

Report on the LkSG (German Act on Corporate Due Diligence Obligations in Supply Chains)

Reporting period from 01.01.2023 to 31.12.2023

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A. Strategy & Anchoring

A1. Monitoring of Risk Management & Responsibility of Management

What responsibilities for monitoring risk management were defined in the reporting period?

The Fresenius Management Board oversees our Group-wide Human Rights Program. Operational implementation is regulated by Group-wide governance and clear responsibilities within the business segments and at Group level.

Group Human Rights Office: The Group Human Rights Office is responsible for the overall management of the Fresenius Group-wide Human Rights Program. It supports the business segments in the implementation of measures and monitors their activities to uphold human rights due diligence obligations. The Group Human Rights Office is made up of employees from the Risk & Integrity department of the Fresenius Group.

Human Rights Function at Fresenius Helios: Fresenius Helios has appointed a Human Rights Function. This Human Rights Function is responsible for the operational implementation of the Group-wide human rights strategy within its own business segment as well as for those legal entities of Fresenius Helios directly affected by the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG).

Has management established a reporting process to ensure that it is regularly – at least once a year – informed about the work of the person responsible for monitoring risk management?

It is confirmed that the management has established a reporting process which, within the meaning of Section 4 (3) of the LkSG, ensures that it is regularly – at least once a year – informed about the work of the person responsible for monitoring risk management.

Confirmed

Describe the process for ensuring reporting to senior management at least annually or on a regular basis with respect to risk management.

As part of the regular and ad hoc risk analysis we conduct for our own operations and supply chain, we identify topics and risks that we assess as taking high priority due to their potential impact and likelihood of occurrence, taking into account our ability to influence them. Where risks are identified, we implement suitable preventive and, if applicable, remedial measures.

Reporting on the Human Rights Program is carried out at least annually and on an ad hoc basis to the Management Board and other bodies. In 2023, this included the results of the risk analysis and a report on the implementation of the Human Rights Program. Related Board resolutions and decisions are recorded in the minutes of the meetings and subsequently communicated to the relevant departments via the Human Rights Functions.

A2. Policy Statement on the Human Rights Strategy

Is there a policy statement that has been prepared or updated based on the risk analysis conducted during the reporting period?

The Policy Statement was uploaded
<https://www.helios-health.com/what-we-do>

Was the Human Rights Statement communicated in the reporting period?

It is confirmed that the policy statement has been communicated to employees, the works council if applicable, the public and the direct suppliers where a risk has been identified in the risk analysis.

Confirmed

Please describe how the policy statement was communicated to each relevant audience.

In the reporting year, information was provided internally in a circular letter about the Human Rights Program and its foundation - our Human Rights Statement. In addition, on the occasion of International Human Rights Day (December 10), information on our corporate human rights due diligence activities, our Human Rights Statement and the grievance mechanism was communicated via the intranet and by email.

The Fresenius Workers' Council was also informed separately about the Human Rights Program at a Workers' Council meeting.

We have published our Human Rights Statement on our website, in both German and English, so that the interested public can learn about our Human Rights Strategy at any time.

Direct suppliers for which a potential risk was identified in the risk analysis were able to obtain information about our Human Rights Statement from our website. Separate information is planned for the coming reporting year.

What elements does the policy statement contain?

- Establishment of a risk management system
- Annual risk analysis
- Anchoring of preventive measures in the company's own business area, at direct suppliers and, if applicable, indirect suppliers, and their effectiveness review

- Remedial measures in own business segment, at direct suppliers and, if applicable, indirect suppliers, and review of their effectiveness
- Provision of a complaints procedure in own business area, at suppliers and review of their effectiveness
- Documentation and reporting obligation
- Description of the priority risks identified
- Description of human rights-related and environment-related expectations for own employees and suppliers

Description of possible update during the reporting period and the reasons for it

The Human Rights Statement pursuant to the German Act on Corporate Due Diligence Obligations in Supply Chains was published for the first time as of January 1, 2023, replacing the voluntary commitment to respect human rights published for the Fresenius Group and thus also for Fresenius Helios in 2018.

We have adjusted our Human Rights Statement in the reporting year due to changes in the Group structure: Information on Fresenius Medical Care has been deleted without replacement following the completion of the deconsolidation in December 2023.

Moreover, an update pursuant to Section 6 (2) of the German Supply Chain Act based on the prioritized human rights and environment-related risks identified in the risk analysis was carried out after completion of the risk analysis.

A3. Anchoring the Human Rights Strategy within the Own Organization

In which relevant departments/business processes was the anchoring of the human rights strategy ensured within the reporting period?

- Personnel/HR
- Environmental Management
- Occupational Safety & Health Management
- Purchasing/Procurement
- CSR/Sustainability
- Legal/Compliance

Describe how responsibility for implementing the strategy is distributed within the various departments/business processes.

Operational implementation is ensured through a Group-wide governance structure as well as clear responsibilities both within the business segments and at Group level.

Group Human Rights Office: The Group Human Rights Office is responsible for the overall management of the Fresenius Group-wide Human Rights Program. It supports the business segments in the implementation of measures and monitors their activities to uphold human rights due diligence obligations. The Group Human Rights Office is made up of employees from the Risk & Integrity department of the Fresenius Group.

Human Rights Function at Fresenius Helios: Fresenius Helios has appointed a Human Rights Function. This Human Rights Function is responsible for the operational implementation of the Group-wide human rights strategy within its own business segment as well as for those legal entities of Fresenius Helios directly affected by the German Act on Corporate Due Diligence Obligations in Supply Chains.

Risk owners and subject matter experts: We have defined risk owners for relevant specialist areas. As subject matter experts, the risk owners are responsible for appropriate risk management and the implementation of risk analyses in their area of responsibility, e.g. Human Resources, Procurement or Occupational Health and Safety.

Human Rights Council: The Human Rights Council is the Group Human Rights Office's advisory body for human rights topics. The members of the Group Human Rights Office and the Human Rights Function of the business segments are represented in the Human Rights Council along with individuals from relevant departments. Its approximately 20 members work in various functions of the Group, including Compliance, Legal, Sustainability, Communications and Procurement, and thus cover diverse perspectives on the topic. The participants discuss Group-wide initiatives and present new concepts and methods.

In 2023, the Human Rights Council met quarterly. The four meetings focused on the further implementation of the Human Rights Program, the development of support materials for carrying out risk analysis, measures in the business segments, and the presentation of a guide for dealing with human rights violations.

Describe how the strategy is integrated into operational processes and procedures.

Our basic principles of human rights due diligence are integrated into operational processes. The specialist departments are responsible for the concrete implementation of human rights due diligence in their functional area. These specialist departments, for example Human Resources or Procurement, contribute their expertise for risk assessments and take appropriate risk management measures in their respective areas of responsibility.

The aspects described in the Human Rights Statement are also integrated into relevant departments and processes through the compliance management systems, the internal control system and the Human Rights Program.

For example, the strategy is integrated into operational processes via the specialist departments as follows:

Occupational safety concepts focus on occupational health and safety as well as occupational health management for employees and are designed to minimize the risk of accidents at work and work-related health hazards.

Internally, the voluntary commitment to respect human rights is set out in a Social & Labor Standards guideline, which defines minimum social standards for the Fresenius Group and further specifies the contents of our Code of Conduct.

The Code of Conduct and the associated guidelines for employees also govern our relationships with suppliers and other business partners. We expect them to comply with all applicable laws as well as ethical standards of behavior in their daily business and have also stipulated this in our Code of Conduct for Business Partners. In

addition, our purchasing departments conduct risk-based business partner reviews before entering into new business relationships. Explicit human rights and environmental clauses are also included in contracts on a risk basis.

Describe what resources & expertise are provided for implementation.

In 2023, various training sessions were held on the Human Rights Program, risk analysis, dealing with human rights violations and human rights due diligence.

The following resources and expertise are also provided for implementation:

- Training and education for employees involved in risk analysis
- Information material and risk lists
- Group-wide risk management system, questionnaires and digital evaluation platform
- Instructions and handouts on risk identification and analysis
- Workshops on conducting risk analyses
- Handouts and workshops on dealing with specific risks and human rights violations
- Human Rights Council for Group-wide exchange

B. Risk Analysis & Preventive Measures

B1. Risk Analysis: Implementation, Approach, and Results

Was a regular (annual) risk analysis conducted during the reporting period to identify, weight, and prioritize human rights and environment-related risks?

- Yes, for own operations
- Yes, for direct suppliers

State the time period during which the annual risk analysis was conducted.

Human rights risks can change over time. We therefore conduct a risk analysis every year. This was done in the third and fourth quarters of the reporting period.

Describe the risk analysis process.

Identifying and assessing human rights risks is an extensive process. Our approach consists of identifying, analyzing, and evaluating risks. We take a risk-based approach which is divided into three phases.

Phase 1: To identify potential human rights risks, Fresenius Helios conducts an analysis which is tailored to the specific country and industry in question.

Phase 2: We conduct a gap analysis to assess which of the potential risks that have been identified could represent actual risks. To do this, we use a standardized questionnaire to record processes, responsibilities, and procedures for each potential area of risk. The questionnaires are used to assess both our own business area and the supply chain. In our business area, risk owners and experts from the relevant fields are closely involved in this gap analysis.

Phase 3: All of the gaps and (if applicable) risks identified in the course of the gap analysis are analyzed and evaluated in the third and final phase of the risk analysis. This phase looks at the impact on those affected and the likelihood of the risks actually occurring. We then define remedial and preventive measures for prioritized risks.

Were event-related risk analyses also carried out during the reporting period?

Yes, due to other events: Event-driven risk assessment due to reports of human rights risks in the supply chain for single-use medical products.

Describe the specific occasions.

As single-use medical products are important tools for us as a healthcare provider, we examined this topic in a focal analysis due to reports of human rights risks in the supply chain for products such as disposable medical gloves.

Describe what findings the analysis has led to with respect to a materially changed and/or expanded risk situation.

The event-related assessment did not find any change in the supply chain risk situation with regard to the suppliers of single-use medical products which we analyzed. This assessment was based on feedback from direct suppliers with corresponding measures, certificates, and commitments to comply with legal requirements.

Describe the extent to which findings from the processing of tips/complaints have been incorporated.

Studies and media reports about the human rights situation in the supply chain for single-use medical products were used to develop targeted questions for our business partners within the supply chain. These were used to conduct the risk analysis.

Results of the risk analysis

What risks have been identified in your own business area as part of the risk analysis/analyses?

- Prohibition on hiring or using private/public security forces that may cause infringements due to lack of instruction or control
- Disregard for occupational health and safety or work-related health hazards
- Disregard for freedom of association – freedom of association and right to collective bargaining
- Prohibition of unequal treatment in employment

Results of the risk analysis

What risks were identified in the risk analysis/analyses of direct suppliers?

- None

Results of the risk analysis

What risks were identified in the risk analysis/analyses for indirect suppliers?

- Disregard for occupational health and safety or work-related health hazards
- Prohibition of forced labor and all forms of slavery
- Prohibition of unequal treatment in employment
- Prohibition of child labor

Describe in more detail how the weighting and prioritization, if any, were done and what considerations were applied.

- Yes, based on the expected severity of the violation by scale, number of people affected, and irremediability
- Yes, based on own ability to exert influence
- Yes, based on the probability of occurrence
- Yes, based on the nature and scope of its own business activities
- Yes, based on the type of causal contribution

Describe in more detail how the weighting and prioritization, if any, were done and what considerations were applied.

To make our contribution towards ensuring that more and more people can access healthcare, we rely on a large number of suppliers from around the world. We focused our analysis primarily on value creation steps located in countries and industries with a potentially high human rights risk. We prioritized suppliers with existing contractual relationships and larger order volumes.

To further weight and prioritize risks, we introduced a comprehensive methodology for assessing their impact and likelihood of occurring. Using this method, the risks were then plotted on a matrix (4x4).

The evaluated impact on those affected ranges from "low" to "severe". It was assessed using four evaluation criteria: scope, scale, possibility for remedial action, and company involvement.

Probability of occurrence ranges from "unlikely" to "almost certain". It was assessed using three different evaluation criteria: process evaluation, evaluation of similar cases which have already arisen, and context factors which could increase the likelihood of the risks materializing.

Which risks were prioritized in your own business area during the reporting period?

- Disregard for occupational health and safety or work-related health hazards
- Disregard for freedom of association – freedom of association and right to collective bargaining

Disregard for occupational health and safety or work-related health hazards

What is the specific risk here?

As a healthcare provider, we work day and night to look after our patients. Risks can rise from this, including in connection with the use of operating equipment and supplies. We constantly work to identify and close possible gaps in standard training on the use of operating equipment and supplies. This also includes the documentation and scope of this training.

In looking after patients every day, we work with and for people in the sensitive field of healthcare. This is an important area where situations can arise which have an emotional impact on our patients and their relatives. In situations like these, our employees sometimes receive verbal and/or non-verbal threats. Here, too, we constantly work to minimize any risks and to train our staff in ways of responding to such situations to keep their working environment safe.

Where does the risk arise?

- Germany
- Spain

Disregard for freedom of association – freedom of association and right to collective bargaining

What is the specific risk here?

Research and media reports as well as indices such as the Global Rights Index of the International Trade Union Confederation (ITUC) describe a particularly high risk of

disregard for freedom of association in Colombia. For this reason, and because trade unions and employees in South America informed us in 2021 that two employees of our Spanish hospital subsidiary Quirónsalud had received alleged death threats from unknown persons - outside our business activities and outside their working environment - this remains a prioritized risk for us. Threats in general, but especially threats of this nature, are completely unacceptable and incompatible with the principles and values at Fresenius Helios and throughout the Fresenius Group. We do not tolerate violence, threats of violence or other forms of coercion or intimidation in our Group. We clearly state this in our Business Partner Code of Conduct as well as in our Human Rights Statement.

The allegations described have been investigated by the local management of Quirónsalud in Colombia in close cooperation with the Fresenius Management Board member responsible for Human Resources, Risk Management and Legal Affairs appointed at that time. All necessary precautions have been taken to protect the lives of our employees within their business activities and to support the investigating authorities. We have also reported on this in the Fresenius Online Sustainability Report 2021.

The principle of respecting the right to freedom of association and collective bargaining applies throughout the Fresenius Group. This includes the right of our employees to decide freely whether they want to form a workers' representation or a trade union and/or be represented by one, always in accordance with the law in the respective place of work. We communicate this clearly in our Human Rights Statement as well as in our social and labor standards policy, which sets out these points clearly and bindingly for all companies of the Fresenius Group.

Where does the risk arise?

- Colombia

B2. Preventive Measures for Own Business Area

What preventive measures were implemented for the reporting period to prevent and minimize the priority risks in your own business area?

- Conducting training in relevant business areas
- Implementation of risk-based control measures
- Other/additional measures
 - Introducing a Social & Labor Standards policy
 - Introducing a guideline on managing human rights and risk analysis (SOP)
 - Introducing human rights governance with risk owners at the various departments, such as human resources, procurement, compliance, occupational health and safety, or environmental protection
 - Individual and local measures to provide our employees with the best possible protection within our sphere of influence

Conducting training in relevant business areas

Describe the measures implemented and specify in particular their scope (e.g., number, coverage/area of application).

- Communications and information about the Human Rights Statement: accessible to all staff
- Communications and information about the human rights program: accessible to all staff
- Information about the whistleblower system: accessible to all staff
- Training on occupational health and safety: all staff
- Training on risk analysis: staff who are involved in risk assessment are risk owners and subject matter experts

Describe the extent to which training is appropriate and effective in preventing and minimizing priority risks.

Our training sessions cover different areas and take various approaches. These range from online to in-person training, compulsory training, and additional information, through to training on specific topics such as conducting a human rights risk assessment or dealing with human rights violations.

By taking an approach which addresses specific topics and target groups, we disseminate relevant content on human rights due diligence with a practical focus for both the individuals affected (e.g., occupational health and safety training) and risk owners (e.g., individuals who are involved in assessing risks or developing preventive measures). In doing so, we cater for the many different aspects of human rights and instill the necessary knowledge in our workforce. This enables staff to identify and prevent risks.

Implementation of risk-based control measures

Describe the measures implemented and specify in particular their scope (e.g., number, coverage/area of application).

Internal Audit also examines human rights issues in the course of its audits. The Group Human Rights Office supports the business segments and supervises their activities to implement human rights due diligence. It also monitors the findings of risk analyses and the implementation of measures to mitigate risk. Internal analyses (e.g., questionnaires) were also used to monitor processes in a risk-based manner.

In the reporting year, we added further human rights aspects to our internal control system. These are implemented continually and in a risk-based manner. Compliance with key core processes will be checked by random sampling.

Describe the extent to which training is appropriate and effective in preventing and minimizing priority risks.

The described monitoring and control measures by different, unrelated departments did not give rise to any indications that the preventive measures were inappropriate or ineffective.

Other/additional measures

Describe the measures implemented and specify in particular their scope (e.g., number, coverage/area of application).

- Introducing a Social & Labor Standards policy
- Introducing a guideline on managing human rights and risk analysis (SOP)

- Introducing human rights governance with risk owners at the various departments, such as human resources, procurement, compliance, occupational health and safety, or environmental protection
- Individual and local measures, such as in Colombia, to provide our employees with the best possible protection within our sphere of influence. For instance, in Quirónsalud's clinics in Colombia, we employ more security staff than is usual in clinics to provide even better protection for our employees and patients in the clinic area 24 hours a day. In addition, monthly meetings with participants from local management and employees have been set up to further strengthen the dialog, to discuss employee issues and to find solutions together.

Describe the extent to which training is appropriate and effective in preventing and minimizing priority risks.

With the introduction of the Social & Labor Standards policy, defined minimum social standards that go beyond the legal requirements were introduced; these apply for the whole Fresenius Group, including our company. The introduction of the Human Rights Guideline (SOP) lays out the creation and development of a human rights structure and a risk-based approach to human rights due diligence at the Fresenius Group. This means it also applies to our company where risks are present.

Guidelines and standard operating procedures embed measures in more specific form. They therefore act as a bedrock and an effective means of preventing and minimizing risks. This also includes upholding the right to freedom of association, which applies to all clinics and sections of Fresenius Helios in equal measure. We respect the right to freedom of assembly and to collective bargaining – including our employees' right to decide for themselves whether they want to appoint staff representatives or establish a trade union, and/or whether they want to be represented by such a body or not – in line with legislation at the site in question. We value constructive collaboration and dialogue with trade unions in all our operating regions. This involves our global HR teams, company-specific points of contact, and clinic managers at each site. When it comes to the working environment, occupational health and safety are core elements of our business activities. We strive to identify, mitigate, and prevent hazards and risks in the workplace. We have established a wide range of processes and measures to achieve this.

Introducing human rights governance at the Fresenius Group – including our company – requires the risk-based implementation of preventive measures along with other human rights due diligence practices.

Individual and local measures also help to counter specific risks.

B3. Preventive Measures for Direct Suppliers

Which risks were prioritized at direct suppliers in the reporting period?

- None

If no risks were selected, give reasons for your answer.

In the course of the human rights and environmental analysis of the supply chain, none of the aforementioned risks were identified for Helios Germany or Quirónsalud

in the first scope of the analysis for direct suppliers using relevant criteria such as sales clusters, country risks, appropriateness, contribution to causation and ESG assessments.

One reason for this is that both Helios Germany and Quirónsalud have predominantly local contractual partners. Helios Germany procures goods and services from direct suppliers, more than 95% of whom are based in Germany. More than 95% of Quirónsalud's suppliers are based in Spain.

No high-priority risks were identified in an initial risk assessment founded on our risk-based approach.

Starting in 2024, risk analysis will be further developed on the basis of additional criteria. In addition, we aim to gradually expand the data we hold on suppliers to include information about indirect suppliers, their domicile, and information about production countries. The objective is to gain more insights into the risk situation deeper in the supply chain.

What preventive measures were implemented for the reporting period to prevent and minimize priority risks at direct suppliers?

- Obtaining contractual assurance for compliance and implementation of expectations along the supply chain

Describe the extent to which the measures to prevent and minimize the priority risks are appropriate and effective.

Our Code of Conduct for Business Partners is binding for suppliers and business partners. It sets out our specifications for companies with whom we do business, including concrete requirements for respecting human rights.

By introducing human rights and environment-related clauses in contracts and implementing these in a risk-based manner, we also embed concrete requirements concerning collaboration and disclosure in the case of human rights violations or suspected shortcomings.

We make risk-based use of self-assessments by suppliers. These provide us with information about respecting human rights and allow us to initiate and agree on additional concrete measures.

B4. Preventive Measures for Indirect Suppliers

Which risks have been prioritized for indirect suppliers based on the event-related risk analysis?

None

If no risks were selected, please explain.

Supplier feedback enabled us to establish that none of the potential risks previously identified led to a high-priority risk at indirect suppliers.

This was based on our measures set out in this report, such as the risk-based use of supplier self-assessments and further risk analyses, along with additional measures.

What preventive measures were implemented for the reporting period to prevent and minimize priority risks at indirect suppliers?

Other/additional measures: Binding Code of Conduct for Business Partners

Describe the measures implemented and specify in particular their scope (e.g., number, coverage/area of application).

Our Code of Conduct for Business Partners is binding for suppliers and business partners. It sets out our specifications for companies with whom we do business, including concrete requirements for respecting human rights. This explicitly requires our business partners to demand that their own suppliers uphold the same standards as a prerequisite for their contractual relationship.

Describe the extent to which the measures to prevent and minimize the priority risks are appropriate and effective.

No risks were prioritized for indirect suppliers. However, our Code of Conduct for Business Partners is binding for suppliers and business partners. It sets out our specifications for companies with whom we do business, including concrete requirements for respecting human rights. This explicitly requires our business partners to demand that their own suppliers uphold the same standards as a prerequisite for their contractual relationship.

B5. Communication of Results

Have the results of the risk analysis/analyses for the reporting period been communicated internally to key decision-makers?

It is confirmed that the results of the risk analysis/analyses for the reporting period have been communicated internally to the relevant decision-makers, such as the management board, the management, or the purchasing department, in accordance with Section 5 (3) LkSG.

Confirmed

B6. Change in the Risk Situation

What changes have occurred with regard to priority risks compared with the previous reporting period?

In 2024, prioritized risks for the company's own business area and in the supply chain are reported for the first time retrospectively for the 2023 financial year. For this reason, there is not yet a basis for comparison with the previous period to which reference can be made.

C. Identification of Violations and Remedial Measures

C1. Identification of Violations and Remedial Measures in Own Business Area

Were any violations identified in the own business area during the reporting period?

No

Describe the procedures that can be used to identify violations in your own business unit.

Helios Kliniken GmbH set up a whistleblowing service within its central Compliance department to ensure that any issues reported are dealt with properly. The whistleblowing service is supported by ombudspersons. Internal and external stakeholders can report concerns via a dedicated email address monitored by the central Compliance department or by contacting the ombudspersons. Both reporting channels can be accessed by internal and external stakeholders via the Helios website. Internal stakeholders can also find the contact details on the company's intranet. The whistleblowing service is designed to enable people to report human rights and environment-related risks or violations resulting from the business activities of Helios itself or a direct supplier. The whistleblowing service ensures that concerns are dealt with correctly. It is independent and treats all reported issues confidentially. Furthermore, the whistleblowing service monitors the implementation of necessary measures at the unit concerned and keeps the whistleblower informed.

The whistleblowing service also reports regularly to the directors. All stakeholder groups can read the rules of procedure on the Helios website. These contain all the relevant information about the process and responsibilities. Internal stakeholders can also access the rules of procedure via the Helios intranet.

As part of Fresenius Helios, Quirónsalud has a whistleblower guideline which was laid down by Fresenius Helios. Four protocols were also introduced setting out the correct procedure and responsibilities for issues of different types and scopes. In 2023, Quirónsalud used the guideline and protocols to define its own whistleblower procedure and started aligning its existing grievance mechanism.

Quirónsalud has outsourced the management of the whistleblower channel to a third party, and, depending on the protocol, the investigation procedure involves various internal and external departments and/or subject matter experts: human resources (labor), prevention, external law firm, local Investigation Committee created at hospital level.

C2. Identification of Violations and Remedial Measures at Direct Suppliers

Were any violations identified at direct suppliers for the reporting period?

No

Describe the procedures used to identify violations at direct suppliers.

Helios Kliniken GmbH set up a whistleblowing service within its central Compliance department to ensure that any issues reported are dealt with properly. The whistleblowing service is supported by ombudspersons. Internal and external stakeholders can report concerns via a dedicated email address monitored by the central Compliance department or by contacting the ombudspersons. Both reporting channels can be accessed by internal and external stakeholders via the Helios website. Internal stakeholders can also find the contact details on the company's intranet. The whistleblowing service is designed to enable people to report human rights and environment-related risks or violations resulting from the business activities of Helios itself or a direct supplier. The whistleblowing service ensures that concerns are dealt with correctly. It is independent and treats all reported issues confidentially. Furthermore, the whistleblowing service monitors the implementation of necessary measures at the unit concerned and keeps the whistleblower informed.

The whistleblowing service also reports regularly to the directors. All stakeholder groups can read the rules of procedure on the Helios website. These contain all the relevant information about the process and responsibilities. Internal stakeholders can also access the rules of procedure via the Helios intranet.

As part of Fresenius Helios, Quirónsalud has a whistleblower guideline which was laid down by Fresenius Helios. Four protocols were also introduced setting out the correct procedure and responsibilities for issues of different types and scopes. In 2023, Quirónsalud used the guideline and protocols to define its own whistleblower procedure and started aligning its existing grievance mechanism.

Quirónsalud has outsourced the management of the whistleblower channel to a third party, and, depending on the protocol, the investigation procedure involves various internal and external departments and/or subject matter experts: human resources (labor), prevention, external law firm, local Investigation Committee created at hospital level.

C3. Identification of Violations and Remedial Measures at Indirect Suppliers

Were any violations identified at indirect suppliers during the reporting period?

No

D. Complaints Procedure

D1. Establishment of or participation in a complaints procedure

In what form was a complaints procedure offered for the reporting period?

- In-house complaints procedure
- Participation in a procedure
- Combination of own and external process

Describe the company's own process and/or the third-party process in which your company participates.

As the leading healthcare provider in Europe, Helios manages the Helios Group in Germany and the Spanish company Quirónsalud Group and combines both of them under the holding company Helios Health GmbH.

Helios Kliniken GmbH has set up a reporting office in the Central Compliance Department to ensure that reports received are handled properly. The Reporting Office is supported by ombudspersons. Internal and external stakeholders can submit their reports either via a dedicated email address managed by the Compliance Central Service or by contacting ombudspersons. Both ways of accessing the reporting system are available to internal as well as external stakeholders via the Helios website. For internal stakeholders, the contact details can also be found on the company intranet. The Reporting Office is intended to enable people to report human rights or environment-related risks as well as violations of human rights or environment-related obligations that have arisen as a result of the business activities of Helios itself or at direct suppliers. The Reporting Office ensures that reports are handled properly; it is not bound by instructions and treats all reports confidentially. Furthermore, the Reporting Office follows up on the realization of necessary measures in the unit responsible and informs the reporting persons accordingly.

The Reporting Office also reports regularly to the Management Board. All stakeholder groups can view the rules of procedure in text form on the Helios website, where all relevant information on the process and responsibilities is published. The Code of Procedure is also available to internal stakeholders on the Helios intranet.

As a part of Fresenius Helios, Quirónsalud follows a whistleblower policy put forth by Fresenius Helios. The policy was adapted to its own business needs and to Spanish regulatory requirements. In addition, Quirónsalud has implemented four protocols that determine who is tasked with responding and how they should proceed, depending on the nature and scope of the grievance reported. Furthermore, there is a Standard Operating Procedure (SOP) to determine the practical components of the Whistleblower channel.

In 2023, Quirónsalud used the policy and the protocols to define their own whistleblower procedure and began to roll out the adjusted grievance mechanism.

Quirónsalud has outsourced the management of the whistleblowing channel to an external party and, depending on the protocol, the investigation procedure involves various internal and external departments and / or specifically trained subject matter

experts: human resources (labor), prevention, external law firm, local investigation committee managed on hospital level.

We are continuously working on further developing our grievance and whistleblower channels and processes and will report on the adjustments and further developments.

Which potential stakeholders have access to the complaints procedure?

- Own employees
- Communities near own sites
- Employees at suppliers
- External stakeholders such as NGOs, trade unions, etc.
- Other: The complaints procedure is open to all persons, including patients as well as customers.

How is access to the complaints procedure ensured for different groups of potential stakeholders?

- Publicly available rules of procedure in text form
- Information on accessibility
- Information on responsibilities
- Information about the process
- All information is clear and understandable
- All information is publicly available

Were the rules of procedure applicable during the reporting period publicly available?

File was uploaded

Link where the rules of procedure can be accessed

Helios Germany: Helios web-based rules of procedures is publicly available in German via the Helios intranet for employees and via our website to all individuals at the following address:

<https://www.helios-gesundheit.de/unternehmen/ueber-helios/werte/compliance/menschenrechte/>

Quirónsalud: Quirónsaluds web-based rules of procedures are publicly available both in English and Spanish via the Quirónsalud intranet for employees and via our website to all individuals at the following address:

<https://www.quironsalud.com/en/group/whistleblowing-channel>

D2. Requirements for the Complaints Procedure

Indicate the person(s) responsible for the procedure and their function(s)

Helios Germany: Head of Compliance

Quirónsalud: Risk and Compliance Committee (consist of members from various departments such as Finance, Procurement, CSR, Compliance, Data Protection) that reports to the Head of Compliance.

It is confirmed that the criteria for the responsible persons contained in Section 8 para. 3 LkSG are fulfilled, i.e. that they offer the guarantee of impartial action, are independent and not bound by instructions, and are obliged to maintain confidentiality.

Confirmed

It is confirmed that for the reporting period arrangements have been made to protect potentially involved parties from being disadvantaged or penalized as a result of a complaint.

Confirmed

Describe what arrangements have been made, in particular how the complaints procedure ensures the confidentiality of whistleblowers' identities.

Helios Germany: The group of persons who receive reports is limited to the employees of Central Service Compliance (2 persons). Information received is stored separately from other work data on a separate drive to which only these employees have access. The identity of a whistleblower is not disclosed as part of the processing procedure or, if this is necessary for processing, only with the consent of the whistleblower.

Quirónsalud: The group of persons who receive reports is limited to the managers of the whistleblowing channel. Information received is stored separately from other work data on a separate drive to which only these managers have access. The identity of a whistleblower is not disclosed as part of the processing procedure or, if this is necessary for processing, only with the consent of the whistleblower.

Describe what precautions have been taken, in particular any additional measures that are in place to protect whistleblowers.

Helios Germany: Training measures are implemented for all responsible managers (managing directors of a Helios company), in which requirements and specifications for the proper handling of information and measures to remedy incidents are disseminated.

Quirónsalud: Training measures are implemented for all responsible managers in accordance with the SOP and the specific protocols, in which requirements and specifications for the proper handling of information and measures to remedy incidents are disseminated.

D3. Implementation of the Complaints Procedure

Were any complaints/tips/cases received during the reporting period via the grievance mechanism?

Yes

Provide more detail on the number, content, duration, and outcome of the procedures.

In the reporting period, a total of twelve human rights-related reports were received through our existing reporting channels at Fresenius Helios. We review all complaints for human rights aspects as part of our case management processes. If the complaint is substantiated, we take appropriate remedial action. In the reporting year, this concerned zero reports. All reports were investigated. Where necessary, corrective actions were initiated or are continuing. On average, investigative procedures took several months.

On which topics have complaints been received?

- Disregard for occupational health and safety or work-related health hazards
- Prohibition of unequal treatment in employment

Describe what conclusions have been drawn from the complaints/tips/cases received and to what extent these findings have led to adjustments in risk management.

The results of our risk analysis and the findings on potential target groups of our grievance and whistleblower channels are incorporated into the further development of our grievance and whistleblowing procedures and the processing of grievances and whistleblowing reports. Based on our findings, we review the effectiveness of the procedure described above on an annual basis, or more frequently if required. Where necessary, we make appropriate adjustments and changes with regard to accessibility and the process of the procedure. Quirónsalud's Risk, Internal Audit and Compliance department is currently developing a comprehensive concept for the further development of the complaints procedure that will be approved and implemented in 2024.

E. Review of Risk Management

Is there a process in place to review risk management across the board for adequacy and effectiveness?

In which of the following areas of risk management is adequacy and effectiveness assessed?

- Resources & expertise
- Risk analysis and prioritization process
- Complaints procedure

Describe how this review is conducted for the respective area and what results it has led to – especially with regard to the prioritized risks.

The Group Human Rights Office supports the business segments and monitors their activities for implementing human rights due diligence.

The appropriateness and effectiveness of these are monitored via the implemented processes, measures and corresponding documentation. This includes, for example, how many training sessions and workshops on the topic of human rights risk analysis have been held with risk owners and subject matter experts.

The risk analysis and prioritization processes build on a Group-wide risk analysis process. All steps throughout the risk analysis and prioritization process are documented. These are consolidated in a special software tool and can be evaluated. Here, the available internal and external data, assessments, explanations and preventive measures are checked for appropriateness and effectiveness.

Grievances reported by internal or external stakeholders are investigated in an appropriate manner. If a grievance proves to be justified, we take effective remedial action. We carefully review all grievances in order to improve our business processes. Corrective actions and/or improvement measures are taken when necessary.

In addition, alongside the review by the Group Human Rights Office, internal controls are an integral part of the risk management at Fresenius Helios. Our internal control system (ICS) consists of a comprehensive set of internal controls and complementary processes. The results are incorporated into the regular review of the adequacy and effectiveness of our human rights program.

Are there processes or measures in place to ensure that the interests of your employees, employees within your supply chain, and those who may otherwise be directly affected in a protected legal position by the business activities of your company or by the business activities of a company in your supply chain are adequately considered in the establishment and implementation of risk management?

In which areas of risk management do processes or measures exist to take into account the interests of those potentially affected?

Complaint procedure

Describe the processes or measures in place for each area of risk management.

Implementing respect for human rights in our own operations and supply chain is an important yet complex task. We believe that all stakeholders deserve the patience and thoroughness we invest in our current and ongoing efforts. We are committed to listening and learning from other organizations and stakeholders as we continue to make progress.

For example, our Workers' Council has been involved in the development of our complaints procedure. A report on all findings from the complaints procedure is also regularly submitted to the General Workers' Council. In addition, our employees as well as external stakeholders such as customers, suppliers and other rights holders can submit a report via our grievance mechanism, either by name or anonymously; such reports are taken into account as we continue to develop our activities to ensure respect for human rights.

For the further development of our human rights program, we plan to expand exchange with relevant internal and external stakeholders and their representatives on the basis of the results of our risk analysis.