

Fresenius Medical Care Renal Therapies Group (RTG) Declaration of Compliance with California SB 1765

RTG is committed to complying with all applicable laws, regulations, and industry standards.

RTG has adopted a Comprehensive Compliance Program (CCP) in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers,” developed by the U.S. Department of Health and Human Services Officer of Inspector General in April 2003 (OIG Guidance).

The RTG CCP includes policies and procedures consistent with the tenets set forth in the Pharmaceutical Research and Manufacturers of America Code on Interactions with Health Care Professionals (PhRMA Code).

Fresenius Medical Care North America (FMCNA) maintains a Corporate Compliance Department, headed by a member of senior management appointed as Chief Compliance Officer. Each division within FMCNA, including RTG, also has a dedicated business unit Compliance Officer.

RTG employees receive compliance training and education, at a minimum, on an annual basis.

The FMCNA CCP maintains a compliance hotline and makes compliance officer contact information publicly available to facilitate effective lines of communication.

The RTG Compliance Program is continually assessed and evaluated to ensure consistency with the evolving legal and regulatory landscape. It is designed to prevent, detect, and remediate violations of law, regulations, and company policies. The RTG Compliance department strives to promote an ethical culture that will guide interactions with healthcare professionals and healthcare entities.

In the event that RTG becomes aware of any potential or actual violations of policy or law, the matter is investigated. If necessary, the investigation is followed by appropriate remedial or corrective actions.

As of January 1, 2015, RTG hereby declares that it is in compliance with both the RTG Comprehensive Compliance Program and California SB 1765 (California Business & Professions Code 119400, 119402).