

Supplier Code of Conduct

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Scope of application

This Supplier Code of Conduct defines the qualitative as well as the social and sustainability-related requirements for the suppliers and business partners (hereinafter: business partners) of Helios Kliniken Group (hereinafter: Helios) and all Fresenius entities participating in the Fresenius Procurement Platform.

The expansion of Fresenius' internal cooperation in the area of procurement, via the Fresenius Procurement Platform, also requires the harmonization of any existing "Supplier Codes of Conduct" and/or comparable content in other documents. The aim is to manage the cooperation with business partners based on common, standardized requirements.

Preamble

Helios and all Fresenius entities participating in the Fresenius Procurement Platform are cooperating with business partners whose products, equipment and services support medical performance. The focus is on the patient, who should receive the best possible treatment and care. All business partners have an influence on this medicine, which is geared to the highest medical quality, safety and patient needs. The procurement of every product, device and service involves internal and external processes that require reliability, transparency and efficiency.

1. Basic requirements for business partners

- Helios and all Fresenius entities participating in the Fresenius Procurement Platform contractually obligate its business partners to comply with the applicable national laws and this Supplier Code of Conduct.
- Business partners of Helios and all Fresenius entities participating in the Fresenius Procurement Platform shall also consider the requirements anchored in this Supplier Code of Conduct when selecting their own business partners and upstream business partners in the supply chain and demand them as minimum standards. Helios' and all Fresenius entities participating in the Fresenius Procurement Platform business partners are fully responsible for their own supply chain.

2. Quality requirements and duty to inform

- Helios and all Fresenius entities participating in the Fresenius Procurement Platform expect their business partners to comply with the highest possible standards. Business partners ensure that all products, equipment and services comply with current quality requirements and applicable legal regulations. If these are medical devices, they must comply with the applicable medical device law.
- The business partners shall inform immediately of any quality problems and recalls affecting the products, equipment or services.

3. Human rights and labor conditions

- Business partners do not tolerate or benefit from forced labor, slave labor or other types of involuntary labor
- Products, equipment and the underlying raw materials and materials must not be manufactured or assembled using child labor, either domestic or abroad. The understanding of child labor is based on the definition of the guiding principles of the United Nations Global Compact and the core labor standards of the ILO (International Labor Organization).
- Business partners are expected to comply with applicable national laws regarding employee rights, working hours and compensation. Compensation should meet or exceed the minimum standard set by national law.

- Business partners promote equal opportunities and equal treatment. Any kind of discrimination must be prevented. No one shall be discriminated based on color, race, political affiliation, religion or belief, age, sex, sexual orientation, physical condition, disability, appearance or any other personal characteristic.
- Business partners shall uphold the fundamental rights of all employees to form, join and participate in trade unions and employee representative bodies. Employees who are active as employee representatives in work councils or trade unions should not be discriminated against. If this right is restricted by local laws, alternative options for employee representation that comply with the law shall be promoted.
- Business partners must comply with and implement national regulations on health protection and occupational safety. This includes working without being impaired by alcohol, illegal drugs or other substances, as well as taking prescription medications that may impair the ability to work. To prevent and minimize work-related injuries and illnesses, business partners must comply with written safety and health guidelines and provide training in that regard.

4. Environment and animal protection

- Business partners must ensure compliance with the applicable national environmental laws, regulations and corresponding standards. The necessary environmental permits and licenses have to be held and the applicable reporting requirements must be met.
- Natural resources such as water and energy have to be used sparingly. Environmental pollution and hazards, such as in particular dirty water, waste, toxic substances, chemicals and air pollution, which may have a negative impact on the health of people and the environment, are to be minimized.
- National animal welfare standards have to be observed and the expansion of animal welfare in animal husbandry is to be promoted. In addition, animal experimentation has to be reduced to a minimum and, if possible, substituted by alternatives, unless otherwise specified by law.

5. Compliance and anti-corruption

- Business partners may not offer any benefits to Helios and all Fresenius entities participating in the Fresenius Procurement Platform employees in order to influence a decision or to securing an improper benefit or business advantage. This applies to medicine, medical products, services and technical equipment, as well as to the assumption of costs for participation in events, private invitations and other benefits.
- Product decisions at Helios and all Fresenius entities participating in the Fresenius Procurement Platform are made independently and free of conflicts of interest. Therefore, all forms of influence exerted by business partners on Helios and all Fresenius entities participating in the Fresenius Procurement Platform employees are to be refrained from. This prohibition applies both to forms of possible influence that are relevant under criminal law and to any processes that could lead to a conflict of professional and personal interests.
- We expect our business partners to make business decisions exclusively on the basis of objective criteria. All forms of influence by third parties on these decisions that could lead to even a potential conflict of interest have to be prevented.
- Business partners are obligated to comply with all relevant data protection regulations and to ensure the implementation of the necessary technical and organizational measures. The technical and organizational measures must be implemented taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the varying likelihood and severity of a risk to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk. Incidental personal data is processed by the business partners exclusively within the scope of data protection law necessity and only if and insofar as a legal basis for the corresponding processing exists.
- Business partners must not tolerate any form, active or passive, of corruption, extortion, embezzlement or other forms of fraudulent behavior. All business partners must comply with the laws

of the countries in which they operate and produce. This includes, but is not limited to, the US Foreign Corrupt Practices Act, the UK Bribery Act, and all United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions against corruption.

- Business partners ensure that raw materials used in products and equipment are not used directly or indirectly to finance or support armed groups and do not cause or promote human rights abuses.
- Business partners comply with all obligations, rules and regulations for the prevention of money laundering and terrorist financing.
- Business partners are required to comply with all national and international legal requirements and trade control regulations.
- Business partners shall behave fairly in competition and observe the applicable antitrust laws. Agreements under antitrust law as well as the abuse of a potentially existing dominant market position are to be refrained from.
- Business partners shall properly document, account for and record all business transactions. The principles of proper accounting must be observed at all times.

Conclusion

Helios and all Fresenius entities participating in the Fresenius Procurement Platform reserve the right to review the compliance of business partners with the Supplier Code of Conduct. This may result in requirements for business partners or sanctions against business partners.

Helios and all Fresenius entities participating in the Fresenius Procurement Platform also reserve the right to adapt this Supplier Code of Conduct. The business partners will be informed of the necessary adjustments.