



Group Tax Policy

For reasons of simplification used masculine form refers all gender.

The tax strategy of Fresenius Group is aligned with our core values: Wellbeing of patients, Quality, Integrity, Responsibility and Reliability.

The tax compliance objectives are aimed at safeguarding compliance with all tax laws and reporting obligations and enhancing shareholder value based on the following principles:

1. We strive to maintain a culture that ensures that all people in our organization are aware that observing rules and the correct handling of tax matters is essential to the Fresenius Group.
2. The Fresenius Corporate Tax department and the other segment tax functions in the group are creating awareness of tax compliance in the Fresenius Group which is implemented in the Code of Conduct. This includes providing appropriate information and training to employees who perform tax-related tasks. The respective rules and procedures of this tax compliance objectives have been adopted by the Management Board.
3. We have to ensure that all applicable tax laws and reporting obligations are observed in a comprehensive and timely manner and that tax affairs are managed responsibly and transparently. We maintain an internal control system that meets existing standards and ensures that we comply with the tax and reporting obligations in all jurisdictions where we do our business. Appropriate processes and efficient controls shall safeguard that tax risks are identified, systematically recorded and assessed considering their probability of occurrence and potential financial exposure and reported in our external financial reporting.
4. Fresenius Corporate Tax department acts as a central point of contact for all Group tax functions, providing support and advice. Together they act as partners of the operating business units rendering attention, support and advice for transactions as well as for day-to-day business. In addition, the Fresenius Corporate Tax department also performs in whole or in part the tax function for some business segments.

5. Complying with applicable tax laws and upholding our reputation with governmental authorities and the public, we support the relevant business processes as well as sustainable growth of shareholder value with efficient tax planning. We don't engage in tax arrangements without business purpose or commercial rationale. We routinely seek external professional guidance to reduce uncertainty when required.
6. Intercompany transfer pricing policies are set in accordance with arm's length's principles following international standards, i.e. taxes have to be paid on profits according to where value is created.
7. Communication and cooperation regarding tax issues is organized in a way that safeguards that all information is managed in a timely and appropriate manner. Tax is part of the internal control system and Risk Reporting. The FSE Group Chief Financial Officer ("CFO") will be informed about all relevant tax matters and the development of tax risks. The Fresenius Corporate Tax department reports regularly to the CFO. The responsible CFOs ensures adequate resources for the tax function.
8. We support a cooperative, honest and respectful approach with tax authorities and other public bodies which we consider essential for efficient tax compliance and risk management.
9. We support initiatives such as the initiatives of the Organization for Economic Cooperation and Development ("OECD") regarding Cooperative Compliance (whereby tax authorities and taxpayers benefit equally from more transparency) and Base Erosion and Profit Shifting ("BEPS").
10. We continuously monitor changes in tax laws and practice. We recognize the importance of participating in discussions on the development of new tax legislation either directly or through the respective interest groups.
11. We are committed to employing and retaining excellent tax professionals long-term. We continuously work on our employer attractiveness, taking into account personal skills and providing a professional environment for personal development.
