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1 Objective

At Fresenius Kabi, our purpose is to provide life-saving medicines and technologies to people who care for patients and to find answers to the challenges they face. Fulfilling this purpose requires every one of us to be committed to working ethically and with the highest standards of integrity. Violations of law or non-compliant behavior can result in severe consequences, both for involved individuals and for our company as a whole.

Therefore, we expect all Fresenius Kabi Personnel to protect the company's reputation by speaking up if there are questions or concerns about potential Compliance Violations which also includes Human Rights Violations. We also encourage everybody outside our organization, who witness potential Compliance Violations in connection with our business operations to speak up and address any concerns to our dedicated reporting channels.

This policy provides a guideline informing about the channels and protection available to Reporters, which kind of reports qualify for protection and whom to report relevant information to. Further, it illustrates in which manner we will support and protect Reporters against potential negative consequences and how we will ensure fair treatment of employees mentioned in reports.

2 Abbreviations and Terms

2.1 Abbreviations

| Abbreviation | Definition |
|--------------|--|
| CAL | Compliance Action Line |
| eDMS | Electronic Document Management system operated by Fresenius Kabi Quality Management (QM) |
| gSOP | Global Standard Operating Procedure |
| HR | Human Resources |
| LCC | Local Compliance Coordinator |
| R/DCC | Compliance Coordinator |

2.2 Terms

| Term | Definition |
|--------------------------------|---|
| Business Partner | Third parties that are active in the promotion and or distribution of Fresenius Kabi's goods and services, or perform services and interact with customers, public officials or healthcare professionals on Fresenius Kabi's behalf |
| Compliance Coordinator (R/DCC) | The R/DCC is a Fresenius Kabi employee who is the compliance contact for a number of legal entities. |
| Compliance Policies | All global policies, SOPs and their ancillary documents as well as other mandatory processes issued by Global Risk & Compliance, all global |

| Term | Definition |
|---|---|
| Compliance Team | Compliance Policies and SOPs issued by Fresenius SE &Co. KGaA which apply to Fresenius Kabi each as amended from time to time. |
| Compliance Violation | <p>Members of Global Risk & Compliance, Organizational Compliance Departments and LCCs.</p> <p>Either a</p> <ul style="list-style-type: none"> ▪ violation of applicable law or industry association codes, ▪ significant non-compliance with internal Compliance Policies or ▪ misconduct that could interfere with Fresenius Kabi values as stated in the Code of Conduct or could have a negative impact on Fresenius Kabi's reputation, <p>committed by Fresenius Kabi Personnel or its Business Partners</p> <p>or</p> <ul style="list-style-type: none"> • a Human Rights Violation committed by Fresenius Kabi Personnel, Fresenius Kabi's direct suppliers (Tier 1) or other companies in Fresenius Kabi's supply chain (Tier 2 etc.) <p>or</p> <ul style="list-style-type: none"> • conduct relevantly damaging Fresenius Kabi's assets or interests committed by Fresenius Kabi Personnel, its business partners or third parties. |
| Conflict of Interest | Someone is compromised when her or his personal interests or obligations conflict with the responsibilities of her or his job or position. It means that the person concerned is positively or negatively biased, independence, objectivity or impartiality in decision making is in question. |
| Fresenius Kabi | Fresenius Kabi AG and / or all subsidiaries / affiliates in which Fresenius Kabi AG holds a share exceeding 50 % or otherwise has Management Control. |
| Fresenius Kabi Personnel or Personnel | Any Fresenius Kabi board member, officer, director, employee, temporary worker, intern and volunteer. |
| Global Reporting Channels | The Compliance Action Line (electronic system operated by Fresenius Kabi or a third-party supplier on Fresenius Kabi's behalf) and the Compliance e-mail address (central e-mail address for reports (compliance[at]fresenius-kabi.com)). |
| Human Rights Violation | A violation of human rights as specified in applicable legislation on supply chain due diligence, including, but without limitation, child labor, child trafficking, child pornography, child prostitution or other child-related misconduct, human trafficking, slavery and forced labor, disrespect of occupational health and safety, the disregard for freedom of association, discrimination, non-payment of binding minimum wages, violation of rules on maximum working hours, deprivation of land or of other means of subsistence, torture and cruel, inhuman or degrading treatment, environmental violations, including the pollution of the air, water and soil, and noise emissions, in accordance with applicable laws, where such risks damage the health of people, significantly impair the natural bases for the production of food or prevent people from having access to proper drinking water or sanitary facilities, and violations of certain international conventions on the disposal of hazardous waste, treatment of mercury and certain chemicals. More detail on protected human rights positions can be found in Global-ANNEX-LE-000070728 "Potential violations of human rights and related environmental risks according to the German Act on Corporate Due Diligence Obligations in Supply Chains" . |
| Investigation Team | Individuals mandated by the Ombudspanel to conduct an investigation. |

| Term | Definition |
|------------------------------------|---|
| Involved Persons | Persons identified/accused or just mentioned in the report as subjects, victims and/or witnesses to allegations. |
| Local Compliance Coordinator (LCC) | The LCC is a Fresenius Kabi employee supporting the Management in its Compliance responsibilities. |
| Management | The authorized legal representative or body of representatives of a legal entity in scope of this policy accountable externally, typically referred to as the general manager(s) (formerly referred to as LCO). |
| Misuse of Company Assets | Unauthorized use of Fresenius Kabi's assets for other reasons than to conduct Fresenius Kabi's business by Fresenius Kabi Personnel; the private use of company equipment as allowed by other Fresenius Kabi policies and guidelines or other internal rules is not included in this definition and not a misuse of Fresenius Kabi assets. |
| Ombudspanel | Body at global/corporate level centrally reviewing every reported potential Compliance Violation and monitoring global trends; governed by the Ombudspanel's rules of operation. |
| Reportable Conduct | See Compliance Violation, Human Rights Violation and section 4. |
| Reporter | Any individual who makes a report via any reporting channel. |
| Retaliation | <p>Direct or indirect acts or omissions in a professional context that are triggered by an internal or external report or disclosure and that cause or may cause the Reporter to suffer an unjustified disadvantage. This includes in particular the following reprisals, if such are not evidently based on justified HR decisions taken independently from the investigation:</p> <ul style="list-style-type: none"> • suspension, dismissal or similar measures • demotion or denial of promotion • transfer of duties, change of place of work, reduction of salary, change of working hours • refusal to participate in further training • negative performance appraisal or issuance of a bad reference • disciplinary action, reprimand or other sanction, including financial sanctions • coercion, intimidation, bullying or exclusion • discrimination, disadvantageous or unequal treatment, e.g. exclusion from team meetings • failure to convert a fixed-term employment contract into an employment contract of indefinite duration in cases where the employee had a legitimate expectation of being offered an employment contract of indefinite duration • non-renewal or early termination of a fixed-term employment contract • causing harm (including damage to reputation), especially on social media, or causing financial loss (including loss of contracts or revenue). |

3 What can be reported?

Individuals are protected under this policy if and to the extent they report Compliance Violations. That includes **suspected or actual**

- **Violations of applicable law / industry association codes** by Fresenius Kabi Personnel or its Fresenius Kabi's Business Partners including but not limited to
 - **Criminal/administrative offences** such as fraud, corruption, bribery, violations of anti-trust law, manipulations of books & records, embezzlement, violations of data-privacy law and money-laundering/terrorism financing,

- **Violations of the Fresenius Kabi Code of Conduct and applicable Compliance Policies** by Fresenius Kabi Personnel or its Fresenius Kabi's Business partners, including, for example, but not limited to:
 - Conflicts of interest
 - Improper giving, offering or accepting of entertainment, hospitality, gifts or other benefits
 - Non-transparent and/or inappropriate correspondence/contacts/collusion with competitors
 - Questionable sponsoring and donation activities
 - Improper healthcare professional interactions, e.g. speaker programs and consulting activities
 - Violence, discrimination, mobbing or (sexual) harassment at the workplace.

- **Human Rights Violations**
 - in relation to Fresenius Kabi's own business operations and
 - in Fresenius Kabi's supply chain, including violations by Fresenius Kabi's direct (Tier 1) and indirect (Tier -n) suppliers

- **Conduct relevantly damaging FRESENIUS KABI's assets or interests**

For the avoidance of doubt, Reportable Conduct does usually **not** include

- Pure HR grievances and other conflicts without any connection to the categories mentioned above (Examples: A personal conflict between Personnel, or a decision relating to employment or engagement, such as a transfer, promotion, or disciplinary action to the extent not also Retaliation or a Human Rights Violation). In such cases, an HR-responsible should be consulted.
- Quality related cases without any connection to the categories mentioned above (Examples: Violations of cGMP, complaints about product quality etc.). In such cases, Quality Management or Management must be informed immediately.

3.1 Content of a Report

The success of a follow-up of the report depends on the detail and quality of information provided.

Therefore, it is important that a report is as precise and complete as possible. Reporters should provide **as much relevant information as possible** and make sure that descriptions are understandable for people outside the Reporter's field of expertise (e.g., explain acronyms).

In general, it is helpful to consider the following basic questions in a report:

- **Who?** (Full names and positions of all involved persons/companies)
- **What?** (All relevant details regarding the specific behavior concerned)
- **When?** (Is the behavior ongoing? Did it happen at a certain time?)
- **How?** (How this was possible in our organization?)
- **Where?** (Country, legal entity, organizational unit, department, office, plant, etc.)

Important: If there are any documents that can serve as evidence, they should be attached to the report. Incomplete or "piecemeal" reports make it more difficult or even impossible to assess the matter and follow up efficiently and will be a delaying factor.

A clear indication where to find evidence for the described misconduct is extremely helpful, too. This can be a specific contract, a production lot number, a specific binder in a specific archive, a specific purchase order or similar.

3.2 False Reporting

Every report that is **based on reasonable grounds and made in good faith** is valuable and highly appreciated. Reports made in good faith must not lead to any disadvantages for the Reporter even if proven incorrect in the end.

However, false allegations made in bad faith, maliciously, for personal gain, or knowingly wrongly accusing somebody else of misbehavior are regarded as a violation of our Code of Conduct, can be illegal and can result in appropriate disciplinary measures or even legal action against the Reporter.

4 Whom to report to?

We encourage Fresenius Kabi Personnel to openly discuss any question or concern regarding Compliance with their direct manager or Local Compliance Coordinator.

Both for Fresenius Kabi Personnel and any other individual can also issue a report in a confidential way and ensure the best protection under this policy. The best way is to contact our Compliance Team directly.

Any Reportable Conduct can be addressed via the **Global Reporting Channels** at any time:

- **The Compliance Action Line ("CAL") or**
- **The Compliance E-Mail Address**

The Global Reporting Channels and the specialized Compliance Team handling any report at corporate level are the preferred and standard set-up for handling reports.

4.1 Compliance Action Line

The CAL is Fresenius Kabi's global Reporting Tool that provides direct and confidential contact with the Compliance Team through a secure channel and even allows **anonymous reporting**. It can be accessed via www.complianceactionline.ethicspoint.com, Fresenius Kabi's homepage (www.fresenius-kabi.com) and Fresenius Kabi intranet.

There are **two options**:

- **CAL Hotline (available in most countries)**

- The Hotline is accessible 24/7 and operators are prepared to communicate in local language.
- An operator will guide a caller through the report and ask questions to clarify the content of the report.
- At the end of the call, the caller will receive a **report key** and **password** which are very important for further follow up. **Callers must write down this data and store it safely for further reference.** They are the only link to connect to the system again and cannot be reset or changed by the provider. If the data is lost, the only option will be to submit a new report.
- With this password and report key it is possible to call again and access the Case Management System.
- In this way, it is possible to communicate with the Investigation Team, e. g. to receive status-updates, receive follow-up questions or to provide further input.
- **Reporters should always follow up on reports.** Otherwise, the Compliance Team cannot get in touch and the investigation might not succeed due to lack of information. A Compliance investigation requires time and effort and, in many cases, follow up communication with the Reporter.
- **Online report (available in all countries)**
 - The Online reporting tool is accessible 24/7 and can be used in local language.
 - To enter a case, Reporters must
 - Select "Make a Report".
 - Fill in all required fields and provide the specific facts that relate to a question or concern.
 - Choose a password and submit the report. This password is very important, this is the only link to connect again to the system, and it cannot be reset.
 - **Reporters should always log into the Case Management system with their password and report key after a couple of days to follow**

up on the report. Otherwise, the Compliance Team might not be able to get in touch with and the investigation might not succeed due to lack of information.

4.2 Compliance e-Mail address

As an alternative to CAL, Reporters can also use the following e-Mail address to contact the Compliance Team:

[compliance\[at\]fresenius-kabi.com](mailto:compliance[at]fresenius-kabi.com)

It is also possible to schedule a personal meeting or (video/phone) call via the above-mentioned e-Mail address.

The e-Mail address can be accessed exclusively by specifically appointed members of Fresenius Kabi's Global Risk & Compliance Department.

4.3 Anonymous reporting

We encourage Reporters to share their identity when making a report. This makes it easier to address the case and follow up as necessary. The Reporter's identity will be kept confidential within the legal boundaries (please see below section 6.2).

However, when submitting a report, **Reporters do not necessarily have to identify themselves. If a Reporter wants to report anonymously, the best way is to do so via CAL (see above, section 5.1).**

When using CAL anonymously, a Reporter's identity is protected by a certified technical solution. This means that the system will not store any data that could disclose the Reporter's identity. Reporters are not even be asked for personal information.

This means that the Compliance Team cannot directly answer to the Reporter for questions or feedback. They can only contact Reporters via CAL so Reporters have to connect to the system again with the codes they will have received. Once logged in, Reporters find the questions or answers our Compliance Team sent to them.

Even when reporting anonymously via the CAL, Reporters can leave an e-Mail address **confidentially which will not be accessible to the Compliance Team.** This email address will only serve the purpose that Reporters can get automated E-Mail notifications in case there are updates in the Case Management System.

Also, the Case Management system offers the opportunity to schedule a secure real-time **chat session** where the Investigation Team can chat with the Reporter, whereby again the anonymity of the Reporter is preserved.

4.4 When to report?

Reporters should express their concerns **as early as possible**. Detecting and addressing deficiencies early might prevent an issue from getting bigger and may help avoiding potential fines and damages. Reporters should act even if they are not 100% sure there is a problem. The Compliance Team will investigate the information provided, attempt to verify it, and take appropriate action.

However, Reporters should also think about the effect that a report might have on others. A report on a potential Compliance Violation is a very serious issue for the people named in such report. Hence, Reporters should make sure to review information that is easily accessible to check in advance whether a concern is plausible or not before reporting.

4.5 Other reporting channels

Fresenius Kabi is committed to analyzing and stopping any non-compliant behavior. To support this aim, **Fresenius Kabi operates an independent and highly specialized team of Compliance Experts (“Investigation Team”)** to follow up on any report in a timely manner and to generate the best possible protection for Reporters. **Fresenius Kabi strongly encourages Reporters to provide these experts with reports via the secure Global Reporting Channels.**

Public authorities

In some countries and regarding specific conduct only, Reporters may be allowed to also notify public authorities of Reportable Conduct without breaching the law. Regarding the specific pre-conditions inside a specific country, Reporters should refer to the local law. Inside the EU, Articles 10 ff. of the applicable EU Whistleblower Directive are relevant. Reporters can find links to national transposition laws of EU-countries that name authorities that can be addressed under <https://www.fresenius-kabi.com/responsibilities/global-speak-up-policy>.

Please note that only a Report via our Global Reporting Channels guarantees a follow-up to a report if a Reporter wish to report anonymously. In contrast to this, public authorities are not necessarily obliged to follow-up on anonymous reports.

Local reporting channels

In addition to the Global Reporting Channels, some local laws require additional local reporting channels regarding specific violations of law. In such cases, the local Fresenius Kabi entities, according to applicable law, establish additional such reporting channels. In these countries, as an exception to the Global Reporting Channels, Reporters can choose to report any Reportable Conduct to a contact within a legal entity only, the LCC.

If Reporters would like the LCC to not share the identities of individuals with the Global Reporting Channels (managed by Corporate/Global), they **must clearly and expressly indicate this to the LCC when making a report (opt-out)**.

Reporters can find a regularly updated list of all relevant entities and contact details under <https://www.fresenius-kabi.com/responsibilities/global-speak-up-policy>.

5 Protection of Reporters

The decision to report a concern can cause inner turmoil and unrest for Reporters. At the same time, Reporters should not have anything to fear, if they are convinced that a concern is true and should be reported. Therefore, a Report made in good faith shall never result in any disadvantages for the Reporter. Good faith is usually means that a reporter has analyzed the relevant facts visible to them before making a report and the report is not knowingly false or done only with the intention to harm persons named in the report.

5.1 Protection against Retaliation

Reporters acting in good faith must not face any form of Retaliation. This includes but is not limited to labor, disciplinary, criminal, or civil sanctions.

Fresenius Kabi treats Retaliation towards Reporters as serious Compliance violations, to be dealt with under disciplinary rules and procedures. All persons subject to this policy

are asked to report any act or suspicion of Retaliation towards reporters as a result of them speaking up as described under section 3.

5.2 Confidentiality

Fresenius Kabi is committed to protecting identities and reputation of both the Reporter and the accused or concerned persons. On the one hand, Reporters are guaranteed confidentiality to a maximum extent within the legal boundaries.

On the other hand, the rights of accused and concerned persons need to be protected, too. Names of accused persons will be kept confidential in the investigation process, and the presumption of innocence applies to all internal investigations.

5.2.1 The Reporter's identity

Reports will be treated confidentially and sensitively.

Only specifically appointed members of the Compliance Team have access to incoming reports. The Investigation Team will not share the Reporter's identity or information that could reveal their identity internally or externally, except if

- Reporters consent
- Reporters choose to report openly (not via the confidential Global Reporting Channels or
- required by law or request of a competent authority or court (e.g. if formally requested by authorities or by a court).

5.2.2 Identities of accused or concerned persons

Fresenius Kabi protect the reputation of accused persons. Investigations are conducted objectively and independently. The Investigation Team will keep the identities of persons named in reports confidential both within and outside the organization.

Exceptions apply to

- requests by competent (prosecution) authorities or via court orders

and to

- persons assigned to conduct the internal investigation who have a need to know and/or
- persons necessary to stop violations of law or non-compliant behavior and to prevent material disadvantages for the company/group or individuals resulting out of such misconduct.

After a report is investigated, identities of accused persons might be shared with the competent management to decide on potential disciplinary action or other remediation steps to be taken. However, to the extent a report is not substantiated, the Investigation Team will not share identities unless deemed necessary and proportionate, in exceptional cases, considering the rights and interests of the concerned persons.

6 Processing of reports

After handing in a report via the Global Reporting Channels, a Reporter will receive a confirmation of receipt immediately, at the latest within 7 days. All reports handed in under this policy will be taken seriously and reviewed in an objective manner according to Global-SOP-LE-000047598 Compliance Case Management.

6.1 Pre-assessment

In a first step, a report will be pre-assessed for plausibility and completeness. The pre-assessment is conducted by the Ombudspanel which consists of members of Global Risk & Compliance. If there are no obvious conflicts of interest, the Ombudspanel may ask members of Organizational and/or Local Compliance to help with the analysis. The time necessary to conduct the pre-assessment depends on the complexity of each individual case but, as it is a preliminary analysis only, should be completed promptly.

The Ombudspanel follows up with Reporters to fill remaining information gaps before taking this decision. Reporters may also ask for a personal meeting to better explain their concerns.

6.2 Investigation

If the pre-assessment leads to an initial suspicion of a Compliance Violation, the Ombudspanel will issue a mandate for an internal investigation to an Investigation Team. The Investigation Team may consist of members of the local, regional, divisional or Global Risk & Compliance team.

The goal of the investigation is to analyze the facts and to find out whether the report is substantiated or not. It also serves the purpose of identifying potential weaknesses of internal controls or potential for improvement in this regard.

The Investigation Team is bound to investigate according to all applicable laws and internal regulations (Global-SOP-LE-000047598 Compliance Case Management). The Investigation Team is obliged to maintain confidentiality about the case and the investigation. All measures must be conducted in an objective and fair manner and in proportion to the reported conduct. The time necessary to conduct an investigation, even more than for pre-assessment, depends on the complexity of each individual case.

During the investigation, if Reporters choose to use the Global Reporting Channels, they should stay in touch with the Investigation Team to receive feedback and to answer additional questions.

Persons subject to an investigation will, at some point, be informed about the ongoing process and will be given an opportunity to comment on any allegations. The purpose of this is to ensure fair treatment of those mentioned in reports.

To conclude the investigation, the Investigation Team submits an investigation report to the Ombudspanel and the Management. The identities of Involved Persons will only be shared to the extent necessary for remediation.

6.3 Remediation

Based on the investigation report and to the extent the report is substantiated, the competent management is responsible to analyze whether remediation is necessary to stop Compliance Violations, to sanction such behavior or to adjust/amend internal controls as a reaction to the findings to avoid reoccurrence. This can include reports to public authorities, e.g., tax and prosecution authorities or the police.

6.4 Feedback

If reports are handed in via the Global Reporting Channels or via another communication form that allows contact with the Reporter, the Investigation Team will be able to stay in touch with to follow-up on additional questions and to give feedback.

As a minimum communication, the Investigation Team will provide a statement regarding the outcome of the Investigation to an extent deemed appropriate with respect to confidentiality and data protection requirements. If the investigation did not lead to any evidence regarding the reported concern, Reporters will be informed that the investigation was concluded as unsubstantiated. If the investigation takes longer

than three months, Reporters will also receive intermediate feedback on the status of the investigation within that period of time.

7 Monitoring in each Legal Entity and Continuous Improvement

The Management shall monitor the implementation of and ensure compliance with this policy. The Management shall also evaluate the impact of any change in the legal environment and reflect such changes in a local policy to the extent required.

8 Applicable Laws

Any guidance on what may be permitted according to this policy is subject to applicable laws and regulations, as well as subject to codes of industry associations that Fresenius Kabi is a member of. This means that whenever a locally applicable law is stricter, i.e., requires a higher standard, than this policy, the stricter legal standard must be followed.

The Management shall monitor local law, regulations and codes in relation to reporting incidents, and implement necessary changes to local policies and processes. Where relevant, the Management shall timely inform other stakeholders, e.g., the responsible R/DCC.

9 Document Change History

| Version | Reason for Change & Change Description |
|----------------|---|
| 1.0 | Document newly established |