

INTRODUCTION

Fresenius Medical Care UK¹ is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chain. This statement is made in compliance with s.54 of the Modern Slavery Act 2015 and sets out the steps taken by Fresenius Medical Care UK¹ during its financial year ending 31 December 2022 to prevent slavery and human trafficking from taking place in any of its supply chains or in any part of its business.

Conducting business in an ethical and responsible manner is part of our corporate responsibility and we expect the same high standards from our suppliers, and this includes an expectation that they conduct their business in a lawful and ethical manner, which includes adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place within their onward supply chains.

STRUCTURE AND SUPPLY CHAIN

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

The main products we sell are:

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

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

POLICIES

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

- [Fresenius Group Human Rights Statement](#), highlighting that all Segments of Fresenius Group, “do not tolerate the use or threat of violence, or any other form of coercion. [...] We do not tolerate forced and exploitative labor or any forms of modern slavery. Employment relationships must be based on voluntary

¹ This statement sets out the steps taken by Fresenius Medical Care UK and its group companies which include Fresenius Medical Care Renal Services Limited, Fresenius Medical Care (Holdings) Limited, Fresenius Medical Care Renal Services (UK) Limited, Fresenius Medical Care (UK) Limited and also includes NxStage Medical UK Limited, each of which fall within the scope of section 54(2) of the Modern Slavery Act 2015.

participation and can be terminated at any time by the employees of their own free will and within a reasonable period of notice, in line with applicable laws. Salaries shall be fair and in line with the law of the place of employment and not unlawfully be withheld"

- [FME Human Rights, Workplace Rights and Labor and Employment Principles](#), stating that “*Everyone should be working of his or her own free will. Fresenius Medical Care does not accept any form of forced labor, and all employees have the right to terminate their employment after giving a reasonable period of notice.*”
- [FME Code of Ethics and Business Conduct](#), which applies globally to every officer, director, employee, contract work and agent of the Fresenius Medical Care. Amongst other things, this Code of Ethics and Business Conduct makes clear to employees the standards of conduct and behaviour expected of them when representing Fresenius Medical Care UK, and requires our employees to report any actual or suspected violation of the law, which would include the Modern Slavery Act 2015.
- [FME Global Suppliers Code of Conduct](#), which covers topics such as ethics, human rights and labor conditions. It requires suppliers to “*take a clear stance against forced labor and any form of exploitative child labor and shall not engage in any form of non-voluntary, forced or compulsory labor*”.

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

EXPECTATIONS FROM SUPPLIERS

As of 2020, FME Global Supplier Code of Conduct forms the basis of our contractual relationships with suppliers, and suppliers are requested to adhere to our Supplier Code of Conduct or demonstrate that they have a similar standard.

In order to manage our suppliers, we are training the Global Procurement Department on sustainability topics and the Supplier Code of Conduct, including on modern slavery.

We also require our business partners to comply with our Code of Conduct as well as the Compliance Brochure for Business Partners.

DUE DILIGENCE AND RISK ASSESSMENT

Our parent company is undertaking a full human rights due diligence process, within the framework of the newly implemented German Supply Chain Due Diligence Law, including on modern slavery and human trafficking matters.

This due diligence is built around a human rights risk assessment, that allows us to identify and to understand the risks and impacts to human rights, resulting from or related to our business activities including business relationships.

In 2022, we further developed our procedures for evaluating suppliers based on sustainability risks incl. modern slavery. Our risk assessment approach, involves assessing the sustainability risk (incl. modern slavery and human trafficking) of suppliers based on country- and industry-level factors. Special focus is placed on suppliers that are critical to our business. Furthermore, we gather information about the specific sustainability performance of selected suppliers via self-assessment forms. We aim to use this information to identify suppliers that do not yet fully comply with our sustainability standards and initiate appropriate follow-up action. Fresenius Medical Care UK also carries out a detailed review of all third parties we work with to assess their suitability generally and to identify any concerns via a Dow Jones search.

COMPLIANCE ACTION LINE

We offer a complaint procedure which allows potentially affected people in our own operations and across our value chain to report any concern, also anonymously.

So far, no cases of modern slavery in our supply chain were reported, but any potential case would be investigated

and properly remedied. This could include an audit of the supplier, training and, as a last resort, the termination of employment of our employees involved in the violation or of the business relationship with the respective supplier.

The complaint procedure is supported by clear non-retaliation policies. This whistleblowing procedure is designed to make it easy for our employees and third parties to make disclosures without fear of retaliation, and so we hope this will contribute to identifying and reporting any potential risk of modern slavery and/or human trafficking occurring within our business or supply chain.

CONFLICT MINERALS

Some of our products may contain tantalum, tin, tungsten and gold which have become known as ‘conflict minerals’ because they may be, in part, sourced from parts of central Africa where armed groups are known to mine and sell these materials to fund civil war. The Fresenius Health Care Group is required to report on its supply chain due diligence in relation to the sourcing of these metals, and you can find out more information about our conflicts minerals policy at [Supply chain - Fresenius Medical Care](http://www.freseniusmedicalcare.com/en/about-us/sustainability/supply-chain/) <http://www.freseniusmedicalcare.com/en/about-us/sustainability/supply-chain/>

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

RISK AND COMPLIANCE

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

According to the Global Slavery Index, Germany has a very low prevalence of modern slavery, with an estimated 0.02% of the population living in modern slavery². Likewise, as our main suppliers operate in a regulated industry which requires high standards of compliance and regular audits by regulatory bodies, we do not therefore believe that our supply chain is particularly susceptible to the practices of modern slavery and human trafficking. We do not have a large temporary workforce (which can be more susceptible to exploitation) and by working in a highly skilled and technical sector we therefore consider our vulnerability to modern slavery practices to be low.

Nevertheless, we take compliance with the Modern Slavery Act 2015 seriously, and do not tolerate slavery and human trafficking within our supply chains. If we were to find evidence that one of our suppliers was involved in modern slavery or human trafficking, we would investigate those allegations, and consider terminating our relationship with them if the incidents were not resolved to our satisfaction.

TRAINING AND PERFORMANCE INDICATORS AND PREVENTIVE MEASURES

Our commitment to prevent and eliminate modern slavery and human trafficking also translates into specific measures to prevent the risk from occurring. Amongst these measures, all employees have to complete their Code of Ethics and Business Conduct via mandatory e-learning annually, and participation in this training is regularly monitored and reported to the board.

SIGN-OFF

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Fresenius Medical Care UK’s slavery and human trafficking statement for the financial year commencing 1 January 2022 and ending 31 December 2022

² <http://www.globalslaveryindex.org>

Signature: 

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UK and Ireland

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