

Modern Slavery Statement for Fresenius Medical Care UK and Ireland

INTRODUCTION

Fresenius Medical Care in the UK¹ and Ireland² is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and its 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 during its financial year ending 31 December 2025 to prevent slavery and human trafficking from taking place in any of its supply chains or in any part of its operations.

Our ultimate parent company, Fresenius Medical Care AG (Fresenius Medical Care AG and all of its affiliated companies and subsidiaries worldwide hereinafter "FME"), has established policies and procedures to facilitate compliance with applicable laws and regulations worldwide. Respecting human rights and acting with integrity is core to our global values and our commitment to ethical business practices and sustainability.

Our responsible procurement principles reflect our commitment to promoting sustainable business practices in our daily operations. We expect our business partners 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

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 gloves and other disposables, the provision of transportation and cleaning services) from third party suppliers based in the UK, our primary suppliers are affiliated FME entities based in Germany that 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

¹Fresenius Medical Care UK includes the following entities: Fresenius Medical Care (Holdings) Limited, Fresenius Medical Care UK Limited, Fresenius Medical Care (Ireland) Limited, Fresenius Medical Care Renal Services Limited, Fresenius Medical Care Renal Services (IDC) Limited, Fresenius Medical Care Renal Services (SS) Limited, Fresenius Medical Care Renal Services (UK) Limited, Nxstage Medical Care UK Limited.

² Fresenius Medical Care Ireland Limited

POLICIES

We have a number of standards and policies which demonstrate our commitment to prevent modern slavery and human trafficking, 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 FME. 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, and provides an internal channel for reporting (the Compliance Action Line).
- The [Fresenius Medical Care Human Rights Policy 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. As per this Policy Statement, *“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, forced labour or human trafficking. 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 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”*.
- Our Global Code of Conduct for Business Partners, which covers topics such as ethics, human rights and labour conditions, highlights the compliance with Human Rights obligations. It lists our expectations towards our business partners. 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 Labour Organization’s 1998 Declaration on Fundamental Principles and Rights at Work.

DUE DILIGENCE PROCESSES

Our parent company, FME, conducts and monitors its global due diligence processes within the framework of the German Supply Chain Due Diligence Act, including on modern slavery and human trafficking matters.

The above-mentioned policies constitute the foundation of our global approach to implement and continuously develop and improve our Human Rights Due Diligence. Our approach takes four dimensions: 1) Risk Assessment: identify and understand human rights risks and impacts linked to our business activities and relationships. 2) 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. 3) Monitoring: tracking progress and effectiveness, further strengthen processes, and provide mechanisms for complaints and grievances. 4) Stakeholder engagement: Engaging with relevant stakeholders as an enabler for dialogue, information exchange, and early identification of emerging risks.

As part of this due diligence process, since 2022, we developed our procedures for assessing suppliers based on their sustainability risks incl. modern slavery, taking into consideration country- and industry-level factors, with a special focus on suppliers that are critical to our business. We have also recently entered into a partnership with EcoVadis, a leading provider of sustainability ratings and supplier assessments. Through this platform 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.

RESPONSIBLE SOURCING OF MINERALS AND METALS

The sourcing of mineral raw materials is another aspect of our commitment to sustainable procurement. The sourcing of minerals is linked to the working conditions of workers in the value chain, particularly when these minerals are extracted from regions with potentially poor labour standards. FME is subject to the provisions of Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), relating to "Conflict Minerals". As outlined in our Conflict Minerals Policy, we adopt standards in line with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Our parent company, FME, 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 conflict 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 ASSESSMENT AND MANAGEMENT

One of the key elements of our human rights due diligence is the risk assessment, which helps us to identify and understand potential human rights risks and impacts linked to our business activities and relationships with third parties. As part of this process, we assess risks of modern slavery and human trafficking in both our own operations and our supply chain. In case of concerns or allegations of modern slavery or human trafficking within our own operations or with one of our suppliers, we will investigate these; in case of substantiation, we will take remedial action including, as needed, termination of the business relationship where issues are not resolved to our satisfaction.

Risks in our own operations

With the aim of focusing on potential situations of vulnerability, in 2025 we conducted an in-depth risk assessment relating to Fresenius Medical Care UK clinic employees working under the UK Visa Sponsorship System. This assessment considered risk factors typically associated with migrant workers, including dependency on the employer for immigration status, the potential use of abusive recruitment intermediaries, and possible barriers to raising concerns.

The assessment did not identify indicators of forced labour or human trafficking in our own operations. It also helped raise awareness among clinic teams and management of the importance of maintaining a work environment free from any form of forced labour and modern slavery.

Risks in our supply chain

Regarding our supply chain, 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.

Given the geographic location, the mature regulatory environment and the nature of these business relationships, we consider the risk of modern slavery in this part of our supply chain to be low.

For certain goods and services sourced from third parties — such as gloves and other disposable medical products, as well as transportation and cleaning services — there is, however, a potential risk of modern slavery in their supply chains.

As reported by certain of our suppliers in their Modern Slavery Statement, this risk is linked in particular to:

- the possibility of recruitment fees being charged to workers, and
- excessive working hours.

Countries including Bahrain, China, India, Indonesia, Malaysia, Pakistan, Sri Lanka, Thailand, Turkey and Vietnam have been identified by certain of our suppliers as higher-risk locations in their supply chains in this context.

For suppliers operating in, or sourcing from, these higher-risk areas, we plan to strengthen our preventive measures to mitigate the risk of modern slavery in their supply chains.

Identified risks in our own operations and supply chains are reported annually to FME's Management Board. The responsible functional teams define appropriate remediation and response measures.

PREVENTIVE MEASURES AND TRAINING

Our commitment to prevent and eliminate modern slavery and human trafficking also translates into specific measures to prevent the risk from occurring. Throughout 2025, we continued to communicate with and raise awareness among relevant groups about our responsibility to respect human rights. The Human Rights Policy Statement was communicated via our company intranet to enhance the understanding and support its application.

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 a keynote session on modern slavery.

In addition, specific teams, such as Compliance, Legal, HR and Procurement functions received a training on our Global Code of Conduct for Business Partners, including on the topic of forced labour.

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 Act. 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.

SIGN-OFF

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Fresenius Medical Care UK and Fresenius Medical Care Ireland slavery and human trafficking statement for the financial year commencing 1 January 2025 and ending 31 December 2025.

Signature:  Signed by:
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Name: **Christopher Slater**

Title: Cluster Lead – Commercial Operations UK & Ireland

Date: February 16, 2026

Signature:  Signed by:
53A822BDD450413...

Name: **Jonathon Lawrence**

Title: Managing Director CDI UK & Ireland

Date: February 14, 2026