



## Group Tax Policy

*For reasons of simplification used masculine form refers to all genders.*

The tax strategy of Fresenius SE & Co. KGaA ("F SE") is aligned with the *Fresenius Principles* and the *Code of Conduct* and aimed at safeguarding compliance with all tax laws and reporting obligations as well as enhancing shareholder value.

Fresenius' tax compliance culture is expressed by the following principles and objectives:

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 Fresenius.
2. The Fresenius Group Tax department ("Group Tax") and the Local Tax Functions of the Segments create awareness and provide training for tax compliance at Fresenius to employees who perform tax-related tasks. The respective rules and tax compliance objectives set forth in this Group Policy 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 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 included in our external financial reporting.
4. Group Tax has tax governance responsibility for Fresenius with functional reporting obligations for all tax functions of the F SE Group Entities. Group Tax and the Local Tax Functions 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, Group Tax 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 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 safeguarding that all information is managed in a timely and appropriate manner. Tax is part of the internal control system and risk reporting. The F SE Group Chief Financial Officer ("CFO") is being informed about all relevant tax matters and the development of tax risks. Group Tax reports regularly to the CFO. The CFO ensures adequate resources for Group Tax and the Local Tax Functions.
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 employ and retain 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.

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