

INTRODUCTION

Fresenius Medical Care UK¹ is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chain. This statement is made in compliance with s.54 of the Modern Slavery Act 2015 and sets out the steps taken by Fresenius Medical Care UK¹ during its financial year ending 31 December 2024 to prevent slavery and human trafficking from taking place in any of its supply chains or in any part of its operations

Our parent company, Fresenius Medical Care AG, has established policies and procedures that comply with applicable laws and regulations worldwide. Our responsible procurement principles reflect our commitment to promoting sustainable business practices in our daily operations. We expect our suppliers to share our commitment to sustainability and demonstrate sustainable business practices across their supply chains. This includes adopting business practices that prevent or eliminate modern slavery and human trafficking.

STRUCTURE AND SUPPLY CHAIN [TO UPDATE]

Fresenius Medical Care UK is the leading independent provider of dialysis care in the UK. You can find out more about our organisation and what we do at <http://www.freseniusmedicalcare.co.uk/about-us/>

We are a vertically integrated company, which means we can offer products, services and support along the entire dialysis chain. Whilst we purchase fluids (such as acid concentrates and disinfectants) and certain other products and support services (such as the provision of uniforms and cleaning services) from third party suppliers based in the UK, our primary suppliers are affiliated Fresenius entities based in Germany who manufacture our dialysis products.

The main products we sell are:

- Hemodialysis machines
- Dialysers
- Bloodlines
- Dry concentrates
- Peritoneal dialysis machines
- Peritoneal dialysis bags
- Peritoneal dialysis accessories
- Acute machines
- Acute kits
- Acute fluids
- Spares

POLICIES

We have a number of standards and policies which demonstrate our commitment to prevent modern slavery and human trafficking from taking place, both for us and for our business partners who assist us in our business operations. Our commitment is defined in, among others:

- Our [Code of Ethics and Business Conduct](#), which applies globally to every officer, director, employee, contract worker and agent of the Fresenius Medical Care Group. Amongst other things, this Code of Ethics and Business Conduct includes our company commitment to respect human rights and makes clear to employees the standards of conduct and behaviour expected of them when representing Fresenius Medical Care UK. It also requires our employees to report any actual or suspected violation of the law, which would include the Modern Slavery Act 2015.
- The [Fresenius Medical Care Human Rights Statement](#) outlines our strategic framework on human rights,

including labour rights. It considers our impact on human rights and summarizes our policy commitments to our own workforce and the workers in the value chain, including on working conditions, non-discrimination and non-harassment, an environment free from forced and child labour, freedom of association, and our commitment towards our patients. In this Policy we state that *“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 labour, child labour or forced labour. Employment relationships must be based on voluntary participation. Hence, our employees can choose to terminate their employment of their own free will by respecting a reasonable pre-notification period, as applicable. We do not tolerate unlawfully withholding wages.”*

- Our [Global Supplier Code of Conduct](#), which covers topics such as ethics, human rights and labour conditions. It requires suppliers to “take a clear stance against forced labour and any form of exploitative child labour and shall not engage in any form of non-voluntary, forced or compulsory labour”.
- Our [Compliance Brochure for Business Partners](#), which is highlighting the compliance with Human Rights obligations and listing our expectations towards business partners.

In 2024, we revised our Global Supplier Code of Conduct and rolled out the [updated Code of Conduct for Business Partners](#) in Q1 2025, publishing it on our website. The new code reflects changes in relevant international standards, external expectations, and legal requirements.

- The Global Third Party Spend Policy provides additional guidance to our employees on how to engage with business partners and workers within our value chain. Our responsible procurement principles are also documented therein. They reflect our commitment to promoting sustainable business practices in our daily operations, incl. but not limited to favourable working conditions, a safe and secure work environment as well as equal treatment and opportunities for all workers in our value chain.

These statements and policies were guided by the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work.

Those policies are embedded in our global approach to implementation of Human Rights Due Diligence, which rests on 3 pillars: (1) identify risks and impacts to human rights, resulting from or related to our business activities, including business relationships; (2) raise awareness of human rights issues within relevant functions and in business relationships; (3) improve practices that incorporate human rights considerations in our business processes.

EXPECTATIONS FROM SUPPLIERS

As of 2020, FME Global Supplier Code of Conduct forms the basis of our contractual relationships with suppliers, and suppliers are requested to adhere to our Supplier Code of Conduct or demonstrate that they have a similar standard. Additionally, we require our business partners to comply with our [Compliance Brochure for Business Partners](#).

In order to manage our suppliers in a way that reflects our sustainability principles and expectations, we regularly train the Procurement Department on sustainability topics, including on the Supplier Code of Conduct (going forward the Code of Conduct for Business Partners), and modern slavery.

DUE DILIGENCE AND RISK ASSESSMENT

Respecting human rights is core to our global values and our commitment to ethical business practices and sustainability. Our Human Rights due diligence process enables us to identify, prevent, and mitigate potential adverse impacts on our workforce on relevant rightsholders. Our parent company, Fresenius Medical Care AG, conducts and monitors its due diligence processes within the framework of the German Supply Chain Due Diligence Law, including on modern slavery and human trafficking matters for all of its subsidiaries.

As part of this due diligence process, since 2022, we developed our procedures for evaluating suppliers based on sustainability risks incl. modern slavery, based on country- and industry-level factors. Special focus has been placed on suppliers that are critical to our business. Furthermore, we gather information about the specific sustainability performance of selected suppliers via self-assessment forms. We use this information to identify suppliers that do not yet fully comply with our sustainability standards and, on that basis, initiate appropriate follow-up action.

Fresenius Medical Care UK also carries out a detailed review of all third parties we work with to assess their suitability generally and to identify any concerns via a Dow Jones search.

COMPLIANCE ACTION LINE

We offer a complaint procedure which allows potentially affected individuals in our own operations and across our value chain to raise concerns and report any potential violations on topics such as human or workplace rights, environmental protection, laws or company policies, including on modern slavery, also anonymously. These reports may also be presented by trade unions or other workers' representatives groups. We investigate all concerns raised. If we find substance or confirm allegations, we take appropriate remedial action such as updating our business processes and taking corrective or improvement measures as needed. These include, but are not limited to, trainings, entering into dialogue, audits of suppliers, and, as a last resort, the termination of employment of our employees involved in the violation or of the business relationship with e.g. affected suppliers.

Our internal policies protect individuals who make a report on reasonable grounds and/or in good faith. Such reporters may not be retaliated against in any way.

So far, no cases of modern slavery in our supply chain were confirmed in the UK.

CONFLICT MINERALS

Some of our products may contain tantalum, tin, tungsten and gold which have become known as 'conflict minerals' because they may be, in part, sourced from parts of central Africa where armed groups are known to mine and sell these materials to fund civil war. Our parent company, Fresenius Medical Care AG, is required to report on its supply chain due diligence in relation to the sourcing of these metals, and you can find out more information about our conflicts minerals policy at [Supply chain - Fresenius Medical Care](#).

We recognise that conflict minerals can also bring an increased risk of modern slavery and are committed to having a conflict-free supply chain.

RISK AND COMPLIANCE

We source the majority of our goods and services from affiliated Fresenius Medical Care entities based in Germany – for example our dialysis machines are manufactured in Schweinfurt, and our dialyzers (artificial kidneys) are manufactured in St Wendel. Component parts for these products and services are also predominantly sourced from other German manufacturers located in the vicinity of these manufacturing sites.

According to the Global Slavery Index, Germany has a very low prevalence of modern slavery, with an estimated 0.6% of population living in modern slavery per thousand people¹. Likewise, as our main suppliers operate in a regulated industry which requires high standards of compliance and regular audits by regulatory bodies, we do not have any indications that our supply chain is particularly susceptible to the practices of modern slavery and human trafficking. We do not have a large temporary workforce (which can be more susceptible to exploitation) and by working in a highly skilled and technical sector we therefore consider our vulnerability to modern slavery practices to be low.

Nevertheless, we take compliance with the Modern Slavery Act 2015 seriously, and do not tolerate slavery and human trafficking neither in our own operations nor in our supply chains. If we were to find evidence that one of our suppliers is or was involved in modern slavery or human trafficking, we investigate those allegations, and

consider terminating our relationship with them if the incidents were not resolved to our satisfaction.

PREVENTIVE MEASURES

Our commitment to prevent and eliminate modern slavery and human trafficking also translates into specific measures to prevent the risk from occurring. Throughout 2024, we continued to communicate with and raise awareness among relevant groups about our responsibility to respect human rights. The Human Rights Statement was communicated via our company intranet to enhance the understanding and support its application. A human rights chapter was added into the Code of Conduct training that is, as per local training concepts, used as an onboarding and as a refresher training, for all Fresenius Medical Care UK employees.

In addition, UK leadership team, compliance, legal, HR and procurement functions will receive dedicated training on forced labour and FME Human Rights Statement in Q1 2025.

To mitigate risks in our supply chain, and in line with relevant legal requirements, we have, in addition to our Global Supplier Code of Conduct, implemented sustainability related criteria, including questions on human rights in the selection process for new suppliers. The global procurement team received training to apply these selection criteria in their tendering processes.

MEASURING EFFECTIVENESS

Our parent company has established processes to assess the effectiveness of our human rights-related policies and actions within the framework of the German Supply Chain Due Diligence Law. These include internal audits, country- or location-based assessments of potential negative impacts, and follow-up on mitigation measures for identified impacts. Metrics such as the number of employees educated on human rights, the volume of complaints and incidents per country, severity assessments on received complaints, among others, provide relevant data and insights.

In 2024, the share of internal audits with human rights topics increased to 75% from 54% in 2023.

SIGN-OFF

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Fresenius Medical Care UK's slavery and human trafficking statement for the financial year commencing 1 January 2024 and ending 31 December 2024.

¹ <http://www.globalslaveryindex.org>

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