



Policy Statement

At DaVita Medical Group, we take great pride in providing life-sustaining care to our patients, taking care of our teammates and holding ourselves to a high standard as a company. We are committed to doing the right thing and conducting our business activities in accordance with our policies, procedures and applicable laws and regulations. Our mission - to be the provider, partner and employer of choice - can only be achieved if each of us lives these responsibilities.

DaVita Medical Group strives to be a community first and a company second. Our Trilogy of Care calls on teammates and stakeholders to care for our patients, each other, and our world. This philosophy drives us to be better corporate citizens and underpins our commitment to the standards of human rights and environmental aspects as set out in the German Supply Chain Due Diligence Act (SCDDA)¹.

DaVita Medical Group conducts its business and operations in accordance with the highest standards of integrity and ethical practice and in a socially responsible manner.

1. Our Commitment and expectations

DaVita Medical Group is committed to respecting and upholding internationally accepted conventions on human rights as stated in the International Bill of Human Rights and the United Nations Global Compact. We believe in equality and the power of diversity, and we are committed to fostering an environment of belonging where all our teammates, patients and partners are treated with respect and dignity. Our commitment to integrity, ethical business practices, community, caring, team, diversity, equality and belonging are reflected in the DaVita global Code of Conduct.²

The guidance provided by our Code of Conduct empowers us to do the right things, the right way. It is meant to help us make the right choices in our daily work and in our long-term strategy. All DaVita teammates are held accountable for upholding the standards set forth in the Code of Conduct³. In accordance with the Code of Conduct, DaVita condemns the use of illegal child labour and does not

¹ **Human rights:** Right to life, Prohibition of torture and cruel, inhuman or degrading treatment (this also includes violations by deployed security forces if they were inadequately instructed or controlled); Right to just and favourable conditions of work, including fair and living wages for employed workers and self-employed workers and small farmers in return for their work and production, safe and healthy working conditions and reasonable limitation of working hours; Prohibition on restricting workers' access to adequate housing when workers are accommodated in company-provided housing and restricting workers' access to adequate food, clothing, water and sanitation in the workplace; Ban on child labour; Prohibition of forced or compulsory labour, Prohibition of slavery, Disregard for freedom of association, Prohibition of unequal treatment in employment, Right to life by prohibiting the creation of a harmful environmental impact; **Environmental aspects:** Ban on the manufacture, import and export of mercury-added products; Ban on the use of mercury or mercury compounds; Ban on unlawful treatment of mercury waste; Ban on the production and use of POPs; Prohibition of unlawful handling, collection, storage and disposal of waste; Ban on the import and export of hazardous and other waste.

² DaVita Code of Conduct

³ DaVita Code of Conduct



accept forced labour or human trafficking. DaVita takes responsibility for fairness in the workplace in accordance with applicable labour laws, including anti-discrimination laws.

DaVita Medical Group complies with all applicable laws wherever we do business, and is committed to following the guiding human rights principles set forth in applicable international standards.

As part of the DaVita Environmental Policy, DaVita is committed to the responsible use of natural resources, continuous improvements in clinical quality and the development of innovative approaches that protect the health of people and the planet.

Our commitment to environmental protection is exemplified in the DaVita Community Care Report.⁴

Furthermore, DaVita expects the same high standards of our suppliers and of any other party with whom DaVita does business.⁵ DaVita business partners play an important role in helping DaVita provide the best possible care for our patients. DaVita Medical Group expects its business partners to comply with human rights and environmental principles and to establish appropriate due diligence procedures in their own supply chain.

2. Risk management and risk analysis

DaVita Medical Group has a variety of proven management systems - risk management, internal control system and compliance management system. The requirements of the Supply Chain Due Diligence Act are integrated into these systems in terms of personnel, processes and documentation.

The risk management framework developed at DaVita International follows several steps: risk identification, risk appetite definition, risk assessment, risk mitigation and risk monitoring. Policies and procedures, both at International and country level, ensure that the business will operate within the tolerance levels intended. When limits are breached, clear action plans with designated owners will be designed.

Our risk management system at DaVita Medical Group enables us to identify and minimize human rights and environmental risks and to prevent, end or minimize the extent of violations of human rights or environmental obligations if we have caused or contributed to these risks or violations within our supply chain.

When setting up and implementing our risk management system, we have taken appropriate account of the interests of our teammates, the employees within our supply chain and those who may otherwise be directly affected in a protected legal position by our economic actions or the economic actions of a company in our supply chain.

⁴ DaVita Community Care Report

⁵ DaVita Medical Group Supplier Guiding Principles

DaVita Medical Group follows a risk-based approach to identify priorities. In the annual risk analysis in its own area of business as well as with direct business partners, DaVita Medical Group considers potential human rights and environmental risks based on country- and industry-specific as well as company-specific information.

The risks identified are evaluated and prioritised. DaVita Medical Group prioritises the identified risks based on an assessment of the severity, the potential impact and the probability of occurrence of the risk and our contribution to causing it.

Chief Compliance Officer (CCO) Germany communicates the results of the risk analysis to the Senior Management Team and considers them appropriately.

In our risk analysis, DaVita Medical Group takes into account also findings from the processing of information received via the complaints procedure, if applicable. DaVita Medical Group maintains a legally valid complaints and compliance procedure (see section 5).

Our risk analysis for the year 2024 in our own business area and our supply chain revealed the following relevant human rights and environmental issues that we identified as potentially risky.

DaVita Medical Group operates exclusively in Germany and over 90% of our direct business partners are also based in Germany. Potentially relevant risks can therefore be identified primarily based on industry-specific risks.

The focus here is on complying with statutory employee rights. DaVita Medical Group analyses the situation of teammates in the workplace at our clinics and headquarter with regard to the following aspects:

- Equal opportunities and protection against discrimination in employment
- Health and safety in the workplace
- Working hours
- Appropriate pay and benefits.

The protection of the environment is closely linked to the protection of human rights and sustainable business practices. As a healthcare company, we pay particular attention to water and waste management in order to make our business activities as environmentally friendly as possible.

3. Preventive measures

In order to avoid human rights and environmental risks, we have introduced various preventive measures in our own business area and in relation to suppliers, the effectiveness of which we monitor on an ongoing basis and adjust as necessary.⁶

DaVita Medical Group defined a Management responsibility for monitoring of human rights and environmental risks by appointing a Chief Compliance Officer (CCO) Germany who is a member of the Senior Management Team. DaVita Medical Group Senior Management Team, which includes board members, is informed regularly, at least once a year about the work of the CCO Germany.

We expect all teammates to comply with the requirements of the Supply Chain Due Diligence Act (SCDDA) and provide training in the relevant business areas.

The DaVita Code of Conduct applies to all teammates. The Code of Conduct obliges all teammates to comply with the relevant laws and internal rules, including those relating to respect for human rights and environmental obligations. Our teammates receive regular training on the content of the Code of Conduct.

DaVita Medical Group expects from our direct suppliers that they comply with our human rights and environmental expectations and address them appropriately along the supply chain. We carry out training and, if necessary further education to enforce the contractual assurances of direct suppliers. We have defined this in our Supplier Code of Conduct.

Our procurement and purchasing strategies take account of identified human rights and environmental risks. We use defined risk criteria to review our business partners based on their business activities prior to entering into business relationships.

If we have substantiated knowledge, we take appropriate preventive measures toward the perpetrator, such as implementing control measures or providing support in preventing and avoiding risks.

We review the effectiveness of the preventive measures once a year and on an ad hoc basis, particularly if we have to expect a significantly changed or significantly expanded risk situation in our own business area or at suppliers; preventive measures are then updated immediately if necessary.

⁶ These preventive measures currently include the following regulations and documents in particular: Supplier Guiding Principles, DaVita Code of Conduct, Teammate Handbook, Community Care Booklet, DaVita Inc. Human Rights Statement, Policy Statement.

4. Remedial measures

If we identify an actual or imminent violation of human rights or environmental obligations, we take appropriate remedial action immediately to end the violation. If immediate elimination, prevention or minimization is not possible with a direct supplier, we draw up a concept with a concrete timetable and implement it.

When creating and implementing the concept, particular consideration is given to:

- the joint development and implementation of a plan to end or minimize the breach with the company causing the breach,
- temporary suspension of the business relationship during efforts to minimize the risk.

To date, we have not identified any imminent (actual) violations of human rights or environmental risks and have therefore not yet had to take any remedial action. We review the effectiveness of the remedial measures once a year and on an ad hoc basis if applicable. In particular, if we have to expect a significantly changed or significantly expanded risk situation in our own business area or at suppliers, remedial measures are then updated immediately if necessary.

5. Complaints and compliance procedure

We have established an SCDDA-compliant system for complaints and reports on human rights and environmental risks and violations of human rights or environmental obligations arising from our business activities or the business activities of our direct or indirect suppliers.

Our compliance program reflects our efforts to our mission and our core values in our day-to-day work.

The effectiveness of the complaints and compliance procedure is reviewed regularly.

a) The Chief Compliance Officer and the Compliance Team

DaVita Medical Group has its own compliance department. When selecting the persons entrusted with this task, it has been ensured that they act impartially. They also act independently and objectively and are obliged to maintain confidentiality. The compliance team members are responsible for implementing the compliance program in day-to-day operations and are always available to answer compliance-related questions or address concerns. The CCO Germany manages the DaVita Medical Group compliance program and reports directly to the CCO International and the CEO Germany.

b) Guidelines, procedures and codes

The Compliance department of DaVita Medical Group has issued international and national compliance policies and procedures as well as codes to help guide our actions. The compliance policies and procedures govern specific areas and aspects of DaVita business activities.

c) Compliance training

All DaVita Medical Group teammates and suppliers are required to complete DaVita compliance training where required by contractual obligations or in case risks are identified. This training is an important part of the foundation of our compliance program.

d) Compliance Hotline

Compliance concerns or issues can be reported to the Compliance Hotline 24 hours a day, 365 days a year in a confidential manner. Both the Compliance Hotline and the complaints procedure is accessible to everyone on DaVita's website.⁷ DaVita Medical Group supports anyone who makes a report in good faith without any discrimination. Everyone can use the Compliance Hotline to report relevant violations of applicable laws (e.g. fraud, corruption, accounting misconduct and human rights or environmental violations) and DaVita's compliance policies and procedures.

6. Documentation and report

DaVita CCO Germany regularly, continuously documents and reports on DaVita Medical Group due diligence obligations in accordance with the Supply Chain Due Diligence Act (SCDDA). We regularly update this policy statement and the measures specified therein.



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⁷ DaVita Medical Group website

