



The Diaverum Code of Conduct



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True care – our culture at Diaverum

Our True care culture is for everyone at Diaverum, regardless of their role or location, whether they work in a clinic or in an office.

It's our foundation and how we work every day to deliver for our patients, their families, and all of our stakeholders.

Cultural differences, a variety of job roles and different work contexts make diversity the lifeblood of us all at Diaverum, but our values and behaviours are how we commonly define our culture.

Culture isn't a project, it isn't an initiative: it's all of us, every day, in our actions, behaviours, decisions, habits, stories. It's the sum total of all of that.

We live out our culture to ensure we can deliver all we must for our patients.

True care, for Life!



Our values

True care

<p>Dare to dream We challenge the norms. Our passion for enabling fulfilling lives gives us courage for innovation and a push for change, in the belief that anything is possible.</p>	Inspiration
<p>Create better, together We support each other and take individual responsibility to foster an inclusive climate. We value teamwork and reach out for help and new ideas, while actively sharing with others.</p>	
<p>Lead by example Integrity is at our core and we walk the talk on what we expect of ourselves and others. We are accountable for our decisions and actions, and set the tone to inspire others.</p>	
<p>Sparkle with enthusiasm We put our heart and soul into our work and don't wait for others to take the initiative. We walk the extra mile and encourage others to do the same.</p>	Passion
<p>Learn something new everyday We are curious, we want to understand and we actively seek out learning in our daily work and to unleash our full potential.</p>	
<p>Make connections We create links, we develop relationships, we form bonds; because we know the outcomes are better when we build bridges.</p>	
<p>Good enough is not enough We continuously strive to deliver better outcomes, and don't simply settle for the status quo.</p>	Competence
<p>Build trust through delivery We focus on delivering what we promise, consistently finding solutions, while being open and honest with challenges we find along the way.</p>	
<p>Demonstrate your skill We apply our knowledge and consistently work to improve and develop so that we are the best in what we do.</p>	

Introduction

To whom does the Code of Conduct apply?

This Code of Conduct and all relevant Diaverum policies and procedures apply to all employees of Diaverum, its subsidiaries, and other individuals that perform work for Diaverum (also referred to as the Company in this document). They also apply to members of the Diaverum Board of Directors when carrying out their duties as directors.

The head of a subsidiary, division, department or functional entity of Diaverum (the 'Responsible Person') has primary responsibility for the implementation of the Code of Conduct.

Nonetheless, we each have a personal responsibility to adhere to this Code of Conduct, in order to preserve the confidence and trust of all patients, co-workers, customers, suppliers and third party service providers.

What is the purpose of the Code of Conduct?

At the heart of Diaverum's Code of Conduct are our values. Our people are the business; the way we care for our patients, how we engage with national health services and suppliers and the role we play in society – all of that stems from our culture and the values we believe in.





The purpose of the Code of Conduct is to clearly state legal, ethical and societal norms for our employees so they understand and apply them to their business conduct.

Ethics & Compliance

We are obliged to comply with the laws of the countries in which we operate. We comply with the highest ethical standards supported by Diaverum's internal policies and procedures and this Code of Conduct. Wherever Diaverum operates, we comply with relevant laws, regulations and local codes of practice.

Individual and management responsibility

We are personally responsible for following the Code of Conduct, including seeking help when needed

to avoid unethical or illegal business conduct.

It is the responsibility of all Diaverum personnel and business partners to be fully aware of relevant laws, regulations and practices as they relate to the job or the assignment. All managers shall ensure that their employees are aware of and comply with the Code of Conduct, and provide guidance concerning compliance matters and means of reporting potential violations. Where the laws of one nation impact Diaverum operations in another country, the employees in that country should advise their affected colleagues of such laws and assist them in assuring compliance. In cases of conflict between more restrictive laws and regulations and the principles set forth in this Code of Conduct, the local law prevails.

Sustainability

The Code of Conduct is directly connected to our commitment to sustainability and responsible business practices. This commitment permeates our day-to-day operations and is grouped into five key areas of activity: Our Patients, Employees & Wellbeing, Access to Care, Operating Responsibly, and the Environment.



Our Patients

We have a holistic, patient-centered approach that focuses on superior clinic experiences as well as improved medical outcomes. We have invested in digital innovation to automate data capture, minimising human errors and maximising the time that our staff can devote to our patients. Educating and supporting patients and families for better treatment outcomes is a key priority.



Employees & Well-being

Diaverum ensures the health and safety of our employees, and cares for their well-being through regular engagement, initiatives and benefits. We are acutely aware of the need to recruit and retain the best staff, which is why we offer all our personnel high-quality training and equal career opportunities.



Access to Care

We bring world-class renal care to patients, wherever they live. As a global company which continuously adds new clinics to its roster and enters new markets, Diaverum has developed a proven, rigorous market entry screening and

assessment strategy. This helps us to establish whether we can enter and operate in a given country while upholding our strong values.



Operating Responsibly

We conduct our business in a compliant, transparent and ethical way. Our approach is underpinned by robust governance, policies and processes. We have zero-tolerance for human rights abuses, compliance breaches and unethical behaviour. Our expected behaviours are outlined in this Code of Conduct are re-enforced through regular employee training.



The Environment

We are tackling our biggest environmental impact – water consumption – whilst ensuring stringent water quality standards. We are decreasing water and energy use by collaborating with dialysis unit manufacturers, standardising new clinic construction and using digital tools to operate efficiently.

Ethics & Compliance

We conduct business morally, ethically and in a socially responsible way, in a manner that is compliant with all applicable law and regulations.

We adhere to Diaverum standards for protecting the health and safety of our patients, co-workers and communities and by not participating in or tolerating fraud, deceit or concealment. Accountability, transparency, ethical behaviour and respect are the traits which will present Diaverum as a trusted partner.



Bribes and Kickbacks

We do not offer to anybody any bribe, gratuity, kickback, any similar payment or favours in connection with company business.

Conflicts of Interests

We avoid personal interests that conflict with interests of the Company, or might influence or appear to influence our judgment or actions in performing our duties.

We always act in the best interest of Diaverum.

We avoid situations where personal interests are, or appear to be, in conflict with Diaverum interests, disregarding any personal preference or advantage.

We conduct our private and other external activities so that they do not conflict or appear to conflict with the interests of Diaverum.

Any such conflict of interest that arises is to be reported immediately to the Responsible Person.

Business Transactions

Diaverum conducts business in full accordance with applicable laws. It also complies with high ethical standards and overall business practice codes, as well as any international or national codes of practice. Business practices might vary from country to country, but we all act fair and with candour in every business environment. We are 'good corporate citizens' in all countries in which we operates.

Contracts and Contract Negotiations

Substantial commercial transactions have to be evidenced by full and complete written agreements. While each business unit determines its policy regarding authority to negotiate significant contracts on behalf of the business unit, Group governance policy governs the authority to sign contracts on behalf of Diaverum.

Patient Referral

There are a number of channels through which patients come to Diaverum. Diaverum only accepts patients referred to our clinics in accordance with fair and transparent practices. We do not tolerate practices where patients are referred to our clinics on illegitimate or subjective criteria. We abide by the policy and procedures that are in line with local laws and regulations concerning referrals; under no circumstances must organic growth targets be prioritised over compliant patient referral management. As a company, we do not engage in any non-compliant (i.e. illegal or unethical) practices concerning patient referrals.

Tax Evasion

As part of our ethical principles, Diaverum is committed to complying with all tax requirements and all appropriate payments in every country that we operate in. Diaverum is also committed to ensuring that employees and relevant third parties do not knowingly help anyone commit tax evasion.

Data Protection

At Diaverum, personal data (especially data related to patients) must not be processed outside of the approved and dedicated systems, nor outside the Diaverum network unless there is a valid purpose and legal basis to do so.

Relationships with Suppliers /Third Parties

Open competition is an elementary component of the free-market systems, as it promotes efficiency, economic development and innovation. We respect all competitors regardless of size, products or competence. We do not engage in price fixing or illegal attempts to coordinate market influence among competitors. We do not disseminate false information about our competitors' products or services, or attempt to undertake any other unfair means to gain a competitive advantage.

Procurement of Goods and Services

All purchase procedures must be processed through the procurement department. We purchase all supplies and requirements on the basis of price, quality and service. All suppliers are dealt with fairly, honestly and openly.

Gifts or Gratuities

We do not give or accept any gifts that might appear to improperly influence a business relationship or decision. We faithfully abide by the laws which regulate our business relationship with public officials.

Trademarks

All Diaverum trademarks – words, names, symbols or devices – are used to identify and distinguish the Company's services. We acknowledge and properly use these trademarks globally.

Company Property and Information

All equipment and digital assets supplied by the Company to achieve its business goals are used solely for this purpose. The use of all communication tools within the Company's network is for business purposes only, unless otherwise stated by Management. The unintentional disclosure of proprietary information can be as harmful as intentional disclosure. We do not disclose proprietary or confidential information to anyone outside the Company.

Policies and Procedures

As part of this Code of Conduct the Company has adopted, and will over time adopt, policies that all Diaverum employees are obligated to follow. These policies set out in detail the guidelines and rules within the scope of each policy. The current list of policies relevant to this Code of Conduct can be found on our internal web site.

Workplace Conduct

Privacy and Dignity

Diaverum recognises the importance of protecting the privacy of our patients and co-workers. As such, all personal data is treated as confidential when collected and stored. Diaverum aims to reduce the risk of violations and ensure that all personal data is maintained and processed in a lawful, fair and transparent way, as well as to ensure governance and accountability to facilitate data protection compliance.

Communication

We adapt our verbal and non-verbal communication to be sensitive to individual needs. We exchange clear information between staff and patients. We present ourselves, we remember names and we give clear and correct information. Clinical personnel always respond to patients' questions accurately and promptly, and work with other Diaverum employees, such as medical directors and attending physicians, to ensure that patients are fully informed.

Respect

We show respect in all contacts with patients and employees, recognising diversity and difference, and valuing the individual.

Workplace

Diaverum seeks to attract and retain the most qualified employees. All employees are treated with respect and dignity and are given the opportunity for further development. Diaverum does not tolerate any form of workplace violence or forced, compulsory or child labour. Freedom of association and the right to engage in or refrain from collective bargaining and agreements are respected as contemplated by applicable laws.

Equality of Opportunity

Diaverum strives to promote diversity and does not engage in or support discrimination in hiring, compensation, access to training, promotion, or termination based on ethnic or national origin, caste, religion, age, gender and sexual orientation, physical disability, union affiliation or political opinion. Diaverum does not discriminate against employees or applicants on the basis of race, colour, religion, national origin, disability, age, gender or sexual orientation.



Health and Safety

The safety of our patients and employees is key for Diaverum. We adhere to the standards set by national, federal, state and local regulations, our policies and procedures, and Company policies regarding the quality of clinical care. Diaverum is committed to providing a safe and healthy working environment for all employees. Continued efforts are made to prevent accidents and injury to health.

Security

Maintaining security is a shared responsibility between employees and the Company.

Substance Abuse

The unlawful manufacture, distribution, dispensation, possession, sale or use of a controlled drug substance – including alcohol – while on Company property and/or while conducting Company business is prohibited.

Violence in the Workplace

The Company will not tolerate any form of violence, threat of violence, or intimidation in the workplace. The Company does not permit any form of firearm or weapon to be carried or maintained on Company property.

Work-related Charges, Indictments or Convictions

When and if we find ourselves personally charged with a work-related criminal offence, we report these matters to the Responsible Person.

Human Rights

Diaverum supports and respects the protection of internationally proclaimed human rights and ensures that it is not involved in human rights abuses.

Political Involvement

Any political involvement has to be in compliance with all applicable laws and business standards. Diaverum limits its political involvement to issues directly related to its business.

Diaverum states political neutrality with regard to political issues, political parties and representatives. The Diaverum name and assets cannot be used to promote political issues.

Reporting Violations: SpeakUP!

Communication is essential, and it is important that employees feel comfortable raising questions and concerns. We call this the right and ability to “SpeakUP!”. The ability to SpeakUP! provides the means for submitting or reporting suspicions of misconduct, that is, actions not in line with the applicable law or Diaverum’s values and policies, that may harm individuals or our company.

Reporting mechanism

Diaverum encourages reporting of violations or suspected violations through the Diaverum online SpeakUP! portal, which can be accessed via our internal website and is available in all languages spoken across the Group. Other ways of reporting are of course allowed, for example talking directly to a manager or any other individual within the organization that the reporter is comfortable speaking to.

Confidentiality and non-retaliation

The Diaverum SpeakUP! portal offers full anonymity to any employee that decides to report violations. All reporters, who act in good faith, are protected. They are at no risk of losing their employment or suffering any undue consequences when they SpeakUP!.

Investigation and disciplinary action

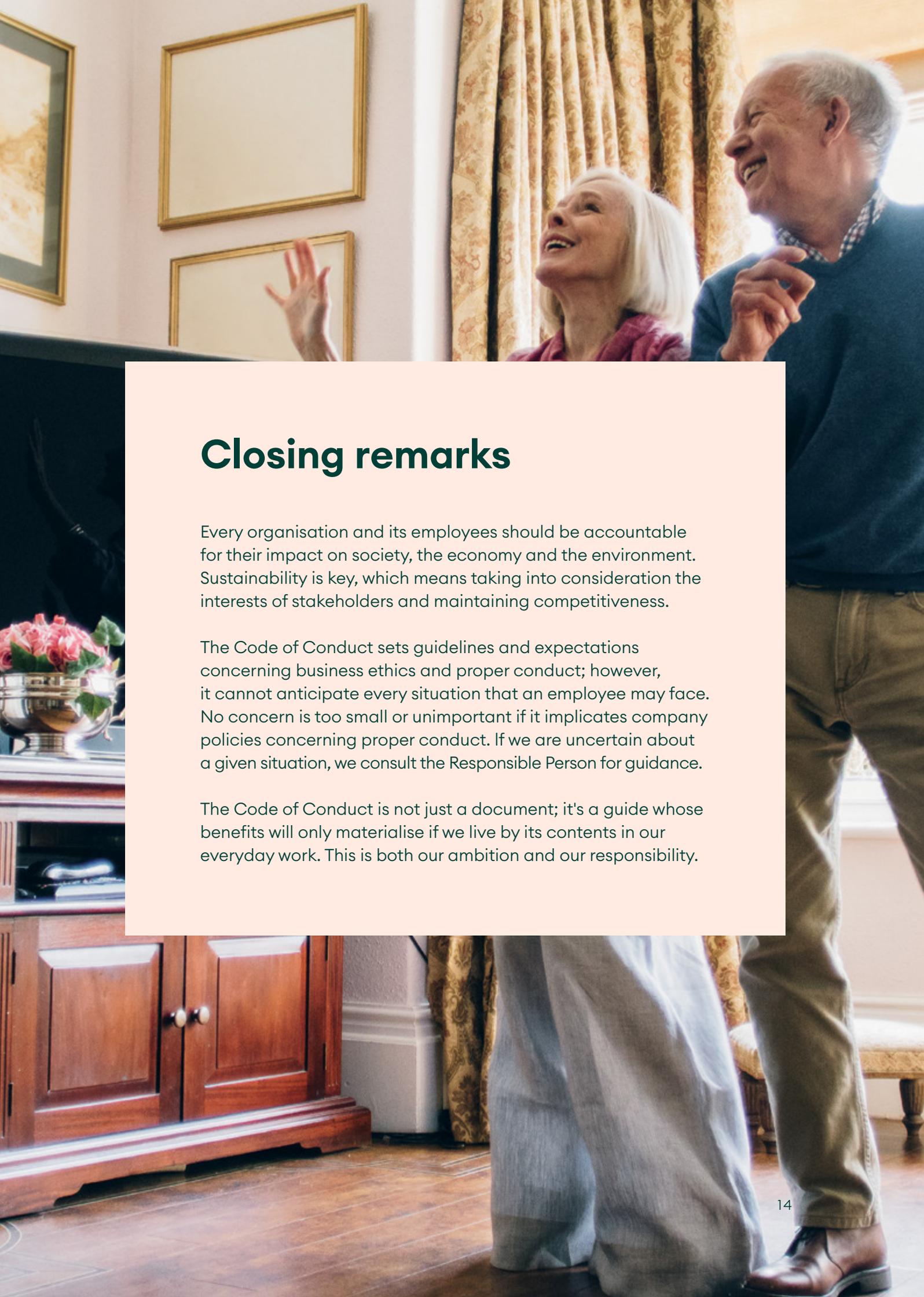
Diaverum will record, assess and investigate all Speak UP! reports in accordance with firm internal policies and procedures that are aligned with applicable legislation. Violation of any corporate compliance policies, failure to report a violation, retaliation against

an employee who in good faith reports a violation, or failure to comply with the Code of Conduct, will result in appropriate disciplinary action. An employee under investigation, if appropriate, may be removed from his/her current work activity.

Governmental investigations

An investigation by a government agency may result in requesting the production of records. All requests, either oral or written, for access to Company files or for other information of any nature should be referred immediately to the Responsible Person who will seek appropriate legal and other advice and assistance.



An elderly couple is shown in a well-lit room, laughing and looking upwards. The woman has short white hair and is wearing a pink top, while the man has white hair and is wearing a blue sweater over a checkered shirt. They are standing in front of a window with patterned curtains. On the wall behind them are several framed pictures. To the left, a wooden cabinet holds a vase of pink roses. The floor is made of polished wood.

Closing remarks

Every organisation and its employees should be accountable for their impact on society, the economy and the environment. Sustainability is key, which means taking into consideration the interests of stakeholders and maintaining competitiveness.

The Code of Conduct sets guidelines and expectations concerning business ethics and proper conduct; however, it cannot anticipate every situation that an employee may face. No concern is too small or unimportant if it implicates company policies concerning proper conduct. If we are uncertain about a given situation, we consult the Responsible Person for guidance.

The Code of Conduct is not just a document; it's a guide whose benefits will only materialise if we live by its contents in our everyday work. This is both our ambition and our responsibility.



Diaverum provides life-enhancing renal care to patients with Chronic Kidney Disease (CKD), enabling them to live fulfilling lives. Diaverum is a leading global provider in renal care services; we help some 40,000 patients with 6.2 million treatments annually. Our vision is to transform renal care, to deliver the highest quality of care for patients and reduce total cost of care for payers. Our focus is haemodialysis, but we offer a portfolio of treatments ranging from preventive care, peritoneal dialysis and home care to coordination of patients' comorbidities, transplantation services and holiday dialysis. Diaverum employs around 14,000 people and operates 452 clinics in 24 countries globally. Diaverum has its head office in Malmö, Sweden.

Diaverum AB
Hyllie Boulevard 53
SE-215 37 Malmö
+46 46 287 30 00
info@diaverum.com
www.diaverum.com