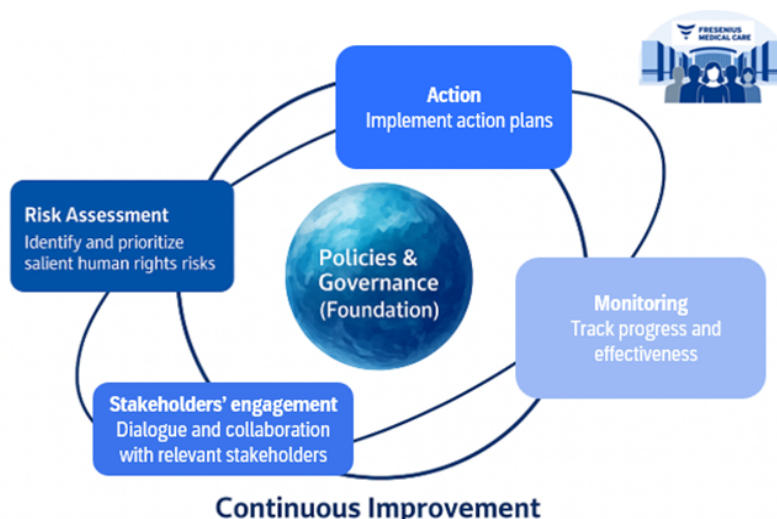
The Fresenius Medical Care Management Board oversees our Human Rights Due Diligence Program. The operational implementation is guided by clearly assigned responsibilities: our Human Rights Office (“Office”) within the Global Legal Function acts as the central contact point for human rights. The Office works closely with our business relevant functions and business segments to ensure proper support and implementation of our commitments, assists the business teams and functional teams, where needed, and monitors the overall status of activities.

The responsible business and functional teams, e.g., teams within Care Enablement, Care Delivery, Human Resources, Procurement, Global Medical Office and others, assess relevant risks and impacts, and take appropriate risk management measures.

Our Human Rights Steering Committee is composed of senior leaders representing our business segments and global functions. It meets on a quarterly basis and provides strategic guidance, supervises the development of our activities, and supports the operationalization of the program.

Our approach to implementing human rights due diligence is built as an ongoing process of continuous improvement, focusing on people and their environment.

Our governance and policies are positioned at the center of our human rights due diligence. It anchors and guides all our human rights due diligence actions and activities. Around this foundation, our approach takes four dimensions:



- **Risk Assessment:** We identify and understand human rights risks and impacts linked to our business activities and relationships. To do so we integrate human rights considerations into relevant risk assessment processes, for example with regard to employment, supply chain, our investment decisions, our clinical research activities and our product development activities. The outcome of our annual and ad-hoc risk assessments feeds into the Corporate Risk Management Process and is communicated to our Management Board.
- **Action:** Identified risks lead to tailored preventive and remedial measures, which are regularly reviewed by business and functional teams with support from the Human Rights Office. A key part of our action is awareness-raising and training on human rights risks, impacts, and related preventive and remedial measures, directed at both our teams and our business partners.
- **Monitoring:** We track progress and effectiveness, further strengthen processes, and provide mechanisms for complaints and grievances. We monitor compliance with relevant legal requirements through various measures and mechanisms, including internal audits, complaint handling, surveys, and internal risk assessment processes.
- **Stakeholder engagement:** Engaging with relevant stakeholders is an enabler for dialogue, information exchange, and early identification of emerging risks.

We are committed to continuous improvement and consider our human rights due diligence as a living and dynamic process that facilitates our actions and measures to be updated in order to meet new risks, changing requirements and evolving expectations.

2.2. Risk assessment

As a global organization with a complex value chain operating in various countries, we are aware that risks and impacts to people may occur.

To identify, prevent, and mitigate human rights risks or adverse impacts, we implement adequate risk management processes throughout the organization. For such processes, we have taken guidance from the UN Guiding Principles on Business and Human Rights and applicable laws.

To identify human rights risk areas resulting from our operations and our supply chains, we follow a two-step approach. We consider potential risks based on country risk indices as well as relevant internal information related to existing preventive measures, such as programs, policies and other controls, along with reports, concerns or complaints and other observations. We prioritize identified risks based on an analysis of the potential impact and likelihood and consider the extent to which our business activities might contribute to the materialization of the risk.

The risk analysis is conducted regularly, but also on an ad hoc basis, as needed – both for our own operations as well as for relevant business partners.

We also would perform an ad hoc risk assessment of our indirect suppliers whenever we have indication of human rights or environment-related violations.

We have identified the following focus areas to guide our human rights related activities:

- patients' rights,
- working conditions in our own operations and in our supply chain, and
- environmental impact on local communities in our own operations and in our supply chain.

2.3. Action

To prevent, remedy, or mitigate human rights risks and impacts, we take appropriate actions, both in our own operations as well as across our supply chain.

These include updating policies and processes to better reflect applicable human rights considerations, raising awareness, monitoring of policy implementation and the adjustment of contractual clauses, where needed. Actions include also responding to concerns, investigating claims, and taking appropriate remedial actions in case of findings.⁹

Relevant functions and business teams take ownership to manage related risks, and to develop action plans. For example, the Human Resources function owns action plans when it comes to labor rights, or the Procurement function owns measures related to our supply chain.

In addition to our [Code of Ethics and Business Conduct](#) we also address specific human rights requirements to our suppliers and business partners, as specified in our Global [Code of Conduct for Business Partners](#). This document defines the minimum requirements that our business partners and suppliers must meet, i.e., regarding working conditions, including Occupational Health and Safety, environmental protection, and quality. We expect them to establish adequate procedures within their organizations, as well as in their value and supply chains, to comply with respective requirements.

⁹ The measures listed in this section provide a non-exhaustive overview of our human rights and environment-related activities. For further details please refer to our Sustainability Statement and other information published on our [website](#).

In addition, various policies and procedures specify our general commitments and expectations when it comes to human rights and environmental protection.

For example, our [Ethical Conduct in Pre-Clinical and Clinical Research Policy](#) stipulates our commitment to ethical standards in our research and development activities. We also maintain policies that safeguard patient rights and explain our responsibility to inform all patients about these rights.

Our Global Social and Labor Standards Policy is our leading document regarding human rights topics related to our employees. It outlines our global minimum standards regarding fair and transparent working conditions, including a discrimination and harassment-free workplace, respecting the freedom of association and the right to collective bargaining, engaging in dialogue with our employees, conducting consultation procedures in good faith as well as the prohibition of child labor, forced labor and retaliation. Our [Global Occupational Health and Safety Policy](#) stipulates our commitment to providing a healthy and safe workplace for our own employees and contractors. Our Global Privacy Principles define our minimum privacy principles for processing and handling the personal data of our employees, patients, business partners, and other stakeholders.

Our [Global Environmental Policy](#) includes our commitment to environmentally sustainable operations and resource efficiency that ultimately reduces the risk to the local population in the surroundings of our sites.

To raise awareness for and steer implementation of human rights due diligence commitments, we provide target-group specific training courses and awareness raising sessions. Those sessions are tailored to the specific needs of various functions, including on human rights impacts related to investment decisions, product development, clinical research, and relationship with sales intermediaries.

2.4. Monitoring

We track progress, further strengthen processes, and provide mechanisms for grievance. We monitor compliance with relevant legal and regulatory requirements through various measures and mechanisms, including internal audits, complaint handling, surveys, exchanges with employees and their representatives, and internal risk assessment processes.

We are committed to monitoring and tracking the effectiveness of our measures and activities, including our complaint procedures. We integrate human rights and related environmental aspects into the scope of internal audits. We also use relevant data, such as overall number of concerns received and remedial actions taken, or outcome of risk assessments performed in our locations to assess the effectiveness of our Human Rights Due Diligence Program and update our measures if required.

In areas where our measures have proven effective, we continue to systematically monitor their implementation and reinforce established practices to ensure sustained performance and continuous improvement over time.

Where our business activities have caused or contributed to actual human rights violations, or where we have detected such violations, we are committed to implementing effective remedial action. Depending on the nature of the violation, we will adopt such remedial measures in our own business activities, as well as in the supply chain, on a case-by-case basis.

Reviewing, managing and handling concerns and complaints is a key dimension of our monitoring approach. We recognize the importance of open communication and aim to create an environment where patients, employees, members of local communities, business partners/suppliers including their workforce, or any other potentially affected individual can raise their concerns and report potential violations.

Our employees, as well as individuals outside of our organization, may share their concerns via multiple channels – either reporting them to Fresenius Medical Care management, Compliance, Human Resources, Legal, the Human Rights Office, or via the Compliance Action Line. The Compliance Action Line form can be easily accessed through our [website](#) (available in 39 languages). Additional [channels for our patients](#) and their representatives are available. We are committed to appropriately following up on each report or complaint. In case of substantiation, we will take appropriate remedial action. We will diligently consider complaints to improve our business processes and take corrective and/or improvement actions as needed.

Our internal policies protect individuals who make a report on reasonable grounds and/or in good faith. Such reporters must not be retaliated against in any way. A summary of our rules of procedures is published on our [website](#).

2.5. Stakeholder engagement and transparent communication

We are committed to establishing suitable and effective dialogue and interactive formats to engage with our patients, employees, employee representative bodies, and other relevant stakeholders. For example, we use our regular employee engagement surveys and patient experience surveys as well as exchanges with patients' organizations to improve our care and working environment and identify strengths as well as opportunities.

We regularly inform the German Works Council on relevant human rights due diligence activities.

Exchange with our peers helps us to further improve our due diligence measures. We are engaging in respective working groups of relevant business networks.

The Management Board of Fresenius Medical Care AG:

Helen Giza; Chief Executive Office	
Martin Fischer; Chief Financial Officer	
Franklin W. Maddux, MD; Global Chief Medical Officer	
Dr. Katarzyna Mazur-Hofsäß; Care Enablement	
Craig Cordola; Care Delivery	
Dr. Jörg Häring; Legal, Compliance, Human Resources	

We regularly – at least annually – report on the status of implementation of Human Rights Due Diligence as part of our Sustainability Statement in the Annual Report. Further information is available on our website at www.freseniusmedicalcare.com.

We document relevant activities in accordance with relevant legislation.

The present Statement is reviewed on an annual basis and as required in the case of significant changes to our risk profile.