

# SEPARATE GROUP NON-FINANCIAL REPORT

## 115 Strategy and management

- 116 The business model
- 116 Our value chain
- 116 Sustainability risks
- 117 Our sustainability goals and programs
- 118 Our sustainability organization
- 119 Our materiality analysis
- 120 Stakeholder and partnerships
- 120 EU taxonomy

## 121 Well-being of the patient

- 121 Access to health care and medicine
- 127 Patient and product safety

## 141 Digital transformation and innovation

- 141 Digitalization and innovation
- 149 Cybersecurity

## 154 Employees

- 154 Working conditions, recruitment and employee participation
- 165 Employee development
- 169 Occupational health and safety

## 178 Diversity

- 178 Diversity and equal opportunities

## 182 Compliance and integrity

- 182 Compliance
- 188 Data protection
- 194 Human rights
- 197 Supply chain

## 199 Environment

- 199 Environmental management
- 205 Water management
- 208 Waste and recycling management
- 211 Climate protection – Energy and emissions

## 216 Report profile

## 217 Limited assurance report of the independent auditor



---

## SEPARATE GROUP NON-FINANCIAL REPORT.

We are committed to responsible and sustainable management as part of our corporate culture and day-to-day business practice. We place great importance on fulfilling our legal and ethical responsibility as a company. Only by doing so can we be perceived as a trustworthy and reliable partner in the health care sector.

### STRATEGY AND MANAGEMENT

As a health care Group with more than 300,000 employees, Fresenius plays an important role in society. For more than 100 years, our mission has been to preserve life, promote health, and improve patients' quality of life – as defined in our company objective – ever better medicine for ever more people. The importance of modern and functional health care for society again became particularly clear in 2021. Our employees worldwide have continued to work tirelessly and under sometimes difficult pandemic conditions – in clinics, dialysis centers, factories, and logistics. In acute

care, we have significantly increased the number of intensive care beds and ventilation stations. The dialysis centers also continued to provide safe treatments, even for kidney patients infected with COVID-19. We have consistently ensured the supply of our vital medicines, medical devices, and services for critically and chronically ill patients.

For Fresenius, economic success is not an end in itself, but a means of continuously contributing to medical progress. The patient's well-being always comes first. It is our point of reference for all business decisions. The common goal of all business segments is to improve health care quality and efficiency. We aim to provide innovative solutions and work proactively to enable a growing number of people to have access to high-quality, affordable medicine.

In our [Code of Conduct](#), we commit to integrity in dealing with our business associates as well as to socially responsible behavior and transparent communication. The Fresenius Code of Conduct defines basic principles that apply to all employees and the management of the Fresenius Group. It also sets out the framework for the relevant regulations of the individual business segments, and defines our respective activity areas. Further information can be found in the Compliance and Integrity section on pages 182 ff.

- We take responsibility for our patients' well-being and are committed to the highest quality in our products, treatments, and services.
- We want to do the right thing and comply with all applicable rules and laws. In addition to legal requirements, we adhere to high ethical standards and rules of good corporate governance.
- We largely owe our success and growth to the commitment of our more than 300,000 employees worldwide. Our aim is therefore to be perceived as an attractive employer to acquire talent, retain employees, and allow them to further develop their skills.
- We think and act long-term in our business decisions. We protect nature as the basis of life and treat resources with care.
- We are committed to respecting human rights as defined by international standards, such as the Declaration of Human Rights of the United Nations.

We analyze the impact of our actions with the help of the United Nations' 17 Sustainable Development Goals (SDGs). A particular focus is on the goals of good health and well-being (SDG 3), high-quality education (SDG 4), and decent work and economic growth (SDG 8). We also align our sustainable actions closely to the United Nations Global Compact and the sustainability requirements of the capital market. Further information is available on our [website](#).

## THE BUSINESS MODEL

Fresenius is a global health care Group and one of the leaders in its respective markets. The Fresenius Group comprises four independently operating business segments managed by Fresenius SE & Co. KGaA: Fresenius Medical Care is the world's leading provider of products and services for individuals with renal diseases based on publicly reported revenue and the number of patients. Fresenius Kabi provides lifesaving medicines, medical devices, and services for the critically and chronically ill. Fresenius Helios is Europe's largest private hospital chain, with clinics in Germany, Spain, and Latin America. Fresenius Vamed specializes in health care facilities projects and service business. The Group Management Report on pages 38 ff. contains additional information on the Group's business model and ownership structures, on legal and economic factors, as well as key sales markets and competitive positions.

## OUR VALUE CHAIN

Fresenius has an international distribution network and operates more than 90 production facilities. The largest of these are located in the United States, China, Germany, Japan, and Sweden. In the Fresenius Group, all purchasing processes are controlled by central coordination points in the business segments. Competence teams bundle the needs, conclude framework contracts, and continuously monitor current market and price trends. They also coordinate global procurement for individual production sites or clinics and

initiate quality and safety controls for raw materials and procurement goods. Supply reliability and quality of care play an important role in an environment characterized by ongoing cost-saving efforts by health care providers and by price pressure in the markets. We therefore constantly optimize our purchasing processes, standardize procurement materials, identify new sources of supply, and negotiate the best possible price deals. Maintaining high flexibility while meeting our strict quality and safety standards is crucial. A broad portfolio of suppliers reduces potential procurement or raw material shortages in both the product and service business.

Additional information is included in the section Procurement on page 58 of the Group Management Report.

## SUSTAINABILITY RISKS

The identification and assessment of potential sustainability risks (non-financial risks) initially takes place at both the Group level and in the four business segments via the existing risk management system. Sustainability risks are assessed that are already covered by the existing risk catalogs and risk reporting of the Fresenius Group. In an additional step, potential sustainability risks are discussed on a quarterly basis at Group level by the corporate functions Risk Management & Internal Control System, Business Integrity and Investor Relations & Sustainability of Fresenius SE & Co. KGaA, and supplemented if necessary. In the future,

we intend to record and assess sustainability risks across the Group in a more harmonized approach together with financial, legal, and compliance risks. This will enable us to achieve an integrated view of our impact on the issues (inside-out perspective) on the one hand and the impact of the issues on Fresenius (outside-in) on the other. This allows us to assess their short-, medium- or long-term financial impacts as well as their impacts on society and the environment. In the area of human rights, we have already started to do this. Further details are provided in the Human rights chapter on pages 194 ff.

In the reporting period, we analyzed potential sustainability risks in the areas of climate change and water scarcity. We did not identify any material risks to our business model in either area. Overall, we did not identify any material non-financial risks, taking into account risk mitigating measures (net risk assessment), related to our own business activities, business relationships, products, or services that are very likely to have an adverse effect on the non-financial aspects mentioned above or on our business operations. The Group Management Report on pages 95 ff. contains further information on opportunities and risks as well as a detailed presentation of risk management.

## OUR SUSTAINABILITY GOALS AND PROGRAMS

We pursue specific sustainability approaches at the level of the four business segments and Fresenius SE & Co. KGaA. The business segments build their own sustainability programs and regularly review how they can further develop and optimize them.

In May 2021, the Fresenius Annual General Meeting approved a new compensation system for the members of the Management Board of Fresenius Management SE. In the context of short-term variable compensation, ESG (Environmental, Social, and Governance) targets have an influence on compensation for the first time in this system, with a weighting of 15%. The focus of the ESG targets is on the key sustainability topics identified by Fresenius in the materiality analysis: quality/patient well-being, innovation and digital transformation, employees and diversity, environment, and compliance and integrity. With the identification of key performance indicators (KPIs) and the definition of comprehensive management concepts, the company will create a basis to make the sustainability performance of the business segments measurable. The identified key performance indicators are intended to facilitate target setting and measurement in the long term and also to be incorporated into the long-term variable compensation of the company's executives.

In the reporting year, the members of the Executive Board achieved the ESG targets. A detailed presentation can be found in the Compensation Report on pages 234 ff. The ESG methodology for determining target achievement is available on the [website](#) of Fresenius SE & Co. KGaA.

For Fresenius Medical Care, the target achievement of the company's Global Sustainability Program is used, which is

also part of the compensation system for the members of the company's Management Board. Fresenius Medical Care's Global Sustainability Program reflects the increasing requirements for sustainability management as well as the company's commitment to continuously improving its performance. It defines global targets for eight focus areas in the period between 2020 and 2022. Fresenius Medical Care selected these areas based on the results of the company's materiality analysis, which identifies the most relevant sustainability topics for its business. The focus areas are the responsibility towards the patients as well as the employees, anti-bribery and anti-corruption, data protection and privacy, human and labor rights, sustainable supply, environment, and occupational health and safety. The program's objective is to establish common global standards, goals, responsibilities, and key performance indicators to monitor sustainability performance.

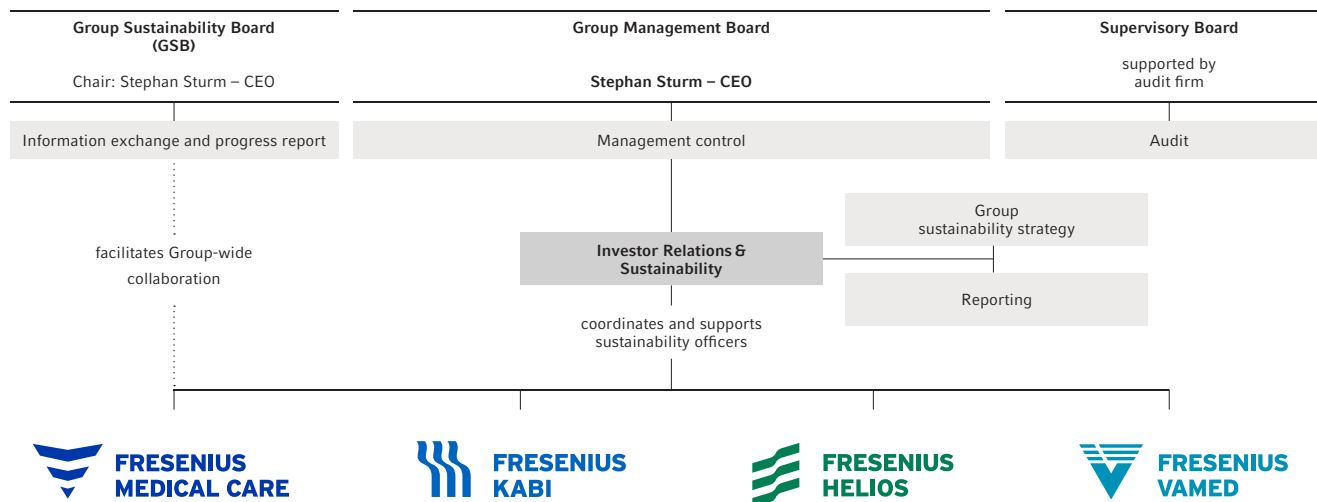
In February 2022, the Management Board of Fresenius Management SE has implemented a climate target, complementing the existing sustainability goals and programs for the Fresenius Group. Fresenius Group aims to achieve climate neutrality by 2040 and to reduce 50% of absolute scope 1 and scope 2 emissions by 2030 compared to 2020. We will continuously assess scope 3 emission impacts for inclusion in our targets. Further information on our environmental management and emissions within our business segments and the Group are provided on pages 199 ff. as well as pages 211 ff. of this Group Non-financial Report.

## OUR SUSTAINABILITY ORGANIZATION

Sustainability at Fresenius is the responsibility of the CEO of Fresenius Management SE, as shown in the overview aside. Fresenius Management SE is the general partner of Fresenius SE & Co. KGaA. The Group Management Board is regularly informed about sustainability issues by the Investor Relations & Sustainability department of Fresenius SE & Co. KGaA. The Management Board and the Supervisory Board review the progress and the results of the sustainability management, which are then published in the separate Group Non-financial Report. The Supervisory Board is supported in this process by the auditor’s limited assurance engagement. The Audit Committee has a special role in reviewing the Group Non-financial Report. The Supervisory Board as a whole is responsible for monitoring the Company’s sustainability performance.

Investor Relations & Sustainability coordinates the implementation of sustainability guidelines and standards at operational level and is responsible for the non-financial reporting of the Fresenius Group. Business Integrity (formerly Corporate Compliance) is responsible for our Code of Conduct and manages issues relating to human rights, supply chain, and compliance. Data protection and Cybersecurity are independent areas of responsibility. The departments and functions at Fresenius SE & Co. KGaA level support the business segments in the development of

### FRESENIUS GROUP SUSTAINABILITY ORGANIZATION



guidelines and management concepts relating to these sustainability topics. The business segments have also defined departments and responsible persons – often in the form of sustainability officers who coordinate all sustainability issues within the business segment. Fresenius Medical Care is itself a stock-listed company and has therefore established its own sustainability governance structure. Sustainability is also an integral part of the Management Board there. The highest governing body for sustainability issues at Fresenius

Medical Care is the Sustainability Decision Board. Headed by the CEO, it is responsible for integrating sustainability into the company’s strategy and business. Together with the Sustainability Decision Board, the Management Board decides on strategic initiatives. In the reporting year, a member of the Supervisory Board was appointed to the position of Lead Independent Director. Her responsibilities include addressing matters relating to ESG aspects of the company.

## THE GROUP SUSTAINABILITY BOARD

The Group Sustainability Board (GSB) is composed of those responsible for sustainability at Group level and in the business segments and is scheduled to meet every two months. The Board discusses the future sustainability strategy of the Fresenius Group. The overall goal of the GSB is to identify the most important sustainability issues for the Group and to strengthen intra-Group cooperation.

In 2021, six GSB meetings were held under the leadership of CEO Stephan Sturm. That year, the GSB focused on the implementation of the EU taxonomy, and the exchange of best practices, and the implementation of the ESG targets of the Management Board of Fresenius Management SE.

## OUR MATERIALITY ANALYSIS

Since 2017, we have been identifying the material topics for the Fresenius Group in a comprehensive materiality analysis. This is carried out every two to three years, depending on possible changes in the corporate structure and the operating business performance. In addition, we review the material topics annually to ensure that they are up to date. Material are those aspects that are relevant for understanding Fresenius' business performance, results of operations, and position, as well as for understanding the effects of its business activities on the non-financial aspects.

MATERIAL CLUSTERS AND TOPICS IN ACCORDANCE WITH GERMAN COMMERCIAL CODE (HGB) SECT. 289C (3)

Social matters	Employee matters	Combating corruption and bribery	Human rights	Environmental matters
<b>Well-being of the patient</b>	<b>Employees</b>	<b>Compliance &amp; Integrity</b>	<b>Diversity</b>	<b>Environment</b>
Access to health care and medicine	Working conditions, recruitment & employee participation	Compliance	Diversity and equal opportunities	Water management
Patient & Product safety	Employee development	Data protection	<b>Compliance &amp; Integrity</b>	Waste and recycling management
<b>Digital Transformation &amp; Innovation</b>	Occupational health and safety		Human Rights	Climate protection
Digitalization & Innovation				
Cybersecurity				
Supply Chain				

– Material aspects according to HGB ■ Material cluster □ Material topic

We conducted our last comprehensive materiality analysis in the 2020 reporting year. The multi-stage analysis process in accordance with HGB and GRI is described in the [Fresenius Sustainability Report 2020](#). In 2021, we checked the actuality of the analysis by means of an environment analysis.

## MATERIALITY ANALYSIS RESULTS

The review of the materiality analysis in the reporting year did not indicate any changes in the 6 material non-financial topic clusters and 15 individual topics compared to the previous year.

However, the content of individual topics and topic clusters was further deepened in the reporting year, such as the topic Clinical Study Management. The structure of the chapters in this report reflects the main topic clusters. The various individual topics are assigned to the chapters according to their prioritization, and their management approach is described according to the requirements of GRI and the German Commercial Code (HGB).

## STAKEHOLDERS AND PARTNERSHIPS

Fresenius is involved in a diverse network of stakeholder groups. We gain valuable insights from this exchange, which we use to continuously develop our quality and sustainability management as well as our reporting procedures. Our main stakeholders are:

- Patients
- Employees
- Providers
- Private shareholders, institutional investors, analysts, and rating agencies
- Political institutions and external organizations, e.g., in the fields of health care and patient care
- Suppliers or other business partners
- In their non-financial reports, Fresenius Medical Care, Helios Germany and Helios Spain also include lists of the stakeholder groups that are specific to their respective business activities: for example, Fresenius Medical Care includes representatives from academia, among others, while Fresenius Helios considers trade unions.

## EU TAXONOMY

For the fiscal year 2021, we are reporting the EU Taxonomy-eligibility of our economic activities for the environmental objectives of climate change mitigation and adaptation for the first time. This is conducted in accordance with the mandatory disclosures required by Regulation (EU) 2020/852 of 18 June 2020 on establishing a framework to

facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (EU Taxonomy Regulation). The application and results of the other conformity criteria and environmental objectives will be reported in future.

As a global health care group with products and services for dialysis, hospital and outpatient care, our core business activities are not covered by the Delegated Regulation EU 2021/2139 and Annex I (Substantial Contribution to Climate Change Mitigation) as well as Annex II (Substantial Contribution to Climate Change Adaptation) and are therefore not considered EU Taxonomy-eligible. This is reflected in the low EU Taxonomy-eligible share of our turnover. However, our investments in existing and new building infrastructure represent the EU Taxonomy-eligible Capex share. Our operating expenses (Opex) do not include any significant EU Taxonomy-eligible share.

### EU TAXONOMY KPIS 2021

KPI	EU Taxonomy-eligible shares 2021	EU Taxonomy-non-eligible shares 2021
Turnover	1%	99%
Capex	49%	51%
Opex	0%	100%

In order to determine the EU Taxonomy-eligible components, we compared the descriptions of economic activities from Annex I and Annex II with our products and services, investment expenditures and expenses. For this purpose, further information on the three KPIs has been discussed, collected and consolidated at the business segment level in a multi-stage process. The determination of the EU Taxonomy KPIs was based on our financial reporting system to

ensure a complete and unambiguous reconciliation to the corresponding items in the annual financial statements and to avoid double counting.

## Turnover

Total turnover for the fiscal year 2021 forms the denominator of the turnover KPI and can be taken from the consolidated income statement on page 278 (equals our sales figure). The EU Taxonomy-eligible turnover in 2021 (1%) relates to external sales generated by Fresenius Vamed in the project business (according to IFRS 15), which are incurred in connection with the construction and renovation of new hospital buildings (Annex I: economic activity 7.1 and 7.2). For the reporting year 2021, no further economic activities are applicable.

## Capex

The amounts used to calculate the Capex KPI (denominator) are based on the capital expenditures reported in the consolidated financial statements resulting from additions in the fiscal year to property, plant and equipment (IAS 16) and other intangible assets (IAS 38) excluding goodwill. In addition, the EU Taxonomy KPI takes into account right-of-use assets (IFRS 16) and additions from business combinations. This information can be found in the notes to the consolidated financial statements on pages 317, 319 and 349. For the identification of the EU taxonomy-eligible share (numerator), the above-mentioned line items were matched with the descriptions of economic activities from Annex I and Annex II. After analyzing the Capex definitions of the EU Taxonomy Regulation, we determined only the Capex

associated with the purchase of products and services from a Taxonomy-eligible economic activity as applicable. This covers the main capital expenditure projects of the business segments. The EU Taxonomy-eligible Capex share 2021 (49%) relates to investments of all business segments in new construction and renovation of buildings, such as clinics or production facilities (Annex I: economic activities 7.1 and 7.2).

### Opex

The amounts used to calculate the Opex KPI (denominator) are based on the direct costs of research and development reported in the consolidated financial statements (Notes page 310) and the costs of short-term leases (Notes page 349). In addition, the cost of maintenance and repair was analyzed for all business segments from the local ERP systems. For the identification of the EU Taxonomy-eligible share (numerator), the above-mentioned line items were matched with the descriptions of economic activities from Annex I and Annex II. After analyzing the Opex definitions of the EU Taxonomy Regulation, we determined only the Opex associated with the purchase of products and services from a taxonomy-eligible economic activity as applicable. We did not identify any significant Taxonomy-eligible components in our operating expenses that are directly attributable to relevant economic activities within the meaning of the EU Taxonomy. The main expenditures for the maintenance of our building infrastructure are capitalized and are thus reflected in the EU Taxonomy-eligible Capex share.

## WELL-BEING OF THE PATIENT

Rising life expectancy and the growing global population make access to high-quality medical care increasingly important. Fresenius is committed to providing access to health care and medicine to as many people as possible worldwide.

### ACCESS TO HEALTH CARE AND MEDICINE

Every year we assume responsibility for the well-being of millions of patients. We offer lifesaving and life-sustaining products and therapies. In their development, we take into account different social and regulatory requirements and adapt them to different health care systems. This enables us to meet the growing global demand for innovative, high-quality therapies. In 2021, we had more than 90 own production sites and operated in more than 90 countries with own subsidiaries. Numerous national and international research projects and studies are carried out in our business segments. In this way, we investigate and develop new treatment standards, improve current standards, for example by studying the side effects of pharmaceuticals by biological sex or age group, and facilitate best practice exchange of our health care professionals. Further, in our hospitals in Spain and Germany, various approval studies for pharmaceuticals are conducted. We report in detail on our clinical study management in the Digital transformation and innovation chapter, see pages 142 f. of this Group Non-financial Report.

Our products are often used to treat people who are suffering from serious or chronic diseases. Our task is to ensure the safety and quality of our products and services and to meet the highest safety and quality standards for all processes and therapies. Information on our health care markets can be found on pages 59 ff. of the Group Management Report 2021.

Our range of products and services includes a comprehensive network of hospitals, modern dialysis procedures and post-acute care – such as rehabilitation – and high-quality drugs and medical products. Our portfolio also includes digital health services, advanced therapies, and the expansion of primary care in emerging and developing countries. The main focus is on the quality of our products and of the medical care we provide our patients.

In 2021, access to health care and medicine was again hampered by the COVID-19 pandemic. In these challenging times, we have taken on our special responsibility as part of the healthcare system with extensive measures, which we already started in 2020. Further information can be found on pages 125 ff. of this report.

### OUR APPROACH

Fresenius' long-term goal is to further develop the company's position as one of the leading international providers of health care products and services. In recent years, we have expanded our company along our value chain – increasing the global availability of our products and services.



The constant development of our products and services allows us to take advantage of growth opportunities. We guarantee our patients high-quality, comprehensive health care with our products and in our own facilities, allowing them to benefit from medical progress.

Our core business focuses on ensuring that as many people as possible worldwide are able to participate in this progress. We consider health equity in our efforts to increase access to care worldwide and to support the development of sustainable health care systems. This means striving to make treatment and health education available to those in need, irrespective of age, income distribution, race or ethnicity, or education.

This ambition is also reflected in our commitment to society.

### Fresenius Medical Care

Fresenius Medical Care recognizes the importance of improving access to health care and is working to provide affordable treatment to a growing number of patients worldwide. The business segment's Global Medical Office leadership team frequently discusses how to best manage this topic as part of the medical strategy. The focus is on both improving access to care and level-of-care outcomes. Fresenius Medical Care considers, for example, barriers to access such as cost and ease of travel to the dialysis clinics, lack of education on kidney disease, and unsustainable health

care systems in developing countries. The business segment aims to increase the number of patients on home dialysis and has improved the digital offering to make it easier for patients to access its services. Additionally, the development of renal care infrastructure is an important part of the company's strategy. This includes continuing to expand its network of dialysis clinics, for example. Fresenius Medical Care also has processes in place that allow patients' treatment to continue during crisis and emergency situations.

Home dialysis allows Fresenius Medical Care to expand the health care capacity, increasing the number of patients that can be treated by a dialysis clinic. In addition, by facilitating treatment for patients living in more remote regions, the business segment aims to widen its geographical reach and reduce patient travel.

### Fresenius Kabi

Fresenius Kabi is committed to improving patients' quality of life. The business segment's product portfolio targets critically and chronically ill patients. It comprises a comprehensive range of I.V. generic drugs, infusion therapies and clinical nutrition products as well as the devices for administering these products. In the field of biosimilars, Fresenius Kabi focuses on autoimmune diseases and oncology. Within transfusion medicine and cell therapies, the business segment offers products for collection of blood components and extracorporeal therapies. With its comprehensive range of

generics and biosimilars products, Fresenius Kabi provides access to modern, high-quality, and affordable therapies for patients. Generics and biosimilars are cost-effective alternatives to originator drugs. They help to lower the price of treatments and thus reduce the burden on healthcare systems, e.g., in the United States or in Europe. Further information is provided in the Group Management Report 2021 on pages 52 ff.

### Fresenius Helios

Fresenius Helios' acute care hospitals, outpatient clinics and other health care facilities offer the full range of medical services. Our international hospital network enables Fresenius Helios to transfer knowledge between health care systems in Germany, Spain and Latin America with regard to affordable health care of high-quality, and with very high standards of service and patient experience. In 2021, this international network enabled an intensive knowledge exchange on the treatment of COVID-19 patients in order to improve treatment outcomes.

### Fresenius Vamed

Fresenius Vamed is active worldwide in the planning and construction of healthcare buildings with the aim of serving patient health and improving access to healthcare services.

Fresenius Vamed also provides operational management services for acute and post-acute care facilities, prevention centers, and elderly care homes, as well as technical services with a focus on building, construction, and medical technology, sterile goods supply, information and communication technology, and infrastructure and business services. This enables Fresenius Vamed to provide access to high-quality medical care for a growing number of people.

Patient safety is directly dependent on the quality of the treatments, care, or products used and indirectly on the provision of operational management services. Fresenius Vamed's main goal is to give people around the world access to health care services at all levels of care.

## PROGRESS AND MEASURES 2021

### Product and service portfolio

There were no significant changes in the Fresenius Group's product and service portfolio in the reporting year 2021. Under the influence of the ongoing COVID-19 pandemic, the primary objective was to ensure patient care and access to our products, services and health care facilities.

#### Fresenius Medical Care

In 2021, Fresenius Medical Care provided home therapy to more than 54,000 peritoneal and hemodialysis patients globally. In 2017, the business segment set itself the goal of

performing over 15% of treatments in the United States in a home setting by 2022. This goal was achieved in the third quarter of 2021 and the business segment set a new target in 2022. Globally, the number of its home dialysis patients increased by about 10,000. In the United States alone, Fresenius Medical Care educated more than 56,000 people living with chronic kidney disease or end-stage kidney disease about home dialysis options in 2021. The business segment did this with the support of more than 180 kidney care experts.

#### Fresenius Kabi

The business segment further adapted its activities to the requirements of the COVID-19 pandemic in the reporting year. Numerous elective or less time-critical treatments were again postponed in the hospital setting. Fresenius Kabi thus stepped up its efforts to secure the supply of healthcare facilities with drugs and medical devices for treatment of intensive care and COVID-19 patients. In addition, the business segment has adapted its activities, e.g., in distribution, to the respective specifications in place to control the spread of infection in the various countries. Through numerous webinars and online offerings, Fresenius Kabi has worked to educate healthcare professionals and patients with training and education on relevant topics such as inflammatory diseases, and clinical nutrition in the care of critically and chronically ill patients, cancer patients or chronic kidney disease patients.

Fresenius Kabi wants to be the preferred partner for physicians and caregivers responsible for the treatment of critically and chronically ill patients. To this end, the Fresenius Kabi Vision 2026 has been developed in the reporting year and adopted in the fourth quarter of 2021. Through Vision 2026 the business segment has defined an overarching direction for Fresenius Kabi with three well-defined growth vectors: broaden its biopharmaceutical offering, development and global roll out clinical nutrition, expand in Med-Tech, and build resilience in its volume-driven I.V. business. Information on Vision 2026 is provided on page 47 of the Group Management Report.

Fresenius Kabi is constantly expanding its product range to provide high-quality and affordable health care to more patients. The business segment is expanding product availability in established markets as well as in new and emerging markets and has launched new products in 2021.

#### Fresenius Helios

In 2021, Fresenius Helios closed the acquisition of the fertility service provider Eugin Group. Following closing of the acquisition, the company has been consolidated in the financial reporting since April 1, 2021, and will be integrated into the non-financial reporting as of 2022. Further information on Eugin Group is included in the Fresenius Group Annual Report on page 82. In 2021, the business segment conducted further strategic portfolio adjustments, which are also described in the Group Annual Report 2021, see page 82 of the Group Management Report.

The improvement of therapeutic measures based on clinical studies outcomes and the increasing use of telemedical services are explained in detail in the chapter Digital Transformation and Innovation on pages 141 ff. of this report.

### Fresenius Vamed

Fresenius Vamed is one of the leading private providers of post-acute care in Central Europe, thus strengthening access to the relevant services, especially in the rehabilitation segment. In 2021, outpatient rehabilitation services were expanded. The outpatient offerings are easy to access and enable in-service utilization of medically necessary rehabilitation services. Existing facilities were expanded by therapeutic offers for additional indications. After numerous rehabilitation facilities were temporarily closed in 2020 due to the COVID-19 pandemic, business operations were largely uninterrupted in 2021. In order to ensure safe access to our health care services for our patients and employees in the wake of the COVID-19 pandemic, comprehensive prevention concepts were drawn up based on regulatory provisions, and measures were implemented and adapted in line with epidemiological developments. In addition, a Coronavirus Crisis Team, which meets regularly, has been installed to check the validity and application of existing preventive measures.

### Patient support in crisis and emergency situations

As a health care Group, we have to be crisis-proof and respond flexibly in all areas: it is our task to enable unrestricted access to our services and seamless care for patients even under difficult conditions. To ensure this, we have established high-performance as well as resilient emergency systems and programs in our business segments.

### Fresenius Medical Care

Fresenius Medical Care's goal is to continue to provide access to health care under difficult circumstances, for example in the case of a health crisis or natural disaster. The business segment has dialysis clinics in many regions of the world with diverse geographic, social, and economic conditions, serving a vulnerable population of patients who need regular dialysis treatment multiple times a week. To allow the business segment to continue treating its patients in extreme conditions, it has developed an emergency response system comprising regional disaster response teams. These teams seek to ensure that treatments continue under difficult circumstances. For example, in February 2021, a team assisted patients affected by extreme weather in Texas that caused a water shortage. More than 160 of the business segment's dialysis clinics were forced to temporarily close as a result, affecting about 5,000 patients. The disaster response teams brought in generators and water tankers to assist in getting clinics operational. Additionally, Fresenius Medical Care provided hospitals with dialysis equipment and supplies to help manage the surge of patients seeking treatment.

Furthermore, the business segment regularly tests the emergency response procedures to assess service safety and continues to donate funds, dialysis machines, and medical supplies to organizations that require support.

### Fresenius Kabi

Fresenius Kabi has a crisis team for emergency situations which is summoned immediately after an event that could lead to a crisis occurs. The crisis team comprises members of the Management Board, key staff units, and other relevant functions of the business segment and initiates necessary measures, coordinates the company's activities, and monitors the measures initiated. Crisis situations are considered to be unforeseen events that may, e.g., have an impact on the company or the public. During the COVID-19 pandemic, the crisis team met to coordinate measures to ensure the supply of vital medicines to patients.

### Fresenius Helios

In the hospital sector, there are legal requirements for how care is to be organized in the event of an emergency. Therefore, hospitals and health care facilities have dedicated emergency plans to respond immediately to incidents that might be critical for patients. These encompass, among others, evacuation plans, emergency systems in case of inter-

ruption of power or water supply, or plans to respond to impacts on local infrastructure, like flooding. Emergency power generators ensure that operations or vital therapies, such as artificial respiration, can continue even in the event of a power failure. In 2021, incidents occurred in Germany and Spain, such as extreme weather events, that impacted the respective local hospital infrastructure and patient care. Patients were not harmed by these events. Incidents were assessed, together with the local authorities, and necessary evacuation measures or remediation measures were implemented.

### **Fresenius Vamed**

At Fresenius Vamed, a structured crisis management system takes immediate effect in critical situations. It comprises the Management Board, key staff units, and the management teams of the lead companies. The crisis team meets as soon as an incident becomes known and initiates all necessary measures. Like Fresenius Helios, Fresenius Vamed's facilities have emergency and outage concepts and crisis communication plans in place, which have been drawn up together with the local emergency units. Beyond that, Fresenius Vamed ensures all necessary prerequisites to ensure the safety of systems and infrastructure, not only for its own facilities but also for those hospitals, for which the company provides facility management services. These measures have increased the speed of response to individual COVID-19-related incidents and thus made it possible to pro-

vide facilities that were particularly affected with additional protective equipment. In 2021, the VAMED clinic Hagen-Am-brock was affected by the extreme weather situation in Germany. Our emergency plans were activated, and the local infrastructure was secured, for example by emergency power generators and submersible pumps. The care of our patients was thus ensured. In our other regions affected by extreme weather situations, no clinic operation was impacted.

### **Health care delivery during the COVID-19 pandemic**

The COVID-19 pandemic again posed continued extraordinary challenges to the global health care system in 2021. For Fresenius as a health care Group and as a company with many employees and a great deal of patient contact, pandemic protection and prevention is essential. Emergency management plays a key role in this: it enables us to maintain the care of all patients in our health care facilities and ensure the supply of medicines. Based on the legal requirements and regulatory recommendations for the COVID-19 pandemic, our business segments implemented measures in response:

#### **Fresenius Medical Care**

In 2021, the fallout from the COVID-19 pandemic continued to present the business segment with extraordinary challenges. These were exacerbated by the fact that acute kidney injury is common in critically ill COVID-19 patients, and

that patients have a high risk of complications should they contract the virus. Patients and staff entering dialysis clinics are screened for the virus and given personal protective equipment. Fresenius Medical Care also encouraged patients to get vaccinated. In addition, Fresenius Medical Care has set up isolation centers and treated more than 17,000 patients infected with COVID-19 in North America.

To broaden the contribution to the fight against COVID-19, the business segment donated € 250,000 to UNICEF to support its vaccination initiative in about 140 countries. UNICEF will put this money towards measures aimed at protecting teachers and medical workers against the COVID-19 virus. This in turn should support the care and education of children impacted by the pandemic. The business segment provided hundreds of acute dialysis devices and further supplies to hospitals for emergency treatment.

Despite the increased safety measures, it was able to continue producing and delivering life-saving products, even when operations and supply chains were hampered by global restrictions.

#### **Fresenius Kabi**

Demand for some of Fresenius Kabi's drugs and medical devices has increased significantly due to the COVID-19 pandemic. For example, the business segment saw an increased demand for its infusion pumps and respective disposables in 2021 and an ongoing high demand for clinical nutrition.

Fresenius Kabi reacted to this demand early, using all suitable capacities to increase production volume for these products. In addition, Fresenius Kabi's crisis team, which was set up at the beginning of the pandemic, is continuously coordinating the efficient manufacturing and supply of essential drugs needed for the management of critically ill COVID-19 patients. Fresenius Kabi continued its activities in response to the ongoing COVID-19 pandemic and adapted them to the changing environment. The focus in the reporting year, in view of the volatility of the procurement markets, was on supply capability in order to ensure the supply of vital medicines and medical devices for patients. The business segment closely monitored the availability of materials required for the manufacture of products to ensure the best possible availability, e.g., through increased inventories as applicable or higher safety stocks for selected raw materials essential for the production of products, as well as ongoing alternative supplier qualifications. In 2021, Fresenius Kabi was able to mitigate supply bottlenecks for sourced products and avoided significant effects on the supply of vital drugs and medical devices to patients.

### Fresenius Helios

Measures taken at our Fresenius Helios' hospitals in 2021 were carried out in close, continuous consultation with the respective crisis team at Group level and the crisis teams or task forces of the clinics as well as the central and local hospital hygiene departments. As of March 2021, the numbers of intensively managed COVID-19 patients in the Helios hospitals dropped significantly and a return to normal operations was initiated. By mid-2021, elective procedures were suspended only in isolated cases, depending on the utilization of the respective intensive care unit by COVID-19 patients. In what was referred to as the fourth wave, the number of COVID-19 patients again increased noticeably from October 2021, with recognizable hotspots in the German states of Saxony and Bavaria. Here, elective operations had to be postponed again in isolated cases. Since June 2021, the number of COVID-19 patients in our German clinics has been published on the [website](#) of the business segment (German language). Further information is provided regarding the intensive care capacity and treatment of the patients.

In the reporting year, it was possible to draw on the experience gained in 2020 and adjust staffing and structural capacity depending on the pandemic situation. At Helios Germany, for example, the number of intensive care beds was increased again to over 1,300 at the start of the fourth wave in fall 2021, following a comparatively relaxed overall situation in the summer. Helios Germany cared for about 30,000 patients with a COVID-19 infection in 2021, more than 8,000 of whom required intensive care. About 5,000 patients died in our hospitals with or due to a COVID-19 infection.

At our hospitals in Spain and Latin America, more than 20,000 patients have been hospitalized in 2021. The mortality rate was 12% in 2021.

The use of social media to educate and inform about COVID-19 has been successful in Germany and Spain. For the German sites, Helios published messages on the pandemic, testing procedures and vaccinations, which were widely shared. Helios Spain uses its social media channel to provide written information or videos on the most urgent questions, like hygiene, vaccines, or even the impact on family life, as well as information regarding the impact on hospitals appointments and the availability of COVID-19 tests in our centers. Our dedicated hotlines were well received by the general public, and we again received a high number of calls.

### Fresenius Vamed

For all managed and owned health care facilities, Fresenius Vamed created catalogs of measures in which the pandemic experiences in Austria, Germany, the Czech Republic, the United Kingdom, and Switzerland were collected; these catalogs are updated regularly. As a result, our health care facilities were able to remain open, subject to the respective regulatory requirements. The experience gained will continue to be incorporated into risk management in the future and will help Fresenius Vamed to continuously improve its processes and actions. Furthermore, a 24/7 information hotline as well as comprehensive and continuously updated

information on the Fresenius Vamed intranet “Corona Info-center” are available to Fresenius Vamed staff. In Germany and Austria, a small number of COVID-19 cases occurred in the nursing facilities, except for two facilities in Germany, where larger numbers of COVID-19 cases were reported.

The prevention measures, such as the 3G rule, testing offers for residents and employees, mandatory masks, access restrictions, etc., have been and are being implemented accordingly or adapted to the situation.

Please refer to the Notes to the Consolidated Financial Statements on pages 312 f. for further information on assistance programs provided by various governments in the form of reimbursement payments and funding in connection with the COVID-19 pandemic.

## PATIENT AND PRODUCT SAFETY

### OUR APPROACH

At Fresenius, our aspiration is: Ever better medicine for ever more people. In order to provide patients with the best possible care, we offer them medical treatments and products that meet our strict requirements for quality and safety. It is essential for the safety and well-being of our patients that we appropriately label our products, describe our services in a transparent manner, and provide all relevant information to patients or their relatives in our health care facilities. For health care professionals, relevant information on pharmaceutical products or medical equipment is

provided through dedicated communication channels, for example websites, and trained experts from our business segments.

We have established sophisticated and efficient processes in all business segments that are fully geared toward the safety of our patients. In the area of quality management, we monitor, manage, and improve these processes with performance indicators. Each individual business segment adapts its **quality management system** and sets priorities according to its respective business model. Our quality management systems meet and are based on various standards or are adapted to them. International standards such as ISO (International Organization for Standardization) and GMP (Good Manufacturing Practice) are particularly important for our production facilities. Our hospitals and health care facilities measure the quality of patient care using various indicators. Each of the four business segments is subject to specific regulatory requirements and standards, depending on the business activity and the market.

We use different applications to check our quality management systems, depending on the business segment and business activity. We use externally provided IT systems as well as self-developed applications. All units are subject to regular external and internal audits. Peer reviews in hospitals are carried out if the internal quality targets are not met. We report on the evaluation and outcome of audits for each business segment.

Training courses for our employees, which are an essential part of guaranteeing the safety of our patients and products, are an important component of our quality management systems.

By offering regular training on a global, regional, and local level, **Fresenius Kabi** ensures that employees are aware of all aspects of the quality management system that are relevant for their daily work. For more information on quality management training at Fresenius Kabi, see the Employee Development section starting on page 168.

**Helios Germany** has three simulation and emergency facilities in Erfurt, Krefeld and Hildesheim. Among other things, surgical procedures or crisis scenarios in the operating room are trained here. In addition, such training courses take place in the clinics directly. In the fields of emergency medicine, anesthesia, intensive care medicine, and obstetrics, decisions on the content and number of participants in the mandatory training courses are based on resolutions of the respective specialist groups. **Helios Spain** continuously provides training on patient safety, on its quality management systems and on topics that are essential in hospital routine. In 2021, 14 sessions or courses were conducted in the hospital network. The exchange of knowledge among the hospital network has been promoted through inter-hospital clinical sessions that now cover several medical fields such as gynecology and obstetrics, pediatrics, and internal medicine. In addition, clinical sessions have been held on several patient safety topics: best patient safety practices in the surgical block, preventing adverse events in the insertion and management of venous access, patient falls prevention, medical record and informed consent completion requirements, transforming the patient safety culture of the hospital through the Joint Commission International accreditation process, and evidence-based safety improvement practices.

**Fresenius Vamed's** quality management officers also regularly conduct legally required training courses and quality management training courses. In addition, Fresenius Vamed plans and conducts in-person and online training courses on a wide range of topics.

Further information on employee training can be found in the Employee Development chapter on pages 165 ff.

### Organization and responsibilities

All Fresenius employees must ensure that the applicable quality and safety regulations are always applied in their areas of responsibility. The employees in the production facilities, outpatient centers, and hospitals have a special obligation to exercise due care. The organizational structures are adapted to the requirements of the individual business segments.

### Policies and regulations

All four business segments comply with the applicable laws within the framework of quality management. This includes the EU legislation on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), the Restriction of Hazardous Substances (RoHS), the Medical Device Regulation (MDR), and the Code of Federal Regulations (CFR) of the U.S. Food and Drug Administration (FDA), among others.

In addition, the business segments have developed their own comprehensive guidelines. Furthermore, they have voluntarily committed to complying with a wide range of industry obligations and international standards.

### Certifications and commitment

Our commitment to patients' health and well-being in the business segments is reviewed and certified by external partners or regulatory bodies. We are continuously expanding the number of sites certified to ISO 9001 standard, applicable international acknowledged care or hospital standards or quality standards provided for centers of expertise for certain areas of treatment. Not all locations have the same scope of certifications. However, at the very least they adhere to internal quality standards, which are subject to applicable regulatory provisions.

Quality principles or standards applied in addition to the internationally acknowledged ISO 9001 are, among others,

- the methodology of the [Initiative for Quality Medicine](#) (IQM), the model EFQM, the standards of the [Joint Commission International](#) (JCI), and the Spanish UNE, for health care facilities, and
- Good Manufacturing Practice (GMP), Good Distribution Practice (GDP), Guideline on Good Pharmacovigilance Practices (GVP), Medical Device Regulation (MEDDEV; MDR), the Code of Federal Regulations (CFR) of the U.S. Food and Drug Administration (FDA), and the ISO 13485 quality management standard for medical devices in our production business of Fresenius Medical Care and Fresenius Kabi.

In 2021, further locations were added to ISO 9001. Due to the COVID-19 pandemic, certifications at Helios Spain planned for the 2020 reporting year were started in the first quarter of 2021 and successfully finalized in March 2021.

The Fresenius Group quality management approach is controlled by internal specialists or dedicated functions within the business segments. Relevant data is reviewed regularly, for example daily. If deviations occur, our specialists initiate root cause analyses or peer reviews; they evaluate deviations and, if necessary, determine corrective or preventive actions. Regular internal audits and self-inspections, at least annually, often at higher frequencies, support data verification and management approaches, for certified and non-certified entities. Thus, we ensure that patient health activities comply with internal guidelines and regulatory provisions. The overarching ambition is to improve the efficiency and coverage of our quality management systems and, ultimately, the credibility of the procedures and systems in place.

Following a risk-based approach, **Fresenius Medical Care** carries out internal audits at least once a year at each of its production sites. The business segment assesses its quality management systems against internal and regulatory standards. Internal quality audits at the local sites help the business segment determine the effectiveness of these systems. The consolidated quality management system is certified according to ISO 9001 and ISO 13485. Fresenius Medical Care also completed the Medical Device Single Audit Program (MDSAP) for this system. The production sites are

subject to regular external quality audits and reviews in accordance with local requirements. Audits are carried out according to the Good Manufacturing Practice (GMP), the Current Good Manufacturing Practice (cGMP), ISO 9001, ISO 13485, or MDSAP. In 2021, 74% of the production sites managed by the Global Manufacturing, Quality, and Supply division were certified to ISO 9001/13485.

**Fresenius Kabi's quality management system** is organized in accordance with the ISO 9001 standard and is binding for all organizations of the business segment. Compliance with the standard is reviewed by TÜV Süd in annual audits at a global level and covers 102 Fresenius Kabi organizations through a matrix certification; further organizations hold local ISO 9001 certificates. In addition, numerous manufacturing plants are also certified according to ISO 13485 for medical devices as well as GMP.

**Helios Germany** applies the German Inpatient Quality Indicator (G-IQI) management system in all German clinics. Newly acquired entities are integrated into this management system from the start of the acquisition. Further certifications encompass the acknowledgment as centers of medical expertise, e.g., for oncology, diabetes, endoprosthetics, or others.

**Helios Spain** gears its quality management toward the requirements of recognized international quality standards. All hospitals and centers are certified according to ISO Standard 9001 and continued to be certified according to the Spanish Association for Standardization, UNE. New acquisi-

tions conducted in 2021 will be included in the certification in 2022. 33% of the hospitals are additionally certified under the quality standard UNE 179003. In 2021, 4 further hospitals were awarded the international certification UNE 179003, a total of 16 hospitals for the reporting year (2020: 12; 24%). 11 hospitals are also already certified to UNE 179006, the standard for infection control (2020: 8). In addition, we have 12 assisted reproduction units certified with UNE 179007.

In 2021, two further hospitals were included in the JCI certification. In total, five hospitals (including clinics in Latin America) are accredited with JCI and four hospitals with the European Foundation for Quality Management (EFQM) standards. Fundación Jiménez Díaz was the first hospital in the world to receive the EFQM Global award. The hospital has obtained more than 750 points, which also gives it the EFQM 7 Stars seal, the highest score for this standard.

**Fresenius Vamed** aligns its internal processes to established quality standards such as ISO 9001, the sector-specific standard EN15224 for quality management in health care, and ISO 13485, as well as the EFQM standards. In addition, Fresenius Vamed has certified several health care facilities according to international standards such as JCI, ISO, or the German QMS-REHA (BAR). All inpatient rehabilitation facilities in Germany must be certified in accordance with a procedure recognized by the Federal Association for Rehabilitation (Bundesarbeitsgemeinschaft für Rehabilitation e.V. – BAR). All certifications form the basis for the continuous improvement of the processes at Fresenius Vamed.

## Evaluation

With regard to patient health and safety in all business segments, breaches or violations that lead to deviations from internal management provisions have to be evaluated. Resulting corrective and preventive actions aim to ensure our patients' health and safety. Information on the identification of deviations and examples of possible deviations can be found in the following reporting on the business segments.

## FRESENIUS MEDICAL CARE

Patient well-being is top priority. As part of the business segment's commitment to delivering safe, high-quality care to patients with chronic illnesses, it continually monitors the performance of its products and services. The focus is on quality, safety, accessibility, and patient experience. Fresenius Medical Care makes further improvements where necessary, keeping in mind the goal to expand access to high-quality health care. The business segment invests in innovations and new technologies, and leverage insights from scientific research and collaboration with partners.

Fresenius Medical Care develops, produces and delivers a broad range of products for treating kidney disease. With its network of production sites around the world, the company controls the procurement, production, distribution, and supply of renal and multi-organ therapy products. The



business segment manages quality and safety in its product business over the entire product life cycle, from design and development, to operation and application.

### Organization and responsibilities

The Global Medical Office drives the medical strategy and coordinates activities related to the advancement of medical science and patient care. It is part of the business segment's network that promotes scientific and medical progress worldwide. The Global Medical Office is led by the Global Chief Medical Officer who is also a member of the Management Board of Fresenius Medical Care. Key findings of the Global Medical Office are reviewed by dedicated committees. They are published on a regular basis and shared with the medical community.

The Global Research and Development and the Global Manufacturing, Quality, and Supply divisions are responsible for the product business of Fresenius Medical Care. The functions report directly to the Management Board of the company.

### Internal rules of conduct and guidelines

Fresenius Medical Care's commitment to continuously improve the quality of care is included in their Code of Ethics and Business Conduct. The Global Patient Care Policy outlines the principles, responsibilities, and processes related to patient experience surveys and grievance mechanisms.

In 2021, a chapter on medical strategy and quality management was included in this policy. Responsibility for integrating the policy into operations lies with senior medical leadership and the interdisciplinary patient care teams in each of the regions.

The Global Quality Policy outlines the company's commitment to product and service quality. The policy also covers the obligation to comply with relevant regulations, and maintain environmentally sound and efficient operations. It is the basis for regional quality manuals and further policies covering responsibilities, training, risk assessments, and audits. The Management Board is regularly informed about the global quality performance.

Over the past few years, Fresenius Medical Care has merged the quality management systems in Europe, Middle East, and Africa, Latin America, and Asia-Pacific.

### Patient information

Fresenius Medical Care treats patients across the full spectrum of chronic kidney disease. The company believes listening to their therapy preferences is critical. The company aims to give patients an informed choice and provide treatment options that best fit their circumstances. Home dialysis provides patients with the opportunity for greater independence and control over their time and health outcomes.

### Our ambitions

Fresenius Medical Care has set itself the goal of implementing a global quality management system by 2024. Additionally, the IT tool for audit management has already been harmonized globally, and the company plans to introduce a global electronic training system by 2024.

Fresenius Medical Care has defined its first global KPI for quality of care – the global hospitalization rate. It measures the length of time a patient spends in hospital.

Fresenius Medical Care is also planning to develop a quality index focusing on the most relevant quality indicators to reflect improvements and achievements related to global patient care.

Having recently achieved the internal NPS target, the business segment is now aiming for a NPS score of at least 70.

### Progress and measures 2021

Fresenius Medical Care works with external organizations to facilitate scientific progress and explore new ways of improving quality of care. In 2021, the business segment was involved in more than 60 key partnerships with academia, research institutes, and peers. Focus areas included cardio-protection, personalized and precise medicine, public health, and the impact of COVID-19 on vulnerable patient populations.

## Evaluation

During the COVID-19 pandemic, Fresenius Medical Care has worked to keep the clinical care environment as stable as possible and deliver a high quality of care. Further information is provided on the company's [website](#), see the Sustainability section.

## Quality analyses

Fresenius Medical Care continually measures and assesses the quality of care provided in its dialysis clinics based on generally recognized quality standards and international guidelines. These include those of the global nonprofit Kidney Disease: Improving Global Outcomes, the Kidney Disease Outcomes Quality Initiative, and European Renal Best Practice. The business segment also considers industry-specific clinical benchmarks and its own quality targets.

Additionally, Fresenius Medical Care evaluates a set of medical indicators on an ongoing basis to measure the quality of care provided in its dialysis clinics. The global hospitalization rate measures the length of time a patient spends in hospital. In 2021, the global hospitalization rate was 10.7 days per patient. This is an important indicator, given hospitalization has a significant impact on a patient's quality of life. It also reflects the business segment's impact on the respective health care system, which is especially relevant during the ongoing pandemic. Other quality of care KPIs are currently measured on a regional level as Fresenius Medical Care continues to harmonize these criteria.

## Patient satisfaction

As part of the global patient experience program, Fresenius Medical Care aims to conduct patient experience surveys at least every two years. The business segment uses the information collected to evaluate the services provided by its dialysis clinics and implement global improvement processes. Fresenius Medical Care's goal is to establish measures that enable more personalized care and improve the quality of services. Based on the results of the 2020 survey, in 2021 the business segment sharpened its focus on improving patient education, individualized patient care, and service excellence. For example, the business segment developed patient education material to help clinic staff better inform their patients about health-related topics.

Fresenius Medical Care measures patient experience and customer loyalty using the Net Promoter Score (NPS). The NPS reflects patients' overall satisfaction with the services. In 2021, the NPS was 71, compared with 67 in 2020. The increase can be attributed to comprehensive local improvement measures, such as those mentioned in the paragraph above. In line with the mission to provide a future worth living for the patients, the business segment is continuously working toward improving patients' experience. As part of the NPS calculations, the percentage of patients is measured that would recommend Fresenius Medical Care. In the reporting year, 78% of the patients answered in the survey that they would highly recommend the services.

In addition to the NPS, Fresenius Medical Care also tracks survey coverage and response rates. In 2021, a global coverage rate of 91% was achieved, in line with the target of 75% or above. In 2021, the response rate was 75%.

## Patient grievance processes

In addition to the experience survey, Fresenius Medical Care provides patients and their representatives with other feedback channels. They can use these to make any suggestions or raise concerns, anonymously if they wish. Channels include dedicated hotlines and email addresses, complaint and suggestion boxes, and a feedback form on the company website. The business segment is committed to resolving any issues in a timely manner.

In the reporting year, the company received 24,449 patient reports through local feedback channels.

The business segment's policies allow patients to report grievances without fear of reprisal or denial of services. In most regions, concerns that are dealt with on the spot are not considered grievances. Fresenius Medical Care provides training to support staff in following patient grievance guidelines.

### Handling product complaints

Post-market surveillance is an integral part of quality management. It is essential that products and services are effective and reliable, and pose as low a risk as possible to patients. Standards for planning, conducting, and monitoring clinical studies help to enhance product quality and safety and improve patients' health. Should any issue arise concerning the safety of our products, Fresenius Medical Care takes corrective action. This could include publishing further information and data on the product after market introduction, or product recall.

Fresenius Medical Care strives to comply with legal and regulatory requirements in monitoring the adverse effects of drugs – also called pharmacovigilance – and medical devices. The business segment collects and reviews adverse events and product complaints. The company has incorporated the topic of reporting adverse events and product complaints in its Code of Ethics and Business Conduct.

### Audits

Fresenius Medical Care has defined key performance indicators to monitor its quality objectives and prevent adverse events. The company discloses the audit score, which indicates the ratio of major and critical findings to the number of external audits. In 2021, more than 50 certification audits were performed at production sites that are managed by the Global Manufacturing, Quality, and Supply division. The audit score was 0.1 (2020: 0.2). Fresenius Medical Care

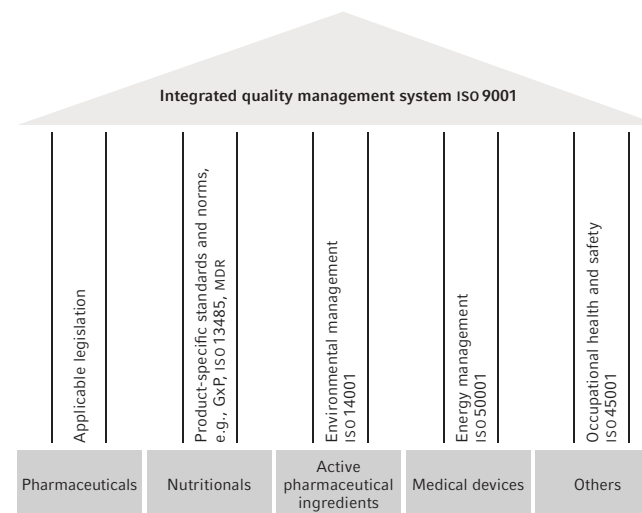
targets an average global audit score not exceeding 1.0 to maintain the effectiveness of its quality management systems and certifications. All audit findings are documented and escalated depending on their criticality and are used to determine and implement appropriate corrective and preventive measures.

### FRESENIUS KABI

Fresenius Kabi's corporate philosophy "caring for life" describes the company's commitment to improving the quality of life of its patients. The quality and safety of its products and services is therefore of paramount importance to the business segment. An important goal of the quality management at Fresenius Kabi is to monitor the applicability, efficacy, and safety of products and services, as well as the success of therapies, and their continuous improvement. To ensure this, the company has established an integrated quality management system, a monitoring and reporting system, and product risk management.

Fresenius Kabi has global standard operating procedures as well as a quality management manual that includes, among other things, the company's quality policy, which also applies to all sites. The business segment uses a global electronic quality management system, KabiTrack, based on the Trackwise® software, for event and change control of quality management processes. The system supports the local implementation of centrally defined processes as well as global oversight.

### INTEGRATED QUALITY MANAGEMENT FRESENIUS KABI



### Organization and responsibilities

At Fresenius Kabi, the globally responsible quality managers report directly to the respective member of the Management Board. The members of the Management Board are directly responsible for quality management. They attend quality oversight meetings and receive quality reports on a regular basis.

## Policies and regulations

Fresenius Kabi has defined the following principles for its quality management:

- Clear assignment of responsibilities
- Qualification and continuous training of employees
- Monitoring of product and patient safety
- Transparent and documented processes and procedures
- Fulfillment of regulatory compliance
- Continuous improvement
- Checking of quality management effectiveness

## Monitoring and reporting systems

Fresenius Kabi interacts with patients, users, and customers in the provision of products and services, and monitors the applicability, effectiveness and safety of its products on the market. Further, the business segment monitors and evaluates relevant information and feedback on the products, services, and therapies during their use. Fresenius Kabi has set up monitoring and reporting systems, e.g. a vigilance system, and a product risk management system covering all regions worldwide, in order to be informed and deal with product quality and patient safety issues in a timely manner. These early-warning systems are designed in such a way that trained complaints and safety officers worldwide record complaints and side effects in IT systems and forward the respective information to experts for review.

## Product risk management

Global safety officers react promptly and appropriately to potential quality-related issues. They initiate and coordinate necessary actions, such as product recalls, on a global level. With its early-warning system, Fresenius Kabi evaluates any quality-related information from various risk areas to identify risks early and take corrective and preventive actions. Information is obtained from databases for complaints and side effects, internal and external audits, and from key performance indicators used for internal control and optimization of quality processes. With these systems, Fresenius Kabi can evaluate the safety profile of any of its products at a global level continuously.

Product recalls, for example, are initiated as a risk-minimizing measure in cooperation with the responsible regulatory authority. At the same time, the cause of the recall is analyzed. Where necessary, corrective measures are taken to prevent the cause of the recall in the future.

## Labeling and product information

Fresenius Kabi's products are classified, e.g., as pharmaceuticals, nutritional products, active pharmaceutical ingredients, or medical devices, based on global and national regulations and standards. The marketing of these products is subject to various laws and regulations to ensure complete and fact-based product information. Fresenius Kabi has a global policy and global standard operating procedures for its product information to ensure that it is in accordance with applicable laws and regulations and that the product information is correct, accurate, and not misleading.

The products of Fresenius Kabi are also subject to certain labeling requirements. The labeling of the products is checked as part of the regular pharmacovigilance activities – e.g., compliance with laws relating to side effects of medicinal products – and updated if necessary. For example, product labeling is updated if competent authorities, e.g., the Pharmacovigilance Risk Assessment Committee (PRAC) of the European Medicines Agency (EMA), publish relevant information. The dedicated function at Fresenius Kabi uses an electronic management system for product labeling or any printed packaging material to manage the information necessary for labeling and to ensure correctness. The requirements of the European Falsified Medicines Directive or the U.S. Drug Supply Chain Security Act (DSCSA) lead the way in this context. Fresenius Kabi takes into account their specifications and has introduced appropriate processes for serialization, testing, and traceability for the relevant products. Further information on transparency in health care can be found on page 185f. of this report, section Compliance.

With the help of its vigilance activities, Fresenius Kabi ensures that the patients' safety of its products is always guaranteed: In this way, the company can identify any changes in the benefit risk ratio of its products at an early stage and reacts in a timely manner. Fresenius Kabi's Corporate Safety Officer is responsible for the global vigilance

system. This function ensures that the company can respond quickly to safety-relevant events. Fresenius Kabi promptly informs its customers and the public about matters concerning product and patient safety; this may be done directly or through appropriate public relations, if applicable.

The new requirements for medical devices as a result of the Medical Device Directive (MDR) issued by the EU in 2017 came into force on May 26, 2021. Thus, the focus on patient safety was significantly tightened for all medical devices on the European market, including the requirements for respective vigilance systems. Fresenius Kabi has adapted its processes in accordance with the new regulation. For example, Fresenius Kabi integrated the shortened reporting timelines to the responsible authorities into its internal processes.

### Our ambitions

At Fresenius Kabi, the application of the highest possible quality and safety standards, the efficacy of products and services, and the adherence to regulatory assessment and compliance requirements, are essential conditions to support the business segment's goal: to ensure its long-term success. Fresenius Kabi continuously promotes a quality and safety culture and aims to ensure compliance with increasing regulatory requirements and expectations of regulatory bodies in an effective manner.

### Progress and measures 2021

In the reporting year, the management approach and governance structure of Fresenius Kabi remained as reported in 2020. Progress focused on implementing the requirements of the EU Medical Devices Directive (MDR), which has been in force since 2021.

### Evaluation

Fresenius Kabi assesses the health and safety impacts of all significant product and service categories. Further, Fresenius Kabi aims to assess products for improvement potential. Further information is provided in the R&D section in Group Management Report on pages 52 ff..

### Vigilance system

The monitoring of adverse reactions or events (side effects) associated with the use of medicinal products is referred to as pharmacovigilance (drug safety). The statutory pharmacovigilance commitments relate to our medicinal products for human use. Similar regulations exist for medical devices. Fresenius Kabi has established various standard operating procedures for the continuous monitoring of the benefit-risk ratio of its own products and assesses their successful implementation based on specific indicators.

- Fresenius Kabi collects and assesses reports about individual side effects and reports them to health authorities worldwide in accordance with regulatory requirements. The business segment claims to submit all safety reports

in accordance with the applicable regulations and therefore strives to report 100% of the Individualized Case Safety Reports (ICSRs) to the authorities in time. For 2021, the worldwide compliance rate was 99.6% (2020: 99.9%). In Europe, in 2021 99.6% (2020: 99.5%) of all adverse reactions were reported to the European Medicines Agency (EMA) in due time.

- In addition, Fresenius Kabi regularly evaluates the benefit risk ratio of its products based on safety-related information from various sources (e.g., adverse event reports, medical literature). The results of these analyses are submitted to authorities as periodic safety reports. Fresenius Kabi aims to submit all periodic safety reports worldwide to authorities in due time. For 2021, the compliance rate was 98.9% (2020: 99.6%). In Europe, 98.8% of all periodic safety reports were submitted in due time to the EMA in 2021 (2020: 98.6%).
- According to regulatory requirements, Fresenius Kabi, as a pharmaceutical company, is obliged to describe its vigilance system in a Pharmacovigilance System Master File (PSMF). Fresenius Kabi uses a global database to collect and evaluate vigilance data on a quarterly basis from all local marketing and sales units for the PSMF. The goal is to receive timely data from all marketing and sales units worldwide. This is documented in the company's vigilance system. For 2021, the compliance rate was 100% (2020: 100%).

In addition to the timely evaluation and reporting of single side effects to authorities, cumulative evaluations on side effects are carried out to guarantee the safety of our products (signal detection). These include important events, e.g., reports about side effects with a fatal outcome to evaluate if new information is available about a known side effect profile or a new side effect of a product leading to a changed risk profile. No such information became known in the reporting year about side effects of the business segment's products.

### Audits and inspections

Fresenius Kabi regularly conducts internal quality audits to ensure the effectiveness of the quality management system and compliance with internal and external standards and requirements. The suppliers related to product manufacturing are subject to a qualification process based on the relevance of the delivered material or service. Also, the supplier's qualification and their recertification is regularly audited. Inspections by regulatory authorities and audits by independent organizations and customers are performed along the entire value chain at Fresenius Kabi. Fresenius Kabi promptly takes steps to deal with any weaknesses or deficiencies discovered during inspections.

The external audits and inspections in the reporting year comprised a total of 30 inspections (2020: 21) regarding

Good Manufacturing Practices (GMP) by the U.S. Food and Drug Administration (FDA), the Australian Therapeutic Goods Administration (TGA), Canada Health, European regulatory authorities, and Quality System audits from TÜV Süd (notifying body for ISO 9001).

### AUDITS AND INSPECTIONS

	2021	2020	2019
Internal audits	58	42	60
External audits and inspections	94	59	64

Based on the respective observations, an audit and inspection score is calculated. The score is calculated by addition of the number of critical and major observations identified during GMP inspections by the authorities mentioned above and the number of non-conformities identified during TÜV Süd ISO 9001 audits, divided by the overall number of inspections and audits; critical observations, if any, or certification status withdrawal are weighted with a multiplier compared to major observations. The audit and inspection score was 1.9 in 2021 (2020: 1.3)<sup>1</sup>. Observations have been and will be addressed by corrective and preventive actions (CAPAs) and effectiveness checks have been and will be defined. The observations neither impacted the GMP certification nor the ISO 9001 certificate.

In 2021, no events with a material adverse impact were recorded that conflict with our quality management goals.

### FRESENIUS HELIOS

Helios Germany has developed a quality management system based on three pillars: Measure, Publish, Improve, used by around 500 hospitals in Germany and Switzerland. This quality management system is based on administrative data (routine data) from patient treatments: the hospitals document each treatment step for later billing with the health insurance companies. This routine data shows whether the healing process took longer than expected, and whether complications or even a death occurred. It also indicates whether a treatment took a normal course; if mistakes were made, they are reviewed in specific audit procedures (peer reviews). Defined **quality indicators** (German Inpatient Quality Indicators – G-IQI) are used to measure and monitor the quality of medical outcomes, which are published. This data allows patients to see, among other things, how often certain treatments are performed in Fresenius Helios hospitals. It also gives patients important information on the doctors' experience and routine and helps inform their own decisions about their treatment. Thanks to its quality and risk management, Helios Germany can continuously monitor key quality parameters and, if necessary, take countermeasures at an early stage.

In Spain, Fresenius Helios implemented the IQI methodology at the end of 2017 in all its hospitals. Since then, 45 indicators have been systematically monitored, first on a quarterly basis, and since 2021 on a monthly basis.

<sup>1</sup> For the calculation of the audit and inspection score, Fresenius Kabi takes into account all information on findings from audits and inspections received by the company before December 31, 2021.

## Organization and responsibilities

At Fresenius Helios, the medical director has direct responsibility for patient and product safety and a Patient Safety Officer position has also been created. Helios Germany's central medical services and medical specialist groups help to implement appropriate measures. The leading physicians in various fields from all Fresenius Helios hospitals in Germany come together to form specialist groups. They ensure that the knowledge of their medical specialty is anchored in all hospitals and represent their respective medical fields internally and externally. They also advise and decide on the introduction of standard processes, sensible innovations, campaigns, and the introduction of medical products.

In Spain, the organization has been reinforced with the creation of a new Corporate Operations department, focused on improvements in the provision of therapies and health services and the design and marketing of new digital products in the ambulatory setting. The Corporate Risk unit has also been created in order to improve risk management in the company.

Helios Germany and Helios Spain's specialist groups exchange ideas and information on specific topics. For example, the German hospitals benefit from Helios Spain's close networking of outpatient and inpatient care – and can take advantage of these experiences.

## Policies and regulations

Helios Germany has built on the numerous measures introduced in the past, to increase patient safety. Two checklists are mandatory for all surgeries in Fresenius Helios' clinics. The "PRÄ" checklist assesses the risks associated with the surgery before it takes place. The second checklist, "PERI", helps to avoid treatment errors immediately before, during, and immediately after the surgical procedure.

Since 2020, these measures have been supplemented by increased hygiene requirements due to the COVID-19 pandemic. For this purpose, the existing hygiene concepts have been adapted to the changed regulatory provisions.

In 2021, the Corporate Patient Safety Committee at Helios Spain continued to develop and implement clinical best practices. The committee consists of members from various hospitals, including clinics in Latin America. The committee has remained active throughout the pandemic, not only advising the hospitals on COVID-19 management, but also developing new strategic patient safety protocols and updating them in 2021. The existing Patient Safety Strategy developed by this committee will be updated in 2022. It is based on principles such as those of the World Health Organization (WHO) and the JCI.

## Hygiene management in hospitals

The aim of Fresenius Helios' hygiene management system is to avoid infections within the hospital and to quickly prevent them from spreading when they do occur. Hygiene management focuses on close monitoring of infections and pathogens, regular hygiene training for hospital staff, for example on correct hand disinfection, monitoring antibiotic

consumption, and training physicians as **antibiotic stewardship (ABS) specialists**. The implementation of and compliance with hospital hygiene measures in the clinics is accompanied and monitored by our specially trained staff – hygiene specialist nurses, hospital hygienists and hygiene officers. The Helios Group hygiene regulation is binding for all employees in all clinics. It is based on the evidence-based recommendations of the Robert Koch Institute (RKI) and prescribes, among other things, hand disinfection – especially before and after contact with patients – for physicians, nurses, medical staff, and other personnel, in accordance with the guidelines of the World Health Organization (WHO).

The clinics monitor their **hygiene status** continuously and transparently: every six months, Fresenius Helios publishes figures for each clinic on the occurrence of the three most important multi-resistant and infection-relevant [pathogens](#). The reporting for 2021 is delayed to the first half of 2022 due to the impacts caused by COVID-19.

In 2020, Helios Spain started encouraging all hospitals to appoint a medical officer to manage infection control and prevention measures. In 2021, 50% of the hospitals had an epidemiologist to manage infection prevention and control within the hospital. Other hospitals had at least one professional specialized in infection control from other specialties (internal medicine, intensive care) who manages this area.

## Patient information

Fresenius Helios provides information to its patients within its hospitals about the patient admission process with the help of the treatment contract, as well as special information documents and privacy statements. The therapeutic objective is discussed with patients during admission and discharge discussions with the treating physicians. Fresenius Helios communicates via an online magazine, social media, its website, and in its communication campaigns for the interested public. In addition, information events on specific medical topics are held in all hospitals (known as patient academies). Further details on transparency in health care can be found on pages 185 f. of this report, section "Compliance".

## Our ambitions

Helios sets company goals to measure the quality of treatment in its hospitals, using the E-IQI methodology in Spain and the G-IQI methodology in Germany. Each hospital treatment (case) is evaluated by making use of comparative measurements, with the benchmark being the German national average as calculated by the Federal Statistical Office or comparable national benchmarks in Spain. The target is in each case to be better than the national average for the respective indication. Further quality targets in our hospitals in Spain relate to patient satisfaction and are measured via the NPS, among other methods.

## Progress and measures 2021

In the reporting year, the management approach and the governance structure of Fresenius Helios remained mainly as reported in 2020.

The IQI methodology will be extended to the clinics in Latin America. In addition to the implementation of the necessary medical and patient data base, the medical documentation will be improved to gather the data relevant to calculate the IQI development.

As an additional tool for improving patient safety, the Corporate Committee on medical liability claims has been reorganized so that medical directors of the hospitals can now participate, in order to improve the healthcare risk management in the hospital network.

A specific policy to enhance the early diagnosis of sepsis was launched in 2021 at our Spanish hospitals. Also, to assist in its deployment, two training videos have been developed using real cases of patients with sepsis, to reinforce the key points that have to be taken into account in order to quickly identify this time-dependent pathology.

## Evaluation

Fresenius Helios assesses the health and safety impacts of all significant treatment or service categories for improvement potential.

In order to ensure that all physicians working at a hospital in Spain perform clinical acts for which they have demonstrated competence, a model has been defined to validate these competencies and accredit the professional to perform the corresponding acts and procedures. This model has been included in a corporate policy that also defines the monitoring of physicians' complication rates through the minimum basic dataset (MBDS).

## Evaluation of the quality of outcomes

For Fresenius Helios, the quality of medical outcomes is key. Helios Germany has defined specific targets for 47 (2020: 45) key quality indicators, including, for example, the frequency of interventions and their results. Helios Germany's results are expected to be better than the German average. The year 2021 was as the previous year exceptional for hospitals and was dominated for long periods by the pandemic and the treatment of COVID-19 patients.

In Germany, Helios achieved a total of 43 of its 47 Group targets in 2021. This corresponds to a quality target achievement of 91% (2020: 89%). In 2021, there were around 17% less patients in the clinics than in the pre-COVID-19 year 2019. Many patients stayed at home at the beginning of 2021, because of the nationwide restrictions and the cancellation of surgeries in hospitals in spring. In the second quarter, the number of patients started to increase again at our German locations.

Helios Spain has introduced quality indicators that correspond to Germany's G-IQI. The results are also compared with the goals of the IQM network. Each hospital publishes its results quarterly, and since 2021 monthly, in a central IT system. This allows individual hospitals to check whether they deviate from the standards set.

The competence gained through the research into COVID-19 and the improved diagnostics related to the infection also led to an improvement in the overall treatment in our Spanish hospitals. Earlier diagnosis, better knowledge of its management and the impact of vaccination, have resulted in less virulence of the illness, less use of intensive care



beds and a lower mortality rate. Thus, throughout 2021, the mortality rate of those hospitalized by COVID-19 in Spain has fallen to 11% compared to 15% in 2020, which reached 17% in the first wave in spring 2020.

Helios Germany uses reporting and learning systems for critical events and near-misses of patients in all hospitals (Critical Incident Reporting System – CIRS). In 2021, a total of 576 events were reported in Germany (2020: 458), which were evaluated at the respective clinic level. The central consolidation and analysis of the CIRS data was further rolled out in 2021. In this way, risks relevant for the overall business segment are identified and remediation measures implemented.

At Helios Spain the clinics report patient safety incidents including near misses. In 2021, a total of 8,480 incidents were reported in 2021 (2020: 4,897). At Helios Spain we actively encourage the reporting of incidents, including hazardous (or “unsafe”) conditions and near misses, as a way of promoting patient safety.

In the interests of transparent error management, Fresenius Helios handles and settles its liability cases itself as far as possible instead of handing them over to an insurer. As a result, we analyze these cases intensively and learn from them. In addition, Helios Germany developed a tool for use in 2021 that automatically queries preventive measures, which, in the event of a confirmed treatment error, will initiate a central review of the usefulness of the respective preventive measures.

## HELIOS QUALITY INDICATORS

Germany	2021	2020	2019	2018	2017
Key indicators, total	> 1,500	> 1,500	> 1,500	> 1,500	> 1,500
G-IQI-targets	47	45	46	46	45
Targets achieved	91%	89%	96%	89%	98%
Peer reviews	7	8	60	55	69

Further information (German language only): <https://www.helios-gesundheit.de/qualitaet/>

## Patient satisfaction measurement and grievance processes

The business segment uses the Helios Service Monitor to measure the satisfaction of inpatients in its German hospital locations once a week. Employees conduct short interviews on care and service. The information is collected anonymously. The management of the hospital and other authorized persons receive the monthly survey results. This makes it possible for necessary improvements to be introduced quickly. In addition, Helios Germany publishes the results of patient surveys, further data on medical treatment quality, and hygiene figures on its corporate website [www.helios-gesundheit.de](http://www.helios-gesundheit.de), see Qualität bei Helios (German language only).

In Spain, Fresenius Helios uses the net promoter score (NPS) to get specific feedback from patients who have been treated as inpatients, outpatients, or in emergencies. 48 hours after a hospital stay, an e-mail is sent to patients asking if they would recommend the hospital and its services. The results are analyzed centrally for Helios Spain and at a hospital level by type of treatment and treatment area. The

goal is to continuously improve the NPS results. The global NPS score has increased over recent years. until the start of the pandemic

## NET PROMOTER SCORE (NPS) SPAIN

	2021	2020	2019
Global NPS	49.9	54.1	54.6
Total reports	534,930	361,800	426,061

In 2021, Helios Spain identified high demand for outpatient consultation that is heavily penalizing NPS results, as the demand from patients is higher than the capacity for consultations and number of doctors in our clinics. The patients expressed their dissatisfaction through low results. The constraints were increased through the lack of professional staff, impacting the availability of services.

Further information can be found in the chapter Employees in the section “Evaluation” on pages 162 ff. of this report.

## Peer reviews

Helios Germany analyzes the cases – including treatments and medical routines – in hospitals that fail to meet individual quality targets, in order to identify and implement improvements. Particularly important are the specific audit procedures in the medical and nursing sectors, and the peer reviews – expert discussions of cases. In Germany, specially trained physicians from the hospitals of Helios Germany and from the IQM network cooperate in the peer review, and question statistical abnormalities. Their insights are translated into concrete recommendations for action in the hospital with the aim of increasing patient safety. In 2021, Helios Germany conducted a total of 7 peer reviews (2020: 8), due to the impact of the COVID-19 pandemic and the resulting restrictions on hospital operations.

Due to the pandemic, Helios Spain was able to perform only 4 peer reviews online by the end of 2021 (2020: 2). Internally, ISO 9001 audits were conducted at all Helios clinics in Spain.

## FRESENIUS VAMED

In post-acute care, elderly care and project management, all processes are regularly checked for their suitability and adapted, if necessary. In accordance with the Federal Association for Rehabilitation (BAR) guidelines, Fresenius Vamed implements all relevant measures to increase patient safety at its post-acute care facilities – including patient surveys, complaint management, and regular internal audits of all segments. The company receives feedback on the

quality of the structure, process, and outcomes from the insurers, e.g., as part of the quality assurance of the German pension insurance or the statutory health insurance providers. In all Fresenius Vamed health care facilities, patients receive relevant information material and patient training to ensure long-term treatment success. Reporting systems for complaints are also available in some health care facilities. In Fresenius Vamed's project business, the lead companies establish guidelines for all subsidiaries, which are reviewed in annual audits.

10 fully inpatient facilities at 6 locations provide care for people in need of care in care grades 1 to 5. The range of care and support includes basic care and medical treatment care, social care, day-structuring measures, and additional care for people with a considerable need for general supervision and care (dementia patients), as well as specialized care for people with severe neurological illnesses, with psychiatric or geriatric psychiatric illnesses, and for people with addictive disorders. In addition to full inpatient long-term care, all nursing facilities also offer short-term and respite care.

## Organization and responsibilities

In order to raise awareness of quality requirements among employees, Fresenius Vamed employs staff for quality and risk management. These employees report directly to management. Quality assurance officers carry out training courses in the various segments, thus integrating all employees in the quality management systems of their facilities.

The quality assurance officers can thus ensure that employees comply with their obligation to exercise due care. Fresenius Vamed informs its employees about its understanding of quality early in the initial training and introductory events. Guidelines are communicated to and documented for the relevant areas and departments in writing (e.g. via work instructions from the respective management).

The VAMED International Medical Board (IMB) ensures the exchange of information between Fresenius Vamed physicians from Austria, Germany, the Czech Republic, Switzerland and the United Arab Emirates. Within Fresenius Vamed, medical specialist groups and executive conferences coordinate on quality and safety.

## Policies and regulations

Fresenius Vamed sets ethical standards through its mission statement as well as through its Code of Conduct, the Clinical Code of Conduct, and the Code of Conduct for Business Partners. Fresenius Vamed's internal guidelines are based on regulatory requirements established throughout Europe, e.g. for rehabilitation. In elderly care, Fresenius Vamed follows the renowned salutogenesis methodological concept. In addition to the statutory requirements and the requirements of the insurers, Fresenius Vamed also adheres to international standards such as ISO and EFQM, expert standards, and medical guidelines. All internal guidelines are regularly reviewed and updated as necessary. Employees can obtain information on the guidelines via the intranet.

## Hygiene management in rehabilitation and nursing care

One of Fresenius Vamed's tasks with regard to hygiene in rehabilitation clinics and nursing facilities is to ensure the highest possible protection for everyone – without restricting individual rehabilitation. Protecting patients from infectious diseases during their stay is a top priority. Newly established health care facilities follow systematic guidelines from day one to prevent infections breaking out or spreading. Clearly defined procedures are followed and compliance with hygiene regulations is strictly controlled.

Fresenius Vamed's hygiene standards in Germany are based on the recommendations of the RKI's KRINKO (Commission for Hospital Hygiene and Infection Prevention). These recommendations take into account all legal requirements for hygiene. In the German facilities, the central Head of Hygiene coordinates the hygiene specialists and establishes overarching standards, together with the Chief Medical Officer. One of the most important hygiene measures is hand disinfection. Fresenius Vamed follows the guidelines of the WHO in this regard. Hygiene specialists, doctors, and nurses with special hygiene responsibilities implement hospital hygiene measures. In Austria, the Federal Hospitals Act forms the basis for the management of hygiene plans, hygiene inspections, the use of hygiene specialists, and doctors with special hygiene responsibilities. In the course of the COVID-19 pandemic, hygiene inspections in the facilities were intensified. Hand hygiene and the correct wearing of protective equipment were continuously addressed.

## Patient information

Fresenius Vamed provides information to its patients in different ways – for example, in the patient information folder or in the treatment contract, and via information brochures, privacy statements, the house rules, and the mission statement. Welcome lectures and training sessions are also offered. The website is available as a source of information before arrival. The goal of therapy is usually discussed and evaluated with patients during admission and discharge discussions.

Since Fresenius Vamed is also active as an accredited inspection body (ISO 17020) and as a manufacturer of medical gas supply systems (RL93/42 EEC), the business segment is subject to both a labeling obligation and an information obligation in accordance with RL93/42 EEC and MPG and/or ISO 13485. The accreditation authority uses external audits, for example, to check whether appropriate provisions exist and whether regulatory or normative requirements are complied with.

## Our ambitions

Fresenius Vamed defines its quality goals annually with the aid of additional key performance indicators. The findings from complaint, case, and risk management are also incorporated. The goals are reviewed regularly.

## Progress and measures 2021

In the reporting year, the management approach and the governance structure of Fresenius Vamed remained as reported in 2020. Progress was focused on the safeguarding and application of hygiene and safety protocols and on adapting those to regulatory provisions.

## Evaluation

Fresenius Vamed assesses the health and safety impacts of all significant product, treatment, and service categories for improvement potential.

## Personalized and individually tailored rehabilitation goals

Fresenius Vamed uses modern, resource-oriented approaches, such as the ICF concept (International Classification of Functioning, Disability and Health) or the computer-based evaluation system CHES (Computer-Based Health Evaluation System). This enables patients to achieve the best possible, evidence-based functional improvement to increase activity and participation in all areas of life, even after severe illness.

In addition, the findings on treatment quality are published, for example by Fresenius Vamed Germany on the website [Qualitaetskliniken.de](https://www.qualitaetskliniken.de). This allows patients to find out about key quality parameters of the various clinics before they are admitted.

## Measurement of patient satisfaction and grievance processes

Fresenius Vamed measures patient satisfaction in its health care facilities in a continuous and structured process. The evaluation is conducted on a weekly and a monthly basis. The company collects data, evaluates it internally, and implements appropriate measures, if necessary. Patient surveys are conducted while the patient is in the clinic, as well

as after their rehabilitation; in some clinics both approaches are established. In this way, the clinics receive comprehensive feedback with regard to patient satisfaction.

Fresenius Vamed uses reporting systems for critical events and near-misses in its health care facilities, i. e., the electronic CIRS (Critical Incident Reporting System). Critical incidents can be reported anonymously there. The reports are processed by a dedicated committee. In addition, Fresenius Vamed uses systems for suggestions for improvement, material vigilance (material safety), and pharmacovigilance (drug safety). Thanks to these systems, a timely and appropriate response to potential sources of danger or complaints can be made, aligned with our internal quality standards.

#### Audits and recertification

To ensure adherence to quality standards, Fresenius Vamed also performs regular internal audits as well as external recertifications. This is done in the certified health care companies as well as in the other facilities of Fresenius Vamed. Quality management audits are carried out there once a year in accordance with the ISO regulations. Internal audits are carried out systematically and cover all business segments, and at a minimum, those topics that are required by the certified standards – i. e., all quality management processes. Besides ISO certifications, audits are conducted by the external regulatory bodies, listed on page 128 of this Group Non-financial Report.

## DIGITAL TRANSFORMATION AND INNOVATION

### DIGITALIZATION AND INNOVATION

Digitalization plays an increasingly important role for Fresenius – whether in health care facilities, in direct contact with patients, or in production. It is a driving force behind the implementation of innovative technologies and treatment concepts and can help us to find solutions to many challenges in the health care sector and help unlock trapped value. For us, the focus is on the opportunities offered by digital solutions. Through innovative, safe, and user-friendly products and systems, we can further improve the quality and efficiency of treatments.

#### Digitalization as an opportunity in health care

Fresenius has been pressing ahead with digitalization initiatives in its business segments for many years. On the one hand, these initiatives are aimed at getting closer to patients and better integrating them into preventive care and therapies. On the other hand, numerous applications help medical professionals to achieve even better treatment results even more efficiently and safely.

This is in line with the results of a [representative poll conducted](#) for Fresenius by the polling organization Allensbach Institut für Demoskopie in Germany, Spain, and the United States. According to a large part of the respondents, the increase in digitalization offers opportunities for the health care system. People associate digitalization with a whole range of positive effects, above all easier com-

munication between doctors, easier access to health information, and improved diagnosis and treatment options. Furthermore, shorter waiting times, cost savings through improved efficiency, and an increase in the quality of health care are expected as positive effects of digitalization in medicine.

Important indicators for Fresenius' digital offering are the answers to the question of what people specifically want: the introduction of digital medical records, the expansion of telemedicine services, and the use of patient data for diagnosis are considered desirable by a large part of the population in Germany, Spain, and the United States. Around one-third of the population in each of these three countries also consider it desirable that more and more personal health data be recorded by means of apps, smartwatches, and fitness bracelets.

#### OUR APPROACH

Our markets are changing rapidly; this is particularly true with regard to digital trends in health care, which have been further accelerated by COVID-19. We are seeing increasing demand from patients, health insurance companies, and health care institutions for new digital services along the entire value chain. Patients want remote treatment and on-demand health care services. Data-driven decision-making is becoming increasingly important, for example in predictive maintenance of dialysis machines and analysis of patient data. At the same time, cybersecurity risks have made us aware of the need for standardized and resilient IT infrastructures.

In order to drive digitalization and innovation at Fresenius, we take different approaches in the four business segments – from independent R & D strategies to active innovation management, as described in the Group Management Report on pages 51 ff.. We also involve external partners such as research institutions and start-up companies in this work. One of our priorities is developing innovative products that not only meet stringent quality requirements, but also affordability requirements. In doing so, we are responding to the growing demand worldwide for high-quality yet cost-effective products and outcome-based services.

Many of our stakeholders, especially our patients and our employees, are directly affected by the changes resulting from the advance of digitalization. Our R & D activities are closely linked to digitalization and are an integral part of our growth strategy. Our aim here is to improve products and processes as well as to develop innovative therapies and integrated health care services; however, we do not conduct fundamental research.

Our products and therapies are designed to help promote human health. Benefits and risks must be carefully evaluated. Whether it is in clinical approval studies or in clinical research projects, the Fresenius Group wants to create opportunities to improve the quality of treatment, especially in the area of critical illnesses and chronic diseases.

All new or improved products and services are subject to internal quality requirements as well as external regulations and regulatory requirements. In the case of digital developments, we pay particular attention to the requirements of the European Union (EU)'s General Data Protection Regulation (GDPR); for more information see the "Data Protection" section on page 188 of this report. We also observe European directives such as the EU Medical Devices Regulation (MDR) in the medical technology sector. We address possible risks such as hacker attacks on sensitive data and systems, by implementing comprehensive cybersecurity concepts, as described in the "Cybersecurity" section on pages 149 ff.

#### Group-wide IT transformation

In 2021, Fresenius began implementing a new, Group-wide IT program to strengthen cooperation in the IT area and increase value creation in the Group. All organizations of the Fresenius Group have participated in the development of the program and are accompanying the transformation process in the Global IT Board.

We want to further develop our IT in such a way that it supports existing business models and enables the development of new ones. Our vision is to digitally transform Fresenius for improved patient care and a successful future for our Group.

## CLINICAL RESEARCH AND INNOVATIVE TREATMENT MANAGEMENT

### Fresenius Medical Care

Fresenius Medical Care's Global Medical Office aims to enhance its patient-focused care delivery business model. This function, led by the Global Chief Medical Officer on Fresenius Medical Care's Management Board, aims to achieve the best clinical outcomes for patients, their families, and the payor community. This office is tasked with evaluating coordinated data from clinical science research and medical practice. This includes facilitating cooperation and knowledge transfer across the entire network of Fresenius Medical Care. More information can be found in the [Annual Medical Report](#), which is available online.

The business segment continuously engages in the research and development of innovative products and enhanced therapies. For example, it facilitates clinical trials, which are a crucial step in developing new treatments. Fresenius Medical Care is also further exploring non-interventional methods by means of mathematic modeling and virtual clinical trial simulations. The research and development activities follow regulatory guidance for clinical research practices. Additionally, they are conducted in compliance with ethical standards. In a global statement, Fresenius Medical Care outlined the principles with which the business segment commits to advancing health care and

managing related risk, as well as advocating for patient rights, patient well-being, and animal welfare. The business segment plans to make this publicly available in 2022. It is of importance, that research partners follow similar bioethics guidelines as the company itself.

The business segment's Frenova Renal Research division provides research services to third parties and has also started enrolling patients in a new initiative to develop the largest renal-focused genomic registry in the world. It aims to enroll over 100,000 patients by 2025. This new registry will contain genetic data from chronic kidney disease patients worldwide and help researchers improve their understanding of kidney disease.

### Fresenius Kabi

At Fresenius Kabi, the knowledge and expertise from experts in clinical nutrition, pharmaceuticals, and medical devices are embedded in research and innovation projects with the goal of improving patients' health and quality of life. As a manufacturer of generic drugs, clinical nutrition products, and infusion and transfusion therapies, as well as biosimilars and medical devices used to administer these products, Fresenius Kabi conducts clinical studies by commissioning qualified external contract research organizations (CROs) and

university scientific institutions to do so. For some products, clinical studies sponsored by Fresenius Kabi must meet regulatory approval requirements. In addition, further studies are conducted regarding patient safety, in order to gain new medical-scientific insights or comparative clinical studies with other products available on the market. The clinical studies sponsored by Fresenius Kabi are always carried out in accordance with strict legal requirements, including, for example, the guidelines of the International Council of Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH), of Good Clinical Practice (GCP), and of the relevant pharmaceutical regulatory authorities such as the U.S. Food and Drug Administration (FDA), the European Medicines Agency (EMA), the Declaration of Helsinki, and the EU General Data Protection Regulation. Fresenius Kabi sponsors studies for registration in close cooperation with various CROs, scientists, and physicians and supports investigator-initiated trials. These studies pursue the goal of generating new scientific knowledge that is significant for patient care using approved and new products.

Fresenius Kabi has a Chief Medical Officer and a **Global Trial Committee** that reviews, evaluates, and approves clinical trials before they begin. Responsibility for clinical study management is aligned with Fresenius Kabi's product groups and is anchored in the divisional organizations. Compliance with the applicable regulations and guidelines prior to, during, and after clinical studies is ensured by a risk-based auditing program. Here, safety of the study par-

ticipants and validity of the study data are considered the most important criteria. No clinical trials are conducted without a positive vote by the responsible ethics committee and approval from the respective competent authority, where required.

When selecting study participants, Fresenius Kabi also takes diversity into account concerning the population group for which a product in question is intended. Fresenius Kabi does not conduct studies without a prior positive benefit/risk assessment. Furthermore, safety events occurring during a clinical study are constantly monitored and evaluated. Study participants are fully informed prior to the start of the study and are enrolled only with their consent. Internally, clinical studies are documented in a central database and the results are published in accordance with the applicable regulations.

### Fresenius Helios

Fresenius Helios conducts clinical trials at many sites to promote innovation processes in clinical treatment, medication, and interdisciplinary exchange. The business segment's innovative strength in clinical study management strongly influences its future success in therapy and inpatient treatment. Among other things, studies are conducted to deter-

mine how effective and safe medicines are and whether medical devices are suitable for approval in accordance with internationally applicable ethical and scientific standards, such as Good Clinical Practice or the Declaration of Helsinki of the World Medical Association. In addition, the division encourages its employees to engage in scientific and technological research activities. The aim is for them to develop personally and use their findings to enhance the well-being of patients.

Projects funded by public grants are also being carried out at the German Helios hospitals – supported by the Innovation Fund of the Joint Federal Committee (G-BA), the German Federal Ministry of Education and Research (BMBF), or ministries of further German federal states, among others. These projects serve the benefit of both Helios' employees and patients; they mostly focus on the development of new therapies, care, and treatment pathways. In cooperation with manufacturers, the focus is also on testing specially designed patient rooms (e.g., for dementia patients) or assessing new technologies in the sterilization of medical equipment. Helios Germany provides data on severe acute respiratory infections (ICOSARI) to the Robert Koch Institute (RKI) in order to monitor the appearance of influenza virus and coronavirus in hospitals.

### Clinical research projects

In Germany, the Helios Center for Research and Innovation (HCRI) is the point of contact for all employees of Helios clinics and its subsidiaries who want to conduct research –

whether with patient data, by participating in clinical drug and medical device studies, or by developing new apps. Before a clinical research project takes place in a clinic, it is ensured, for the protection of the participating patients, that scientific, ethical, and legal requirements are met and that the project complies with Fresenius Helios' guidelines and quality standards. These requirements are listed in the **Helios Group Regulation Research and Science**. This Group regulation also specifies the framework conditions within which Helios specifically promotes research projects of its own employees that are expected to have a high level of benefit for patients.

A total of 48 hospitals or integrated health care facilities are involved in at least one research project. The respective Helios clinics or facilities in question employ what are referred to as investigators and study assistants – specially trained staff such as biologists, chemists, or natural scientists with doctorates, but also nurses. They determine on-site the costs associated with a study and the benefits to patients and to Fresenius Helios. In addition, the HCRI supports the research clinics of Helios Germany along with employees in studies initiated by the clinics themselves (known as investigator-initiated studies, IITs).

HCRI, as the central office with experts in regulatory principles and methodology and in contract management, is supported by the Central Data Protection Service and has been conducting the central study review since 2019. More information on data protection can be found in the respective section on pages 188 ff. of this Group Non-financial Report.

In the wake of the COVID-19 pandemic, Helios-wide analyses based on routine data were conducted several times; they substantiated, for example, the changed number of

patients for various acute conditions (myocardial infarction, mental disorders, major tumor surgery) during the pandemic.

### Progress and measures in 2021

Under the Horizon 2020 research program of the European Union, the Helios Leipzig Heart Institute is coordinating [PROFID](#), a large international research project on prediction and prevention of sudden cardiac death after myocardial infarction. The project started in January 2020, is scheduled for five years, and brings together more than 20 top partners from 12 European countries including key academic institutions, the European Society of Cardiology, public health insurance bodies, health economic experts, and patient organizations. The Fresenius entities involved are the Helios Leipzig Heart Center and Helios Spain. The assessment of risk factors for sudden cardiac death is based on machine-learning approach using approximately one million patient datasets. The findings will be subsequently validated in two international clinical trials that are currently the largest clinical trials worldwide in the field of cardiac devices.

### Evaluation

In 2021, a total of 424 studies were conducted in the Helios clinics in Germany, the majority of those with the goal to improve therapies for patients. For example, under the leadership of Helios ENDO-Klinik Hamburg, an international group of experts from over 40 countries developed guidelines and algorithms under which a safe return to normal operations and the performance of elective orthopedic sur-

gery was possible. The study results were published in spring 2021.

Further, Helios Germany conducted 34 COVID-19-related studies in its clinics.

### Fresenius Vamed

At Fresenius Vamed's [Institute for Gender Medicine](#), all health issues that lead to an extension of the healthy years of life and to the improvement of quality of life are researched, with a particular focus on gender-specific aspects with regard to individualized medicine. These research activities encompass prevention, acute care, rehabilitation, and nursing.

## DIGITALIZATION AND INNOVATION IN THE BUSINESS SEGMENTS

### Fresenius Medical Care

Digitalization plays an important role for both health care services and products. The business segment continually develops products and digital services that improve access to health care, which has become more critical during the pandemic.

Fresenius Medical Care's Global Research and Development division manages the global research and development activities related to product engineering. The Global Medical Office is responsible for the clinical digitalization strategies and the use of digital clinical data for research and operations. The basis of this commitment to continuous innovation is articulated in the Code of Ethics and Business Conduct.

## Progress and measures in 2021

### ► Telehealth care

In North America, Fresenius Medical Care has established telehealth platforms aimed at giving extra support to patients on home dialysis. For example, the cloud-based solutions for home dialysis are designed to keep patients connected to their care teams, with better access to recent treatment data. By making this data more easily accessible to clinicians, care teams can resolve treatment issues earlier and reduce hospitalization. For the peritoneal dialysis patient education experience app, the business segment was awarded two Bronze Awards for Excellence in Technology by the research and analyst firm Brandon Hall Group.

### ► Digital product innovations

The business segment has expanded its digital options to facilitate better access to information for the patients under its care. The digital platforms enable virtual contact, which has, for example, reduced the risk of infection for patients and staff during the pandemic. Keeping patients and care teams connected and giving them access to recent treatment data is vital for continuously improving medical outcomes, user experience, and the effectiveness of care. The business segment has two main platforms, that are provided via apps. One is used predominantly in North America and the other is accessible across more than 20 countries in Europe,

Africa, Asia-Pacific, and Latin America. Combined, these apps had more than 26,000 active users in December 2021. The business segment use digital platforms in more than 20 countries to overcome the challenges presented by COVID-19. In the United States, Fresenius Medical Care recorded over 410,000 remote visits between patients, care teams, and physicians by the end of 2021.

### Fresenius Kabi

As a global health care company that offers lifesaving medicines and technologies for infusion, transfusion, and clinical nutrition, digitalization and innovation are of great importance to Fresenius Kabi. The digitalization of processes is a cornerstone in the development of innovations and an important aspect in effective care for critically and chronically ill patients, as well as compliance with regulatory requirements. Fresenius Kabi develops devices and applications in various medical fields to support its customers' ongoing digitalization. Devices not only have to be optimized in their core functions but increasingly need to be embedded into the IT systems of hospitals, clinics, and plasma centers. Fresenius Kabi wants to benefit from this trend and will focus on the constant development of its portfolio, while



acknowledging the increasing role of software in medical technology and its application area. This is part of the Fresenius Kabi Vision 2026, which was developed in 2021 and adopted in the fourth quarter.

In order to take even greater advantage of the opportunities of digital transformation and to develop digital business models, Fresenius Kabi has started to realign its IT organization as part of the Group-wide IT program. The digital transformation is thus to be driven forward and the value contribution of digital applications for the company and customers increased. The business segment is increasingly using intelligent automation and artificial intelligence to improve business processes in administrative functions. In production and quality management, Fresenius Kabi is using digital platforms to implement process control systems, monitor plant efficiency, and manage data and support workflows in laboratories. This also enables the business segment to access data to analyze and automate decision-making processes. Digital solutions are constantly being developed along the entire value chain to make internal work processes more efficient and simpler.

At Fresenius Kabi, responsibility for digitalization is anchored in the central, divisional, and regional organizations; steering responsibility lies with the Fresenius Kabi IT Executive Board, which is chaired by the responsible member of the Management Board and the head of the global IT department. Other relevant functions are also represented on this board.

### Product innovation

In product development, Fresenius Kabi's expertise includes all related components, such as the raw material for drugs, the pharmaceutical formulation, the primary packaging, the devices needed for application of drugs and infusions, and the related production technology. In the field of biosimilars, Fresenius Kabi focuses on autoimmune diseases and oncology. More information on R&D can be found in the Group Management Report from page 51 onwards.

The business segment has standard operating procedures for the development and design of products and for the cybersecurity of its devices; for more information see the "Cybersecurity" section on pages 149 ff. The responsibility for innovation and development is anchored in the divisional organizations of the company. Fresenius Kabi constantly addresses the advancement of scientific findings. Employees work together in cross-organizational and cross-functional teams to develop innovative solutions for medical needs.

### Progress and measures in 2021

#### ► Digital transformation

Fresenius Kabi started to implement the business segment's new governance structure as part of the Group-wide IT program for digital transformation in 2021. Fresenius Kabi has thus had an integrated IT organization for business-specific applications and IT services since October 2021 and in this way aligns them even more closely with the requirements of the business model and its customers and patients.

#### ► Digital product innovations and digital applications

Digital applications can help to ensure patient safety and regulatory compliance. For example, Fresenius Kabi introduced radio frequency identification (RFID) technology, known as smart labels, for drugs in the United States in 2020. The smart label enables hospitals to automatically identify, locate, and manage their inventories. Following the successful launch of the first RFID-labeled product in the United States, two more products with smart labels were launched there in 2021.

With digital technical services, Fresenius Kabi helps improve the efficiency of processes in hospitals and care facilities. Digital technical service applications accelerate maintenance and can reduce the downtime of medical devices due to maintenance work. In this context, Fresenius Kabi aims to offer its solutions to its customers in as many countries around the world as possible.

In compliance with data protection regulations, Fresenius Kabi is also working to use the data generated by the apps to improve patient care. For example, the aim is to identify potential risks for patients and improve the decisions made by patients or health care professionals.

## Fresenius Helios

Digitalization is key for Fresenius Helios to ensure the sustainability of its hospitals and outpatient facilities, and to improve the quality of health care and the service provided to patients.

Since 2020, the business segment has used a newly developed process for managing digitalization projects in Germany via the Helios Digitalization Board (Helios DIGI) to manage and centrally evaluate proposals for digitalization projects. Proposals are collected in the clinics and outpatient facilities of Helios Germany and in the Fresenius Group and then rated. The Board decides on the approval of project proposals. All digitalization projects, including rejected project ideas, are published in the “Helios.Digital” project database via the intranet “myHelios”.

Helios Spain’s IT and process strategy aims to further improve digital patient interaction such as video conferencing and chats, where patients can present their medical history, protocols, and automated tests for specific diagnoses. To ensure that the IT strategy is gradually implemented, the business segment has introduced a competence model called Digital Stars at Spanish hospitals. This model is based on three pillars: Digital Customer (patients), Digital Professional (employees), and Digital Organization (administration).

Each of the three pillars has key figures to indicate progress in digitalization and its acceptance, and collects data, for example on the number of patients making use of digital medical consultations, the number of electronic prescriptions issued by employees, and the number of invoices automatically generated. The data is evaluated on a monthly basis and enables comparison of the state of evolution of digitalization in the various hospitals in Spain.

### The Helios patient portal

Fresenius Helios started introducing a patient portal at its clinics in 2019. Patients can now access treatment documents such as diagnoses, book appointments online, or attend video consultations at 50 German clinics, around the clock and from home. The portal can be accessed via the websites of the respective clinics. In 2021, the patient portal recorded 130,000 registered users, 300,000 documents exchanged via the portal and nearly 85,000 online appointments.

Many users already access Helios Spain’s patient portal. Nearly all Spanish hospitals are connected. The hospitals benefit from a central data repository and improved data transmission and coordination. Via the digital portal, patients of Helios Spain can track the progress of their own clinical treatments and view recommended therapeutic measures. They have direct access to 3D radiological images and can contact their responsible specialists and interact via web formats. In addition, it is possible to digitally request an appointment for most of the examinations avail-

able and to read up on the risks associated with an examination. Prior to a procedure, patients can also sign a consent form electronically via the portal.

### Electronic patient file (EPF)

A digital patient file with doctor’s letters, findings, and complete clinical imaging is available at the majority of workstations in the clinics; this creates added value for both treatment providers and patients. By 2022, other medical data such as nursing documentation and medication will also be available in the digital patient file at Fresenius Helios. In about half of the Helios clinics, integrated software solutions already issue warnings of possible interactions with other drugs, which increases patient safety.

In general, this makes many processes more efficient and improves medical quality. The expansion of the Germany-wide telematics infrastructure, ordered by the government, into which the electronic patient file will be integrated in the future, focuses on improving the quality of care and the efficiency of care and administrative processes. This project aims to modernize the technical infrastructure in the German health care system up until 2025.

E-medication is one planned aspect of the telematics infrastructure. It will enable electronic prescriptions to be transmitted digitally to parties outside the hospital – e.g., medical practices and pharmacies – and to be uniquely assigned and tracked. Patients can make their own decisions on the distribution of information.

In Spain, the electronic patient file contains discharge papers, issued by medical or nursing staff, along with medication information and prescriptions. Thanks to this paperless process, patients can go directly to the pharmacy with their smartphone. Prior to an appointment at the hospital, they fill out a form online and then receive notifications and directions. At the clinic they are navigated directly to the treatment room via the app.

### Fresenius Vamed

Fresenius Vamed has established digitalization as a strategic business area with the aim of implementing digitalization initiatives and projects, coordinating digitalization activities within the Vamed Group, driving digital innovation, and generating new digital solutions and services. Among other things, Fresenius Vamed is developing patient services for digital assistance systems that support ambient assisted living (AAL) and digital rehabilitation services. In the project business, Fresenius Vamed has long used complex virtual models (Building Information Modeling - BIM) in the planning and operation of health care facilities, which enable to simulate and optimize the entire life cycle (planning, design, construction, operation, and maintenance) of a health care facility. Additionally, Fresenius Vamed is also undertaking internal digitalization projects in the areas of project business, high-end services, and general operations management. The management of the digitalization strategic business unit regularly reports to the Management Board on progress.

### Progress and measures in 2021

In 2021, the management approach and the governance structure of the digitalization strategic business unit of Fresenius Vamed remained as reported in 2020. Progress focused on various digitalization projects and initiatives in the areas of high-end services, overall operations management, and project management.

### OUR AMBITIONS

The Fresenius Group diligently works on expanding its competencies and developing new areas of business in order to offer digital solutions to the challenges faced by the health care sector.

The four business segments take different, segment-specific, approaches to the area of digitalization and innovation. In the care of critically ill patients, the demands on treatment success are becoming ever higher. The demand for effective therapies together with intelligent medical applications and devices will rise steadily.

### EVALUATION

All business segments have their own approach to digitalization and innovation and are currently developing key performance indicators (KPIs). As a material aspect, digitalization and innovation is also included in the variable remuneration of the Group Management Board. Further information is included on page 234 ff. of the Annual Report 2021, see the Compensation Report.

In 2021, **Fresenius Medical Care** started the process of further integrating specific environmental criteria in its research and development activities. The business segment is also working to include sustainability topics in the early stages of innovation projects.

**Fresenius Kabi** continuously reviews its progress in the area of digitalization. In 2021, the business segment reviewed the structure of its IT organization. Responsibility for business-specific IT applications and services for medical professionals and patients are thus anchored directly in the business segment and decisions are accelerated. In this regard, Fresenius Kabi intends to make even greater use of artificial intelligence applications and to exploit the possibilities of analyzing digital information for the benefit of the company and its customers.

In 2021, no critical events with a significant impact on the safety of study participants or compliance with the applicable requirements and standards became known.

In the hospital sector, **Helios Germany** measures the degree of digitalization using the EMRAM Score from the service provider HIMSS Analytics. EMRAM is an eight stage (0 – 7) model that provides transparency on a hospital's degree of digitalized processes. A fully digitalized hospital would reach stage 7, while a hospital at stage 0 would use paper-based documentation in all departments. The results for 2021 will be available in the first quarter of 2022.

**Fresenius Vamed** regularly reviews its management approach using standard controlling processes. In addition, the digitalization strategic business area collects data and regularly reports on the status of the respective initiatives and projects in the business segment. Fresenius Vamed uses common trend and innovation studies, e.g., Gartner Hype-Cycle, and in 2021 also the results of the Allensbach study, to formulate and evaluate strategies for digitalization in the health care market. Local publications and trend analyses are also taken into account. In 2021, the business segment increased the use of telehealth solutions and mobile apps.

Overall, the digitalization of processes was driven forward throughout the Fresenius Group in 2021.

## CYBERSECURITY

### OUR APPROACH

At the Fresenius Group, we pursue a holistic approach for the management of cybersecurity. We bring cybersecurity and business decision-makers in the Group together to develop a joint approach aligned with our strategic goals. We base our strategy on cyber-risk analyses and the security requirements of our four business segments. This approach is reflected in all Group security policies.

In 2017, the Management Board of Fresenius Management SE initiated the Cybersecurity Approach, Roadmap and Execution (CARE). Since 2018, CARE has represented the Group's cybersecurity program, which bundles initiatives to strengthen our resilience in preventing and defending against cyber attacks. In 2020, the Management Board of Fresenius Management SE enacted a Group-wide Cybersecurity Policy that defines the objectives, structure, and operational organization for cybersecurity governance across the Fresenius Group, embedded in CARE.

To manage Group-wide cybersecurity and associated risks, we have determined five risk domains. These are managed by the respective Risk Domain Managers – at corporate level and in the four business segments. Facilitated by the Group Cybersecurity Office (GCSO), the managers appoint Special Interest Groups (SIGs) that define cybersecurity requirements and coordinate risk management activities. The managers promote the use of best practices and the exchange of expertise and knowledge across all cybersecurity risk domains.

The CARE program is structured along these risk domains across four cybersecurity clusters to ensure that our digital environment stays robust and recovers quickly in case of an

incident. Overall, eight sub-programs have been set up to meet the primary objectives of the respective clusters in all risk domains:

- ▶ **Critical Asset Protection:** Protection for the most critical assets that are of highest value to the Group
- ▶ **Baseline Security:** Defining and implementing minimum cybersecurity standards
- ▶ **Cyber Defense:** Detecting and responding to cybersecurity incidents in a timely manner to limit the business impact
- ▶ **Governance, and Risk & Organization:** Establishing a foundation for effective cybersecurity governance

The Opportunities and Risk Report contains further information on cybersecurity at Fresenius in 2021, on page 110 f.

### Certification and commitment

Cybersecurity insurance policies are in place at business segment level, where deemed suitable for risk transfer. In addition, there are certifications such as ISO/IEC 27001 at Group and business segment level. In addition, to complement the governance structure for risk minimization and to further hedge risks, the conclusion of a global cybersecurity insurance will continue to be evaluated at Group level.

## Organization and responsibilities

### The organizational structure

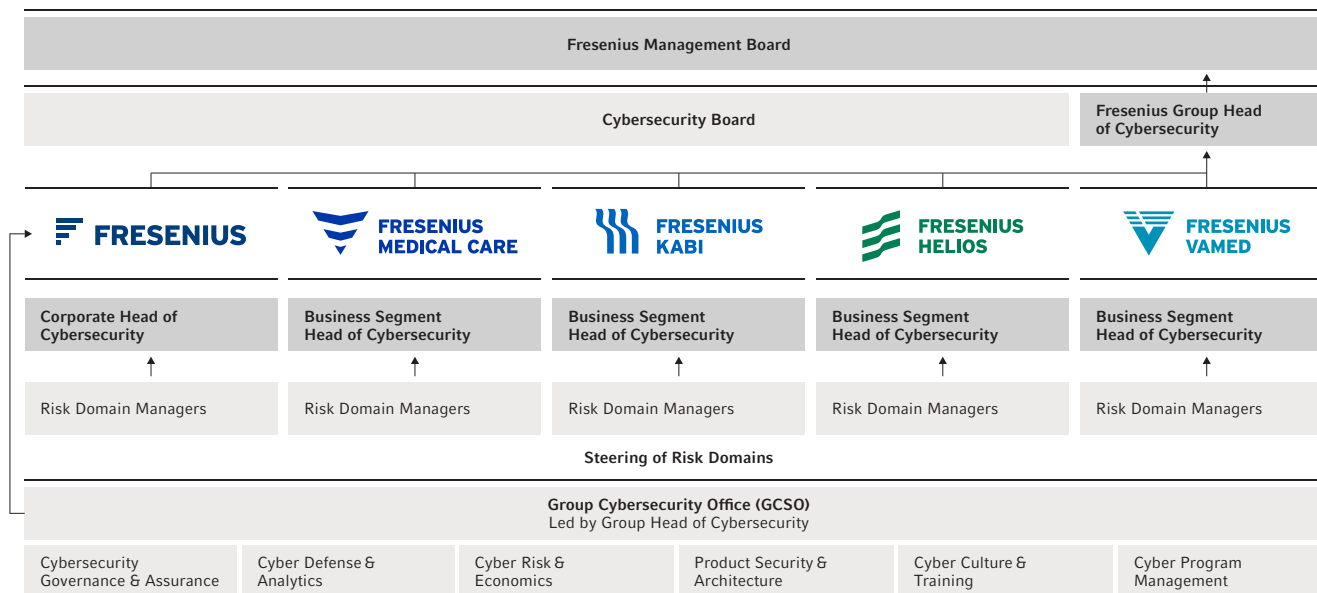
The CFO on the Fresenius Group Management Board oversees cybersecurity governance and receives direct reporting from the Group Head of Cybersecurity. The position of the Group Head of Cybersecurity, who acts as Group-wide Chief Information Security Officer (CISO), has overall responsibility for the governance of cybersecurity within the Fresenius Group and leads the Group Cybersecurity Office (GCSO). He defines the Group-wide cybersecurity strategy and coordinates this strategy with the respective cybersecurity heads in order to ensure an aligned approach across all business segments.

In the four business segments, the respective Business Segment Heads of Cybersecurity (Segment CISO) are responsible for the activities in the respective business segments. At Fresenius SE & Co. KGaA level, the Corporate Head of Cybersecurity is responsible for the individual corporate functions.

The GCSO enables and manages cybersecurity within the Fresenius Group. It ensures that relevant cybersecurity activities are organized and implemented at the business segment level, monitored, and coordinated from a Group perspective. Where necessary, the business segments are advised and supported in their activities.

The GCSO is divided into six functions: Cyber Governance & Assurance, Cyber Risk & Economics, Products Security & Architecture, Cyber Defense & Analytics, Cyber Culture & Training, and Cyber Program Management.

### CYBERSECURITY ORGANIZATION



ity & Architecture, Cyber Defense & Analytics, Cyber Culture & Training, and Cyber Program Management.

At the operational level, the four business segments are responsible for their cybersecurity management. The business segments establish and report on strategic objectives and strategies for addressing risks. The objectives are based on the Group-wide cybersecurity strategy and are autonomously defined by the Business Segment Heads of Cybersecurity, who are responsible for implementation.

In addition, the cross-divisional Cybersecurity Board meets on a bi-monthly basis. It consists of the Group Head of

Cybersecurity, the Corporate Head of Cybersecurity, and all Business Segment Heads of Cybersecurity. It ensures the exchange of information on Group-wide cybersecurity matters between the business segments and Group functions, defines criteria for evaluating and monitoring the development of cybersecurity across the Group, and reviews the progress and results of cybersecurity measures and initiatives. The Cybersecurity Board also monitors the adoption and implementation of the Group-wide cybersecurity policies.

The individuals responsible for cybersecurity usually have many years of experience in cybersecurity management, extensive knowledge, and appropriate professional certifications.

### The reporting structures

The CFO of the Fresenius Group, as a member of the Management Board of Fresenius Management SE, is informed about cybersecurity-related topics on a weekly basis by the Group Head of Cybersecurity, and as required. The Group Head of Cybersecurity reports quarterly to the Management Board of Fresenius Management SE and at least annually to the Supervisory Board. The Chief Financial Officers of the business segments, and for Fresenius Vamed the member of the Management Board responsible for the service business, meet on a quarterly basis in the CARE Steering Committee to organize regular reporting and to steer the cybersecurity initiatives across the business segments.

The Business Segment Heads of Cybersecurity inform the respective members of the CARE Steering Committee and additionally report on cybersecurity matters to their Management Boards at least on a bi-annual basis. The Risk Domain Managers report to their respective Heads of Cybersecurity. In addition, the Data Protection, Enterprise Risk Management, and Compliance departments regularly exchange information on matters relating to cybersecurity.

### Guidelines and regulations

Our Cybersecurity Policy Framework consists of a set of policies, requirements, and procedures. It forms the founda-

tion for cybersecurity in all business segments and Group functions. Within this framework, we define confidentiality, integrity, and availability as our key objectives for protecting digital information, technologies, and systems across our risk domains. It was approved by the Management Board of Fresenius Management SE and the management committees of the four business segments.

The Cybersecurity Policy is based on the Fresenius Code of Conduct and follows internationally recognized standards and best practices, such as the [Charter of Trust](#). It defines the overarching policy and organizational structure for cybersecurity governance in the Fresenius Group. The underlying Risk Domain Policies specify the framework, processes, and roles and responsibilities for each risk domain to attain the overarching objectives of protecting the confidentiality, integrity, and availability of Fresenius' digital information in a holistic manner.

The four business segments also have specific minimum security standards, which take into account specific regulatory requirements or local legislation. Minimum security standards already established in the four business segments are leveraged as Group-wide standards where appropriate.

### Our ambitions

The objective of our cybersecurity program CARE, which covers all risk domains, is to increase the maturity level of our cybersecurity capabilities, strengthen our resilience towards cyber attacks, and continuously reduce our cyber risks. We evaluate the ever-changing threat landscape, define minimum security standards for our cyber risk domains, and implement appropriate security measures in

a targeted, risk-based, and cost-effective manner. The Cybersecurity Board annually develops Group-wide and business-unit-specific operational objectives and measures to safeguard the confidentiality, integrity, and availability of our digital information – and to continuously enhance the cybersecurity of our IT, manufacturing, and health facility environments, as well as our medical devices. These are coordinated via the Group Head of Cybersecurity and are submitted to the CARE Steering Committee, which is established at Management Board level and meets on a quarterly basis.

## PROGRESS AND MEASURES IN 2021

### CARE Program

Throughout the reporting period, the various CARE sub-programs have been established to fulfil our ambition of increasing the maturity level of our cybersecurity capabilities, strengthening our resilience against cyber attacks, and constantly addressing our cyber risks. Selected progress in line with the CARE program structure is outlined below:

- **Cybersecurity Baseline Measure Implementation (CBMI):** implementation of enhanced cybersecurity baseline measures, such as endpoint detection and response (EDR) solutions, strengthened authentication mechanisms for critical areas

- **Cyber Training & Awareness (CTAP):** extending the reach of the Group-wide training and awareness platform; conducting various training and phishing campaigns; establishing the cybersecurity awareness brand (“Cyber Aware”) and associated materials such as posters, videos, and merchandise articles
- **Cyber Defense:** aligning incident response procedures; implementing the “Fresenius Virtual Cyber Defense Center” and the “Fresenius Intelligence Office”; extending monitoring visibility to enable early detection and fast response
- **Governance, Risk & Organization:** implementing a cybersecurity governance structure; assessing cybersecurity capability maturities; defining a cybersecurity risk management framework; conducting several cyber risk insurance dialogs to evaluate cyber risk transfer

## Risk analysis

In accordance with the newly established Group-wide Cybersecurity Risk Management Framework, the GCSO – together with the business segments – conducts a business-driven evaluation of the strategic cybersecurity risks along Fresenius’ value chains. The cyber risks of the Group are attributed to the business activities of the respective business segments. While the cyber risks in the product business are closely related to interruptions to manufacturing or logistic processes, as well as theft of intellectual property, the risks in our health care facilities are related to patients, their health information, and the medical devices used.

We continuously derive our cybersecurity measures from the bi-annual cyber risk evaluations in order to effectively mitigate our risks.

We are currently in the process of designing a cybersecurity metrics system that will enhance transparency regarding the overall cyber risk situation of Fresenius. To this end, we defined an initial set of metrics (e.g., what we refer to as crown jewels with critical weak points, average phishing simulation click rate, mean time required to resolve incidents), which in future are to be collected across all the Group’s cybersecurity environments. This will help us to understand how well prepared and resilient we are to prevent (stay robust) and recover (recover quickly) from a cyber attack. In the next step, the system design will be gradually rolled out to complement the existing cybersecurity governance structure.

Our Risk Report contains extensive information on the effects of cyber risks on risk management; see page 110 f. of our Annual Report 2021.

## Security concept

To protect the Group’s value generation, we have developed tailored frameworks for our five cybersecurity risk domains that define the security architectures, concepts, and requirements. We have been implementing the frameworks successively since 2021. The respective preventive, detective and corrective measures are prioritized and implemented through our CARE program to effectively reduce risk. While our main objective is to prevent cyber risks from materializing, we can detect cyber threats at an early stage through various monitoring solutions in order to respond in a timely

manner and limit the actual business impact of security incidents. Recurring analyses and defense processes are automated in order to react even more efficiently. Incidents are thoroughly investigated to derive additional measures to improve our overall security.

## Training

In 2019, we launched the Cybersecurity Training & Awareness Program (CTAP). The goal is to establish a cyber culture at Fresenius, enabling our employees to learn about cybersecurity risks and how to deal with them, and to develop the habits to protect themselves against cyber attacks. In addition to mandatory training on data protection and information security, CTAP offers various courses, games, videos, and other cybersecurity learning content, such as the digital CTAP learning platform. We regularly simulate phishing attacks to monitor the effectiveness of the training and to provide users with information on an appropriate response if phishing is suspected. We calculate a personal risk score for employees based on their behavior in phishing tests and the number of cybersecurity training sessions they have completed. All CTAP activities are tailored toward Fresenius’ specific risks and are available in several languages. The success of the CTAP activities is measured using predefined success criteria.

In addition, we constantly inform our employees through various channels about current cyber risks and new types of cyber threats. We also organize a Cybersecurity Awareness Month in October each year. In October 2021, various webinars were conducted, with a focus on the cyber threats posed by the still high number of employees working from home. Further, webinars for employees' children were offered as "cyber junior training". We are convinced that children and young teenagers have a comparably high need for cyber awareness, especially in view of the increased use of remote learning during the COVID-19 pandemic.

The phishing tests conducted in 2020 and 2021 showed that the intensive training activities positively influenced our employees' security awareness. Therefore, the level of difficulty was raised. The phishing rate initially deteriorated and improved again in the course of the year, thanks to further training sessions. We inform the respective employees individually and directly about the results in their personal dashboard. Further information is provided at Group level on our intranet.

### Reporting paths

If Fresenius employees suspect cyber threats, they can contact [CERT@fresenius.com](mailto:CERT@fresenius.com), [CyberAware@fresenius.com](mailto:CyberAware@fresenius.com), or any cybersecurity employee. To improve reporting efficiency, suspicious mails may be reported through the "Phish Alert Button", which performs an automated analysis and involves the Cyber Emergency Response Team (CERT), if required. Our CERT investigates possible threats and incidents in our IT, manufacturing, and health facility environments, as well as suspected violations. If a malicious phishing attempt is detected, the sender is blocked and the security protocols adapted accordingly.

### EVALUATION

We established our Fresenius Group cybersecurity governance structure in 2020 and further improved it in 2021: part of the further development and improvement of our cybersecurity governance is the definition and reporting of KPIs, e.g., the total number of breaches, along with substantiated classification by severity. We are diligently working to further mature our KPI reporting system for the Fresenius Group. In the meantime, we abstain from reporting any KPIs externally, either in total or by risk domain. The increase in reporting transparency must always be in compliance with our risk prevention activities. Information from our external reporting must not lead to targeted attacks on our infrastructure.

### Audits and monitoring

The Internal Audit departments carry out independent audits to improve the effectiveness of our risk management, internal control, and governance processes in all areas of the company. Cybersecurity aspects are taken into account in the risk-based annual planning and audit execution. The results of the audits are analyzed by the Cybersecurity Group function and are incorporated into the ongoing improvement of existing cybersecurity activities.

Furthermore, independent auditors conduct regular and comprehensive security assessments (e.g., penetration tests, security reviews of critical systems) and certification audits (e.g., ISO 27001, HDS). Results from audits or other monitoring activities are evaluated if internal processes have to be adjusted. Additionally, we work with management consultancies and auditing companies to review and improve our cybersecurity processes. For security reasons, we cannot make any statements about specific review processes.



## EMPLOYEES

The commitment of our more than 300,000 employees worldwide forms the basis of our success. Their achievements, skills, and dedication help our business segments to hold leading positions in their respective markets.

Reporting in this chapter encompasses three categories that we deem essential:

- Working conditions, recruitment, and employee participation
- Employee development
- Occupational health and safety

Further, diversity has been identified as material to our company, and is therefore presented on pages 178 ff. of this report.

The importance we attach to personnel issues is also expressed in our structure: the Group Management Board member responsible for Human Resources (Labor Relations Director), Risk Management and Legal is responsible for the interests of employees. The business models of each of our four business segments set different operational requirements for the management of key matters. In the following section, we will therefore report on both Group-wide and segment-specific personnel concepts and measures.

## WORKING CONDITIONS, RECRUITMENT, AND EMPLOYEE PARTICIPATION

### OUR APPROACH

#### Working conditions

As an international health care Group, we create various incentives for employees, depending on the country and location. These include flexible working time models and the chance to participate in the company's success via variable compensation models. Benefits for full-time employees of the organization are also provided proportionally to part-time employees. In Germany, for example, benefits can be based on joint agreements between management and works councils. We describe our variable compensation models in detail on pages 369 ff. of the Notes.

The collaboration with unions and works councils in various countries globally is explained on pages 155 f. In the case of working time models, challenges remain with regard to an employee's function or the local markets. Further information is included in the business segments' reporting.

In recent years, we have established various dialog formats to strengthen communication between management and employees – both at Group level and in the individual business segments. This allows the Management Board to provide employees with information on important issues personally. In addition, we promote our feedback culture and constructive exchange of ideas.

#### Recruitment and candidate communication

In order to meet our future demand for qualified specialists, we use a variety of different tools to recruit staff. We monitor our working environment and competitive surroundings closely to identify potential. Furthermore, we use digital personnel marketing, organize our own recruitment events, and present the company at career fairs. In recent years, we have significantly broadened our range of personnel marketing activities and expanded our global careers website. In 2021, the market research institute Potentialpark named Fresenius the German company with the best online offering for applicants for the tenth consecutive year.

#### Employee retention

A variety of initiatives ensure that employees are retained effectively. Fresenius offers various benefit components on a corporate and business segment level. These encompass, for example, employee benefit programs, profit-sharing bonuses, pension plans, compensatory time accounts, and tariff-based future payments. Not all elements are implemented equally within the Fresenius Group, but can, however, be accompanied by local benefits depending on the market and employee requirements and regulatory provisions.

## Employee participation

### Exchange with employee representatives

Trust and cooperation between management, employees, and employee representatives is well established at Fresenius and is an integral part of our corporate culture. An open and ongoing dialog between management and employee representatives, as well as unions, is important to us.

Fresenius acts responsibly toward its employees. This is detailed in our commitment to respect the international standards mentioned in our Code of Conduct and our Human Rights Statement. Fresenius SE & Co. KGaA respects freedom of association and recognizes the right to collective bargaining. Employees have the right to join or not to join a union in accordance with local laws. We do not tolerate discrimination based on trade union membership and act accordingly. We are committed to an open and solution-oriented dialog between employees and their representatives, and our management within the relevant legal and operational frameworks. For more information, see pages 194 ff. in the chapter on Human Rights.

Employees liaise with their supervisors, but they can also turn to their human resources or compliance officers, as well as to the works council, their union representatives, or other employee representatives for assistance. In Europe,

about 78% of our employees are covered by collective bargaining agreements. In some European countries, Fresenius is subject to industry-related collective agreements, e.g., in France, which are binding by law due to the industry to which we are affiliated. Where this is not the case, country-specific collective bargaining agreements can be negotiated with local trade unions or comparable social partners. On a global base, about 50%<sup>1</sup> of our employees are covered by collective bargaining agreements.

In European countries, workplace representation bodies are organized according to national law. The business segments have overall responsibility for dealing with local employee representatives and trade unions at country or site level. Our discussions with these representatives focus on local and regional circumstances. Together with the employee representatives, we aim to find tailored solutions to the challenges in the different locations. Further information is included in the business segment sections; see pages 156 ff.

Fresenius has reached an agreement with the European Works Council (EWC), making provisions for a structured dialog with the international trade union associations; meetings are subsequently held once a year between representatives of the four business segments, the employee representatives of the Supervisory Board, and representatives of the international trade union associations.

### Dialog at European level

Fresenius SE & Co. KGaA has a European Works Council comprising 19 employee representatives from 12 countries as of December 31, 2021. These individuals come from the EU and EEA (European Economic Area) member states in which Fresenius employs personnel.

The EWC is responsible for the participation of Fresenius employees in cross-border measures, insofar as these have a significant impact on the interests of Fresenius personnel and affect at least two countries within their area of responsibility, such as the relocation or closure of companies or collective redundancies. For example, the management informs and consults with the EWC on the structure and economic and financial situation of the Group, its anticipated growth, employment situation, investments, organizational changes, and the introduction of new work and production processes. The EWC meets once a year, while its executive committee convenes three times a year, partially in hybrid form due to the COVID-19 pandemic. In 2021, the new elections and appointments to the EWC took place as planned. In preparation for the constituent EWC meeting, an extraordinary meeting of the executive committee (GFA) was held in hybrid form. The EWC was reconstituted in April 2021. The European trade union federations IndustriALL and the European Federation of Public Service Unions (EPSU) attend the meetings at the invitation of the EWC.

<sup>1</sup> Based on about 91% of Fresenius Group total employees.

The focus topics of the EWC in the past fiscal year were projects in the Group's business segments for reorganization, e.g., in the area of global human resources management, the digital transformation, the Group-wide cost and efficiency program, and compliance matters relating to the Group's human rights declaration. Another focus area was the impact of the COVID-19 pandemic on Fresenius' employees. To this end, an exchange of information took place on the situation in the individual countries. Against the backdrop of the COVID-19 pandemic, the prolongation of the agreement on the digital performance of tasks was reached with the EWC.

At its annual meeting, the EWC entered into a dialog with the Management Boards of Fresenius Vamed, Fresenius Kabi, and the management of Fresenius Digital Technology (formerly Fresenius Netcare).

The EWC elected six employee representatives to the Supervisory Board of Fresenius SE & Co. KGaA, including at least one representative of the trade unions.

### **Fresenius Medical Care**

Fresenius Medical Care's employees have always been key to its success. It is important for the business segment to continuously hire and retain the best people for the job, inspire them to stay with Fresenius Medical Care long term, and support their development during their employment. This helps to create an attractive, fair, and trusting work environment for all employees.

### **Organization and responsibilities**

The business segment uses its Global People Strategy as a framework for its activities. Fresenius Medical Care's global HR function – which is responsible for defining and implementing the Global People Strategy – reports to Fresenius Medical Care's CEO. This function provides and manages the relevant standards, policies, and processes in accordance with the evolving requirements of the employees and the business. The Global People Strategy has four priorities: (1) engage employees; (2) make the right capabilities available to support the business goals; (3) continuously advance the organization; and (4) foster excellent people practices.

In line with these priorities, the business segment continually develops and improves the Human Resources (HR) policies and guidelines that steer the global activities. In 2021, the business segment established new global employee guidelines on a broad range of topics such as employee engagement, talent management practices, and inclusion and diversity.

Fresenius Medical Care also regularly completes audits of its employee-related activities. In 2021, more than 20% of internal audits had an HR focus.

### **Employee retention**

Fresenius Medical Care has an established organizational and talent review process, which identifies high-performing and high-potential talent among the top leaders of the business segment. This process allows identified employees to be assisted in building their readiness to tackle future challenges and take on more responsibility.

### **Recruitment**

When it comes to hiring talented staff, Fresenius Medical Care faces increasingly strong competition. As a result, the business segment is working to continuously improve its employer brand. The company aims to remain an attractive employer and recruit, engage, and retain excellent employees. In 2021, Fresenius Medical Care started to set various internal targets to help itself achieve this aim. These relate to, for example, employee engagement, survey participation, and voluntary turnover.

### **Dialog and feedback formats**

Fresenius Medical Care's primary objective of its employee engagement activities is, to give every employee the opportunity to provide feedback and engage with the company in an ongoing and open dialog. In doing so, the business segment hopes to create an attractive work environment, and to boost the employees' commitment and performance. Fresenius Medical Care wants to encourage them to contribute to the company mission and vision. The global employee engagement survey is a tool that helps the business segment do this. Fresenius Medical Care conducts one full employee engagement survey every two years and "pulse checks" in the years between. Through the survey, the company identifies strengths, as well as opportunities to improve the work-

ing environment. The results are used to initiate global and local measures, with the aim of increasing engagement levels in the long term. In 2021, Fresenius Medical Care conducted a global engagement survey. Almost 90,000 employees worldwide responded, reflecting a participation rate of 74% – up from 68% in the last full survey in 2019. The latest survey revealed that 56% of employees who participated are actively engaged – the same rate as in 2019. This was despite the challenging environment created by the COVID-19 pandemic. The employee engagement score is based on three aspects: how many employees would speak positively about Fresenius Medical Care, how many intend to stay at Fresenius Medical Care, and how many feel motivated to perform at Fresenius Medical Care. In 2021, the business segment trained about 10,000 managers on how to read and act upon the results from the global engagement survey.

### Progress and measures in 2021

The COVID-19 pandemic continued to present the business segment with health care challenges throughout 2021. Fresenius Medical Care has introduced various measures to protect and support its employees during this health crisis. For example, Fresenius Medical Care increased employee opportunities for flexible working, created new opportunities for virtual learning, and continued to adapt the organization to the requirements of a virtual environment. In the United States, Fresenius Medical Care provided its employ-

ees with COVID-19-related pay and incentives, as well as other resources to help them overcome financial challenges and to support their overall well-being.

In 2021, Fresenius Medical Care continued to roll out its global HR compliance framework, which sets out its principles and defines how the business segment applies them in its HR processes. Employees received training on the framework, and the roll-out was accompanied by supporting materials to help employees understand what is expected of them.

In Germany, where the business segment is headquartered, Fresenius Medical Care concluded seven agreements with the works councils in 2021. These agreements covered topics such as mobile working, expense reimbursement, COVID-19-related issues, and the HR information system. Other agreements with local works councils related to site-specific workplace matters were finalized.

### Fresenius Kabi

Fresenius Kabi aims to be perceived as an attractive employer around the world in order to attract qualified and motivated talent to the company. It is particularly important to understand regional and local characteristics of the markets and to take these into account when addressing talents based on job profiles. Fresenius Kabi is continuously developing its processes for recruiting employees further and fosters the collaboration between the human resources departments and the divisions. In 2021, Fresenius Kabi continued to carry out application and selection processes partially in virtual form due to the ongoing COVID-19 pandemic. In addition,

Fresenius Kabi uses social networks to address potential candidates with the close involvement of the communications department. In the past fiscal year, Fresenius Kabi was able to fill vacancies as planned. The company continuously works to offer its employees a modern working environment.

### Organization and responsibilities

Fresenius Kabi has a Center of Expertise for Talent, Leadership and Organizational Development (CoE TLO), including Talent Acquisition & Employer Branding and Diversity, Equity & Inclusion in the global human resources department, which reports directly to the head of global human resources. The CoE TLO aims to further develop talent acquisition, personnel and organizational development, and talent management, and to strengthen a company-wide learning culture and corresponding structures and offers for promoting talent at Fresenius Kabi.

### Policies and regulations

As the basis for the shared understanding of collaboration, Fresenius Kabi has defined company values that have been introduced worldwide. These company values are anchored in both the Code of Conduct and the Quality Management Handbook. They are embodied in the corporate environment, and employees maintain a culture of cooperation across national borders, as well as functions and hierarchies.

## Recruitment

Fresenius Kabi set up a Recruiting Center in 2021 to fill vacant or new positions in the central functions and the Transfusion and Cell Therapies division in Germany, which is part of the CoE TLO. The departments are supported throughout the process by the Recruiting Center's team of experts in the search for and selection of suitable candidates. In this way, Fresenius Kabi aims to define individual requirements for vacant positions to improve the recruiting process. The team of experts also draws on a network and talent pool of candidates, who are also given a central point of contact for all questions relating to the recruiting process.

In the region North America, the process of recruiting personnel and introducing new employees to the company can be carried out completely virtually, thanks to the adaptation of existing IT systems.

## Dialog and feedback formats

Fresenius Kabi attaches great importance to dialog with employees across hierarchical levels. Due to the pandemic, dialog and feedback formats could only be conducted online in 2021. To support dialog between management and employees, video messages from the CEO on relevant topics were published on the global intranet, for example. In addition, digital formats were used to foster the exchange between the CEO of Fresenius Kabi and top executives.

For the first time, Fresenius Kabi conducted a **global employee survey** in 2021. In order to achieve a high level of participation, the business segment decided to conduct an open survey accompanied by an internal communication campaign. The focus was on respectful leadership culture and collaboration, trust and integrity, and agility within the business segment. More than 70% of employees participated in the global employee survey. Initial significant insights were gained with important information for global human resources and the top management: the responses show differences both regionally and in the business units. Fresenius Kabi sees very high levels of positive feedback in Asia and South America as well as in the Transfusion and Cell Therapies division, for example. In addition, the close and cooperative collaboration within the company's own team was also emphasized, with a satisfaction rate of above 90%. The evaluation of the survey will be finalized in 2022.

Fresenius Kabi also uses regional employee surveys to sustainably increase employee satisfaction, gain valuable insights into business processes, and increase loyalty to the business segment. The business segment conducted a survey in Switzerland, in 2021, in which approximately 90% of employees participated. About 70% of employees took part in another employee survey in the United Kingdom. Fresenius Kabi is currently further evaluating the results to take them into account in the future development of employee-related cultural company initiatives. Once the evaluation has been concluded in 2022, further measures will be derived.

## Progress and measures in 2021

In 2021, the newly established Recruiting Center focused on improving the recruitment of new employees in the central functions of Fresenius Kabi and the Transfusion and Cell Therapies division in Germany. Further progress focused on conducting the first global employee survey for Fresenius Kabi to gain important insights into employee satisfaction and retention.

Fresenius Kabi developed the Fresenius Kabi Vision 2026 in the reporting year and adopted it in the fourth quarter of 2021. Vision 2026 entails a cultural change. Fresenius Kabi wants to advance its company culture together with its employees – in relation to how employees work together, what values the company stands for, and how it makes decisions. Further information on Vision 2026 can be found on page 47 of the Group Management Report.

## Fresenius Helios

Unlike many other industries, hospitals need to work around the clock, 365 days a year to ensure patients are cared for. Against this background, flexible working hours therefore pose certain challenges and require the revision of existing concepts and the introduction of new ones. Further, Helios offers its employees the opportunity to work part-time.

**Helios Germany** also has to deal with a specific challenge posed by Germany's Ordinance on the Minimum Requirements for Nursing Personnel in Hospitals (PpUGV), which has increased the need for nursing personnel, of whom there is a shortage on the labor market in some areas. The search for employees focuses on the following fields of action: training of qualified personnel internally, advertising for skilled workers, and searching the international labor market. Helios Germany participates in government-led campaigns to recruit personnel on the international labor market, as well as supporting people who have qualified as nurses abroad in their applications or in their searches for language schools. Many international nursing professionals have completed academic training at universities. These forms of vocational training are mainly aimed at complex medical activities and an often strongly cooperative collaboration in medical teams. The German vocational training system is a generalist training, which enables its participants to care for people of all ages. Specialization is possible during and after vocational training. Bringing together the strengths of both training systems is a great advantage and offers an opportunity to advance the overall quality of medical care in the hospitals.

In **Spain**, prospective nurses complete their training at a university. Later, they can specialize through a specific program – choosing between occupational health nursing, family and community health, obstetrics and gynecology, geriatrics, pediatrics, and mental health. Helios Spain has established partnerships with universities to provide classroom training for these professionals and to raise its attractiveness for potential candidates.

Helios Spain aims to further expand its position as a leading private provider of health care services in Spain. To do so, it needs to attract new employees, retain them, and develop them further. Along with this, the business segment participated in various online recruitment sites in 2021 and started to promote its main vacancies through social media campaigns. The quality of Helios Spain as an employer was confirmed by various external rankings in the course of 2021; the business segment is one of the 50 best companies to work for in Spain according to Forbes Magazine, for example.

#### Organization and responsibilities

At Helios Germany, the Central Service for Personnel Recruitment and Development is responsible for creating and implementing measures and strategies for the operating units within the clinics to attract, train and develop personnel. The Central Personnel Management and Collective Bargaining Service is responsible for structuring working conditions under collective agreements and improving the service for employees.

The central function People & Organization of Helios Spain is responsible for collective agreement management and negotiation as well as ensuring that wages are in compliance with applicable regulations. From Spain's headquarters, the function participates in all collective bargaining processes through the corporate labor relations department.

Helios Spain has a company-wide dashboard to manage, evaluate, and improve the most important personnel KPIs. The dashboard is available to all clinics and enables them to conduct benchmark comparisons. Thus, the company pro-

vides transparency for all clinics on the most relevant KPIs and enables best-practice sharing on how to improve personnel management in our Spanish hospitals.

#### Policies and regulations

All Fresenius Helios hospitals apply collective agreements, including those in Germany, which are linked to the Helios Group collective agreement, the collective agreement for public service (TVöD), or company-specific collective agreements. In Germany, all Fresenius Helios hospitals are subject to the current Working Time Act, which in some cases provides for wage reopener clauses for supplementary tariff regulations. The Works Constitution Act, which grants the works councils co-determination rights and control, also has a regulatory effect. The framework with regard to working hours for the individual companies is regularly agreed by the respective company parties onsite.

In its human resources policy, Fresenius Spain states that the company's success depends to a large extent on its employees. The guideline also defines the objectives of human resources work; these include transparent internal communication and the development of a program for the ongoing training of employees.

In Spain, all workers are covered by collective agreements set by law, which set out their basic rights, such as pay and working hours. The agreements thus ensure attractive working conditions and market-oriented remuneration for workers and are negotiated with their legal representatives. There are two different collective bargaining variants at the

sites in Latin America: In Peru, there is only one collective agreement; it applies to all employees regardless of the union to which they belong. In Colombia, on the other hand, negotiations take place at the local level. In clinics with a collective agreement, it applies only to union members.

### Flexible working conditions and digitalization

In 2021, Helios Germany further continued digitalization in the HR area and transferred about 28% of the companies' personnel files to the digital HR management system at the end of the year. All HR processes are to be digitalized by the end of 2022.

In addition, Helios Germany is developing new working time models, especially for the medical service, but also for nursing and administration. To this end, workshops and meetings of working groups with the aforementioned occupational groups took place in 2021. The working time models developed from the findings are presented to personnel and clinic managers so that they can test them and put them into practice in the facilities.

Working hours during the officially ordered lockdown periods, with no or only limited childcare, were also less fixed than before. Mobile working was also made possible in 2021 for employees whose work does not require direct contact with patients.

### Induction of new employees

In the last few years, Helios Germany further developed and standardized the processes used for induction of new employees and new managers. The aim is to reduce early turnover to a minimum. In 2021, new measures were established in the first clinics, such as the appointment of an onboarding mentor, structured familiarization concepts, and feedback discussions during the probationary period. New managers participate in a three-stage program within two years of taking up their posts. A key component of this process is the integration of employees from abroad. This includes language courses and programs to familiarize them quickly with the day-to-day work processes in German hospitals, as well as supporting measures for social integration together with local employees.

Helios Spain uses digital onboarding. By doing so, the business segment ensures that standards set for the induction of new employees are uniform. For instance, the onboarding includes information on the company and its values as well as general and job-specific training. To ensure successful integration, a survey is conducted with new employees both in the first week and after three months. They can also sign up for a mentor program and receive individual support early in their careers.

### Dialog and feedback formats

Helios Germany offers annual appraisal interviews to all employees. From these employee discussions, and from other dialog formats, it became evident how important it is for employees in the nursing division that well-functioning, integrated teams are maintained.

In order to better understand employee satisfaction, especially under the influence of the ongoing COVID-19 pandemic, an **employee survey** was conducted in Spain in January 2021. The participation rate was about 40% of the applicable employees. More than 21,000 were invited to respond to the survey. The participation rate was impacted by the high working intensity in our clinics due to COVID-19, as well as the high fluctuation rate in the first year of service among our employees in Spain. The results were announced to all employees. According to the results, the employees would like to strengthen mutual recognition promote the contribution of ideas, and cope better with difficult situations in the future. As a result, employees had the opportunity to submit suggestions for improvement in a competition. Helios Spain immediately began to implement the measures derived from the best ideas in regional action plans, which are to be continued into 2022.

Employees in Spain who decide to leave the company likewise have the opportunity to state reasons for their departure in a coordinated interview. These interviews are IT based, automatically conducted and documented.

### Progress and measures in 2021

In 2021, the management approach and the governance structure of Fresenius Helios remained as reported in 2020. Progress focused on digitalization and creating flexible working models against the background of the pandemic, and on measures to retain employees.

In 2021, Helios Spain defined and implemented an internal mobility policy with the aim of publishing all vacancies in the employee portal on the intranet with the goal of retaining employees within the clinic Group. In doing so, the business unit highlights opportunities and career paths to professionals who want to develop further, while making an important contribution to retaining talent.

In addition, Helios Spain is planning a project on performance management and sustained feedback for middle management. The implementation is initially planned for specific centers and scheduled for the beginning of 2022.

### Fresenius Vamed

Fair working conditions are part of Fresenius Vamed's mission statement. Fresenius Vamed's corporate culture is characterized by the diversity of unique people, open dialog, mutual appreciation, respect, caring, clear goals, and decisive leadership. The company values, strategies, and goals should manifest themselves through open, intensive, and direct communication. The Fresenius Vamed business model is very broad in nature, which places special demands on the recruitment of personnel. The recruiting process is tailored to the individual requirements of the individual positions.

### Organization and responsibilities

Human resources work at Fresenius Vamed's entities is managed by the business segment's Human Resources division. Since the general conditions in the individual countries in which Fresenius Vamed is active are highly diverse, the division ensures that those responsible in the various countries are actively involved.

In Austria, the management of Fresenius Vamed and the human resources managers of the rehabilitation and care facilities actively participate in the respective collective bargaining negotiations in order to ensure the best justifiable conditions for the employees and the company.

Where collective agreements are applicable, these are overpaid in most locations. In addition, market-specific salaries are evaluated on a regularly basis.

### Policies and regulations

Fresenius Vamed has put detailed guidelines and standards in place regarding working conditions and working hours. Compliance with these requirements is constantly monitored. In 2021, new regulations were adopted because of the COVID-19 pandemic, e.g., for working from home, for hygiene at the workplace, and for business trips.

### Flexible working conditions and digitalization

Digitalization and flexibilization continued to accompany Fresenius Vamed in all areas of ongoing human resources work and communication in 2021. In the Czech Republic, for example, the business segment worked on the development of an app to make communication between the respective management and employees who do not work at the actual workplace faster and more direct. In order to be able to access information on the move in future, the Austrian parent companies have also developed an app for their employees. This can be used to access the contents of the intranet and, for example, certain training courses.

### Dialog and feedback formats

Appraisal interviews are an essential part of Fresenius Vamed's management culture. In addition to essential insights and measures for further successful cooperation, the necessary training and further education requirements also result from the detailed discussions. These are summarized in a training plan, on the basis of which the corresponding training and continuing education program is drawn up. This ranges from specialist training in the health care sector and personality-building seminars to customized language training and IT seminars.

### Progress and measures in 2021

In 2021, the management approach and the governance structure of Fresenius Vamed remained as reported in 2020. Progress focused on the design of working conditions in the context of the COVID-19 pandemic.

### Our ambitions

The four business segments pursue segment-specific ambitions in the areas of working conditions, recruitment, and employee participation. We want to build on the position of our business segments as drivers of innovation in the health care sector. Our aim in doing so is to attract new employees who contribute to the company's success through their willingness to perform, their expertise, their experience, and their willingness to work together as a team.



## EVALUATION

At the end of the 2021 fiscal year, the Fresenius Group had 316,078 employees. This was 4,809 or 2% more than in the previous year (December 31, 2020: 311,269). In terms of FTE (full-time equivalents), this also represented a 1% increase at the Fresenius Group. Acquisitions in the business segments Fresenius Medical Care and Fresenius Helios contributed 1% to the increase in employees, while the total number of employees decreased at Fresenius Medical Care.

The **regional distribution** is as follows: about 31% of employees are employed in Germany, 26% in the rest of Europe, and 24% in North America.

Our distribution of **employees by function** remained largely unchanged in 2021: About 14% of the workforce was employed in the production sector, and 71% in the services sector. Our personnel structure was thus stable in terms of development. The high proportion of service personnel is mainly due to the large number of nurses in our health care facilities.

The **rate of new hires**<sup>1,2</sup> in relation to the overall number of employees in each business segment is evidence of our efforts within recruitment. The **length of service**<sup>1</sup> within the Group can vary with acquisitions in the business segments. In 2021, the average was 8.3 years and remained close to the previous year's level of 8.2 years.

In 2021, the proportion of **employees who voluntarily left**<sup>1,3</sup> the company increased to 12.8% (2020: 9.8%). Main reasons for this development were the uncertainty in the labor market associated with the COVID-19 pandemic, stress-

## EMPLOYEES (HEADCOUNT) BY BUSINESS SEGMENT

	2021	2020	2019	2018	2017
Fresenius Medical Care	130,251	133,129	128,300	120,328	121,245
Fresenius Kabi	41,397	40,519	39,627	37,843	36,380
Fresenius Helios	123,484	116,952	106,377	100,144	105,927
Fresenius Vamed	19,721	19,414	18,592	17,299	8,667
Corporate/Other	1,225	1,255	1,238	1,136	1,030
<b>Total as of Dec. 31</b>	<b>316,078</b>	<b>311,269</b>	<b>294,134</b>	<b>276,250</b>	<b>273,249</b>

## EMPLOYEES (FTE) BY BUSINESS SEGMENT

	2021	2020	2019	2018	2017
Fresenius Medical Care	122,909	125,364	120,659	112,658	114,000
Fresenius Kabi	39,579	39,032	38,264	36,423	34,923
Fresenius Helios <sup>1</sup>	101,652	96,899	88,057	82,522	85,577
Fresenius Vamed	15,730	15,364	14,770	13,665	7,215
Corporate/Other	1,141	1,166	1,154	1,060	969
<b>Total (FTE) as of Dec. 31</b>	<b>281,011</b>	<b>277,822</b>	<b>262,904</b>	<b>246,329</b>	<b>243,913</b>

<sup>1</sup> FTE: For Helios Kliniken Germany, the number of employees converted to the full collectively agreed working time on monthly average (Vollkräfte)

## EMPLOYEES (HEADCOUNT) BY REGION

	2021	2020	2019	2018	2017
Europe	180,122	174,835	165,862	158,939	154,172
thereof Germany	98,754	96,915	91,014	88,086	86,613
Europe excl. Germany	81,368	77,920	74,848	70,853	67,559
North America	76,740	75,837	74,894	72,672	75,083
Asia-Pacific	27,145	27,805	27,457	25,575	24,381
Latin America	30,192	30,871	23,998	17,610	17,709
Africa	1,879	1,921	1,923	1,954	1,904
<b>Total as at Dec. 31</b>	<b>316,078</b>	<b>311,269</b>	<b>294,134</b>	<b>276,750</b>	<b>273,249</b>

<sup>1</sup> Fresenius Medical Care's 2017 data reflects country data representing 96% of all employees. Helios Germany's data for 2017 includes the post-acute care business in Germany.

Fresenius Vamed's data for 2017 also includes temporary staff and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. The data from Helios Spain contains the hospitals in Latin America as of 2020. Data does not include the recently acquired company Eugin, yet.

<sup>2</sup> Calculated as the number of external hires in a business segment within the reporting period, relative to the number of employees at year-end.

<sup>3</sup> Calculated as the number of employees who left the organization voluntarily in relation to the number of employees at the end of the year.

ful labor conditions in the health care sector and thus an increase in early turnover as well as people leaving the industry. We explain this development in detail in our business segments and measures taken to correspond to this situation on pages 165 ff. of the Group Non-financial Report, section “employee development”.

The **average age** of Group employees was 41.6 years (2020: 41.7 years). The majority (55%) of our employees are between 30 and 50 years of age. We aim to maintain a well-balanced age structure within our Group. The distribution reflects the demand for a high proportion of skilled and experienced employees in our business segments.

### Fresenius Medical Care

After declining to 11.9% in 2020, Fresenius Medical Care’s voluntary turnover rate rose to 16.5% in 2021. This increase reflects an increasingly competitive labor market, especially in clinics and the manufacturing business. To counteract this increase, the business segment implemented several measures. These include various measures to help managers and HR professionals to help improve employee retention. The average tenure of employees increased from 7.3 years in 2020 to 7.6 years in 2021.

### NEW HIRES<sup>1,2</sup>

in %	2021	2020	2019	2018	2017
Fresenius Medical Care	23.7	23.1	24.7	21.7	n. a.
Fresenius Kabi	17.1	13.5	17.1	16.9	19.8
Helios Germany	18.8	14.3	15.4	16.0	19.8
Helios Spain	29.0	25.5	20.1	27.6	n. a.
Fresenius Vamed	18.4	18.4	17.8	22.5	11.0
Corporate/Other	11.0	6.1	11.2	12.5	9.7

### AVERAGE LENGTH OF SERVICE<sup>1</sup>

in years	2021	2020	2019	2018	2017
Fresenius Medical Care	7.6	7.3	6.8	7.1	7.0
Fresenius Kabi	7.9	7.9	8.6	7.5	7.4
Helios Germany	10.3	10.3	10.6	10.8	10.5
Helios Spain	7.7	8.0	8.4	8.2	n. a.
Fresenius Vamed	7.8	7.7	6.9	7.8	6.1
Corporate/Other	7.8	7.5	7.3	7.3	7.6
<b>Total</b>	<b>8.3</b>	<b>8.2</b>	<b>8.1</b>	<b>8.2</b>	<b>8.1</b>

### VOLUNTARY TURNOVER<sup>1,3</sup>

in %	2021	2020	2019	2018	2017
Fresenius Medical Care	16.5	11.9	14.3	13.2	12.2
Fresenius Kabi	11.3	7.1	9.2	9.4	11.3
Helios Germany	9.5	8.3	9.1	6.9	6.0
Helios Spain	11.0	9.8	7.6	3.8	n. a.
Fresenius Vamed	9.3	7.8	7.6	9.5	8.0
Corporate/Other	3.5	1.7	3.5	3.8	2.7
<b>Total</b>	<b>12.8</b>	<b>9.8</b>	<b>11.0</b>	<b>9.8</b>	<b>9.9</b>

<sup>1</sup> Fresenius Medical Care’s 2017 data reflects country data representing 96% of all employees. Helios Germany’s data for 2017 includes the post-acute care business in Germany.

Fresenius Vamed’s data for 2017 also includes temporary staff and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. The data from Helios Spain contains the hospitals in Latin America as of 2020. Data does not include the recently acquired company Eugin, yet.

<sup>2</sup> Calculated as the number of external hires in a business segment within the reporting period, relative to the number of employees at year-end.

<sup>3</sup> Calculated as the number of employees who left the organization voluntarily in relation to the number of employees at the end of the year

## Fresenius Kabi

Total employees at Fresenius Kabi increased slightly in the reporting year. The external hires as well as the voluntary turnover were marked by the constraints for personnel in the health care market, a development which we also experienced in the other business segments.

## Fresenius Helios

The total number of employees increased in the reporting year at Fresenius Helios. Employee retention measures were initiated early and thus, we were able to respond to the impacts on the labor market, caused by the pandemic. The voluntary turnover only slightly increased to 10.3% (2020: 9.0%). At Helios Germany, the rate was at 9.5% below the rate at Helios Spain with 11.0%.

In view of the renewed decline in the number of cases by around 16% in the reporting year compared with the pre-COVID-19 year 2019, Helios Germany made moderate adjustments to positions in the medical service in 2021. These

### AVERAGE AGE<sup>1</sup>

	2021	2020	2019	2018	2017
Fresenius Medical Care	42.1	41.7	40.8	40.8	41.7
Fresenius Kabi	39.2	39.9	38.7	38.4	38.5
Helios Germany	42.2	42.2	42.5	42.6	42.7
Helios Spain	40.4	40.5	41.0	40.0	n. a.
Fresenius Vamed	44.3	44.0	41.2	43.6	43.0
Corporate/Other	39.7	39.3	39.1	38.9	39.2
<b>Total</b>	<b>41.6</b>	<b>41.7</b>	<b>41.0</b>	<b>41.0</b>	<b>41.5</b>

job adjustments amounted to around 3% and were carried out by not filling vacant positions or letting fixed-term employment contracts expire. The adjustments in the medical services were conducted without redundancies.

## Fresenius Vamed

At Fresenius Vamed, the number of employees increased by 2%. The turnover was impacted by COVID-19 and the change in work-life-balance aspirations of employees in administrative functions. Further, employees in health care facilities faced increasing.

### AGE STRUCTURE<sup>1</sup>

Dec. 31	2021			2020			2019			2018			2017		
	Below 30	Between 30 und 50	Above 50	Below 30	Between 30 and 50	Above 50	Below 30	Between 30 and 50	Above 50	Below 30	Between 30 and 50	Above 50	Below 30	Between 30 and 50	Above 50
Fresenius Medical Care	16%	58%	26%	17%	58%	25%	18%	56%	26%	16%	57%	27%	18%	56%	26%
Fresenius Kabi	21%	60%	19%	22%	61%	17%	23%	60%	17%	23%	60%	17%	25%	59%	16%
Helios Germany	20%	47%	33%	20%	48%	32%	19%	48%	33%	18%	49%	33%	19%	49%	32%
Helios Spain	21%	59%	20%	18%	60%	22%	17%	61%	22%	18%	62%	20%	n. a.	n. a.	n. a.
Fresenius Vamed	16%	47%	37%	15%	49%	36%	16%	50%	34%	15%	50%	35%	18%	54%	28%
Corporate/Other	25%	51%	24%	25%	53%	22%	24%	54%	22%	25%	54%	21%	24%	55%	21%
<b>Total</b>	<b>19%</b>	<b>55%</b>	<b>26%</b>	<b>19%</b>	<b>55%</b>	<b>26%</b>	<b>19%</b>	<b>55%</b>	<b>26%</b>	<b>18%</b>	<b>55%</b>	<b>27%</b>	<b>19%</b>	<b>55%</b>	<b>26%</b>

<sup>1</sup> Fresenius Medical Care's 2017 data reflects country data representing 96% of all employees. Helios Germany's data for 2017 includes the post-acute care business in Germany.

Fresenius Vamed's data for 2017 also includes temporary staff and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. The data from Helios Spain contains the hospitals in Latin America as of 2020. Data does not include the recently acquired company Eugin, yet.

## EMPLOYEE DEVELOPMENT

### OUR APPROACH

We offer our employees the opportunity to develop professionally in a dynamic international environment. Our four business segments use different concepts and measures for personnel development – depending on their own customer and market structures. They constantly adapt their approaches to current trends and requirements. In addition to Group-wide mandatory training courses on the respective Codes of Conduct, there are mandatory training courses on quality management, environmental management, and occupational health and safety in the business segments. Digitalization is also playing an increasingly important role in the daily work done by our employees, which we explain in the following. Segment-specific talent management and individual further training offerings for employees and managers are our other personnel development measures.

### Vocational training

Vocational training is very important to us. This is why we offer applicants many opportunities to start their career pathways in our company. In 2021, more than 6,300 young people were doing dual vocational training and/or dual study at our locations in Germany. Across the Group, we offered more than 43 posts requiring formal training and 29 dual degree programs. Compared to the 2020 training year, the Group's range of training opportunities was expanded once again. The dual study program in General Industrial Engineering, Digital Transformation, and the training program for Digitalization Management were offered

for the first time. The classic direct entry route aside, Fresenius also offers graduates trainee programs for further professional orientation.

### Fresenius Training Compendium

The training compendium of Fresenius SE & Co. KGaA lists all of the training opportunities available to our employees. This includes programs for communication and presentation, self-management, and project management, as well as specific learning content depending on the job profile of the target group of employees.

### Fresenius Learning Center

In addition to the training compendium, we offer training courses in the Fresenius Learning Center (FLC) learning management system. Depending on the subject, these training programs consist of one or more modules. Most of these involve some e-learning – for example webinars – as well as classroom training; reading materials are also offered to different target groups. Employees in Germany who do not have their own computer or laptop, or who do not have a quiet work environment, can take the training courses they need at specially set up learning locations. Fresenius Helios

and Fresenius Vamed also offer needs-based e-learning and document the training activities in their own learning management systems.

### Digitalization of the training offered

In the reporting year, we continued to advance the digitalization of Fresenius' development and training offerings. Numerous training measures as well as compulsory training took place as webinars or e-learning courses. Among other things, this enabled fast, up-to-date, precise training, especially in the area of hygiene, which is particularly important during the ongoing COVID-19 pandemic. The organization of digital learning opportunities took place mainly on the already existing or newly implemented learning platforms. Further information is provided in the following descriptions of the business segments.

### FRESENIUS MEDICAL CARE

Fresenius Medical Care is committed to supporting the learning and development of employees around the world. In this context, the business segment provides learning opportunities to all employees irrespective of their location or position in the business segment. Learning platforms

#### TRAINEES AND TRAINING RATIO FOR GERMANY

Trainees <sup>1</sup>	6,305	5,985	4,952	4,354	4,019
Training ratio	6.38	6.18	5.44	4.94	4.64

<sup>1</sup> Includes vocational training and university students

	2021	2020	2019	2018	2017
Trainees <sup>1</sup>	6,305	5,985	4,952	4,354	4,019
Training ratio	6.38	6.18	5.44	4.94	4.64

allow employees to pursue their career goals and interests in a self-directed manner.

### Organization and responsibilities

Individual learning needs are identified through development and career discussions that are often part of a performance management process. Since 2019, the business segment has intensified efforts to train managers and employees in how they can contribute to these career conversations. Online resources are provided such as webinars and virtual classroom trainings.

### Progress and measures in 2021

The business segment expanded its digital learning platform globally in third-quarter 2021. Since then, more than 16,000 employees have participated in training via this platform. In addition, the company provided certain employee groups with specific training. The top 450 leaders were offered leadership resilience training via virtual classroom events, as well as training in employee engagement strategies. New leaders also received courses on employee development.

The global performance and development platform for leaders, which was introduced in 2020, was made available to all employees.

### FRESENIUS KABI

Fresenius Kabi has global, regional, and local structures for training and developing employees. Employees are trained and qualified according to their functions and responsibilities. Mandatory global training for employees is carried out internally. This includes, for example, training on the Code of Conduct.

All employees who are directly involved in the manufacturing, testing, and distribution of our products, as well as employees who work in a supporting role (e.g., technical maintenance, IT) receive mandatory training in job-related good manufacturing, control, and distribution practice and in occupational health and safety and environmental protection.

In addition, occupational health and safety and environmental and energy management training is conducted at all certified sites. Further training supplements this and serves to support the introduction, further development, and improvement of the corresponding management systems and measures.

As part of talent management, postings to other countries are also used to promote professional and personal development. These comprise both long- and short-term postings, which also contribute to meeting specific staffing needs. In addition, Fresenius Kabi supports the development of digital competencies, for example in connection with making work more flexible, such as mobile work by its employees, through further training programs.

### Organization and responsibilities

The CoE TLO reports directly to the head of the global Human Resources department. In 2021, it was assigned worldwide responsibility for managing Fresenius Kabi's learning activities. In this way, the business segment aims to offer more individualized and extended training activities. Training is mainly offered decentrally, to provide training opportunities quickly and in accordance with the respective requirements. The personnel development measures are evaluated by

the responsible organizations within Fresenius Kabi. Feedback from employees and executives is also taken into account.

### Progress and measures in 2021

In 2021, numerous learning modules were rolled out, for example the module on the Code of Conduct, which was supplemented by a chapter on human rights, or a training module on "Fair Competition – Acting in Accordance with Antitrust Law". Mandatory training was increasingly conducted online. The range of mandatory online modules was also expanded. Fresenius Kabi documented training activities in more than 50 countries, with more than 30,000 employees trained in 2021 in the most relevant internal learning management systems. The online training on background, behavior, and preventive measures relating to the pandemic was continued in 2021 in various languages.

### FRESENIUS HELIOS

Employee training and development activities help Fresenius Helios achieve its four strategic business objectives: to offer the best service, to be a leader in medicine, to do sustainable business, and to expand on its market position. These will enable Fresenius Helios to further improve with regard to medical quality and to position itself as an attractive employer at the same time. Training budgets, along with regular employee and career interviews, are therefore firmly anchored in Fresenius Helios' corporate culture.

However, Fresenius Helios has also been faced with increased competition in the human resources sector, also due to new regulatory requirements in line with the lower thresholds for nursing. The demand for skilled workers has continued to increase over the past few years, especially in the nursing sector in our relevant markets of Spain and Germany. For this reason, Fresenius Helios intends to acquire a large proportion of the necessary nursing personnel through in-company training at its 34 training centers in Germany.

In Spain, the business segment focuses on cooperations with universities. In contrast to Germany, where nurses receive vocational education and training, Spanish nurses are educated at universities, as described on page 159. The business segment is also tackling the continuing challenge posed by the shortage of skilled workers in the medical sector. One example is the structured talent pools of senior doctors that Helios Germany is building.

All professional groups at the hospital can learn, train, and further develop their expertise at the Helios Academy and the Fresenius Helios training centers in Germany, to develop professional and personal competencies. Fresenius Helios also offers its employees trainee and assistant programs, for example, and builds up competence profiles for clinic management.

In Spain, more than 5,000 students are trained annually by our experts; they acquire practical skills during their undergraduate and postgraduate training. We also have eight university hospitals where classroom-based content of a

medical school is taught and more than 400 medical staff are fully trained each year. In our two nursing schools, we cover classroom and hands-on training as well as vocational training; for example, we qualify students as Imaging Technicians for Diagnosis and Nuclear Medicine and Technicians in Radiation Therapy and Dosimetry.

Fresenius Helios now uses digital work tools across the board in all areas of basic and advanced training and education. Learning content is organized using what is known as the Helios knowledge account – a digital education management system – and learning scenarios implemented via e-learning and online seminars.

### Organization and responsibilities

In 2020, Helios Germany merged the two departments of Digital Knowledge Media and Academy/Talent Management under the new Central Service Recruitment and Development.

Helios Spain has created a central department that brings together different talent and employee areas: Talent Acquisition and Management, Internal Communications and Employer Brand, Apprenticeship, and the Universidad Corporativa, a corporate training academy. The aim is to attract the best professionals and create an optimized workplace. With the launch of the Universidad Corporativa, an advisory board was also established, which includes a number of company and divisional directors. It is responsible for aligning and promoting the training with the strategic goals of the company.

### Progress and measures in 2021

Due to the pandemic, a large number of training courses were again switched to digital formats in 2021. This included training content for nurses, for example, as well as content from the career programs and wherever it was methodically and didactically appropriate. Helios Spain started the development of a new training platform in 2021. The goal is for more than 90% of Spanish training to be offered via e-learning.

Helios Spain is in the process of accrediting new university hospitals for medical degrees and nursing schools. The company also has its own master's degree programs based on the needs of our own nursing and medical professionals and of the professionals we need in order to seize opportunities in the health care markets. The master's degree in Emergency Care for Doctors, for example, was launched in 2021. This is aimed at professionalizing our emergency physicians and attracting external professionals.

In 2021, for the first time, the business segment partnered in Spain with the IESE Business School to run an advanced healthcare management program. Its aim is to provide training in modern and efficient hospital management and in leadership skills – and to transform care models and services as well as clinical research, for this purpose. In 2021, 60 professionals participated. Comprehensive assessments, including 360-degree feedback interviews and feedback

sessions, were conducted with all participants to create individual development and training plans. A second in-depth assessment is planned for the first half of 2022 so that necessary improvement measures can be implemented.

### FRESENIUS VAMED

The expertise and project experience of its employees plays an important role in the success of Fresenius Vamed in view of the heterogeneous nature of its activities in the high-end service business, overall operations management, and project management. It is therefore extremely important for the business segment to promote the further development of its employees in a targeted manner. Key for Fresenius Vamed's personnel management are individually adapted personnel development measures and a comprehensive, needs-oriented training offering, which is very diverse in nature due to the complex structure of the business segment. As part of its strategic personnel planning, Fresenius Vamed identifies young employees with particular potential and promotes their individual development. This is done via trainee programs and in the VAMED Human Capital Management (HCM) Program, which prepares employees with potential to take on leadership and specialist roles.

Fresenius Vamed is increasingly using digital elements such as e-learning to design new training offerings. Employees can access a pool of knowledge via various knowledge platforms. In addition, Fresenius Vamed has the option of developing and rolling out micro-learning modules independently. These short training modules are largely available online, and have enabled fast, up-to-date, precise training and education on applicable COVID-19 regulations, particu-

larly in the area of hygiene. Fresenius Vamed has also digitalized essential and mandatory training and further education activities. The same applies for the monitoring of the participation within a defined period as well as e.g. successfully carried out exams which are digitally recorded and evaluated.

All employees are free to use their own Fresenius Vamed Academy. Their courses and training cover not only specific professional issues, but also topics such as personal development and leadership, interpersonal skills, and methodological expertise. Various knowledge platforms, such as the International Medical Board (IMB), also pool the know-how of about 1,200 health care professionals working for Fresenius Vamed. The content of the program has not changed significantly over the course of the COVID-19 pandemic, with a certain number of courses and events being digitalized and some classroom seminars postponed to later dates.

### Organization and responsibilities

Fresenius Vamed's Human Resources management team, together with the responsible business segments and the Management Board, develop and implement measures to promote and train employees and new talents.

### Progress and measures in 2021

In 2021, the management approach to training and development and the governance structure of Fresenius Vamed remained as reported in 2020. In the area of employee development, progress also focused on dealing with the challenges of the COVID-19 pandemic.

## EVALUATION

### Fresenius Medical Care

Fresenius Medical Care is in the process of assessing the industry standard for average training hours undertaken per employee annually, and plans to meet or achieve this standard, if it has not already done so, by the end of 2024.

### Fresenius Kabi

For training of employees in production on quality management an average of almost 26 hours was spent per employee in 2021. The quality management training for employees from 2019 and 2020 has been renewed and additionally supplemented by quality trainings for new employees.

#### AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE IN PRODUCTION<sup>1</sup> REGARDING QUALITY

	2021	2020
Production (training hours/average)	25.93	20.06
Number of employees included in the calculation (FTE)	23,700	21,800

<sup>1</sup>The production area comprises the following employee groups: operation/manufacturing, quality control, quality assurance, maintenance/technical support and warehouse.

The business segment uses an IT-based annual talent review for dialog and feedback on performance, competencies, and development potential for upper management levels and to strengthen the exchange between employees and their superiors on the individual development planning. On this basis, Fresenius Kabi identifies, evaluates, and develops executives and talents in all regions, divisions, and central functions worldwide. The Talent Review, which was conceptually revised in 2020, was implemented in 2021. It is now fully automated and supported by an IT system, to better assist managers and employees. Furthermore, evaluation and analysis of results have been made more efficient for the global Human Resources department.

### Fresenius Helios

In the reporting year, Fresenius Helios again recorded, compared to the pre-pandemic times, significantly higher use of online conference tools and digital learning platforms in both Germany and Spain. Fresenius Helios utilizes annual feedback meetings to discuss topics relating to training and education. The business segment also analyzes the effectiveness of its digital offerings and programs for employees. It carries out qualitative evaluations and reviews the recorded usage statistics, results of outcome measurements (e.g., filling vacancies after development programs), and participation rates.

In 2021, Helios Germany held a total of 221 training sessions in the fields of emergency medicine, anesthesia, intensive care medicine, and obstetrics at its simulation and emergency facilities, thus training a total of 1,756 physicians and nurses.

Fresenius Helios had dedicated targets in Spain and Germany with regard to annual investments in the training and education of employees. In view of the ongoing digitalization and increased use of e-learning, whether this target must be adjusted is currently being examined. An adjustment will be made in fiscal year 2022 at the earliest.

Fresenius Helios continued the development of training portfolio management, the aim of which is to evaluate and market employee training and further education options and services more effectively – internally and externally.

### Fresenius Vamed

Fresenius Vamed continually evaluates its own vocational training and development programs; where necessary, the business segment develops and implements adaptation or improvement measures.

Fresenius Vamed also continually optimizes its human resources development processes through additional digitalization.

## OCCUPATIONAL HEALTH AND SAFETY

### OUR APPROACH

Ensuring the health and safety of our employees is an essential part of our corporate responsibility. The Fresenius Code of Conduct states that we must take the necessary measures to protect our employees and to prevent work-related accidents. All four business segments focus on preventive measures and on the individual responsibility of employees when it comes to occupational health and safety. The occupational safety concepts are adapted to the specific business models of the four business segments. These focus on occupational health and safety within production, as well as occupational health management for health care facility or administrative employees. The aim of all the measures is not only to protect employees, but also to ensure the health and safety of patients. All Fresenius business segments continually record data on occupational health and safety in line with regulatory requirements.

During the ongoing COVID-19 pandemic in 2021, the safety and health of our employees, their families, and the communities in which we work were again the focus of our response activities. In early 2021, our clinics in Germany and Spain started with the implementation of a vaccination campaign which was expanded to our administrative offices. With regard to hygiene in particular, we had to take special measures. At times, our employees also had to face restrictions, e.g., by wearing personal protective equipment (PPE), or carry out additional work, for instance in the case of necessary admission controls. A major challenge for us in this



regard was developing individual protection concepts, measures, and working regulations that allow us to continue all operational and administrative activities. Depending on the evolution of the incidence rates and changes in regulatory provisions, it was necessary to promptly adapt our protection concepts and guidelines and to communicate these to the employees. This also meant equipping our employees with suitable protective material.

In our **clinics**, we have intensified infection control practices that were already in place in order to protect both our patients and our staff.

In the **production facilities**, we introduced strict hygiene measures in 2020, such as disinfection and distancing.

Since March 2020, a large number of our employees in **administrative functions** have been working from home to avoid infection.

There has been continuous and direct communication with the employees of all sites and companies ever since the beginning of the pandemic. The specially established crisis teams communicated the hygiene and medical requirements as part of regular communication in the Group, taking into account the respective local official regulations and country-specific ordinances and laws.

Occupational Health and Safety (OHS) is decentrally organized within the Fresenius Group. The business segments have internal specialists and dedicated functions that ensure that the respective guidelines and requirements for the

local entities are applied, and define specifications such as company-wide guidelines for the business segments. Relevant data is reported regularly, for example on a monthly or quarterly basis, to identify deviations. If deviations occur, our specialists initiate root cause analysis and evaluation, and corrective or preventive actions are implemented where necessary. Regular internal audits, partly annually, support the verification of data and management approaches, for entities both certified in accordance with ISO 45001 and without certification. Thus, we ensure that internal guidelines and regulatory provisions are complied with.

No Group results are available for occupational health and safety in fiscal year 2021. Although no effects can yet be reported at Group level, we report on the measures initiated in the reporting year and related progress in the business segments.

### Certifications and commitment

Our commitment in the business segments regarding OHS is supported, monitored, and certified by external partners or regulatory bodies. The overarching ambition of the management system according to ISO 45001 – which replaces the OHSAS 18001 standard – is to improve occupational health and safety management and ensure the effectiveness of existing procedures and systems. To drive this forward, we are consistently expanding the number of entities certified with this management system standard. Audits performed by other external bodies are scheduled with the local management.

### Fresenius Medical Care

Some of the production sites and dialysis clinics of Fresenius Medical Care are certified according to international health and safety standards. These include ISO 45001 in Europe, Middle East, and Africa, Latin America, and Asia-Pacific, and the Australian Council on Healthcare Standards (ACHS) in Asia-Pacific. In addition to external audits by relevant authorities, internal reviews and audits are conducted to monitor compliance with corresponding regulations, policies, and procedures. The business segment is working on harmonizing the management concepts for occupational health and safety as part of its Global Sustainability Program.

### Fresenius Kabi

A global management system in accordance with the international ISO 45001 standard supports occupational health and safety at Fresenius Kabi. The global management handbook and standard operating procedures provide global management requirements for the certified organizations' local management. The management system covers all employees as well as temporary workers at certified sites. The certified entities set local targets to enhance the occupational health and safety management. The local management reviews it at least once a year with regard to its continued suitability, appropriateness, effectiveness, and potential for improvement. Global internal audits ensure implementation of the management system. Furthermore, it is audited on an annual basis and certified by TÜV Rheinland.

At Fresenius Kabi, 30 organizations are certified according to the ISO 45001 standard<sup>1</sup>. The company is working on rolling out the certification globally according ISO 45001 to all manufacturing plants by 2023<sup>2</sup>. Fresenius Kabi aims to improve occupational health and safety processes and align them with internationally recognized standards. In 2021, nine additional manufacturing plants were included in the ISO 45001 certification of Fresenius Kabi.

### Fresenius Helios

Helios Kliniken in **Germany** have local approaches to occupational safety and occupational medicine that comply with regulatory requirements.

**Helios Spain** works continuously to ensure the safety and health of its employees. With the implementation of SAP at all its hospitals in Spain, Helios Spain changed the management of occupational health and safety from local systems to a single company-wide system. Based on ISO 45001 (formerly OHSAS 18001) and Spanish regulatory provisions, all hospitals are required to report occupational health and safety incidents along with their cause, lost time, illnesses and absenteeism as well as other KPIs in a tool. The local management, which is responsible for ensuring that regulatory requirements for occupational health and safety are met, is guided by a handbook and standard operating procedures (SOPs). A central department for corporate ill-health prevention coordinates all activities and the reporting.

### Reporting systems

All four business segments have notification systems for accidents at work.

At **Fresenius Medical Care** responsibility for occupational health and safety lies with regional and local management. This structure allows the company to comply with different regulatory and legal requirements, and to report incidents to authorities based on local specifications. Representatives at local level collect relevant data and report it to regional representatives. The management regularly reviews this information.

**Fresenius Kabi** organizations document all accidents worldwide – for both its own employees and temporary workers. Occupational accidents are categorized according to their severity and reported to the responsible central OHS function and other relevant functions of the business segment depending on their severity. For example, work-related accidents that result in at least one day of absence must be reported within two working days to the central OHS function; other, less severe accidents without or with less than one day of absence are reported on a quarterly basis. All reported accidents are investigated, and the results are documented in respective reports. Additionally, in 2021 Fresenius Kabi started to include first-aid cases and unsafe situations

including near misses in the reporting of occupational accidents. These can be taken into account in the analysis of occupational health and safety.

**Fresenius Helios** uses a Critical Incident Reporting System (CIRS) for critical incidents and near misses at all hospitals. This is anonymous, can be used in all areas of a hospital site, and primarily serves the preventive protection of both patients and employees. The reporting system can be used to make preventive corrections in processes and workflows and thus eliminate risks from everyday work. Further information can be found on page 138 of this report.

If an accident occurs in a clinic, a defined process must be followed in order for the person affected to have recourse against the accident insurance organization: the person involved in the accident reports the event to the responsible function depending on the local organizational structure, e.g., the human resources department. The clinic must then file a report with the accident insurance organization within a specified period.

At all **Fresenius Vamed** sites, reporting procedures are in place to identify and prevent work-related injuries. In Austria these are, for example, the reporting of occupational accidents and near-accidents and preventive workplace evaluation. All work-related accidents and all events that almost lead to an accident are documented locally. In addition, the human resources department reports all accidents with lost days to the accident insurance, in accordance with country-specific requirements.

<sup>1</sup> The standard OHSAS 18001 has been replaced by the international standard ISO 45001. The business segment concluded the transition in 2021.

<sup>2</sup> The implementation will be concluded at all manufacturing plants of Fresenius Kabi in 2023. The certification issuance from the individual certification companies may extend into the following year.

## Training

Fresenius SE & Co. KGaA and all four business segments conduct regular occupational health and safety training to prevent incidents in their fields of operation. In our **clinics**, employee health and safety training courses cover topics such as the safe use of sharps and disposables, and hand hygiene as well as infection control, and prevention of emergencies and their control. Health and safety training provided in our **production sites** focuses, for instance, on hand hygiene, the safe handling of work equipment, hazardous chemicals, and emergency prevention and response. Fresenius Kabi holds, for instance, monthly training sessions on work-related risks. For example, training sessions were held with occupational health and safety managers in 2021 on emergency preparedness, OHS committees according to ISO 45001, behavioral safety and general safety aspects in the handling and storing of chemicals. Fresenius Vamed offers employees in Austria a separate e-learning module on employee protection.

## Our ambitions

Occupational health and safety is highly relevant for the Fresenius Group. The aim is to define a Group-wide KPI that will serve as a long-term performance indicator and be reported. Further details can be found in the Compensation Report on pages 234 ff. of the Annual Report 2021.

Our business segments manage their occupational health and safety measures in line with segment-specific ambitions.

**Fresenius Medical Care** plans to include further global indicators in the internal reporting from 2023 to reflect

overall performance: the total recordable injury frequency rate and lost time injury frequency rate. In certain segments of the regional businesses, the business segments has already defined targets for incident rates, safety training, or the monitoring of occupational health and safety performance. The business segment plans to set global targets for occupational health and safety by 2023.

**Fresenius Kabi** wants to continue the improvement of its occupational health and safety management. The ambition of the business segment is to prevent all work-related accidents and improve workplace safety. To achieve this, Fresenius Kabi is developing appropriate occupational health and safety programs and measures with local managers.

The introduction of a system for the comprehensive recording of occupational accidents at all **German Helios hospitals** is planned for 2022. In future, key figures such as the lost time injury frequency rate (LTIFR) are also to be collected. To this end, Fresenius Helios is closely cooperating with the German accident insurance institutions and internal managers. In the future, Helios Germany will also collect data for preventive health and safety at work purposes.

**Fresenius Vamed** currently collects relevant key figures locally that may result from occupational accidents. In the future, changes in occupational health management will also be evaluated to an increasing extent.

## FRESENIUS MEDICAL CARE

Fresenius Medical Care is committed to providing a safe and healthy work environment for its employees and contractors. In 2021, the company established a new global Occu-

pational Health and Safety Policy, which outlines the key principles. The policy was approved by the Management Board of Fresenius Medical Care.

Fresenius Medical Care strives to prevent work-related accidents and hazards to protect employees and contractors. The business segment tracks and analyzes accidents and injuries at local and regional levels, identifies their root causes, and takes corrective action.

## Training

To prevent incidents and increase awareness, Fresenius Medical Care provides health and safety training. Employee training courses in the dialysis clinics cover, for example, the safe use of sharps and disposables, hand hygiene, infection prevention, and emergency management. Training provided at the production sites focuses on, among other topics, the safe handling of work equipment and chemicals, and emergency prevention and response. In the United States alone, more than 48,000 employees completed health and safety training in 2021.

## Progress and measures in 2021

As part of the Global Sustainability Program, Fresenius Medical Care began a global risk assessment in 2021. The company identified the biggest physical risks as injuries from needlesticks, slips, trips, and falls. The business segment is working to identify and prioritize high-risk areas

and plans to develop specific risk mitigation measures in the coming years. It has also piloted an initiative in the production sites in Europe, Middle East, and Africa. This initiative aims to facilitate the sharing of information concerning significant accidents, near misses, and occupational health and safety best practices.

Fresenius Medical Care also offered COVID-19 vaccinations to its employees at various locations.

### Evaluation

No work-related fatalities were reported between 2019 and 2021. In the reporting year, the business segment is reporting on work-related fatalities for the first time.

### FRESENIUS KABI

The safety of employees at their workplace is Fresenius Kabi's central concern. The aim is to prevent all work-related accidents. Fresenius Kabi's occupational health and safety guidelines focus on the following principles:

- implementing the necessary measures to ensure the health and safety of employees,

- provision of appropriate information, training, and instruction to employees and all persons at our locations,
- ensuring and supporting continuous improvement,
- preventing work-related injuries, illnesses, and other incidents, e.g., implementing technical protection measures,
- performing hazard and risk assessments for all routine and non-routine activities,
- complying with applicable legal requirements and other occupational health and safety requirements,
- providing and ensuring the continuous safe operation of facilities, machinery, and equipment,
- safe handling, use, storage, and proper disposal of hazardous substances.

Experts in the central OHS function analyze and evaluate occupational health and safety programs, working procedures, risks, and objectives, and facilitate exchange of information about occupational health and safety throughout the company. Risk assessment is an important part of occupational health and safety management. Based on the outcomes of risk assessment, occupational health and safety measures are developed and implemented locally. This is supplemented by a notification system, in which work-related incidents and accidents are reported and analyzed. In addition, regular training on work-related risks, procedures, and precautionary measures is provided at all sites.

Responsibility for occupational health and safety management lies with the divisional and local organizations; global management responsibility lies with the central organization, which reports to the responsible member of Fresenius Kabi's Management Board.

Fresenius Kabi has implemented standard operating procedures (SOPs) and further instructions as well as guidelines to provide a global framework for occupational health and safety. A management handbook and additional SOPs provide a consistent framework for the local occupational health and safety management of ISO 45001-certified organizations.

### Progress and measures in 2021

In 2021, the management approach and the governance structure of Fresenius Kabi remained as reported in 2020. Progress focused on the transition of sites certified according to OHSAS 18001 to the international standard ISO 45001, and implementation of the ISO 45001 management system at additional manufacturing plants to further improve occupational health and safety management. Furthermore, the exchange of occupational health and safety management practices has been facilitated internally.

## Evaluation

Fresenius Kabi performs global internal audits at its organizations to confirm compliance with applicable requirements and identify potential improvements. As necessary, the company develops measures to exploit this potential together with local responsible persons. Due to the COVID-19 pandemic, most audits continued to be conducted digitally in 2021. Quarterly virtual meetings took place with representatives from the organizations to exchange learning points about work-related accidents and their future prevention.

Occupational accidents are categorized according to their severity and are investigated by means of a standard investigation template. Furthermore, local management assesses the investigation reports to decide whether technical improvements, additional working equipment or instructions, or further training are required to avoid reoccurrence in future and to improve occupational health and safety for employees.

Fresenius Kabi calculates the LTIFR<sup>1</sup> from the data it collects and uses this as an indicator to measure performance; the LTIFR deteriorated by about 4% compared to the previous year due to an incident at a production site in China. Fresenius Kabi also considers the lost time injury severity rate (LTISR)<sup>2</sup> in the analysis. Occupational health and safety reports are submitted to the Management Board and other relevant functions of Fresenius Kabi on a quarterly basis.

### LOST TIME INJURY FREQUENCY RATE<sup>1</sup>

Fresenius Kabi	2021	2020	2019	2018
LTIFR	2.4	2.3	2.6	3.1

The occupational health and safety report provides information about, for example, LTIFR, LTISR, the severity of the occurred injuries, the type of accidents and the identified root causes.

In December 2021, a serious fire occurred at a production site in China, resulting in the deaths of five employees and one other person being hospitalized. An investigation of the incident and the cause of the fire was initiated immediately. The business segment will adopt measures to address the incident and its potential or actual consequences, and to prevent future occurrences, based on the review results by the business segment and local authorities.

In addition, the company recorded one serious work-related accident, which was attributable to insufficient risk assessment. This has prompted additional preventive measures at the respective site, e.g., training and reassessment of hazards and risks connected with the respective work activities. In 2021, Fresenius Kabi saw only a limited number of COVID-19 cases at its facilities, with no significant impact

on production output. Precautionary and hygiene measures to protect employees and limit the impact of COVID-19 developed and implemented in 2020 have been continued to be monitored and stringently maintained in 2021. Furthermore, COVID-19 had no impact on the further roll-out of the ISO 45001 management system in 2021 and did not affect OHS performance of the business segment.

## FRESENIUS HELIOS

Fresenius Helios hospitals have risk assessments for the individual workplaces and maintain lists of hazardous substances. As a preventive measure, Fresenius Helios conducts occupational health and safety inspections of areas of the hospitals to detect potential risks. The main risk areas are identified via accident reports or information from employees and undergo rigorous assessment. As part of a risk assessment, these are then analyzed.

In **Germany**, clinic experts use the S-T-O-P principle (substitution, technical, organizational, and personal measures). Fresenius Helios then reviews the implementation process and its effectiveness. The procedure used is the equivalent of a classic PDCA loop – plan, do, check, act – for continuous improvement. In coordination groups, for example for mental health risk assessments, specialized employees work together with managers to develop cross-functional measures. Similar procedures can be found for example in occupational health management and occupational reintegration management. The business segment is currently reviewing whether to introduce an integrated management system for occupational health and safety in Germany.

<sup>1</sup> LTIFR: Number of work-related accidents resulting in at least one day of absence from work in relation to 1,000,000 working hours.

<sup>2</sup> LTISR: Number of days absent due to work-related accidents in relation to 1,000,000 working hours.

**Helios Spain** strives to develop an exemplary culture within health care provision, in order to avoid occupational health risks and promote healthy habits among its workforce. This is also implemented in the company's policy on workplace safety, which is applicable at all company levels and locations. Helios Spain has standardized occupational health and safety across the Group's hospitals and companies and developed a company-wide training platform for specific workplace-related risks. Various KPIs, including absenteeism, occupational illness, and work-related injuries, are consolidated for all hospitals on a monthly basis in a single standardized system and are evaluated. Based on this, measures are then taken to reduce absenteeism and prevent accidents at work.

As a hospital operator, Fresenius Helios implements in Germany **occupational medicine measures** primarily with own medical personnel. At numerous locations, Helios Germany supplies occupational health services to external companies. The safety-related support of the clinics is ensured specifically by highly qualified personnel.

In Spain, the range of services encompasses about 300 institutions that provide **occupational health management**. Via these prevention centers, around five million employees are examined annually in cooperation with companies.

Helios Spain has a management system for health and safety at work that has been coordinated with the health and safety committees and approved by management. It has undergone the legally required audits in Spain, as well as internal audits and certifications. The implementation and monitoring of the OHS system is taken care of by specially authorized employees.

Since 2021, the OHS system has included a process for continuously identifying hazards and deficiencies, assessing risks for incidents, and determining measures for control, correction or mitigation, and prevention, and improvement. It complies with applicable legal requirements for risk assessment and the implementation of necessary controls. This process includes all employees who perform or have access to routine and non-routine activities in Helios Spain workplaces. All current and planned workplaces, procedures, (OHS) processes, and tasks located or performed at the centers, as well as their design, are assessed – as are human factors such as personal behavior. Also covered are (the design of) infrastructure, equipment, and materials in the workplace, whether provided by Helios Spain or by third parties. The process also includes hazards that arise in the immediate vicinity of the workplace from work-related activities under the control of the business unit, as well as those that exist outside the workplace but potentially affect the safety and health of its employees.

An integral part of Helios Spain's OHS management system is training in the prevention of occupational risks. For each of the professions practiced at Helios Spain, there is a special course dealing with the risks and associated preventive measures. Each year, the division also identifies additional training needs for risk prevention in the workplace. In addition, courses and exercises are held on emergency measures.

### Organization and responsibilities

The senior management team of Fresenius Helios, the Helios Occupational Health business segment as well as the Helios segment Infrastructure have the task of coordinating occupational health and safety in Germany.

In terms of organization, the Helios Occupational Safety segment is assigned to the area of Authorized Officers & Environmental Management in the Infrastructure business segment. It was founded in 2019 and currently looks after about two-thirds of all the employees in the business segment, in addition to Fresenius Vamed and Xenios, a Fresenius Medical Care company.

Helios Occupational Safety within the segment Infrastructure and its engineers are responsible for almost all Helios clinics and their subsidiaries (e.g., cleaning, logistics, or catering). They look after all aspects of health and safety at work for Fresenius Helios' employees, as well as the employees of Fresenius Helios subsidiaries, ensuring coordination is carried out in close collaboration with the supervisory authorities on a daily basis.

The Helios Occupational Health business segment in Germany also has an Occupational and Organizational Psychology department.

At local level, the members of the Occupational Health and Safety Committee take a targeted approach to monitoring the various aspects of occupational safety and health promotion. The meetings held by the Occupational Health and Safety Committee meet the legal requirements set for composition and number of participants. In addition, specialist personnel and managers in special steering groups at the hospital sites work on dealing with specific areas, such as occupational health management.

At Helios Spain, the OHS system defines the functions, roles, and responsibilities for health and safety in the workplace.

Helios Germany follows the legal requirements and takes all necessary measures to comply with them. At local level, we work closely with the relevant accident insurance institutions in the interests of our employees. Preventive measures to maintain occupational health and safety standards are a priority.

The Fresenius Helios policy on workplace safety in Spain promotes safe behavior among its workforce; it applies at all levels of work and at all locations in Spain.

### Progress and measures in 2021

Since 2021, Helios Germany has been involved in a project of the responsible professional German association Institution for Statutory Accident Insurance and Prevention in Health and Welfare Services (BGW). This initiative, launched in Sep-

tember 2021 at the Park Hospital in Leipzig, aims to develop and establish unified occupational medicine and occupational safety standards, and improve internal and external interface management. In addition, a pilot project was launched in October 2021 to expand the existing range of occupational health services to include digital services such as online consultations.

### Evaluation

Qualified occupational health and safety specialists and occupational physicians examine whether the requirements for occupational health and safety are met at Fresenius Helios in Germany. In addition, the requirements are regularly reviewed by supervisors from the BGW. Various audits, sometimes internal, of Fresenius Helios in Germany enable consistent analysis of existing procedures, validation of processes, and effective optimization of the occupational health and safety management already in place. Experts from the field of occupational health and safety, and hygiene, monitor jointly the management of occupational health and safety based on regulatory provisions. They are constantly cooperating across segments and developing improvement processes.

Helios Germany documents accidents locally and assesses the potential for associated risk, with a specific assessment carried out on-site; this is then discussed and assessed together with the relevant supervisory authorities.

Time management reports, which document absences and absenteeism and their development are recorded and evaluated locally in hospitals. Further, accident figures are evaluated at each meeting of the local health and safety

committee. Based on this, Fresenius Helios takes measures to reduce absenteeism and prevent occupational accidents. In addition to the figures resulting from accident reporting, on-site local audits in particular serve to monitor the effectiveness of risk evaluations and local occupational safety and health management approaches.

Helios Spain collects data for preventive occupational safety on a monthly basis. The division has defined key figures to document absenteeism and accident rates, as well as the status of compliance with important legal requirements at employee level. Each location in Spain reports on a monthly basis on the development of the key figures. At Helios Spain, there are dashboards for monthly monitoring of absenteeism, occupational accidents, and general illness. The development of the indicators is assessed, and in case of deviations, the business unit implements optimizing projects to reduce absenteeism.

In 2021, a fire occurred in a ward at a hospital site in Germany. The night services on duty in all departments evacuated patients in accordance with the emergency and fire protection plans. Three patient fatalities were reported in the context of the fire. No employees were harmed. The hospital management, the hospital pastoral care and the psychological service took care for patients and employees. The hospital staff is prepared for such crisis situations through annual mandatory training. The remediation work is still ongoing and will be completed in the course of spring 2022.

## FRESENIUS VAMED

The health and safety of employees is firmly embedded in our company's culture and the Fresenius Vamed mission statement. All employees, and in most instances patients and customers too, are covered by the company's holistic approach to occupational health and safety. Due to the diverse range of services and the different responsibilities involved, the implementation process is organized in very different ways throughout the business segment – nationally and internationally. In the area of occupational health and safety, all locations are subject to the respective local laws and regulations. Compliance with these regulations is also ensured at local level.

Due to the decentralized organizational structure of Fresenius Vamed, a range of different legal and internal guidelines play a significant role in occupational health and safety. The Code of Conduct covers administration and the area of technical services, while the Clinical Code of Conduct regulates the area of health care and medical personnel. To prevent work-related injuries and occupational accidents, all new employees receive safety training at the very beginning of their employment.

Risk management is a fixed component in the area of occupational health and safety and has also been taken into account as such in the organizational structure. In Austria, for example, a certified risk manager and auditor was appointed to ensure competence in this area. Further, the respective workplace-specific risks were identified, analyzed, evaluated, and reduced to an acceptable level by means of targeted measures in the process organization; this was carried out in close coordination with the divisional managers. With regard to COVID-19, specific attention was paid to reducing risks relating to infection as well as the physical and mental stress involved in dealing with the overall situation. Corresponding documentation was provided in the safety and health protection documents.

In **Austria**, the safety center of VAMED Technical Services employs several safety specialists. This center is responsible for the safety-related support of Fresenius Vamed's operations. In order to maintain and further develop their competence, all safety specialists are subject to a focus-specific training program adapted to the respective needs of the organization. In addition, the manager of the safety center is certified as quality, safety, risk, and environmental manager and as lead auditor.

**Switzerland** has its own safety officers who are responsible for occupational safety and data protection. In addition, there is a dedicated CIRS Circle: this is a committee of representatives from different areas, who analyze critical and near-critical situations, in order to develop and implement solutions.

In the **Czech Republic**, there are not only safety officers, but also a legally required categorization of work into safety levels. This categorization is performed by in-house responsible persons. The categories determine what protective clothing the employer must provide for the respective workplace and the scope of occupational health examinations of the respective employee.

## Progress and measures in 2021

In 2021, the management approach and the governance structure of Fresenius Vamed remained as reported in 2020. Progress focused on health protection during the COVID-19 pandemic.

Wherever logistically possible, COVID-19 testing was offered to employees free of charge on site, and vaccinations were provided centrally by the facilities. Masks, protective equipment, and adequate disinfection facilities were provided. Maintaining minimum distances in the office was supported by a rotation system and working from home.

In some facilities, more psychological support was offered and bonuses were paid to employees in direct contact with patients for the particular stress they experienced during the pandemic.



## Evaluation

All Fresenius Vamed locations are subject to regular occupational health and safety inspections. At Fresenius Vamed, work-related incidents must not only be reported, but they also trigger an audit of existing work processes and of any proposed changes and the implementation thereof. Corresponding internal guidelines are available. The aim is to minimize risks and prevent the recurrence of hazards. Therefore, all incidents are subject to a structured evaluation by means of a root cause analysis including the corresponding improvement measures. These are prioritized in terms of technical, organizational and personnel criteria. The effectiveness of the measures is validated on site by the responsible local safety specialists. To ensure a holistically structured approach, a standard operating procedure has been implemented.

In 2021, an evaluation of mental stress in the workplace was carried out by an external provider. The lead companies at the headquarters participated in the evaluation, which set out to derive further findings for improved working conditions. The results are expected to be available at the beginning of 2022. Based on the results, measures will be developed going forward.

## DIVERSITY

### DIVERSITY AND EQUAL OPPORTUNITIES

#### OUR APPROACH

At Fresenius we support equal opportunities for all and consciously oppose discrimination of all kinds. No one may be discriminated against on the basis of skin color, ancestry, faith, political views, age, gender, ethnicity, nationality, cultural background, sexual orientation, physical condition, appearance, or other personal characteristics. We work in an atmosphere of mutual respect. Our dealings with each other are open, fair, and appreciative. We do not tolerate insults, humiliation, or harassment. Our managers have a special responsibility in this respect and act as role models. These values and our aspirations with regard to diversity are laid down in the Fresenius Code of Conduct, which is binding for all employees. This code makes our stance clear, i.e., to support equal opportunities for all. This lays the foundation of our cooperation and corporate culture. Further information on our approach to equal opportunities is provided in the "Human rights" section, see pages 194 ff. of the Group Non-financial Report.

#### Dealing with incidents of discrimination

Information about violations of the principles of the Fresenius Code of Conduct and other possible misconduct can be reported via various notification systems – anonymously, if necessary, as described in the Compliance chapter, on page 185, and on page 188 in this report. All information is carefully examined and appropriate action taken in accordance

with the results of the investigation. Depending on the type and severity of misconduct, sanctions such as actions under employment, civil, or criminal law can be imposed. After finishing the investigation, measures that prevent future misconduct, or at least make it more difficult, are implemented. If business segments have implemented additional, specific reporting channels, these are described in this chapter.

#### Diversity lived in the business segments

Fresenius promotes international and interdisciplinary cooperation as well as diversity in our business segments and regions. The diversity of our markets and locations is also reflected in the workforce of the four business segments. In our home market in Germany, we have employees of around 140 nationalities. All business segments attach great importance to equal opportunities for all employees in the workplace as well as in the application, selection, and development procedures. In order to integrate equal opportunities in all processes and workflows, the business segments develop diversity concepts that are adapted to the requirements of their respective business models and regions.

#### Employees with disabilities

The Fresenius Group also employs people with disabilities, severe disabilities, and other limitations. The spectrum not only includes people in wheelchairs or with mental disabili-

ties. Survival of cancer, or diabetes, rheumatism, depression, back problems, or cardiovascular disease can also be the cause of a disability or impairment.

Fresenius is committed to the inclusion of severely disabled people. We want to enable our employees to apply their knowledge and skills as fully as possible. In doing so, the respective local legal requirements must be implemented. As these differ significantly in some cases, management is decentralized and local. For example, severely disabled employees in Germany are entitled to a workplace suitable for the disabled, part-time work if the disability requires shorter working hours, special protection against dismissal, and additional leave.

### Fresenius Medical Care

Fresenius Medical Care's commitment to inclusion and diversity is incorporated in its [Code of Ethics and Business Conduct](#). The business segment introduced a guideline stipulating that the interview round for senior-level positions should, where possible, include at least one qualified candidate from an underrepresented group. The objective is to increase diversity levels in the company, taking global ambitions and local environments into account.

Various channels are available to employees, patients, and third parties to report potential violation of human or workplace rights, laws, or company policies. Based on an analysis of its grievance mechanisms in 2020, Fresenius

Medical Care is working on improving the complaint handling practices and to establish globally consistent processes.

In 2021, Fresenius Medical Care built on its past efforts to foster a diverse and inclusive workplace, and to raise awareness of the benefits the company believes such an environment brings. The business segment further developed global inclusion and diversity initiatives. For instance, it held an inclusion workshop for the Management Board. In addition, an Asia-Pacific Women's Leadership Initiative was launched in 2021 as a catalyst to continue driving inclusion and diversity among the 13,000-strong workforce in the region.

Fresenius Medical Care also established a main contact for Diversity, Equity, and Inclusion (DE & I) in North America, who is focused on supporting the advancement of the key objectives in this area in alignment with the global inclusion and diversity work. She is supported by both the business segment's DE&I Executive Committee and its DE&I Council. Together these form a diverse group of employees who provide input on the business segment's continued efforts to build a more trusting and inclusive culture.

Fresenius Medical Care intends to further strengthen inclusion and diversity beyond gender diversity over the next few years. For example, the business segment plans to increase the focus on ethnic diversity in the future. To support these efforts, the company plans to help establish new employee resource groups (ERGs) across the regions. These groups refer to employees who meet based on shared com-

mon interests. In the United States alone, Fresenius Medical Care has 14 ERGs dedicated to different employee interests and aspects of diversity.

### Fresenius Kabi

Fresenius Kabi emphasizes equal opportunities for all employees in their daily work as well as in recruiting, application, and development processes. Numerous projects are placed in an intercultural environment. Transnational teams are working on solutions to the manifold challenges in the health care sector. The company values of Fresenius Kabi – customer focus, quality, integrity, collaboration, creativity, passion and commitment – form the basis for the day-to-day actions of all Fresenius Kabi employees. The company values of Fresenius Kabi underline the importance of respectful collaboration between all employees and are part of its [Code of Conduct](#).

Fresenius Kabi has a Center of Expertise Talent, Leadership, and Organizational Development (CoE TLO), which reports directly to the head of the Global Human Resources department. The CoE TLO is tasked with anchoring diversity and inclusion in the organization and supporting the regional and divisional human resources functions in their activities with a global framework.

Fresenius Kabi has guidelines and reporting systems for reports of potential violations of the principles defined in the Fresenius Kabi Code of Conduct. Employees can report

possible violations of the principles to their supervisors, their human resources department, or the compliance department, for example via e-mail. An online platform also offers the possibility of anonymously reporting violations of corporate principles to the company in various languages.

In the reporting year, the management approach and the governance structure of Fresenius Kabi remained as reported in 2020. Progress focused on further embedding diversity management in the business segment. The COVID-19 pandemic had no impact on Fresenius Kabi's diversity management in 2021.

In 2021, Fresenius Kabi established a diversity, equity, and inclusion (DEI) department as well as a Steering Committee for the region North America. Activities there focused on building competencies for diversity- and equity-friendly and inclusive behavior and developing regional DEI concepts for Fresenius Kabi employees.

### Fresenius Helios

At Fresenius Helios, the aspiration to be non-discriminatory and provide equal opportunities extends equally to employees, business partners, and patients. In Germany, it is also anchored in Helios' vision and mission, which were finalized in 2021, and in its six guiding principles: the guiding principle "Working together" emphasizes how valuable human diversity is – for example in nursing or medical teams at the clinics.

At **Helios Germany**, the Director of Human Resources has overall responsibility for diversity. A separate diversity working group was set up in 2021 to design and implement

overarching measures. In the hospitals, the clinic management is responsible for implementing the diversity concepts.

In the fourth quarter of 2021, Helios Germany signed the Charter of Diversity ([Charta der Vielfalt](#)) – an employer initiative for diversity in the workplace. Underpinning this commitment, the business unit is developing tools to strengthen diversity in all dimensions. The Helios intranet makes information, internal and external networks, and examples of best practice transparently available to employees.

Incidents involving discrimination are processed via the clinic management in cooperation with the human resources managers and, depending on the severity of the incident, escalated to regional or central level. As a rule, in the event of incidents of discrimination, a crisis management team is deployed to advise on the specific procedure to be used on a case-by-case basis.

**Helios Spain** commits to a diverse corporate culture in its Code of Conduct. The management is committed to using gender equality tools – for example, through integrative language and training, or in procedures such as personnel selection processes and internal promotions, as well as in cases of sexual harassment or gender discrimination. Helios Spain is currently in the process of negotiating equality plans for all locations in the hospital group. This kind of equality plan respects the European directives and the national rules in Spain on equal opportunities and wage transparency between men and women, and also guarantees non-discrimination in the workplace. Negotiations with trade unions on these equality plans took place during 2020 and 2021.

Each clinic of Helios Spain employs an equal opportunities officer, who is specially trained and exercises an advisory function for the respective management. In addition, the equality plan is monitored by a central committee comprising members from the management and employee representatives, who report on the implementation and development status at the locations. Specific action plans are also drawn up to ensure inclusion and equal opportunities for all employees in our clinics and health care facilities.

At Helios Spain, incidents involving discrimination can be reported via the Human Resources department, the intranet and the employee portal. In addition, sexual and gender-based harassment can be recorded via a dedicated complaint protocol. Three reports were received in 2021. Those related to own employees were investigated internally by the labor relations department. Two reports were solved and not further substantiated. One report is still under investigation.

### Integration of international nursing staff

To support its foreign employees, in particular foreign nurses, Helios Germany began to train staff as integration managers in 2020. In the course of the year, 40 integration managers who were either still undergoing or had already completed training supported nurses who had come to us from

abroad when they arrived in Germany, helping them to deal with authorities and providing support in other situations. The aim here is to help with social and cultural integration, as well as aiding professional and linguistic integration. This is supported and complemented by local initiatives at each hospital location.

### Fresenius Vamed

Fresenius Vamed focuses, among other things, on addressing diversity in the effective promotion of young talent and the management of succession planning. In the area of training and development in particular, the diversity of employees is taken into account and, for example, online training is offered in various languages.

At Fresenius Vamed, a diversity and gender representative oversees equality issues.

Suspected cases of discrimination or violations of diversity provisions are reported to and investigated by the Compliance Organization. Various reporting channels through which possible compliance cases can be reported are available to Fresenius Vamed employees for reporting suspected cases of discrimination, as explained on page 185,

section “Reporting channels”, of this Group Non-financial Report.

Fresenius Vamed has developed concepts for the integration of foreign nursing staff.

### OUR AMBITIONS

Promoting diversity and inclusion at all levels of the company is a priority at Fresenius. The Fresenius Group Management Board welcomes the activities within the business segments to further building on this diversity in future and benefiting from it more widely.

In the past, the Management Board of Fresenius had already set targets for the proportion of women in the two management levels directly below the Management Board. For more information, please refer to our Corporate Governance Report on pages 232 f. of the Annual Report 2021.

### EVALUATION

The proportion of female employees in the Fresenius Group increased slightly to 69% as at December 31, 2021 (Dec. 31, 2020: 68%). The proportion of females in services or care is traditionally higher than in the area of production. This

is reflected in the proportion of female employees in our business segments: Our business segment Fresenius Helios has with 74% the highest proportion of female employees among the Group. The number of female participants in the Group-wide Long Term Incentive Plan (LTIP 2018) is a good indication of the share of women in management positions. According to this, the ratio of women among the more than 1,800 top executives increased to 32.6% as at December 31, 2021 (Dec. 31, 2020: 31.6% of 1,700 top executives).

At Fresenius Medical Care, as of December 31, 2021, women accounted for 69% of the total workforce and 26% of positions in the first two management levels. Gender diversity in the business segment’s main governance bodies and at management level has remained stable over the past two years. In 2020, the Management Board of Fresenius Medical Care defined a new target of 22% for the share of women in the first management level below the Management Board and 32% in the second management level. The business segment aims to achieve these targets by 2025. In 2021, the definition of the two management levels below the Management Board for which targets were set was also adjusted in this context.

### FEMALE EMPLOYEES

Dec. 31	2021	2020	2019	2018	2017
Fresenius Medical Care	69%	69%	69%	69%	69%
Fresenius Kabi	51%	50%	50%	50%	51%
Fresenius Helios	74%	75%	75%	75%	76%
Fresenius Vamed	62%	62%	63%	64%	56%
Corporate/Other	40%	38%	39%	39%	39%
<b>Total</b>	<b>69%</b>	<b>68%</b>	<b>68%</b>	<b>68%</b>	<b>68%</b>

## COMPLIANCE AND INTEGRITY

### COMPLIANCE

For Fresenius, compliance means doing the right thing. Our ethical values are based on more than just regulatory requirements, which means that we not only act in accordance with the law, but also according to applicable sector codices, our internal guidelines and values. For our employees, this is the foundation of all our activities. For our business partners and suppliers, it is the standard Fresenius sets for cooperation. In this way, we want to help ensure that everyone can rely on us as a partner of trust and integrity.

Our risk-based compliance management systems are aligned with the business of each of our business segments. Our key ambition is to prevent corruption and bribery in our business environment. Beyond that, prohibiting violations of antitrust law, data protection regulations, trade restrictions, and anti-money-laundering laws, preventing the financing of terrorism, and protecting human rights are also key areas, which we address with dedicated compliance measures.

### OUR APPROACH

At Fresenius, we strongly believe that compliance protects what is most important to us: the well-being of the patients we care for. Compliance is firmly anchored in our corporate culture and guides us in our everyday work. Integrity,

responsibility and reliability form the core of our understanding of compliance. Thereby, we design all our measures in such a way that they prevent compliance violations.

As stated in our [Fresenius Code of Conduct](#), we are fully committed to adhering to statutory regulations, internal guidelines, and voluntary commitments, as well as acting in accordance with ethical standards. Violations are not to be tolerated. If a violation is detected, we perform an investigation, initiate the necessary remediation measures, and impose sanctions if applicable. In addition, incidents prompt us to anchor ethical and compliant behavior even more firmly in our corporate culture, as well as to further sharpen our compliance programs and prevention mechanisms in order to prevent future violations.

In all four business segments and at Fresenius SE & Co. KGaA, we have set up dedicated risk-oriented compliance management systems. These are based on three pillars: prevention, detection and response. Our compliance measures are primarily aimed at using preventive measures to avoid compliance violations. Key preventive measures include comprehensive risk identification and risk assessment, appropriate and comprehensive policies and processes, regular training, and ongoing consultation. We also carry out internal controls to identify possible compliance violations and ensure that we act in accordance with the rules.

The design and implementation of our compliance management systems are based on international regulations and guidelines, such as the ISO standards on the set-up of compliance management systems and applicable audit standards of the IDW (PS 980). When implementing measures, we take into account the respective national or international legal frameworks.

### Organization and responsibilities

#### Involvement of the Management Board

Responsibility for compliance within the Fresenius Group lies with the Management Board and has been assigned to the board member responsible for Human Resources, Risk Management and Legal of Fresenius Management SE. The Management Board member assumed the function of Chief Compliance Officer of Fresenius SE & Co. KGaA until Dec. 31, 2021. As of Jan. 1, 2022, the new Group function Risk & Integrity was established, encompassing the areas Risk Management & ICS (Internal Control System), Business Integrity (formerly Corporate Compliance) and Data Protection. The Head of Business Integrity has assumed the functions and responsibilities of the Group Chief Compliance Officer of Fresenius Group. He has a direct reporting line to the Member of the Management Board, responsible for Human Resources, Risk Management and Legal.

In our four business segments, Chief Compliance Officers and in some instances Compliance Committees develop and monitor the respective compliance management system. These functions report to the respective management of the business segment.

## The organizational structure

The business segments have established their own compliance organizations, which are based on the business organization. This includes respective Corporate Compliance departments, which develop global compliance initiatives for their business segment and support their respective compliance officers. More than 400 employees throughout the Group are responsible for compliance tasks and support Fresenius managers and employees in all compliance-related matters.

### Corporate Compliance department of Fresenius SE & Co. KGaA

The Corporate Compliance department of Fresenius SE & Co. KGaA sets minimum standards for the compliance management systems, especially for those compliance risks that are relevant to all business segments. The department supports the compliance officers in the four business segments with standardized management tools, processes and methods, and develops overarching compliance initiatives with them.

### Compliance Steering Committee

The Compliance Steering Committee (CSC) is the central advisory body of Fresenius SE & Co. KGaA for Corporate Compliance matters. The CSC is composed of the Chief Compliance Officer, the Chief Financial Officer, and the heads of the Legal, Internal Audit, and Corporate Compliance departments. If necessary, representatives of other governance departments attend the meetings of the CSC. The Compliance Steering Committee discusses the further development

of the Compliance Management System, as well as important compliance initiatives and relevant compliance risk areas. The members of the committee also discuss severe compliance cases and their remediation. All four business segments report annually to the CSC on the progress of their compliance management systems. The meetings of the CSC take place every six to eight weeks. In 2021, eight meetings took place – due to the COVID-19 pandemic, most of them virtually.

### Best practice exchanges and compliance expert panels

To ensure ethical conduct, we continually review our business practices and exchange on best practices with our compliance colleagues worldwide. Despite the travel restrictions that remained in place in 2021, regular exchanges in cross-divisional expert panels continued to take place within virtual meetings. Areas of collaboration included antitrust and foreign trade law, as well as anti-money laundering, whistleblower protection, and cross-border investigations.

### Reporting structure

The Chief Compliance Officer of Fresenius SE & Co. KGaA is informed about initiatives driven by the Corporate Compliance department on a weekly basis. Compliance case reports of medium severity for the corporate segment are reported to the Chief Compliance Officer immediately. The Management Board of Fresenius Management SE receives reports on the corporate compliance management system's status and selected initiatives regularly, at least twice a year. The Corporate Compliance department also prepares an annual

compliance report, which provides a comprehensive overview of all Corporate Compliance initiatives. The Supervisory Boards of both Fresenius SE & Co. KGaA and Fresenius Management SE are regularly informed about progress of compliance measures, at least once a year, most recently in December 2021. The business segments have established individual reporting lines to their respective management. The management teams of the business segments receive regular reports on compliance by their Compliance Officers.

Despite the differences in business and risk profile in each business segment, we strive to uniformly evaluate the design of the compliance management systems. In 2021, aspects of the effectiveness of compliance measures were also surveyed after the Corporate Compliance department of Fresenius SE & Co. KGaA reviewed the maturity of the compliance measures of the business segments and Fresenius SE & Co. KGaA for all compliance risk areas by using the Compliance Management System Reporting methodology in the previous year. The results were presented to the Compliance Steering Committee as well as the Management Board and Supervisory Board. This assessment will be continued on a regular basis.

### Guidelines and regulations

The Fresenius Code of Conduct forms the framework for all rules applicable in the Fresenius Group. The Code of Conduct lays out the principles of conduct for all employees, including managers at all levels and members of the Management Board. The Code is aligned with international regulations, as explained on page 182, and was adopted by

the Management Board of Fresenius Management SE. In addition, the four business segments have implemented their own Codes of Conduct, which reflect the Fresenius Code of Conduct principles and are adapted to the individual characteristics of each business segment. The Code of Conduct is available to all employees and is also available on the Internet. Guidelines, organizational directives, and process descriptions supplement and further define the rules of the Code of Conduct.

These are our principles, which are also defined in the Fresenius Code of Conduct:

#### Quality

- Ensuring quality of products and services.

#### Integrity

- Acting fair in competition
- Dealing properly with third parties
- Handling conflicts of interest transparently
- Acting in exemplary fashion

#### Responsibility

- Protecting data
- Protecting company property
- Handling company information confidentially
- Living social responsibility

#### Reliability

- Creating transparency in accounting, reporting, and communication with the public

#### Risk assessment

By using standardized methods, we regularly record, analyze, and evaluate compliance risks in each business segment and at Fresenius SE & Co. KGaA. These risk assessments cover over 20 risk groups depending on the business segment. Once a year, the compliance responsables exchange information on key findings from the respective risk assessments. In addition to core compliance risks such as bribery and corruption, antitrust violations, money laundering, terrorism financing, data protection violations, trade restrictions, and human rights violations, the risk assessment also includes other significant business risks such as information security, environmental and occupational safety, quality assurance, and the protection of intellectual property, where the responsibility lies with other functions.

#### Dealing with third parties

Our Code of Conduct and the related guidelines for Fresenius Group employees also regulate our relations with business partners and suppliers. We expect them to comply with applicable laws and standards as well as ethical standards of conduct in daily business and have specified this in our [Fresenius Code of Conduct for Business Partners](#). Our ambitions to avoid corruption and bribery are laid down in our Codes of Conduct. Among other topics, the Codes explicitly prohibit corruption and bribery and oblige our partners to comply with relevant national and international anti-corruption laws. In addition to risk-based business partner due diligence, we inform our business partners about these requirements before entering a business relationship.

The Codes of Conduct of the Fresenius Group are publicly accessible, for more information see chapter Supply chain, starting on page 197.

#### Business partner and investment due diligence

All business segments and Fresenius SE & Co. KGaA conduct risk-based due diligence on business partners before entering into a business relationship. In each business segment, the business partners to be screened are selected on a risk-based basis according to defined criteria. A risk profile of the partner is drawn up and targeted measures are initiated: accordingly, the compliance contract clauses are based on the partner's risk profile to prevent corrupt actions. We also reserve the right to terminate the contract in the event of misconduct. If we suspect misconduct on the part of a business partner, we take additional measures which, depending on the severity of the misconduct, may include audits or certifications.

Whenever we decide on potential acquisitions and investments, we take compliance risks into account in due diligence measures, among other things via the Acquisition and Investment Council (AIC), which reviews planned acquisitions and investments in a defined process for Fresenius Kabi, Fresenius Helios, Fresenius Vamed and Fresenius SE & Co. KGaA. Every acquisition and investment proposal submitted to the Management Board must first be discussed, reviewed, and evaluated by the AIC. The AIC is made up of managers from various functions, including Compliance. If necessary, we initiate safeguarding measures and include, for example, compliance declarations and guarantees in the

contracts. Following an acquisition, we integrate the new company into our compliance management systems as quickly as possible.

### Financial transactions

We have implemented dedicated controls for cash transactions and banking transactions, such as the dual-control principle. We also monitor cash transactions that exceed a certain threshold. In this way, we want to ensure that all financial transactions are correctly accounted for, authorized, and processed. Thanks to automated processes, we can identify compliance risks at an early stage. Evaluations of compliance with threshold values as well as other verification processes for supplier master data in affected business segments also provide valuable guidance.

This year, the reinforcement and refinement of the Group-wide guidelines on cash and banking transactions was a major project across all business segments. In addition to further controls for payments, the new regulations mainly relate to controls to prevent money laundering. These Group-wide guidelines also provide guiding principles for the subsidiary policies.

### Money laundering

Based on the risk profiles of our business segments, we have established measures to address money-laundering risks in the Fresenius Group as part of the implementation of the requirements of the Money Laundering Act for traders in

goods. These measures include anti-money-laundering guidelines, specific topic-related risk analyses, internal controls such as the prohibition of certain cash payments, and auditing processes for relevant transactions. We have anchored the implemented controls in our guidelines and conduct training on them.

### Trade restrictions

To provide people worldwide with access to lifesaving medicine and medical equipment we also supply products to countries that are subject to trade restrictions. It is particularly important to us to comply with all currently applicable legal provisions, e.g., with regard to sanctions or export controls. To this end, we have introduced various measures in the business segments concerned, such as monitoring processes and special IT system checks for deliveries that are subject to import or export restrictions. The measures depend on the specific risk in the country concerned. We aim to ensure that we can comply with all applicable sanctions and requirements for export controls, even in the event of short-term changes in legislation.

### Reporting channels

If Fresenius employees suspect misconduct, e.g., violations of laws, regulations or internal guidelines, they can contact their supervisors or the responsible compliance officers and report the possible compliance incident. They can also report potential compliance incidents anonymously, e.g., by

telephone or online via whistleblower systems and e-mail addresses set up specifically for this purpose. All business segments have established appropriate mechanisms. The whistleblower systems of Fresenius SE & Co. KGaA, Fresenius Medical Care, Fresenius Kabi and Fresenius Vamed are available via the corporate websites not only to employees, but also to third parties, e.g., customers, suppliers, and other partners, in a total of more than 30 languages

### Transparency in the health care sector

In the health care sector, transparency is of major importance with regard to business conduct, patient information and quality of care. More information can be found on pages 127 ff. in the Well-being of the patient chapter, section "Patient and product safety".

Fresenius Group companies have to adhere to laws and our ethical principles that

- require us to track and report publicly payments made to health care professionals and organizations;
- require us to issue written notification or approval and to disclose the purpose and scope of the interaction between a Fresenius Group entity and health care professionals, such as in health care facilities;
- require us to publicly disclose data pursued in clinical trials as well as disclose to patients the information gathered in patient studies. This is linked to the public right to transparency regarding data used to approve



new medicines, as well as provisions to adhere to relevant data protection standards; for more information see chapter Data protection, pages 188 ff.;

- require transparency in pricing and reimbursement procedures for pharmaceutical products.

We are committed to respecting the codes and principles associated with membership of various associations. In addition, we disclose all donations to health care professionals in our business segments, in accordance with the publication requirements applicable to us.

### Our goals

Our goal is to integrate our comprehensive understanding of compliance into our daily business. The aim is to prevent violations, continuously improve our compliance management systems, and to further evolve a “living compliance culture” Group-wide. Exchange on best practices from our business segments plays a key role here. Each year, all business segments develop operational goals and measures to further strengthen their compliance management systems. These are coordinated by the compliance responsables and presented to the Compliance Steering Committee.

## PROGRESS AND MEASURES 2021

### Risk assessment

In 2020, the business segments expanded the risk assessment to include bottom-up information, which they continued to carry out in 2021. Fresenius Kabi already introduced this approach in 2019 and continued this in the 2021 reporting year. Fresenius Helios, on the other hand, will implement bottom-up risk assessments in 2022. After introducing a harmonized IT tool, we made further adjustments to regulatory requirements and adapted existing risk processes in 2021. This way, we ensure an improved Group-wide compliance risk reporting.

### Compliance training

Compliance training is a high priority for Fresenius. All employees are offered training on compliance issues, covering basic topics such as our Code of Conduct and corporate guidelines, as well as specific topics such as anti-corruption, antitrust law, anti-money-laundering, data protection, and information security.

To convey the content in a targeted manner, we rely on individual concepts tailored to the respective department and employees. We use various formats such as in-house training, live webinars, on-demand video training, and traditional online training. Participation in essential basic training, such as on the Code of Conduct, is mandatory.

Employees are prompted and reminded to participate in mandatory training courses, for example with automatic

registration, or manual registration by compliance departments, human resources, or managers. To promote a risk-conscious and value-oriented corporate culture, we train executives using a dialog-based approach.

**Fresenius Kabi** focused on the topic of antitrust and the development of an e-learning program to combat money laundering and terrorism financing. Furthermore, Fresenius Kabi introduced entertaining and easy-to-understand video training in series format on various compliance topics, in addition to the mandatory training courses.

In the reporting year, **Helios Spain** began preparing additional training courses for the risks identified in the compliance risk assessment, in addition to the existing training courses on the Code of Conduct.

Workshops on the prevention of corruption and on the U.S. Foreign Corrupt Practices Act (FCPA) were held at **Fresenius Vamed**.

Furthermore, in addition to the mandatory training courses, entertaining and easy-to-understand video training courses in series format on various compliance topics and the subject of information security, further information on pages 149 ff. in the chapter Digital transformation and innovation, were introduced in several areas of the Group.

### Continuing development of the business partner due diligence

**Fresenius Medical Care** enhanced its global internal audit activities by improving the resources and focusing on anti-corruption in high-risk areas. More than 80% of inter-

nal audits included a compliance focus. Prior to entering new business relationships, and as part of its continuous monitoring of existing business relationships, the company assesses third parties for compliance risks. In 2021, the business segment assessed and approved 29,000 third parties. In addition, Fresenius Medical Care has implemented their third-party training approach at global level. In the scope of the business segment's training third parties refer to those in the sales channel. These include distributors, re-sellers, wholesalers, commercial, or sales agents. They also refer to any other third party involved in the sales of the products that potentially interact with government officials or health care professionals for sales of the products. The business segment also continued to conduct anti-corruption-related audits of third-party business partners. Fresenius Medical Care undertook 17 audits, exceeding its target to complete 15 in the reporting year.

**Fresenius Kabi** improved its systems and processes in the area of business partner screening in 2021. For example, what is known as robot-assisted process automation (RPA) is now used to provide further background information on business partners. Since its launch in April 2021, the RPA solution has automatically provided the persons responsible for the due diligence with a report for each business partner due diligence carried out using our system. This report contains Internet search results against certain search terms and a current search report from our third-party pro-

vider for business partner data showing potential red flags. For medium- and higher-risk business partners, the RPA solution delivers the result of another dedicated sanctions list check. The associated guidelines and training courses are currently being revised. Fresenius Kabi has also updated its anti-money-laundering and counter-terrorist-financing policy to reflect the current legal situation and the first national risk analysis.

**Helios Spain** launched a more comprehensive project in the reporting year that will lead to business partner due diligence for every supplier or business partner in the division in the future. Further information can be found in the Supply chain chapter on page 199.

**Fresenius Vamed** has established a risk-based business partner due diligence as part of the continuing development of business partner audits. In addition, guidelines for the prevention of corruption have been introduced.

### Dealing with conflicts of interest

At Fresenius SE & Co. KGaA, we support our employees in dealing responsibly with conflicts of interest. We provide relevant internal policies, and guidelines, as well as answers to the most frequent questions, on the intranet. Training and regular updates complement the activities at the Group level and within the business segments. Our Corporate Compliance department is also available as a contact partner for all questions.

**Fresenius Kabi** introduced a comprehensive, global anti-bribery and anti-corruption policy during 2021 that sets out clear rules and principles for avoiding bribery and corruption within the company and in connection with interac-

tions with third parties. These guidelines replace older regulations, e.g., on dealing with healthcare professionals and organizations and on conflicts of interest, and bring these rules together in a uniform document.

**Helios Germany** updated its anti-corruption policy in 2021 and adapted it to current requirements. The focus here was on the experience gained during implementation, as well as adaptation to the current framework conditions. At **Helios Spain**, new anti-corruption guidelines were drawn up in the reporting year, covering topics such as participation in congresses, travel and representation expenses, and donations. Training on these guidelines is in preparation.

## EVALUATION

### Audits and inspections

The Internal Audit departments conduct independent audits to improve the effectiveness of the risk management, control and governance processes at Fresenius SE & Co. KGaA and in the Group companies of the business segments. This was also done in 2021, taking into account risk-based measures of the compliance organizations such as policies and procedures as well as their implementation. If weaknesses are identified, Internal Audit monitors the implementation of remediation actions taken by the respective management. The audit engagement results are analyzed by the compliance organizations and are incorporated into the continuous improvement of existing measures.

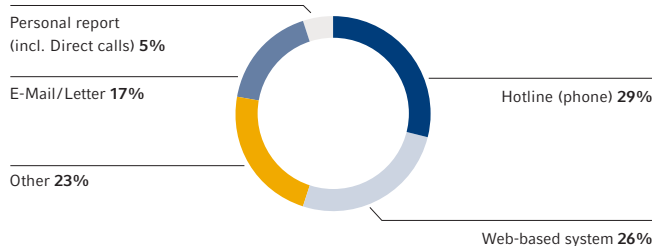
At Helios Germany, adherence to the business segment's transparency regulations is monitored on a random basis in regular transparency reviews. With the Compliance Cockpit, Fresenius Kabi has a tool that provides managers of each subsidiary with an annual overview of compliance-relevant key parameters based on external and internal indicators. Fresenius Kabi reviews these key parameters annually and defines monitoring measures for those subsidiaries with an increased risk profile. Fresenius Kabi also conducts regular reviews of compliance initiatives in the form of workshops. Fresenius Kabi's compliance organization organized various international workshops again in 2021. The workshops not only served as intensive training for local employees, but also enabled compliance officers to review and, if necessary, improve their understanding of compliance, the effectiveness of local implementation of internal guidelines, and the development and improvement of central compliance initiatives.

### Reports in 2021

In 2021, a total of 2,119 compliance reports<sup>1</sup> were received via the reporting channels. They were collected via different input channels as shown in the graph.

The compliance reports were assigned to the following topic groups, among others: Business Integrity including Anti-Corruption (105 reports), Data Protection (659 reports), and Human Resources/Workplace (1,040 reports).

#### MESSAGES BY INPUT CHANNEL



#### Dealing with possible compliance violations

We take all potential compliance violations seriously. An initial assessment focuses on the plausibility and possible severity level of the potential violation. We take every case of possible misconduct as an opportunity to review our corporate processes for improvements. The severity of the compliance violation determines who is responsible for further investigation. If necessary, a dedicated team takes over the investigation, which may include internal professionals or external support. Measures are implemented in a timely manner by the responsible management in close cooperation with the responsible compliance officers. Depending on the type and severity of the misconduct, disciplinary sanctions or remedies under civil or criminal law may be imposed. After completion of the investigation, we implement measures to prevent similar misconduct in the future. Further information pursuant to § 289c (3) No. 6 HGB on the Non-Prosecution Agreement of Fresenius Medical Care can be found in the Notes to the Consolidated Financial Statements.

#### DATA PROTECTION

As a globally operating company, we process the personal data of, among others, our patients, employees, customers, suppliers, and other business partners. Careful handling of the data provided to us is of great importance for Fresenius. To meet this responsibility, we are continuously developing our data protection measures.

#### OUR APPROACH

Fresenius is committed to the right to informational self-determination and the privacy of all individuals from whom we receive and process data in the course of our business. This also includes the processing of personal data by third parties on our behalf. The Fresenius Code of Conduct forms the framework of our daily actions. A key component of this is the Group's commitment to handling personal data responsibly. Data protection is thus a core task for us at Fresenius. To meet new requirements or to accommodate new technologies, we are constantly developing our data protection management systems. The operational tasks of data protection management are managed by the functional departments. In these tasks they are supported by processes of our Data Protection Management System. In certain areas, our Compliance Management System provides additional support, such as through general risk assessments or the investigation of potential data privacy violations.

<sup>1</sup> For Fresenius Medical Care in North America, the hotline system was used for multiple reporting purposes: In addition to the reporting of compliance concerns, reports can also be made on patient care and safety. These patient-related cases were not included in the Group-wide number of compliance reports.

We continuously work to ensure that all processing of personal data that we hold meets the requirements of the EU General Data Protection Regulation (EU-GDPR) and other national and international data protection regulations.

### Risk assessment

We regularly assess risks related to data protection and IT security in every business segment and at Fresenius SE & Co. KGaA, using standardized methods in a top-down approach. All business segments and Fresenius SE & Co. KGaA record their data processing activities in central IT applications or systems and subject them to a data protection review, including a risk assessment. For this purpose, we organize business processes in such a way as to integrate data protection into the design of new, or amended, data processing activities as early as possible. Among other things, this enables us to implement the data protection principles and incorporate the technical and organizational measures in processing that are necessary to meet the legal requirements, e.g., from the GDPR, and to minimize potential risks. The introduction of new or modified IT systems is subject to standardized review processes to examine the implementation of data protection and IT security requirements.

### Data subject rights

Fresenius SE & Co. KGaA and all business segments respect and protect the rights of all persons whose data is processed. Personal data is processed for the legal purposes

specified in each case, in accordance with legal requirements. We also require third parties with whom data is shared for specified purposes to comply with our policies. All business segments and Fresenius SE & Co. KGaA safeguard the rights of data subjects by adequately informing them of their rights and by having established processes and tools in place to ensure that requests are answered in a timely manner. Fresenius informs data subjects – whether employees or external parties – about the processing, e.g., collecting and storing, of their data. We inform employees of any amendments to the data protection information.

We have also implemented technical and organizational measures, including appropriate measures that serve to safeguard the rights of data subjects in accordance with the GDPR. We provide data subjects with an uncomplicated way to find out what personal data we process about them. Fresenius SE & Co. KGaA and Fresenius Kabi have developed easily accessible technical solutions with which data subjects can address their inquiries to the companies. The requests are evaluated and responded to at both corporate and local level. Fresenius Kabi, for example, monitors the receipt of requests centrally, although the collection of and responses regarding all requested information may also be carried out locally if deemed necessary. This takes place in the local language with the assistance of local data protection advisors.

Helios Spain processes requests from data subjects in accordance with the requirements for hospitals and is supported by central Data Protection Officers. A technical solution for submitting data requests is to be implemented at Helios Spain in 2022.

Fresenius Medical Care developed a number of standard operating procedures allowing for individuals whose personal data the business segment holds to exercise their rights as data subjects.

With these solutions, Fresenius Medical Care supports data subjects in exercising their rights to access, rectification, restriction, objection, portability, and deletion of their personal data in a timely manner. The business segment complies with requests for deletion in accordance with legal requirements.

### Reporting systems

At Fresenius SE & Co. KGaA, we have a zero-tolerance policy regarding data protection violations. External parties and all employees of the Fresenius Group may raise concerns regarding data protection via the existing whistleblowing systems or dedicated e-mail addresses. We investigate and evaluate all reported indications of potential infringements as quickly as possible and, where necessary, question and adjust our corporate processes. When required, we report privacy breaches to the authorities and inform those affected promptly and in accordance with legal requirements. The data protection organizations of the business segments and of Fresenius SE & Co. KGaA conduct their own audits and document possible violations. Information on data protection notifications received can be found in the Compliance chapter on page 188.

## International data transfer

As a globally operating company, we give high priority to ensuring an appropriate level of data protection in all international data transfers as defined by the GDPR and all other international legal requirements relating to data transfer. Thus, Fresenius SE & Co. KGaA and Fresenius Kabi have submitted what are known as Binding Corporate Rules (BCRs), i.e., mandatory internal company guidelines, to the responsible data protection authorities for review and approval and are preparing their internal implementation. BCRs help the participating companies to establish a uniform level of data protection aligned with the standards of the GDPR and contribute to the lawful processing of personal data internationally. In accordance with the EU-GDPR or other legal safeguards and contracts, the business segments and Fresenius SE & Co. KGaA only transfer data to third countries outside the European Union on the basis of an adequacy decision of the European Commission, recognized certifications, or other legal safeguards. To this end, in addition to commercial contracts, we also enter into specific supplementary data processing agreements with data recipients. In these, we also make use of the current EU model clauses, which were last issued by the European Commission in June 2021. The latest developments in the area of international data transfer, such as the European Court of Justice ruling in the Schrems II case on the Privacy Shield and the corresponding recommendations of the European Data

Protection Board and of the national authorities and their committees, are closely monitored and taken into account in risk assessments and when concluding contracts. The internally published templates are adapted without delay. When data is processed in countries outside the EU by third parties, the contractor is subjected to a careful review and measures are taken to ensure compliance with privacy regulations.

As part of Fresenius Medical Care's international business operations, the business segment may transfer personal data to third parties that undertake business activities on its behalf or within the Fresenius Group. The business segment expects these third parties to meet applicable laws, the business segment's own standards of conduct, and to comply with the information security and privacy policies. Fresenius Medical Care prioritizes the protection of data in all transfers, in line with the EU General Data Protection Regulation (GDPR) and other international data transfer laws. New developments concerning international data transfers have been assessed internally. Fresenius Medical Care considers the results of these assessments in its new guidance and its process for engaging with third parties based outside of the European Economic Area. Corresponding training has been developed and rolled out to relevant employees.

## Training

We train employees on current requirements and threats in connection with data protection and data security. To this end, we use an extensive range of e-learning courses, face-to-face training, and other training measures. We supplement general training with training measures for specific employee groups. In this way, we ensure that employees entrusted with processing data are informed about the current legal situation and the corresponding internal requirements.

We inform new employees about the appropriate handling of sensitive data and oblige them to maintain confidentiality. Newly hired employees at Fresenius SE & Co. KGaA, Fresenius Kabi, and Fresenius Helios also receive online mandatory instruction in data protection within a specified period. Each company at Fresenius Kabi and Fresenius SE & Co. KGaA must provide evidence regarding the instruction of employees in data protection at least every two years. At Helios Germany, each company must train all employees in data protection at least once every two years. Fresenius Vamed organizes an annual e-learning course, which is obligatory for employees. In-depth training sessions are also held on an ad-hoc basis. The mandatory e-learning course and the re-certifications of the Data Protection Officers were carried out in 2021.

## Organization and responsibilities

### Organizational structure

Fresenius SE & Co. KGaA and all business segments maintain data protection organizations in line with their organizational and business structure. These include independent Data Protection Officers, who report to the management of the respective companies. All data protection organizations, separated according to functions, have both advisory and controlling functions, which complement each other in their tasks. The data protection organizations support the management and specialist departments of the assigned companies in operational data protection issues and in complying with and monitoring the applicable data protection requirements. The respective Data Protection Officers are responsible for monitoring compliance with these requirements. They are the contact persons for national and international supervisory authorities and are supported by competent data protection advisors and coordinators. Depending on the business segment, the data protection advisors are organized centrally, regionally or locally.

**Fresenius Kabi** lists the contact details of the local data protection advisors appointed by the site manager on its intranet, together with the relevant country and site. They support the data protection officer, for example in the local language, in any communication with the local data protection authority, in inquiries from employees, and in the implementation of internal processes.

**Helios Spain**, for example, has set up data protection committees at the hospital level.

**Fresenius Medical Care** has a network of local country and sub-regional Privacy Liasons, who liaise between country management and the regional privacy leads to ensure compliance with local law and implementation of the Code of Ethics and Business Conduct which also defines the privacy standards and guides the business segment's approach to protecting personal information.

In total, more than 300 employees at Fresenius are entrusted with data protection tasks.

The Data Protection Officers from the business segments and Fresenius SE & Co. KGaA regularly exchange information on best practices and initiatives, including at Group Coordination Meetings and conferences, jours fixes, and other formats. In 2021, all events took place purely virtually.

### Involvement of the Management Board and reporting

Overall responsibility for data protection at the level of the Fresenius Group lies with the Management Board member responsible for Human Resources, Risk Management and Legal of Fresenius Management SE. The Data Protection Officer of Fresenius SE & Co. KGaA reports directly to this Management Board member.

In addition, data protection is a regular topic for the Compliance Steering Committee, which includes the Management Board member for Human Resources, Risk Management, Legal and Compliance of Fresenius Management SE. The Data Protection Officers responsible for the four business segments report regularly to the respective management.

### Guidelines and regulations

Data protection is a joint task of all employees of the Fresenius Group. At the core of this is the joint commitment of all business segments and Fresenius SE & Co. KGaA to data protection, as specified in their Codes of Conduct. In the [Fresenius Code of Conduct](#), we clearly commit ourselves to the careful handling of data and the right to informational self-determination: we undertake to respect the rights and privacy of all persons from whom we collect or receive data. This also applies to suppliers and business partners. For instance, Fresenius Kabi obligates its suppliers to handle data carefully by means of a [Code of Conduct](#).

All business segments and Fresenius SE & Co. KGaA have also drawn up policies for data protection and the handling of personal data. The data protection policies are complemented by further guidelines, standards, or standard operating procedures. These support the employees in implementing GDPR requirements and other relevant local laws and regulations in their areas of responsibility.

### PROGRESS AND MEASURES IN 2021

In 2021, at Fresenius SE & Co. KGaA and within the business segments, data protection was further developed with a view to global operational activities. Our measures therefore focused on the development of new training content and the implementation of existing training concepts, as well as on the expansion of audit concepts to take regulatory changes

into account. There was also a focus on data protection measures in connection with the increasing use of virtual health offerings.

### Risk management

Fresenius SE & Co. KGaA further developed its data protection management system in 2021. In addition to the ongoing development of the already-existing process for efficient investigation of potential breaches of data protection, this also included the expansion and implementation of the data protection audit concept. In order to implement the risk-based approach, the data protection risk assessments of data processing activities are also constantly optimized and implemented. In 2021, significant further developments took place in the areas of data deletion and international data transfer.

**Fresenius SE & Co. KGaA** has implemented guidelines for the creation and implementation of deletion concepts. The requirements of the European Data Protection Board were implemented in the course of a revision of contracts and of the additional risk assessment in connection with this. The use and implementation of specific applications for the future performance of the data protection risk assessment also played a key role in the ongoing developments. In order to further strengthen risk management, new e-learning units on data protection and on the BCRs are currently being developed at Fresenius SE & Co. KGaA. A further focal point was the permissible processing of personal data in connection with COVID-19 measures.

At **Fresenius Kabi**, a risk assessment of data processing activities in an application is performed in several stages on the basis of templates developed for this purpose. The application will be further developed so that future risk assessments will no longer be performed in separate templates, but within the application. Data privacy impact assessments are performed on an ongoing basis; in the future, the process will be an integral part of the application for recording data processing activities. To ensure structured and efficient processing of notifications on data protection incidents and potential data protection violations, Fresenius Kabi has implemented internal guidelines; these are accompanied by a technical solution with which notifications on data protection incidents can be recorded by local data protection advisors on the basis of a notification by employees. The technical applications for conducting and documenting, recording, and processing data subject inquiries were further developed. A report developed for this purpose provides information on the number, type, and processing status of data privacy incidents and data privacy inquiries.

**Helios Germany** strengthened various instruments of the data protection management system in 2021. Additional materials such as checklists for auditing processing activities, e.g., were made available to the sites, the Helios audit concept was updated, and the notification processes for auditing new processing activities were revised centrally and locally due to the implementation of the Helios Digitization Board (DIGI Board). In 2021, the focus was on, e.g., the adoption of Helios Group regulations on data privacy, the further development of auditing processes, and the continued data-privacy-compliant design of hospital information systems (e.g., access logging and auditing for improper access, both independently and on an ad hoc basis). Many measures were also necessary at Fresenius Helios as a result of COVID-19, e.g., in relation to vaccination and surveying of the vaccination status of employees. This required close coordination with the relevant authorities.

**Helios Spain** has continued to implement data protection impact assessments and has expanded them to include additional indicators for information security or technological risks.

**Fresenius Vamed** has progress in data protection management evaluated and documented annually by an external law firm. In 2021, the business segment focused in particular on updating directories and revising the deletion concept for its processing activities.

### Training

In 2021, Fresenius SE & Co. KGaA developed a new data protection training program consisting of various modules, which will be rolled out in 2022. In addition to a comprehensive module on data protection, this also includes explicit training on the applicable data protection guidelines.

Since 2021, **Fresenius Medical Care** included privacy awareness in its mandatory Code of Ethics and Business Conduct training. The business segment offers a range of e-learning opportunities and classroom training courses

and combines general training with targeted measures for specific employee groups. In 2021, the business segment offered more than 60 training classes on data privacy to its employees and contractors around the world. Training in North America is aligned with HIPAA (Health Insurance Portability and Accountability Act of 1996) requirements. In the European Union, it covers GDPR requirements. In 2021, Fresenius Medical Care launched an awareness campaign as part of its first International Privacy Day celebrations. This involved the introduction of a privacy website in countries in Europe, Middle East, and Africa, as well as Latin America, and Asia-Pacific.

In the reporting year, **Fresenius Kabi** completely revised its training on data protection and information security in the form of an e-learning course and divided it thematically into individual modules. The training content was expanded to include how to deal with data protection incidents and possible data protection violations as well as a separate module on Binding Corporate Rules (BCRs). The training was rolled out globally as an e-learning course in the final quarter of the reporting year. Data privacy advisors and compliance employees were also trained in dealing with data privacy incidents. Training on data privacy clauses in contracts, data privacy agreements, conducting a risk assessment, or handling data subject inquiries were developed as accompanying training measures. A question and answer page on the intranet provides information on individual questions with references to further information, contacts and internal company applications.

**Helios Germany** has added a new online training course on data protection and FlexWork to its existing training portfolio in response to new work requirements. **Helios Spain** introduced company-wide data protection training in 2021. In 21 clinics, face-to-face training was also conducted during the pandemic.

In 2021, employees at **Fresenius Vamed** participated in data protection e-learning courses. Furthermore, 48 people received an initial or re-certification as Data Protection Officers.

## EVALUATION

### Audits and monitoring

To ensure compliance with data protection regulations, several governance functions in the Group perform regular checks with different focuses in all business segments. The Internal Audit departments carry out independent audits to improve the effectiveness of risk management, control and governance processes in all business segments. Aspects of data protection are also taken into account on a risk basis. The data protection related results of the audits are analyzed by the respective data protection officers and are incorporated into the continuous improvement of existing measures of the respective business segment. All business segments and Fresenius SE & Co. KGaA have defined corresponding audit concepts for this purpose.

In addition, data protection controls are an integral part of various internal control frameworks in the business segments. Findings on potential improvements from audits and

reviews are used to continuously develop our data protection processes. **Helios Germany's** audit concept, for example, stipulates that each company is to be reviewed regularly – at least once a year – in the course of internal audits and supplemented by a central, annual risk analysis (on January 31 of each year for the previous fiscal year) with regard to data protection.

**Helios Spain's** audit concept requires all hospitals to be audited every second year. This is performed as an internal audit conducted by the company's data protection team and an external law firm. Every year without an on-site audit, a self-audit checklist is distributed by the data protection team and filled out by the hospitals.

**Fresenius Kabi** conducts data protection audits on the basis of an internal process by the Data Protection Officer and records the results of data protection audits performed in tabular form. The Internal Audit departments carry out independent audits to improve the effectiveness of risk management, control and governance processes in all business segments. In this context, aspects of data protection are also taken into account on a risk-based approach. Thematically identical deviations are grouped and communicated as preventive measures. The measures resulting from audit deviations are also documented and the status updated by the respective local data protection advisors. The progress of the implementation of measures resulting from audit deviations is regularly reviewed.



## HUMAN RIGHTS

Human rights are universal. As a global health care company, Fresenius views the respect for human rights as an integral part of our responsibility. We are committed to meeting the regulatory requirements and social expectations of due diligence for the respect of human rights.

Medical care for patients and the well-being of our more than 300,000 employees are among the most important engagement areas of our human rights due diligence. We are aware that respecting human rights extends beyond our own company operations and core business. We consider human rights issues when selecting and cooperating with our suppliers and business partners, both in procurement and in sales and distribution. We are working to increase the transparency of our supply chains. The knowledge gained by doing so helps us to ensure secure supplies while reducing human rights risks in the procurement of important raw materials and supplies, as shown on page 197 f.

## OUR APPROACH

Fresenius is committed to respecting and upholding human rights. We underline this commitment with a Group-wide Human Rights Statement, which the Management Board adopted in 2018. The statement is based on the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. It covers human rights issues that are of particular importance to our Group, which include prohibiting exploitative and illegal child labor or forced labor, preventing discrimination, promoting equal opportunities, and creating safe working conditions.

The publication of the statement also marked the starting point for our Human Rights Program, which establishes preventive measures helping Fresenius to prevent or reduce human rights risks in its business processes and includes human rights risks in our Group-wide risk management. The measures of the Human Rights Program are closely aligned with the [UN Guiding Principles on Business and Human Rights](#) and build on its five elements: establishment of fun-

damentals, risk analysis, measures and integration, reporting, and grievance mechanisms.

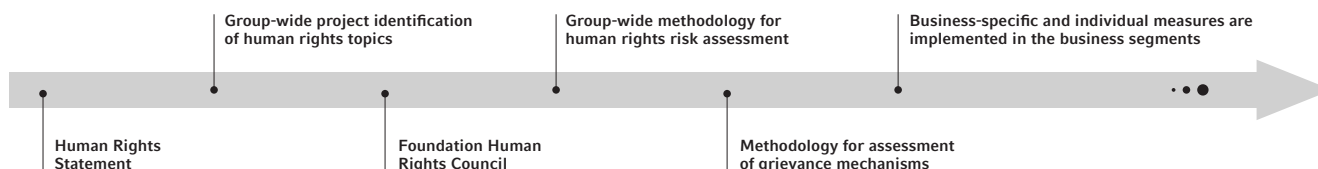
In 2019, we identified and defined human rights topics that are of particular importance for the Group in a comprehensive project involving all business segments. They include access to health care, working conditions in the supply chain, and preventing discrimination and promoting equal opportunities. Our business activities and relationships can have impacts on human rights in these areas. In addition, the business segments work on potential issues specific to their business, such as potential environmental impacts related to production. This analysis forms the basis for identifying potential human rights violations and gives us the opportunity to develop necessary measures. In 2020, a Group-wide methodology for human rights risk analysis was initiated to identify and prevent or mitigate human rights violations at an early stage – and to then define further measures in the business segments.

## Organization and responsibilities

### Human Rights Council

In 2019, Fresenius established a Human Rights Council to drive the implementation and development of our Human Rights Program at the Group level. It is composed of representatives of the four business segments and Fresenius SE & Co. KGaA. The approximately 20 members of the Human Rights Council are active in various functions within the Group, including compliance, legal, sustainability, communication, purchasing, human resources, and medicine. The committee meets quarterly and promotes information

## MILESTONES OF THE HUMAN RIGHTS PROGRAM



exchange on current human rights topics across the business segments. The participants discuss Group-wide initiatives and present new concepts and methods. In 2021, the Human Rights Council met four times.

**Addressing human rights in the business segments**

In each of Fresenius’ four business segments, various departments are responsible for planning and implementing human rights activities within their business segments and supply chains. Supported by Compliance Management Systems (CMS), they carry out training within the Group on specific human rights issues and provide information on how employees can react to and report any misconduct.

**Guidelines and regulations**

**Fresenius Human Rights Statement**

Our [Human Rights Statement](#) is a commitment by Fresenius SE & Co. KGaA and its business segments. In addition, Fresenius Medical Care has adopted its [Human Rights, Workplace Rights and Labor and Employment Principles](#). The human rights statements supplement the Codes of Conduct of the business segments and their underlying human rights commitments. The Human Rights Statement can or should be regularly updated as new insights arise or new essential issues need to be added. Details on the topics on which we

position ourselves in the Human Rights Statement are available online on our corporate website [fresenius.com/compliance](https://www.fresenius.com/compliance).

In the Human Rights Statement, we position ourselves on the following topics:

- ▶ Creating safe working conditions
- ▶ Preventing discrimination and promoting equal opportunities
- ▶ Protecting personal data
- ▶ Prohibiting exploitative and illegal child labor or forced labor
- ▶ Respect the right to freedom of association and collective agreements
- ▶ Considering our impact on the environment
- ▶ Assuming responsibility along the supply chain

**Human Rights Program**

We respect and support human rights as defined in international standards, e.g., the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. Our actions are based on the UN Guiding Principles on Business and Human Rights, which were established in Germany through the National Action Plan for Business and Human Rights (NAP) and the CSR reporting obligation. The measures of our Human Rights Program – which we are continuously developing, as the graphic shows – are based on these principles. We incorporate new requirements and legal frameworks, such as the Supply

HUMAN RIGHTS PROGRAM



Chain Due Diligence Act, which comes into force in Germany in 2023, into the ongoing development process and adapt our measures where necessary.

**Complaint mechanisms and reporting channels**

Employees of all business segments and of Fresenius SE & Co. KGaA can raise their concerns directly with their managers. Employees and external stakeholders may also use dedicated complaint management systems to provide information or use designated e-mail addresses to draw attention to possible human rights violations or other violations. We provide information on these systems in the Compliance chapter, page 185. We strive to continuously improve

our processes and further optimize the complaint mechanisms. Based on the requirements of the UN Guiding Principles on Business and Human Rights and the European Union Directive on the protection of whistleblowers and their implementation in national law, we developed specific criteria for complaint mechanisms or procedures. Based on these criteria, an assessment has shown that the reporting system of Fresenius SE & Co. KGaA meets these requirements. The business segments observe the developments in this area and adapt their processes as needed, based on these criteria.

We are committed to protecting persons reporting complaints in different ways. Reports can be made anonymously, where legally permitted. Incoming reports are treated confidentially as described in the respective guidelines. Ombuds panels also exist at Fresenius SE & Co. KGaA, Fresenius Vamed, and Fresenius Kabi. These carry out preliminary assessments of reports received and initiate risk-appropriate investigations of reports on a case-by-case basis. Employees are also informed about the possibility of reporting potential violations through externally accessible websites. Our reporting channels are also accessible to supplier employees and other third parties. Fresenius Medical Care has an anti-retaliation policy in place.

If we find substantiated concerns or violations of laws and policies, we take appropriate measures. We use the results of internal reviews and reports to review our business processes and implement corrective or improvement measures where necessary. This information is also very useful for our risk assessments and the Group-wide risk management.

### Our goals

Our primary goal is to establish and continually develop appropriate human rights measures for Fresenius to prevent, end, or minimize the possible negative human rights impact of our business activities and supply chain.

### PROGRESS AND MEASURES 2021

To protect human rights, along with other measures, new guidelines were developed by individual business segments in the reporting year, which are accompanied by training courses.

### Risk management and assessment

The Fresenius Group has identified human rights issues and fields of action in all business segments that are particularly relevant to our value chains. In doing so, we consider various factors, including business models of the business segments, and current public debates and regulatory developments such as National Action Plans (NAPs) for Business and Human Rights.

Based on these topics, we further introduced our Human Rights Risk Assessment methodology in individual business segments in the reporting year 2021. This methodology takes into account the severity of the potential human rights risks, such as the impact on the people affected and the possibility of restoring the situation, as well as the likelihood of a potential human rights violation. Human rights risks have been integrated into Group-wide risk management in 2021.

### Human rights training

In 2021, **Fresenius Medical Care** included information on human rights in its mandatory Code of Ethics and Business Conduct training, as well as in its Global Supplier Code of Conduct training. The business segment's aim is to raise awareness of this topic among employees.

In 2020, **Fresenius Kabi** supplemented the e-learning training on the Fresenius Kabi Code of Conduct with a chapter on human rights. The supplementary human rights module was successfully rolled out in 2021 as part of the mandatory e-learning on the Fresenius Kabi Code of Conduct. Employees are familiarized with the content of the human rights statement and the company's positions on illegal child or forced labor, discrimination and equal opportunity, safe working conditions, the right of freedom of association and collective bargaining, protecting personal data, the influence on the environment, and responsibility in the supply chain.

**Helios Germany** trained its purchasing staff in the reporting year on the topics covered by the recently introduced Supplier Code of Conduct. In addition to requirements relating to environmental protection and human rights, it also includes further requirements, e.g., animal welfare and labor standards that will be required of suppliers and business partners in the future.

**Helios Spain** has developed a comprehensive program that focuses on people. The program also reflects the content of the Code of Conduct, in which the company emphasizes the importance of respectful behavior, a commitment

to equal opportunities and freedom from discrimination, and respect for the compatibility of family and career. In the future, this content will be trained with additional focus topics such as human rights, social responsibility, and the environment. The ambition is to train all persons responsible for these topics who are assigned to the individual hospitals and companies of Helios Spain. However, the training courses are also open to all employees who wish to further train their knowledge in this area.

## EVALUATION

In the reporting year, we received information on potential human rights violations via the existing reporting channels. Further information on the reporting channels can be found in the chapter Compliance on page 185 and page 188. We evaluated these and determined that our management approach at Group level has proven itself; thus, no adjustments have been made compared to the management approach in 2020. However, progress and measures in the business segments certainly relate to changes in the respective governance structure or the improvement of existing reporting systems.

## SUPPLY CHAIN

### OUR APPROACH

We expect our suppliers and business partners to comply with our and equivalent ethical, social, ecological, and human rights standards. To this end, they are expected to introduce processes to ensure compliance with applicable standards. The requirements for our direct suppliers, service providers, and other partners are set out in Codes of Conduct for Business Partners and Suppliers and corresponding contractual clauses. If we suspect that rules of conduct have been or are being violated, we react accordingly. Depending on how serious the misconduct is, we may, e.g., introduce additional control measures, such as audits, and request additional written confirmations from suppliers and business partners.

### Guidelines and regulations

Our Codes of Conduct for Business Partners and Suppliers take into account the respective business models of the business segments. The Codes of Conduct are used in purchasing contracts and contracts with other business partners, e.g., distributors and sales representatives – as annexes or references. Fresenius Medical Care has embedded its expectations in its [Global Supplier Code of Conduct](#). [Fresenius SE & Co. KGaA](#), [Fresenius Kabi](#), and [Fresenius Vamed](#) have set out their requirements in Codes of Conduct for Business Partners and Suppliers. Fresenius Helios defines its expectations of business partners in the respective contracts and in the [Code of Conduct for Suppliers](#) intro-

duced at the end of 2021. The codes include details on the regulation of child and forced labor, and fair working and employment conditions such as working hours and wages.

## PROGRESS AND MEASURES 2021

### Supplier evaluation

Transparency in the supply chain is important to identify and address human rights risks. In the reporting year, our global procurement activities demonstrated their reliability – despite the particularly volatile procurement market situation in 2021. The business segments' individual measures are provided below; additional information on procurement activities can be found in the Group Management Report on page 58.

### Fresenius Medical Care

Fresenius Medical Care's Global Supplier Code of Conduct specifies its expectations of suppliers in terms of sustainable business practices, covering topics such as integrity and ethics, human rights and labor conditions, quality, occupational health and safety, and environmental protection. It forms the basis of their contractual relationships with suppliers. Fresenius Medical Care continues to incorporate the requirements of the Global Supplier Code of Conduct into supplier contracts and has updated all relevant procurement guidelines across the regions to include a reference to this document. In 2021, the business segment also developed an onboarding process for suppliers to inform them of the sustainability requirements. This includes procedures

to manage situations where suppliers do not wish to or are unable to adhere to these requirements.

In the reporting year, various employees in Procurement, as well those working in Legal, Finance, and Compliance, participated in internal training courses on the Global Supplier Code of Conduct. Additionally, in 2021, Fresenius Medical Care developed a global e-learning course on sustainable supplier management, with the goal of reaching procurement staff in all countries by the end of 2022. It has also developed an internal process to manage supplier feedback, which will be rolled out in 2022.

In the context of its Global Sustainability Program, Fresenius Medical Care launched an initiative to evaluate suppliers based on sustainability risks. This helps to cluster suppliers according to these risks, which allows it to monitor them more closely and take the required action when necessary. In 2021, Fresenius Medical Care further developed its risk assessment procedures, taking into consideration the requirements of the new German Act on Corporate Due Diligence Obligations in Supply Chains, which will come into force in 2023. As part of this initiative, Fresenius Medical Care will ask critical suppliers to provide information about their sustainability performance via, for instance, a self-assessment form. Fresenius Medical Care will use this information to identify suppliers that do not fully comply with its sustainability standards so it can initiate appropriate fol-

low-up action. In addition, Fresenius Medical Care continued to screen social media for negative reports regarding its suppliers' business conduct related to sustainability. In 2021, the business segment screened 100% of its most important suppliers based on relevant spend.

### **Fresenius Kabi**

Fresenius Kabi has identified strategic suppliers that the business segment monitors closely because of their importance to the business; this is managed by Fresenius Kabi's global strategic purchasing organizations.

Based on defined processes, Fresenius Kabi classifies strategic suppliers according to their risk and evaluates them regularly. The business segment also conducts supplier audits.

Since 2019, Fresenius Kabi has assessed the aspects of occupational health and safety, environment, human rights, business ethics, and sustainable procurement of relevant<sup>1</sup> strategic suppliers, which has been further continued in 2021. This enables Fresenius Kabi to identify suppliers' ESG performance (Environment, Social, Governance). Subsequently, suppliers can be requested to implement appropriate measures to reduce their ESG risks. Fresenius Kabi is supported in its supplier evaluation by an external service provider that provides ESG assessments for global supply chains. In addition, the business segment continued to work on integrating supplier assessments based on ESG criteria into supplier processes in the reporting year 2021. At the end of 2021, more than 70% of the relevant strategic

suppliers had been evaluated against ESG criteria. The internally set ambition was thus achieved. The ESG performance of the majority of suppliers was confirmed by the assessment. Strategic suppliers with a low ESG assessment score have been requested in 2021 to take measures to improve their performance.

In view of the volatility on the procurement markets in the reporting year, Fresenius Kabi closely monitored the availability of materials required for the manufacture of products and ensured the best possible availability, for example by increasing inventory levels as applicable and continuing to certify alternative suppliers. Thus, in the reporting year 2021, Fresenius Kabi was able to mitigate supply bottlenecks for sourced products and avoided significant effects on the supply of vital drugs and medical devices to patients.

### **Fresenius Helios**

At Fresenius Helios in Germany, the purchasing department regularly evaluates strategically important suppliers according to standardized criteria and processes. In 2021, the supplier evaluation for the years 2020 and 2021 was carried out on 204 suppliers with a procurement volume of around €1.03 billion. Criteria include the quality of processes, IT infrastructure, and the quality of operational and strategic collaboration.

In addition to this focus, further environmental and social aspects, as required by the German Supply Chain Due

<sup>1</sup> Suppliers of APIs, excipients, primary packaging materials, energy, disposal services, filters, granulates, lab consumables, secondary and tertiary packaging, strategic components, clinical studies, medical devices components.

Diligence Act as of 2023, were assessed. In 2021, on this basis, the potential human rights risk areas defined in 2020 were further evaluated and divided into specific risk groups.

Helios Germany's purchasing department will also take this Group-wide, uniform risk assessment on the topic of human rights into account for the further evaluation of its suppliers in order to ensure early identification of potential risks. Helios Germany also introduced a Code of Conduct for Suppliers at the end of 2021, which will be an integral part of all contracts in the future. On this basis, the company will consequently demand the inclusion of further, predominantly ecological and social, aspects in the future.

Fresenius Helios in Spain has developed a procedure for the general evaluation of all suppliers, elaborating different supplier categories and detailed criteria for analysis and evaluation for the different categories. To implement the supplier evaluation, software is used that allows traceability of the different actors involved in all phases of the evaluation process. Part of this project is a validation process to ensure that suppliers are aware of and accept the Code of Conduct. The processes established with this project are intended to improve supplier selection through a standardized, comprehensive evaluation. For this purpose, a modular questionnaire was developed. It includes, among others, general, financial, qualitative, social, and environmental aspects of suppliers, criminal incidents, and implementation of compliance, data protection, and cybersecurity. The objective is to ensure

transparency and quality in various procurement areas – such as the evaluation of food safety, pharmaceuticals, construction and other work, and equipment. In the reporting year, Helios Spain thus launched an extensive analysis of direct suppliers to the central purchasing department, the construction and equipment department, and the quality department. Further implementation of the project is planned for the next two years at Helios Spain. Here, the framework audited in 2021 is to be extended to the other suppliers, as well as the purchasing processes of the clinics and health centers.

#### **Fresenius Vamed**

Fresenius Vamed already introduced a Code of Conduct for Business Partners in 2017, which was revised in 2020 and further rolled out in the reporting year. A key component is Fresenius Vamed's expectation of its business partners to comply with human rights, environmental protection, and sustainability.

With the further development of the business partner due diligence, Fresenius Vamed has also introduced corresponding guidelines, through which a risk-based audit of all business partners is regulated.

## **ENVIRONMENT**

As a health care Group, Fresenius feels a responsibility to protect the environment and use natural resources carefully because only a healthy environment can be a home for healthy people. It is important to avoid possible negative effects on the environment and health. To this end, we identify and evaluate potential hazards and take the necessary measures to protect the environment. In our Group-wide materiality analysis, we identified the following topics for our internal environmental management strategy as particularly relevant to our core business:

- Water management
- Waste and recycling management
- Climate protection – energy and emissions

### **ENVIRONMENTAL MANAGEMENT**

We aim to develop an integrated environmental approach for the Fresenius Group and foster a balanced view across all functions with regard to relevant environmental aspects. In its business operations, the Fresenius Group is subject to numerous guidelines and regulatory requirements that must be applied and complied with at all times. We integrate national requirements into our internal guidelines, which are defined in ISO-based or ISO-oriented management systems.

### **OUR APPROACH**

We aim to analyze our impact on the material environmental aspects in both the manufacturing and services areas, as the risks of financial or reputational costs linked to environmental litigation are expected to increase. Also, reducing in-process material is essential for many industries affected

by growing natural resource scarcity. Dedicated monitoring of natural resource consumption and waste-generating activities can lead to lower costs and, in some cases, new business opportunities. This is why we assess trends and adapt our activities if deemed essential to support the sustainable, long-term growth of our business. We report on our progress and measures in 2021 on page 203 f. Information on risks can be found in the Group Annual Report 2021 in the Opportunities and Risk Report on pages 95 ff.

On a business segment level, the environmental management strategy is aligned to the respective business models. Since the requirements in our business segments differ, environmental management is decentralized. The common foundation of environmental management approaches in our business segments is the ISO 14001 standard. All segments have implemented local, regional, or global management systems to take into account the respective business models and adapt processes accordingly. The dedicated functions of the business segments monitor and control the environmental impact of their operations. They analyze environmentally relevant vulnerabilities, develop suitable standard procedures, and implement appropriate measures. They support their certified local entities in effective, directed environmental goal-setting, monitoring these goals as well as developing and implementing mandatory guidelines for all entities.

## CERTIFICATIONS AND COMMITMENT

The environmental commitment of our business segments is reviewed or certified by external partners and regulatory bodies. We are continuously expanding the number of sites certified to ISO 14001. In 2021, further entities were added on a Group level. Information on the various standards is provided for each business segment in this chapter.

The environmental management approach of the Fresenius Group is controlled by internal specialists or dedicated functions within the business segments. Relevant data is reported regularly, e.g., on a monthly basis, to identify deviations. If deviations occur, our specialists initiate a root cause analysis which is evaluated, and corrective or preventive actions are implemented where necessary. Regular internal audits, partially annually, support the verification of data and management approaches, both for certified and non-certified entities. In this way, we ensure that activities to protect the environment are in accordance with internal guidelines and regulatory provisions. The overarching ambition is to improve efficiency and coverage of our management systems, so as to ensure the effectiveness of the procedures and systems in place.

### Fresenius Medical Care

Production sites, distribution centers, laboratories, and dialysis clinics are subject to internal and external audits. This involves checking their compliance with environmental laws and regulations, certification requirements, and internal

guidelines. Due to the COVID-19 pandemic, audits in 2021 took place virtually. In total, 25% of the production sites are certified according to ISO 14001 standard and 5% of the production sites have ISO 50001 certifications.

The environmental management of Fresenius Medical Care is described in this section; for energy management and emissions see page 211 f.

### Fresenius Kabi

Fresenius Kabi has a matrix certification for both its global environmental management system and the energy management system; both systems are audited annually and certified by TÜV Rheinland. Fresenius Kabi continuously monitors certified organizations to ensure that they comply with the standard process guidelines that are binding for them. To this end, globally appointed auditors conduct regular internal audits of the organizations. Fresenius Kabi is working to implement the environmental management system according to the international standard ISO 14001 and the energy management system according to ISO 50001 at all manufacturing plants worldwide by 2026<sup>1</sup>. To achieve the goal of implementing the management systems, the business segment has drawn up an ambitious implementation plan and is working systematically on its realization. By expanding the coverage of the management systems, Fresenius Kabi aims to continuously improve its environmental and energy performance. 40 Fresenius Kabi organizations are currently certified according to ISO 14001, and 3 additional manufacturing

<sup>1</sup> Implementation will be concluded at all Fresenius Kabi manufacturing plants in 2026. The certification issuance from the individual certification companies may extend into the following year.

plants were certified in 2021. Further, 22 organizations are certified according to ISO 50001, and 4 additional manufacturing plants were included in the certification in 2021. Information on the environmental management of Fresenius Kabi can be found on page 202; for energy management and emissions see page 212.

### Fresenius Helios

Fresenius Helios started the introduction of an environmental management system in accordance with ISO 14001 in Germany in 2020 and continued this process in 2021. The certification of all Helios clinics is to be covered by matrix certification in the coming years.

Implementation of the energy management system in accordance with ISO 50001 was completed at all Fresenius Helios sites in Germany by the end of 2020. The clinics of Helios Germany were audited up to the end of 2019 according to the EDL-G in compliance with DIN EN 16247. With the introduction of the energy management system according to ISO 50001 in 2020, the EDL-G will continue to be operated seamlessly.

At Helios Spain, two further hospitals were certified according to ISO 14001 in 2021. The total number is now 42 hospitals. The number of hospitals certified to ISO 50001 increased by 1 to a total of 7.

### Fresenius Vamed

In 2021, at Fresenius Vamed no new certifications according to ISO 14001 or ISO 50001 were performed. The number of facilities with appropriate certifications was unchanged, with 7 facilities certified to ISO 14001 and 76 certified to ISO 50001.

## ENVIRONMENTAL MANAGEMENT IN THE BUSINESS SEGMENTS

### Fresenius Medical Care

As a large international company, Fresenius Medical Care recognizes its responsibility to protect the environment and use natural resources carefully. Therefore, the business segment tracks and analyzes environmental data generated by the dialysis clinics and production sites worldwide, including energy and water consumption levels. This helps the company to manage resources more effectively. Eco-reporting across regions and functions is facilitated by specific tools.

Responsibility for environmental management is shared between global and regional functions. The Global Manufacturing, Quality, and Supply division is accountable for sustainable operations in the production business. Responsibility for environmental protection in dialysis clinics lies with the respective management in the regions. In 2021, the company also set up a network of environmental experts to regularly exchange information and work together on environmental deliverables at a global level. This is an important step toward establishing global governance, with the aim of driving strategic environmental initiatives across the whole organization.

Fresenius Medical Care monitors national and international regulations concerning environmental issues on an ongoing basis so that internal policies, and manuals are up to date. The business segment has established internal environmental standards, which are complemented with external certifications if it adds value.

In 2021, Fresenius Medical Care rolled out a new digital tool at its production sites to improve the data quality and efficiency of its eco-reporting. At the dialysis clinics in Asia-Pacific, Fresenius Medical Care introduced the eco-reporting software that is already being used in dialysis clinics in the Europe, Middle East, and Africa region, and in Latin America. Manufacturing and clinic staff received the necessary training on these new solutions.

### Life cycle assessments

To help understand the environmental impact of its products, Fresenius Medical Care also conducts simplified product life cycle assessments (Screening LCA) for selected products. These assessments identify the life cycle phase with the highest impact, and the processes and materials needed to focus on to improve the eco-performance of the products and services. Based on international guidelines and the requirements of ISO 14001 and IEC 60601-1-9 standards, Fresenius Medical Care calculates the environmental impact caused during each individual stage of a product's life cycle. The IEC 60601-1-9 standard applies to efforts to reduce the adverse environmental impact of medical electrical equipment. Screening LCAs were used to assess most of the active medical device product lines and are gradually being extended to disposables. In addition, the business segment has conducted detailed comparative product life cycle assessments for important disposables. These follow the structure and requirements of ISO 14040/44 standards and compare the eco-performance of several of the acid concentrates and dialyzers.



## Fresenius Kabi

The focus of the environmental management system at Fresenius Kabi is to improve environmental performance and prevent environmental incidents. Key opportunities are, e.g., reducing energy and water usage, as well as wastewater, waste, and emissions, in relation to production activities.

A manual for the respective management system and standard operating procedures provide the certified units with the framework for their local environmental or energy management system.

The local management reviews the environmental management system at least annually to ensure continued compliance with the applicable requirements and effectiveness of the systems, and to identify potential for improvement. These local reviews are consolidated, analyzed, and evaluated on an annual basis by Fresenius Kabi's global EHS (Environment, Health, and Safety) function. Appropriate corrective measures will be initiated if deviations from the requirements of the ISO 14001 or ISO 50001 management systems are identified. Based on the local management reviews, the global EHS function presents a global management review to the responsible members of Fresenius Kabi's Management Board and other relevant functions of the business segment. In addition, the global EHS function reports on a quarterly basis about Fresenius Kabi's environmental and energy performance with selected indicators and provides an update on the implementation of the ISO 14001 and ISO 50001 management systems.

Manufacturing sites must identify environmental protection measures associated with environmental aspects of their activities and services. This can relate to emissions into air, water, or soil, consumption of natural resources and raw materials, waste and wastewater, packaging, transport, or other local environmental impacts. Environmental impacts of organizations are evaluated and, where necessary, environmental protection measures are implemented and reviewed for effectiveness. In addition, using internal audits, Fresenius Kabi identifies further improvement opportunities and develops appropriate measures with locally responsible managers to tap that potential. During an audit, a review is conducted as to how environmental aspects have been evaluated by the respective organization and whether objectives have been set for significant environmental aspects. Objectives and respective measures are reviewed by the auditor during inspection tours or on the basis of monitoring records. This is carried out at certified sites in particular. In addition, internal audits cover preparedness for emergencies including heavy weather events, floods, earthquakes, or hurricanes, depending on relevance or location. The frequency of global internal audits depends on audit observations from previous audits, environmental incidents, certification status, or the evaluation of the management review and can vary between one and four years. Global internal audits are conducted by the global EHS department. Due to the ongoing COVID-19 pandemic in 2021, most audits have been conducted remotely.

Fresenius Kabi has implemented mandatory environmental guidelines worldwide, which provide the framework for environmental protection in all Fresenius Kabi's organizations. The guidelines include general principles on how to address and prevent environmental risks, as well as how to prevent environmental incidents. Fresenius Kabi also expects careful and responsible handling of nature and its resources from its suppliers; this is set out in the Suppliers' Code of Conduct.

## Fresenius Helios

The environment has a direct impact on health. As a hospital operator, Fresenius Helios therefore feels a responsibility to protect the climate and the environment. With its environmental management strategy, the business segment works to reduce the environmental impact of hospital operations. It is the aim of Fresenius Helios to control energy consumption, raise employee awareness of the environment, and with these measures, to improve the ecological sustainability performance of its hospitals in the long term.

In Germany, the Infrastructure business unit is responsible for the energy and environmental management strategy of Fresenius Helios hospitals. It supports hospitals in the central purchasing of products or services and in sharing best practice procedures, among others. The business unit reports directly to the Chief Operating Officer (COO) of the parent company Helios Health.

In Spain, environmental management is part of operational management and is carried out by the Quality Management department and by the local environmental management committees of the hospitals. In addition, these interdisciplinary working groups develop and promote environmental guidelines and support the hospitals in their implementation. The guidelines serve to raise environmental awareness and tackle climate change through optimized energy use. In addition, the management policy, which applies to Helios Spain as a whole, contains the following obligations: to protect and preserve the environment, to promote environmental initiatives, to apply environmental protection and conservation measures, and to comply with the applicable requirements.

### Fresenius Vamed

Fresenius Vamed continuously monitors national and international regulations on environmental and climate protection. Internal principles, guidelines, and standard operating procedures are updated as necessary. The division also expects its suppliers to treat the environment and natural resources with care and responsibility; this is set out in the Code of Conduct for Business Partners. As part of the ESG component of variable Management Board compensation and together with the relevant Fresenius corporate functions, the responsibilities and processes for the environmental area of Fresenius Vamed were collected and recorded in an internal process documentation in 2021.

### OUR AMBITIONS

Each business segment has its own approach to environmental management. We are currently developing key performance indicators (KPIs) at Group level to measure our environmental performance and the impact of Scope 3 emissions, as environmental management is a key aspect of the variable compensation of the Board of Management. For more information, please refer to page 234 of the Annual Report 2021, section "Compensation Report". Further, in February 2022, the Management Board implemented a climate target for the Fresenius Group. Details are provided on page 117 of the Group Non-financial Report.

**Fresenius Medical Care** set new climate targets in January 2022.

**Fresenius Kabi** constantly works to improve its environmental management and reduce negative impacts on the environment. Certified organizations set local targets to constantly improve their environmental and energy performance.

**Fresenius Helios** is evaluating the extent to which the share of renewable energies relative to total energy requirements can be increased at the German clinic sites. The business segment is also exploring opportunities to increase the proportion of energy generated in-house. In this way, it is continuously increasing its own energy generation quota through combined heat and power plants. Nine new combined heat and power plants were installed at Helios Germany in 2021.

At **Helios Spain**, a defined percentage of annual investments is targeted at improving environmental and energy performance through projects. The business segment has set itself ambitious overarching goals and defines the environmental targets for each hospital locally each year. Since 2020,

clear targets have been in place to reduce electricity and gas consumption in all hospitals. Furthermore, in 2021 the business unit set itself comprehensive goals to raise environmental awareness, improve energy use, and document CO<sub>2</sub> emissions in all hospitals. The infrastructure of the hospitals is to be analyzed, with a view to increasing their own generation of energy and improving their equipment.

Helios Spain's hospitals operate an energy management system; seven of these hospitals are ISO 50001-certified and are working on annual improvements to achieve energy savings.

**Fresenius Vamed** continues to strive to evaluate its strategy on the basis of sustainability criteria and to identify performance indicators that will serve long-term strategic development.

### PROGRESS AND MEASURES IN 2021

In 2021, the Fresenius Group initiated various measures and projects with a view to establishing an integrated environmental approach. In February 2022, the Group climate target was approved. Further information is included on page 117 of the Group Non-financial Report.

In addition, our business segments achieved progress on which we report in the following.

### Fresenius Medical Care

In 2021, the business segment launched a Global Environmental Policy, which was approved by the Management Board of Fresenius Medical Care. It provides a framework for environmental management at a global level and will serve as a basis for developing improvement targets. It addresses

how Fresenius Medical Care manages and monitors environmental impact. It also acts as a framework for other policies and manuals. In addition, the company introduced manuals and guidelines for global data and reporting environmental indicators related to energy, greenhouse gas (GHG) emissions, and water. These include guidelines on how to report information using the new digital eco-reporting tool. Furthermore, Fresenius Medical Care has included information on environmental standards in the mandatory employee training on the Code of Ethics and Business Conduct.

The company regularly identifies and evaluates environmental risks as part of its enterprise risk management. In 2021, Fresenius Medical Care used Task Force on Climate-related Financial Disclosures (TCFD) standards as guidelines in this process for the first time. Additional risk examples were added to the risk catalog and specific assessments were performed, for example concerning water stress and climate change vulnerability.

### Fresenius Kabi

In 2021, Fresenius Kabi progressed with the roll-out of the environmental management system at the designated manufacturing plants. The global EHS function supports the local organizations in preparing and implementing the management system and certification according to ISO 14001.

In addition, in 2021, the business segment began to take sustainability criteria into account in decision-making processes for new projects, such as the development of products or capacity expansions.

### Fresenius Helios

In addition to the centrally managed energy efficiency projects, some Helios hospitals are also implementing site-specific projects to improve their energy and environmental performance.

At Helios Spain, the stronger integration of environmental management at Group level is supported by specific targets set by the hospitals' management in 2021. Furthermore, since 2015, the business unit has been part of the Clúster de Cambio Climático alliance, organized by Forética, a leading corporate network for sustainability and corporate responsibility in Spain and Latin America. The alliance meets three times a year to discuss a specific topic with experts and authorities, to evaluate the best climate-related practices in the private sector, and to promote exchange and transparency between companies.

### Fresenius Vamed

As part of the ESG component of variable Management Board compensation, Fresenius Vamed reviewed and recorded responsibilities and processes, and defined strategies on the core topics of energy and water in 2021. Detailed contents and derived measures of these various developments can be expected to be reported in 2022.

### EVALUATION

Internal and external audits are used to identify potential for improvement at both local and global level and to take measures to continuously improve environmental performance.

### Fresenius Medical Care

At Fresenius Medical Care's production sites, the business segment is involved in local environmental projects that are reported as part of the global Green & Lean initiative. This initiative enables best practices to be shared across the organization. The objective is to reduce emissions, promote the efficient use of natural resources, and increase recycling rates. By the end of 2021, more than 100 projects were reported. They aimed at, for example, improving processes and recycling. As a result of these projects, per year the company expects to save more than 20,000 MWh of energy (0.8% of its total energy consumption), prevent nearly 5,500 t of CO<sub>2</sub> equivalent emissions (0.7% of its total Scope 1 and 2 emissions), save more than 220,000 m<sup>3</sup> of water (0.5% of its total water consumption), and recycle or reuse roughly 700 t of waste.

### Fresenius Kabi

In 2021, Fresenius Kabi, e.g., conducted a global internal audit at one entity in which employees were randomly chosen and interviewed about their awareness of the environmental policy, environmental objectives, and the entity's environmental management representative. It was found that awareness of these aspects in the respective entity showed potential for improvement. As a result, corrective and preventive actions were initiated, such as more frequent employee communication to raise awareness.

The headquarters of Fresenius Kabi are audited annually by TÜV Rheinland with regard to ISO 14001 environmental management certification. In 2021, no observations were detected, confirming that the environmental management system is in line with the requirements of ISO 14001. The ongoing COVID-19 pandemic had no impact on the roll-out of the environmental management system according to ISO 14001 in 2021.

### Fresenius Helios

Helios Germany conducts internal and external energy audits at the hospital sites. As part of the monitoring process, the respective personnel is sensitized to potential savings and increasing energy efficiency as well as related measures. The effects on energy efficiency are regularly monitored and evaluated within the energy management system. This process is part of the continuous improvement according to the requirements of ISO 50001.

Helios Spain achieved the targets set for 2021 and expanded the existing matrix certification of ISO 14001 to further hospitals. In addition to the local ISO 14001 certification targets, the goal was to include all sites in Spain into the ISO 14001 certification.

### WATER MANAGEMENT

For decades, water consumption has been increasing worldwide and water shortages are occurring in more and more regions. We too need water both at our production plants and in our health care facilities. We therefore handle

this scarce and vital resource responsibly. We work with management systems and control systems globally to ensure that water quality meets internal and external regulatory requirements so it can be used safely during production, in processes, and in our health care facilities. The health of our patients and employees must be protected. The aim of our water management is therefore not only to ensure the highest quality and sufficient availability of freshwater but also to avoid unnecessary polluting the sources from which we obtain water or into which we discharge our wastewater. Water withdrawal for the Fresenius Group has been surveyed annually since 2016 as a part of non-financial reporting.

### OUR APPROACH

Fresenius continuously reviews national and international regulations on water management. This ensures that internal principles, guidelines, and standard operating procedures are always up to date or often go beyond regulatory requirements, e.g., within the framework of global management handbooks. Depending on the operating activity, either environmental or hygiene experts ensure that internal guidelines and external regulations are adhered to.

At our clinics and hospitals, most of the water withdrawal is from municipal water supplies. We have implemented applicable risk management procedures that come into action if impurities are detected or if the quality of water is not compliant with standards set. Further, dedicated reporting

lines provide transparency within the business segments. The local government is informed of any detected critical deviations from local drinking water provisions.

### Fresenius Medical Care

Large volumes of water are required both in production sites and in dialysis clinics – dialysis requires a significant quantity. It is critical that the water Fresenius Medical Care uses for dialysis is of high quality, which is why the company generally uses municipal water that is treated further in its dialysis clinics.

### Progress and measures in 2021

In 2020, Fresenius Medical Care assessed water stress at production sites. This determined that 7% of sites are in areas defined as locations with an extremely high risk of water stress. Water stress is a situation when the demand for water surpasses the available amount during a certain time, or when poor quality restricts its use. In 2021, the business segment followed up on the results of this assessment in various ways. For instance, it conducted interviews with teams at selected sites in areas with an extremely high risk of water stress to raise awareness of the issue and to assess the need for potential remedial measures. The company expanded the scope of its water stress assessment to include the majority of its dialysis clinics. Fresenius Medical Care used the World Resource Institute's Aqueduct tool to collect the data. According to the results, 12% of included dialysis clinics are in areas defined as locations with an extremely

high risk of water stress. Additionally, Fresenius Medical Care has started to analyze water stress scenarios for 2030 and 2040. The company aims to complete the assessment by the end of 2022, and plans to integrate the findings into its risk management.

### Fresenius Kabi

Water is primarily used in production at Fresenius Kabi, e.g., for cooling or in sanitary facilities, and is discharged as wastewater. Some manufacturing sites are reusing water, e.g., by using condensate water from installed air handling units or in steam condensate recovery systems. The business segment also uses water for its products, e.g., for infusion solutions such as sodium chloride. The water used for this purpose must meet stringent quality requirements to ensure product quality and patient safety. Fresenius Kabi's global environmental standard operating procedures and working instructions include instructions for the responsible handling of water, including the control of wastewater. Each of Fresenius Kabi's manufacturing sites is required to evaluate its environmental impact, e.g., from water usage and wastewater. Water management measures consider a reduction in water and wastewater volumes, and monitor the quality and authorized withdrawal of water and discharge of wastewater.

**Water discharges** are locally managed at the sites in accordance with applicable local regulations. Water discharge by quantity is regularly reported to global EHS in accordance with internal standards and guidelines.

Fresenius Kabi is in the process of implementing the Common Antibiotic Manufacturing Framework (CAMF) of the AMR Industry Alliance. According to the CAMF requirements, wastewater contaminated with antibiotic residues should not be discharged untreated. In 2021, the business segment started to establish corresponding processes and measures at the relevant sites that produce antibiotics. These processes and measures complement the existing internal standards and procedures.

**Water availability** at Fresenius Kabi's production sites is important to ensure business continuity. The business segment analyzes the water situation using the World Resources Institute's Aqueduct Water Risk Atlas, which contains information on current and future water risks at specific locations. Fresenius Kabi has identified manufacturing sites that are in areas with extremely high or high risk of water scarcity. At these sites, efficient water management is especially important to ensure water availability for production and to prevent negative impact on the local water situation as far as possible.

### Progress and measures in 2021

In 2021, the management approach and the governance structure of Fresenius Kabi remained as reported in 2020. Progress focused on the introduction of CAMF at the antibiotic-producing manufacturing plants and the evaluation of methods for treating wastewater as well as the introduction of systems to control Predicted No-Effect Concentrations (PNEC) as defined by the AMR Industry Alliance. PNEC values

can be used to determine discharge concentration targets for antibiotics that are not expected to cause environmental effects.

### Fresenius Helios

As a hospital operator, the availability and quality of water is extremely important to Fresenius Helios, in all countries and at all sites. The focus of water management at the Helios clinics lies on ensuring an uninterrupted supply of water of consistently high quality and on preventing microbiological contamination. The use of water as a resource in health care facilities is subject to strict legal requirements both in Germany and in Spain. Rainwater, for instance, can only be used in areas that are not critical for patient safety. Compliance with the respective applicable regulatory requirements, e.g., the Drinking Water Ordinance (TrinkwV) in Germany, has top priority. In order not to endanger patients, employees, or other people at any time, water management is closely linked to hygiene management.

The company's own guidelines and specifications determine the hospital-specific procedures. Further internal requirements regarding drinking water quality apply. These must be implemented in all German and Spanish facilities. For these reasons, Helios does not reuse water or use gray water – i. e., treated water from showers or washbasins.

For the discharge of wastewater, Helios Spain and Helios Germany must comply with strict regional and local legal requirements, which are monitored within the respective wastewater treatment plants. Deviations are reported directly to the hospital concerned and forwarded to all responsible departments through established reporting chains. After evaluating an incident, Fresenius Helios aims to ensure that the requirements are met in future. This is enabled through measures like technical improvements or changes to processes and additional training.

### Progress and measures in 2021

In 2021, the management approach and governance structure in the water management area of Fresenius Helios remained as reported in the previous year.

Helios Spain set a target in 2021 to optimize water consumption in the clinics.

### Fresenius Vamed

For Fresenius Vamed, a sufficient supply of fresh water for patient well-being and hygiene is a key element in the planning, construction, and operation of health care facilities. The health care facilities built by Fresenius Vamed use construction and sanitation technology that enables optimal water management – adapted to local regulations. At the same time, intelligent water management must under no circumstances undermine hygiene measures or jeopardize the well-being of patients. The largest freshwater users at

Fresenius Vamed are rehabilitation clinics with therapy pools, e.g., in the orthopedics department, and facilities that sterilize used medical instruments.

Fresenius Vamed uses local management systems, process owners, and operating procedures to ensure that the respective local guidelines on water and wastewater are strictly adhered to. The internal principles, guidelines, and standard operating procedures are adapted to the applicable regulatory requirements.

Due to the material significance of fresh water use for compliance with hygiene measures and thus patient safety, no significant reductions in water consumption are made. In the long term, the business segment aims to achieve constant water consumption. Secondary use of water is not considered an urgent priority in view of the hygiene issues to be observed.

### Progress and measures in 2021

In 2021, the management approach and governance structure in the water management area of Fresenius Vamed remained as reported in the previous year. Progress focused on the internal preparation of the process documentation in alignment with the ESG component of the variable compensation for the Fresenius Group Management Board.

### EVALUATION <sup>1</sup>

In 2021, Fresenius withdrew a total of 56.4 million m<sup>3</sup> of water (2020: 56.2 million m<sup>3</sup>). Over the last three years, a relative reduction in water withdrawal was achieved, both in relation to sales and to FTE. Around 91% came from the

municipal water supply, while about 8% was sourced from groundwater and 1% from surface water. In the hospital and rehabilitation sector in particular, water is sourced from the municipal water supply. This is due to the strict hygiene regulations and high demands on water quality in health care facilities.

In 2021, the reported water withdrawal at **Fresenius Medical Care** decreased by 1% compared with 2020. This was because mainly due to efficiency measures at various production sites and lower production volumes. The business segment is working to develop global water-related targets in addition to those it already has at regional level. It plans to define these global targets by the end of 2022.

**Fresenius Kabi** continued to improve its water management in 2021. Methods used to improve the treatment and discharge of antibiotic-contaminated water at the relevant sites have been identified. Appropriate measurement methods and processes will be implemented at some sites to better avoid potential negative impacts of antibiotic-contaminated wastewater. In addition, the business segment has used the results of the analysis of water-stressed areas at its production sites to align water management efficiently and sustainably to the local situation.

Water withdrawal at the business segment was 10.1 million m<sup>3</sup> in 2021 (2020: 9.7 million m<sup>3</sup>). In 2021, several projects to reduce water withdrawal were implemented at manufacturing plants of Fresenius Kabi. Water-saving projects in 2021 included, e.g., the use of recycled water for boilers, efficient water usage in cooling towers or reduction

<sup>1</sup> Fresenius Medical Care figures include energy consumption and water withdrawal at production sites, as well as electricity consumption and water withdrawal at dialysis centers. Emissions include scope 1 and 2 emissions of production sites and Scope 2 emissions of in-center treatments in dialysis clinics. The data from Fresenius Helios encompasses as of 2018 all hospitals in Spain and the clinics in Latin America as of 2020. Fresenius Vamed's data includes all fully consolidated health care facilities and service entities, and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. Newly acquired companies are included in the second year of consolidation, at the latest. If data of the business segments is not available in time, it is extrapolated on the basis of existing data. An adjustment will be made in the next report. Prior-year information was adjusted to conform to the current year's presentation. Due to rounding, individual numbers and percentages presented in this report may not precisely reflect the absolute figures.

of water consumption in restrooms. Further, the COVID-19 pandemic had an impact on water performance in some countries, due to additional cleaning activities, as well as more employees working remotely, among other factors. In addition, water performance at some sites was affected by ongoing expansion measures or regulatory validation processes, e.g., testing new production lines for quality requirements.

**Fresenius Helios** had not set any water management targets for 2021 to reduce water consumption specifically. Water withdrawal at the business segment was 4.0 million m<sup>3</sup> in 2021 (2020: 4.1 million m<sup>3</sup>). Water withdrawal depends on the number of patients treated in hospitals and in 2020 and 2021 on the increased demand for sterilization and hygiene in the hospital setting.

In the business segment **Fresenius Vamed**, water withdrawal increased slightly compared to the previous year. In 2020, the post-acute clinics were closed due to regulatory provisions to limit the impact of the COVID-19 pandemic. In 2021, only two German tourism facilities, Ostsee Resort Damp and Allgäu Resort Bad Grönenbach, were temporarily affected. The regular course of business of most facilities led to an increase in total water withdrawal.

#### WATER WITHDRAWAL FRESENIUS GROUP<sup>1</sup>

m <sup>3</sup> in millions	2021	2020	2019	2018	2017
Fresenius Medical Care	41.4	41.7	43.2	42.1	n.a.
Fresenius Kabi	10.1	9.7	9.5	9.7	9.8
Fresenius Helios	4.0	4.1	3.8	3.7	3.2
Fresenius Vamed	0.8	0.8	0.7	0.7	0.3
<b>Total</b>	<b>56.4</b>	<b>56.2</b>	<b>57.3</b>	<b>56.2</b>	<b>n.a.</b>

#### FRESENIUS GROUP<sup>1</sup> RELATIVE WATER WITHDRAWAL

in m <sup>3</sup>	2021	2020	2019	2018
Water withdrawal/€1 million sales	1,502	1,549	1,612	1,676
Water withdrawal/FTE	201.8	203.1	218.7	228.2

#### WASTE AND RECYCLING MANAGEMENT

Natural resources are becoming increasingly scarce all over the world. We can only operate sustainably if we use the raw materials available to us efficiently. This also includes the responsible handling of waste – because it contains valuable resources that can be returned to production. Through systematic waste management, we aim to reduce our material consumption and minimize the amount of waste produced. In the health sector, strict hygiene requirements apply to the materials used and to the safe disposal of hazardous waste. With clear internal guidelines and comprehensive controls, we ensure that these are complied with.

#### OUR APPROACH

For Fresenius as a health care Group, professional, safe waste disposal goes hand in hand with the requirements of hygiene and sterility in production processes and treatments in hospitals. Our approach extends from the selection of suitable disposal containers to cleaning and sterilization procedures and the occupational safety of our employees in the disposal of hazardous, e.g., infectious, waste.

The handling of waste in the health sector is strictly regulated. Fundamentally, waste must not pose a danger to our patients, our employees, or the environment. Our production processes and our treatments in health care facilities must be hygienic and sterile at all times. All business segments

<sup>1</sup> Fresenius Medical Care figures include energy consumption and water withdrawal at production sites, as well as electricity consumption and water withdrawal at dialysis centers. Emissions include scope 1 and 2 emissions of production sites and Scope 2 emissions of in-center treatments in dialysis clinics. The data from Fresenius Helios encompasses as of 2018 all hospitals in Spain and the clinics in Latin America as of 2020. Fresenius Vamed's data includes all fully consolidated health care facilities and service entities, and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. Newly acquired companies are included in the second year of consolidation, at the latest. If data of the business segments is not available in time, it is extrapolated on the basis of existing data. An adjustment will be made in the next report. Prior-year information was adjusted to conform to the current year's presentation. Due to rounding, individual numbers and percentages presented in this report may not precisely reflect the absolute figures.

must always dispose of their waste professionally and safely. As the business models of our business segments are different, Fresenius conducts waste management on a decentralized basis. The four business segments are responsible for assessing individual risks and, where necessary, establishing internal guidelines for dealing with waste. The business segments provide training to their employees and carry out checks to ensure that the standards contained therein are adhered to.

### Fresenius Medical Care

Waste is managed on a local and regional level, allowing Fresenius Medical Care to adhere to all applicable laws and regulations. The business segment has ongoing waste initiatives that help to reduce its environmental footprint. For instance, the Reusable Sharps Container Program in the United States enables Fresenius Medical Care to reuse each container up to 600 times, thereby reducing the amount of plastic ending up in landfill. Thanks to this program, in 2021, the business segment has reused more than 1.2 million containers, diverting more than 1,000 t of plastic waste from landfill and preventing more than 400 t of carbon emissions.

### Progress and measures in 2021

In 2021, Fresenius Medical Care continued to analyze the waste streams of its production sites and dialysis clinics in all regions. In the context of the company's Global Sustainability Program, Fresenius Medical Care is planning to develop a global approach to consolidating waste data and

to defining reduction targets. As part of this, in 2021 the company introduced new measures to improve waste data collection processes at four pilot production sites. Fresenius Medical Care plans to roll these measures out to all sites at the beginning of 2022. Additionally, the business segment is assessing opportunities at its sites for stepping up the recycling or reuse of resources.

### Fresenius Kabi

Waste at Fresenius Kabi is mainly generated as a byproduct of production processes or packaging material of the product containers in hospitals, private households, or nursing homes. This includes both non-hazardous and hazardous waste, i. e. solvents, cytostatics, or antibiotics.

The business segment's global environmental standard operating procedures include global requirements for waste management. The instructions constitute a global framework for the business segment's waste management and set minimum requirements for Fresenius Kabi's own facilities. As part of waste management, the business segment has established a sequence for the measures to be taken: waste prevention, preparation for reuse, recycling, other recovery, in particular energy recovery and backfilling, and disposal of the resulting waste. The measures taken must always be in compliance with applicable laws and regulations.

Each of Fresenius Kabi's manufacturing sites is required to separate its waste according to local regulations and to store the waste under consideration of measures to protect the environment, e.g., to avoid contamination. The local Fresenius Kabi organizations are responsible for the disposal

of waste in accordance with the applicable local regulations. In general, local EHS managers or dedicated waste managers are responsible for waste management at the respective organizations. Where necessary, local training courses on waste management are conducted. Regular audits of the commissioned waste disposal companies are conducted by the local organizations to ensure compliance with the applicable regulations.

As part of the ISO 14001 requirements, certified organizations evaluate processes that significantly contribute to the generation of waste as well as identifying potential for improvement. The business segment also considers the conservation of resources and options for recycling or reuse of the generated waste. Based on the evaluation, measures are implemented to reduce waste or increase the recycling rate.

If the design of a product is under the control of an ISO 14001-certified organization, as part of the life cycle perspective, the design phase of the product must take environmental aspects into account. The influence of the organization on pharmaceutical products can be limited due to the importance of patient safety and product quality requirements.

Furthermore, in 2021 the business segment began to take sustainability criteria into account in decision-making processes for new projects, such as the development of products or capacity expansions. ISO 14001-certified organizations set local targets for their waste management.



Fresenius Kabi records the waste volumes generated at its production sites, logistics centers, compounding centers, and the further ISO 14001-certified organizations and categorizes them by waste type and disposal method. Plastic waste represents the largest portion of classified non-hazardous waste. Hazardous waste is, to a large extent, processed and reused for a different or similar purpose. To a large extent, the internally generated waste is recycled. Non-recyclable hazardous waste is mainly incinerated and a large part of it is led into energy recovery.

### Progress and measures in 2021

In 2021, the management approach and the governance structure of Fresenius Kabi remained as reported in 2020. Progress focused on recovery as well as the control of waste, e.g., in storage, handling, and waste disposal.

### Fresenius Helios

Fresenius Helios sees waste disposal management as a process. This begins with waste avoidance and continues through to consistent recycling or environmentally friendly disposal. In hospital operations, the business segment must always meet strict hygiene requirements: medical instruments and aids are cleaned and packed separately so that they can be reused as sterile items. In addition, various disposable medical products are used. This results in waste, the professional and safe disposal of which must be guaranteed.

The Fresenius Helios facilities are subject to strict regulations. In Spain, the Law 22/2011 on Waste and Contaminated Soils applies, for example, which sets out requirements for different types of waste. Specially trained staff in the hospitals are responsible for ensuring that the respective requirements are met. In particular, if hospitals in Germany generate more than two tons of hazardous waste per calendar year, they must appoint a company waste officer or an external waste officer and report this to the responsible authority. For this purpose, the waste officer requires the relevant expertise, which is regulated in the Closed Substance Cycle Waste Management Act (Kreislaufwirtschaftsgesetz) in conjunction with the Ordinance on Waste Management Officers (Verordnung für Betriebsbeauftragte für Abfall). When disposing of waste, Helios Spain and Helios Germany must take into account not only the requirements of environmental protection, occupational safety, and infection control, but also specific hospital hygiene requirements. Appropriate disposal containers and cleaning and sterilization procedures must be used.

### Progress and measures in 2021

In 2021, Helios Germany began to implement or prepare for the implementation of the new regulatory requirements of the German Packaging Act 2021 (VerpackG). For instance, an initial concept for reusable packaging in the restaurant and catering segment was drawn up.

Helios Spain is also currently working to reduce single-use plastic in line with European and Spanish legislation. Large packs, e.g., with dispensers or dosing aids, are increasingly being used to prevent packaging waste. The business unit has also been working with a supplier to improve the labeling of recyclable primary packaging.

### Fresenius Vamed

The waste generated in all of Fresenius Vamed's business processes is disposed of in accordance with regional, national, and industry-specific regulations. The local management of each health care facility is responsible for ensuring compliance with these guidelines. Reusable waste is processed in the required recycling processes. Other waste is disposed of by composting or incineration or is sent to landfill. For clinical and hazardous waste, the individual facilities of Fresenius Vamed cooperate with local disposal companies, who ensure that the waste is disposed of in compliance with the law.

The most important legal basis for waste management in Austria is the Waste Management Act (AWG 2002), which is supplemented in the federal states by state laws to include local aspects, such as the fees to be paid. There are also a large number of legal provisions under European law. All of these regulations create the legal framework to ensure an efficient waste management industry in Austria.

The health care facilities built by Fresenius Vamed use construction and sanitation technology that enables optimal resource management adapted to local regulations. The provision of technical management services is a major business segment of Fresenius Vamed. One focus of our activities is to ensure the longevity of technical systems through maintenance and repair.

## Progress and measures in 2021

In 2021, the decentralized management approach and governance structure in the waste and recycling management area of Fresenius Vamed remained as reported in the previous year.

## EVALUATION

No Group results are available for waste management in fiscal year 2021. Although no effects can yet be reported at Group level, we report on the measures initiated in 2021 and related progress in the business segments.

Fresenius Kabi's total waste volume increased in 2021. Fresenius Kabi is continuously working to increase recycling rates<sup>1</sup> and has been able to make progress on hazardous and non-hazardous waste in order to be able to put valuable resources to further use. The COVID-19 pandemic has increased the generation of waste related to protective hygienic measures, although this was partly compensated for by the increased amount of remote work carried out by administrative employees.

In our health care facilities and our clinics, the waste volume caused by disposables and protective gear has increased due to COVID-19. Especially in the hospitals, the amount of (potentially) infectious waste requiring special disposal increased.

## CLIMATE PROTECTION – ENERGY AND EMISSIONS

Climate change and its effects are also impacting Fresenius: in health care facilities we have to prepare for rising temperatures and the increase in severe weather events in order to protect the health of patients at all times. Our production processes and the operation of health care facilities require a high level of energy input. Energy-efficiency measures can lead to short- and long-term cost savings; in addition, through the increased usage of renewable energies, they also make an important contribution to climate protection.

## OUR APPROACH

In energy management and climate protection, our aim is to go beyond the legal framework to identify ways of minimizing the impact on the environment and to implement these in our management approaches. In 2021, the divisions focused primarily on the topics of efficiency enhancement, energy saving, and thus the reduction of CO<sub>2</sub> emissions.

Uninterrupted energy supply is a top priority for Fresenius in order to ensure patient safety and reliable production or care. We always examine possible energy-saving measures with the greatest care. The energy management system is geared to the requirements of our business segments and is certified according to ISO 50001. We are constantly expanding the number of certified sites.

Fresenius constantly invests in new buildings and modernizations that meet the latest energy standards and legal requirements.

## Fresenius Medical Care

Fresenius Medical Care monitors the energy consumption at its production sites and the electricity usage in its dialysis clinics. In Europe, Middle East, and Africa, the company has set local electricity-related targets.

Further information on the management approach can be found on page 201.

## Progress and measures in 2021

In 2021, Fresenius Medical Care introduced measures to reduce energy consumption at several of its production sites. For example, the business segment has started piloting an energy management system at some of the dialysis clinics in the United States that aims to improve energy efficiency by centralizing the control of energy use. The system is expected to be rolled out in 2022 across some 800 locations. In addition, the business segment implemented various projects as part of its Green and Lean Initiative. For example, the company continued to replace fluorescent lighting with LED lighting in selected warehouses and production areas to save energy.

Fresenius Medical Care also assessed the share of renewable energy impact within its total electricity consumption.

<sup>1</sup> Calculation of the recycling rate has been updated according to the GRI standard 306-4 (2020) for waste by category and disposal method applied as of 2021 for both, 2020 and 2021 data; waste disposed for energy recovery is no longer categorized as recycled waste.

To do this, the company considered the country-specific average share of renewables needed to produce electricity. According to this calculation, renewables accounted for 22% of total electricity consumption in 2021, compared with 21% in 2020. In the United States, the business segment purchased 140,000 MWh worth of Green-e certified Renewable Energy Certificates (RECs) in 2021. These correspond to about 54,000 t of Scope 2 CO<sub>2</sub> equivalent and account for 10.7% of the business segment's global Scope 2 emissions (calculated based on location-specific emission factors).

### Fresenius Kabi

The focus of the energy management system at Fresenius Kabi is on improving energy performance and preventing excessive use of energy. Key opportunities are reducing energy and emissions in proportion to the volume of production activities. Fresenius Kabi derives its energy mainly from external providers. This includes the purchase of renewable energy such as hydropower, solar, or wind power. The business segment also generates electricity in its own facilities and uses, e.g., combined heat and power systems. Fresenius Kabi wants to increase the share of renewable energy in its overall energy consumption.

Local measurable objectives and energy targets are derived from the business segment's global energy policy. As stated on pages 200 f. of the Non-Financial Consolidated Report, Fresenius Kabi has matrix certification for its global energy management system, which is audited annually and certified by TÜV Rheinland.

Responsibility for energy management lies with the divisional and local organizations; global management responsibility lies with the central EHS function, which reports to the responsible member of Fresenius Kabi's Management Board.

Further information on the management approach can be found on page 202.

### Progress and measures in 2021

In 2021, the management approach and governance structure of Fresenius Kabi remained as reported in 2020. Progress focused on increasing energy efficiency and reducing CO<sub>2</sub> emissions in proportion to the volume of its production activities.

For energy management, the Global Competence Cluster Energy and Water Management, an internal information platform for global exchange, has already produced ideas for improvements. Four energy-saving projects were concluded in 2021. Furthermore, potential exemplary methods for the intracompany transfer and new projects are currently being evaluated. Four projects concluded in 2021 will lead to savings of approximately 241.3 t of CO<sub>2</sub> annually; the savings of another project will be evaluated in 2022.

### Fresenius Helios

The rising temperatures resulting from climate change are also affecting Fresenius Helios' business operations, especially in Spain. In recent years, refrigeration technology, which serves to cool technical equipment and hospital rooms, has become more important for hospital operations than

heat generation. In addition, more frequent severe weather events such as heavy rainfall or flooding may pose a threat to the health care services of hospitals.

In Germany, the Infrastructure business unit has established a central energy procurement and management system that records the energy consumption of each site. Helios Germany uses this system to compare consumption figures and to initiate improvement measures. Helios Germany's own energy supplier, HKG Energiedienstleistungen GmbH, is responsible for energy procurement.

Various parameters can be monitored via a central portal – from the price of electricity on the energy market to the hospitals' respective energy consumption. In order to monitor energy flows more precisely, a measurement concept is being implemented at relevant sites. This is an essential component to meet the requirements of the ISO 50001 standard. With its central energy procurement and management system, Fresenius Helios can compare the consumption values of the clinics, initiate targeted improvement measures, and share best practices from individual clinics within the company.

Helios Spain analyzes its energy management risks and uses renewable energy sources in some clinics. In order to ensure an uninterrupted energy supply at all times, every hospital has a mains backup system: in the event of a power outage, this system guarantees a secure supply of electricity for the principal energy consumers in the clinics within

a few seconds. To safeguard this protection, these emergency power systems are inspected and tested regularly, at least once a year.

Electricity and natural gas are purchased centrally at Helios Spain. The business unit also has an energy manager, who monitors the consumption of all hospitals and provides corresponding data for evaluation and comparative analyses. In addition, each hospital reviews and implements specific energy-saving measures. Seven Helios Spain hospitals use thermal solar energy and photovoltaic systems to generate energy. To generate thermal energy, the division also uses miniature combined heat and power plants at two hospitals and biomass at another hospital.

### Progress and measures in 2021

In order to improve the data situation regarding electricity consumption and to comply with the requirements of the German Renewable Energies Act (EEG), Helios introduced a Group-wide measurement and delimitation concept in 2021. Corresponding metering technology measures all electricity consumption at all hospital locations and distinguishes between Helios' own consumption and that of third parties, e.g., units rented by flower stores.

In 2021, Helios Spain analyzed whether technical installations needed to be renewed. The business unit also conducted a study on the use of solar energy systems.

### Fresenius Vamed

The respective management teams are responsible for energy and emission management at Fresenius Vamed's health care facilities. The effectiveness of energy management measures in the certified business segments is assessed by regular independent audits as part of ISO 50001 certification. In Germany, this certification was implemented together with the Infrastructure business unit of the Fresenius Helios hospitals.

### Progress and measures in 2021

In 2021, the management approach and governance structure of Fresenius Vamed remained as reported in the previous year. Progress focused on the ongoing internal preparation of the process documentation as part of the ESG component of variable Management Board compensation. Furthermore, a pilot project was initiated in order to be able to collect data on Scope 3 emissions in the future from industrial activities in Austria, Germany, Switzerland, and the Czech Republic.

### EVALUATION<sup>1</sup>

We calculate our Scope 1 and 2 GHG emissions following the methodology of the Greenhouse Gas Protocol, using the latest version from the UK Department for Environment, Food and Rural Affairs (DEFRA). We also use the emission factors of the International Energy Agency (IEA) for electricity consumption. We additionally use these emission factors to calculate the indirect emissions from electricity.

Fresenius<sup>1</sup> consumed a total of 5.8 million MWh of energy in 2021, an increase of 6% compared to the previous year; the main energy sources were gas (thereof 97% natural gas) and district heating. When purchasing energy, we consider efficiency requirements and changes in demand. We are exploring the possible use of renewable energies and already generate our own electricity at numerous sites. In 2021, the share of renewable energy consumption was 2%. Among the main energy sources, electricity demand is our most material driver of CO<sub>2</sub> emissions. Accordingly, Scope 2 emissions are higher than Scope 1 emissions in all business segments. In 2021, Fresenius generated a total of 1,524 thousand tons of CO<sub>2</sub> equivalents (2020: 1,512 thousand tons).

At **Fresenius Medical Care**, total emissions (Scope 1 and Scope 2) decreased by 1% in 2021 compared with 2020. The reported Scope 1 emissions increased by 8% in 2021 compared to 2020. This increase is due to more accurate data reporting and a change in the reporting approach, with

<sup>1</sup> Fresenius Medical Care figures include energy consumption and water withdrawal at production sites, as well as electricity consumption and water withdrawal at dialysis centers. Emissions include scope 1 and 2 emissions of production sites and Scope 2 emissions of in-center treatments in dialysis clinics. The data from Fresenius Helios encompasses as of 2018 all hospitals in Spain and the clinics in Latin America as of 2020. Fresenius Vamed's data includes all fully consolidated health care facilities and service entities, and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. Newly acquired companies are included in the second year of consolidation, at the latest. If data of the business segments is not available in time, it is extrapolated on the basis of existing data. An adjustment will be made in the next report. Prior-year information was adjusted to conform to the current year's presentation. Due to rounding, individual numbers and percentages presented in this report may not precisely reflect the absolute figures.

the reporting tool now automatically calculating conversions for natural gas. The reported Scope 2 emissions decreased by 5% due to enhanced data reporting as well as lower emission factors provided by the IEA. Most of the Scope 1 and Scope 2 GHG emissions stem from energy consumption. Fresenius Medical Care is currently assessing Scope 3 emissions that arise from activities or assets that the company does not own or control along its value chain.

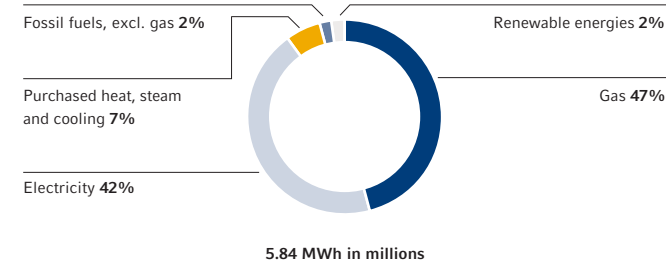
Each year, the headquarters of **Fresenius Kabi** are audited by TÜV Rheinland with regard to the ISO 50001 energy management certification. In 2021, no observations were detected, confirming that the energy management system is in line with the requirements of ISO 50001. Further, Fresenius Kabi successfully achieved the self-imposed target for the continuing roll-out of the ISO 50001 energy management system in accordance with the internal implementation plan, thus expanding the coverage of the management system to additional manufacturing plants. The ongoing COVID-19 pandemic had no impact on the roll-out of the energy management system according to ISO 50001 in 2021.

In addition, the focus in the past fiscal year was on increasing energy efficiency and the share of renewable energy in total energy consumption. Furthermore, the COVID-19 pandemic had an impact, e.g., on energy performance in some countries due to the significant energy baseload in combination with COVID-19-related fluctuations

in production, which affected energy performance and consequently the generation of emissions. Energy performance was also affected in 2021 by expansion measures and regulatory validation processes, e.g., the testing of new production lines for quality requirements.

The spread of coronavirus required our **Spanish hospitals** to increase ventilation, so the energy consumption required for air conditioning increased in some facilities in 2021.

#### GROUP ENERGY CONSUMPTION BY SOURCE



#### FRESENIUS GROUP<sup>1</sup> ENERGY CONSUMPTION

MWh in millions	2021	2020	2019	2018	2017
Fresenius Medical Care	2.61	2.49	2.43	2.38	n. a.
Fresenius Kabi	1.79	1.66	1.64	1.65	1.57
Fresenius Helios	1.24	1.16	1.09	1.14	0.95
Fresenius Vamed	0.19	0.18	0.16	0.17	0.05
<b>Total</b>	<b>5.84</b>	<b>5.47</b>	<b>5.32</b>	<b>5.34</b>	<b>n. a.</b>

#### FRESENIUS GROUP<sup>1</sup> RELATIVE ENERGY CONSUMPTION

in MWh	2021	2020	2019	2018
Energy consumption/€ 1 million sales	156	151	150	159
Energy consumption/FTE	20.9	19.8	20.3	21.7

<sup>1</sup> Fresenius Medical Care figures include energy consumption and water withdrawal at production sites, as well as electricity consumption and water withdrawal at dialysis centers. Emissions include scope 1 and 2 emissions of production sites and Scope 2 emissions of in-center treatments in dialysis clinics. The data from Fresenius Helios encompasses as of 2018 all hospitals in Spain and the clinics in Latin America as of 2020. Fresenius Vamed's data includes all fully consolidated health care facilities and service entities, and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. Newly acquired companies are included in the second year of consolidation, at the latest. If data of the business segments is not available in time, it is extrapolated on the basis of existing data. An adjustment will be made in the next report. Prior-year information was adjusted to conform to the current year's presentation. Due to rounding, individual numbers and percentages presented in this report may not precisely reflect the absolute figures.

At **Fresenius Vamed**, operations in 2021 concentrated on developing the management approach to climate protection in connection with the ESG component of variable Management Board compensation. Relevant collection and control processes were also defined. Furthermore, the business segment was involved in the diverse discussions at the Fresenius Group on the definition of a CO<sub>2</sub> reduction target. As the processes for the above items are still ongoing, no changes in management approaches are to be reported for 2021. With regard to energy consumption, 2021 can be considered a return to a normal year at Fresenius Vamed. After many facilities were closed for longer periods in 2020 due to the COVID-19 pandemic, consumption levels in 2021 returned to the pre-pandemic level.

#### FRESENIUS GROUP<sup>1</sup> RELATIVE GHG EMISSIONS SCOPE 1 AND 2

t CO <sub>2</sub> equivalents in thou.	2021	2020	2019	2018
t CO <sub>2</sub> equivalents/€ 1 million sales	41	42	42	46
t CO <sub>2</sub> equivalents/FTE	5.5	5.5	5.8	6.2

#### FRESENIUS GROUP<sup>1</sup> GREENHOUSE GAS EMISSIONS (GHG) SCOPE 1 AND 2

t CO <sub>2</sub> equivalents in thou.	2021	2020	2019	2018	2017
<b>Fresenius Medical Care</b>	<b>766</b>	<b>770</b>	<b>775</b>	<b>776</b>	<b>n. a.</b>
Scope 1	263	242	227	219	n. a.
Scope 2	503	527	547	557	n. a.
<b>Fresenius Kabi</b>	<b>443</b>	<b>417</b>	<b>409</b>	<b>424</b>	<b>422</b>
Scope 1	170	160	169	169	174
Scope 2	273	256	239	255	248
<b>Fresenius Helios</b>	<b>277</b>	<b>287</b>	<b>284</b>	<b>296</b>	<b>255</b>
Scope 1	122	112	107	114	103
Scope 2	155	175	178	182	152
<b>Fresenius Vamed</b>	<b>39</b>	<b>39</b>	<b>36</b>	<b>38</b>	<b>9</b>
Scope 1	23	21	18	19	3
Scope 2	16	17	18	19	6
<b>Total</b>	<b>1,524</b>	<b>1,512</b>	<b>1,504</b>	<b>1,534</b>	<b>n. a.</b>
Scope 1	578	536	522	521	n. a.
Scope 2	946	976	982	1,013	n. a.

GHG emissions in t CO<sub>2</sub>e

<sup>1</sup> Fresenius Medical Care figures include energy consumption and water withdrawal at production sites, as well as electricity consumption and water withdrawal at dialysis centers. Emissions include scope 1 and 2 emissions of production sites and Scope 2 emissions of in-center treatments in dialysis clinics. The data from Fresenius Helios encompasses as of 2018 all hospitals in Spain and the clinics in Latin America as of 2020. Fresenius Vamed's data includes all fully consolidated health care facilities and service entities, and, as of 2018, the German post-acute care business transferred from Fresenius Helios to Fresenius Vamed. Newly acquired companies are included in the second year of consolidation, at the latest. If data of the business segments is not available in time, it is extrapolated on the basis of existing data. An adjustment will be made in the next report. Prior-year information was adjusted to conform to the current year's presentation. Due to rounding, individual numbers and percentages presented in this report may not precisely reflect the absolute figures.

## REPORT PROFILE

We want to inform our stakeholders transparently about our sustainability activities through this report. The report meets the regulatory requirements for a separate Group Non-financial Report. It was prepared in accordance with Section 315c in connection with Sections 289c to 289e of the German Commercial Code (HGB). The EU taxonomy disclosures included were prepared in accordance with REGULATION (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (EU Taxonomy Regulation). Together with the additional information we offer on our website, it forms our Sustainability Report 2021. For the preparation of the Group Non-Financial Report, we considered the Sustainability Code (Deutscher Nachhaltigkeitskodex) and the standards of the Global Reporting Initiative (GRI) as possible frameworks. Due to our global business activities, we decided to use the globally recognized GRI standards as a framework. In accordance with Section 289d HGB, Fresenius SE & Co. KGaA uses the GRI Standards for the structured description of management approaches in accordance with GRI 103: Management Approach 2016. Furthermore, this report contains a review of the materiality analysis we conducted in 2020 in accordance with GRI 102-46 (determination of report content and topic delimitation) from GRI 102: General Disclosures 2016 and the legal requirements.

Further, we also report ESG information in accordance with the SASB Index and the Task Force on Climate-related Financial Disclosures (TCFD). These additional indices, outside of the Non-financial Report, include information provided in the audited Group Non-financial report, however, they were not part of the audit process.

## REPORT FRAMEWORK

This separate Group Non-financial Report covers the financial year (calendar year) 2021 and relates to the Group including its four business segments, i. e., all fully consolidated companies that are subject to the legal or actual control of Fresenius SE & Co. KGaA, Bad Homburg, Germany.

The Notes to the consolidated financial statements in the Annual Report contain further information, see pages 288 ff. Deviations from this reporting framework are marked in the appropriate place. References to data or information outside of the Group Management Report or the Notes are considered further information and are not part of the separate Group Non-financial Report. The report is published annually as a separate Group Non-financial Report and is part of the Annual Report. The last separate Group Non-financial Report was published in March 2021.

## DETERMINATION OF THE CONTENTS OF THE REPORT

We base our choice of report content on the GRI standards, the principles of materiality and the requirements of our stakeholders, especially the capital market. In addition, the United Nations' Sustainable Development Goals (SDGs) serve as a framework for identifying and aligning our sustainability activities. In 2020, we conducted a comprehensive

materiality analysis, see pages 110f. of the Group Non-financial Report 2020 for more information. Experts from the four business segments as well as relevant Group functions have reviewed and validated the results. In 2021, a review confirmed the identified materials topics as still valid. The content of this separate Group Non-financial Report was defined in accordance with Sections 289c (2) and (3) HGB for the principle of dual materiality. The Management Board has reviewed and approved this report. The contents of the have also been examined by the Supervisory Board of Fresenius SE & Co. KGaA in accordance with Section 171 (1) of the German Stock Corporation Act (AktG). The Supervisory Board made use of the option pursuant to Section 111 (2) of the German Stock Corporation Act (AktG) to commission an external audit by PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft.

## EXTERNAL AUDIT

Auditors PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft submitted the information in the separate Group Non-financial Report to an audit according to ISAE 3000 (Revised) to obtain limited assurance against the relevant legal requirements and issued an independent audit certificate.

## INDEPENDENT PRACTITIONER'S REPORT ON A LIMITED ASSURANCE ENGAGEMENT ON NON-FINANCIAL REPORTING<sup>1</sup>

To Fresenius SE & Co. KGaA, Bad Homburg

We have performed a limited assurance engagement on the Separate Non-financial Group Report of Fresenius SE & Co. KGaA, Bad Homburg, (hereinafter the "Company") for the period from 1 January to 31 December 2021 (hereinafter the "Separate Non-financial Group Report").

Not subject to our assurance engagement are the external sources of documentation or expert opinions mentioned in the Separate Non-financial Group Report.

### RESPONSIBILITY OF THE EXECUTIVE DIRECTORS

The executive directors of the Company are responsible for the preparation of the Separate Non-financial Group Report in accordance with §§ (Articles) 315c in conjunction with 289c to 289e HGB ("Handelsgesetzbuch": "German Commercial Code") and Article 8 of REGULATION (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18. June 2020 on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (hereinafter the "EU Taxonomy Regulation") and the Delegated Acts adopted thereunder, as well as for making

their own interpretation of the wording and terms contained in the EU Taxonomy Regulation and the Delegated Acts adopted thereunder, as set out in section "1 Strategy and management – EU-Taxonomy" of the Separate Non-financial Group Report.

This responsibility includes the selection and application of appropriate non-financial reporting methods and making assumptions and estimates about individual non-financial disclosures of the Group that are reasonable in the circumstances. Furthermore, the executive directors are responsible for such internal controls as the executive directors consider necessary to enable the preparation of a Separate Non-financial Group Report that is free from material misstatement whether due to fraud or error.

The EU Taxonomy Regulation and the Delegated Acts issued thereunder contain wording and terms that are still subject to considerable interpretation uncertainties and for which clarifications have not yet been published in every case. Therefore, the executive directors have disclosed their interpretation of the EU Taxonomy Regulation and the Delegated Acts adopted thereunder in section "1 Strategy and management – EU-Taxonomy" of the Separate Non-financial Group Report. They are responsible for the defensibility of this interpretation. Due to the immanent risk that indeterminate legal terms may be interpreted differently, the legal conformity of the interpretation is subject to uncertainties.

### INDEPENDENCE AND QUALITY CONTROL OF THE AUDIT FIRM

We have complied with the German professional provisions regarding independence as well as other ethical requirements.

Our audit firm applies the national legal requirements and professional standards – in particular the Professional Code for German Public Auditors and German Chartered Auditors ("Berufssatzung für Wirtschaftsprüfer und vereidigte Buchprüfer": "BS WP/vBP") as well as the Standard on Quality Control 1 published by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany; IDW): Requirements to quality control for audit firms (IDW Qualitätssicherungsstandard 1: Anforderungen an die Qualitätssicherung in der Wirtschaftsprüferpraxis - IDW QS 1) – and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### RESPONSIBILITY OF THE ASSURANCE PRACTITIONER

Our responsibility is to express a conclusion with limited assurance on the Separate Non-financial Group Report based on our assurance engagement.

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised): Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the IAASB. This Standard requires that we plan

<sup>1</sup> PricewaterhouseCoopers GmbH has performed a limited assurance engagement on the German version of the separate non-financial group report and issued an independent practitioner's report in German language, which is authoritative. The following text is a translation of the independent practitioner's report.



and perform the assurance engagement to obtain limited assurance about whether any matters have come to our attention that cause us to believe that the Company's Separate Non-financial Group Report, other than the external sources of documentation or expert opinions mentioned in the Separate Non-financial Group Report, are not prepared, in all material respects, in accordance with §§ 315c in conjunction with 289c to 289e HGB and the EU Taxonomy Regulation and the Delegated Acts issued thereunder as well as the interpretation by the executive directors disclosed in section "1 Strategy and management – EU-Taxonomy" of the Separate Non-financial Group Report.

In a limited assurance engagement the procedures performed are less extensive than in a reasonable assurance engagement, and accordingly a substantially lower level of assurance is obtained. The selection of the assurance procedures is subject to the professional judgement of the assurance practitioner.

In the course of our assurance engagement, we have, amongst other things, performed the following assurance procedures and other activities:

- Gain an understanding of the structure of the Group's sustainability organisation and stakeholder engagement
- Inquiries of the executive directors and relevant employees involved in the preparation of the Separate Non-financial Group Report about the preparation process, about the internal control system relating to this process and about disclosures in the Separate Non-financial Group Report
- Identification of likely risks of material misstatement in the Separate Non-financial Group Report

- Evaluation of the implementation of central management requirements, processes, and specifications regarding data collection through targeted sample testing at selected sites
- Analytical procedures on selected disclosures in the Separate Non-financial Group Report
- Evaluation if the preparation of the ESG targets, which are part of the Management Board compensation as non-financial performance targets, is in line with the methodology described in the Compensation Report
- Reconciliation of selected disclosures with the corresponding data in the consolidated financial statements and group management report
- Evaluation of the presentation of the Separate Non-financial Group Report
- Evaluation of the process to identify taxonomy-eligible economic activities and the corresponding disclosures in the Separate Non-financial Group Report
- Inquiries on the relevance of climate-risks

In determining the disclosures in accordance with Article 8 of the EU Taxonomy Regulation, the executive directors are required to interpret undefined legal terms. Due to the immanent risk that undefined legal terms may be interpreted differently, the legal conformity of their interpretation and, accordingly, our assurance engagement thereon are subject to uncertainties.

### ASSURANCE OPINION

Based on the assurance procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Separate Non-financial Group Report of the Company for the period from 1 January to 31 December 2021 is not prepared, in all material respects, in accordance

with §§ 315c in conjunction with 289c to 289e HGB and the EU Taxonomy Regulation and the Delegated Acts issued thereunder as well as the interpretation by the executive directors disclosed in section "1 Strategy and management – EU-Taxonomy" of the Separate Non-financial Group Report. We do not express an assurance opinion on the external sources of documentation or expert opinions mentioned in the Separate Non-financial Group Report.

### RESTRICTION OF USE

We draw attention to the fact that the assurance engagement was conducted for the Company's purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Consequently, it may not be suitable for any other purpose than the aforementioned. Accordingly, the report is not intended to be used by third parties for making (financial) decisions based on it. Our responsibility is to the Company. We do not accept any responsibility to third parties. Our assurance opinion is not modified in this respect.

Frankfurt am Main, February 21, 2022

PricewaterhouseCoopers GmbH  
 Wirtschaftsprüfungsgesellschaft

[Original German version signed by:]

Nicolette Behncke  
 Wirtschaftsprüfer  
 [German Public Auditor]

ppa. Mirjam Kolmar