

Modern Slavery Act Statement – Diaverum AB

Diaverum AB (“**Diaverum**”) together with its subsidiaries (“**Diaverum Group**”) operates a global renal care business, providing services to approximately 40,000 patients at around 450 clinics, across 24 countries. Our work is driven by our core values: competent in delivering the highest medical quality and excellent education for staff and patients, inspiring to improve the healthcare system and passion to serve our patients.

At Diaverum, we seek to ensure that our business is conducted morally, ethically, in a socially responsible way, and in compliance with all applicable laws and regulations. Acting responsibly is part of our True care culture and underlies the code of conduct (the “**Diaverum Code of Conduct**”, [available here](#)) for Diaverum employees and contractors who provide services on a permanent basis and in a manner comparable to an employee (in this statement, such employees and contractors are jointly referred to as “**Diaverum Personnel**”).

We set out below the steps taken by Diaverum to ensure that there is no modern slavery and human trafficking in our business and supply chains. This statement is made pursuant to section 54(1) of the (UK) Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Diaverum for the financial year ending 31 December 2023.

Our structure, our business and our supply chains

Diaverum’s head office is located in Sweden and the principal activity of Diaverum AB is the provision of renal dialysis services.

Diaverum AB is a direct and/or indirect shareholder in Diaverum companies operating in the EMEA region (Albania, France, Germany, Greece, Italy, Portugal, Spain, Sweden, the UK, Hungary, Lithuania, North Macedonia, Poland, Romania, Saudi Arabia and Morocco), Latin America (Brazil, Chile and Uruguay) and the Asia Pacific Countries (Singapore, Malaysia, China, Kazakhstan and Russia). In the UK, Diaverum UK Limited operates 27 fully managed clinics and 9 facility managed clinics, and is based in St Albans, Hertfordshire. Diaverum UK is owned by Diaverum Holding UK Ltd, which is owned by Diaverum AB.

Our senior management is actively involved in promoting a compliant and ethical business. Via the Group Compliance function, the executive team of the Diaverum Group drives and monitors compliance initiatives and oversees compliance-related developments.

Diaverum’s average number of staff (including contractors) as of 31 December 2023 was approximately 13,000 worldwide, with around 780 employees in the UK. Our workforce consists of nationals from 24 countries, with a majority from Romania, Saudi Arabia, Spain, Poland and France.

Diaverum sources key products for performing dialysis treatments from selected international companies such as Baxter, Nipro and B. Braun. Diaverum also has corporate agreements or price agreements with some companies for specific



products such as on/off kits and dialysis chairs and beds.

Diaverum has information of the manufacturing country of origin of the products from our main suppliers. For the few products produced in countries with higher potential risk (India, Indonesia and Thailand) we have in some cases done on-site visits, see the Risk Assessment and Management Section below.

Policies and procedures

The Diaverum Code of Conduct sets out Diaverum's commitment to creating a fair, safe and healthy working environment. Diaverum respects the protection of human rights and does not tolerate workplace violence or forced, compulsory or child labor. We strive to promote diversity and do not discriminate based on ethnic or national origin, caste, religion, sex, age, sexual orientation, physical disability, union affiliation or political opinion. We do not discriminate against Diaverum Personnel or applicants on the basis of race, colour, religion, national origin, disability, gender, age or sexual orientation.

All Diaverum Personnel must follow the Diaverum Code of Conduct. In addition to complying with the high ethical standards as specified in Diaverum's Code of Conduct, Diaverum Personnel must act ethically according to the rules, regulations and customs of the country in which they work.

The Diaverum Code of Conduct encourages reporting and self-reporting of a violation or a potential violation of the Code of Conduct or any applicable law and regulation. Under no circumstances will a reporter be subject to any disciplinary or retaliatory action.

The head of each subsidiary or functional entity of the Diaverum Group has primary responsibility for the implementation of the Diaverum Code of Conduct. Where a misconduct or a potential violation is reported, Group Compliance conducts a preliminary investigation. Violation of any corporate compliance policies, failure to report a violation, retaliation against any Diaverum Personnel who in good faith reports a violation, or failure to comply with the Diaverum Code of Conduct will result in appropriate disciplinary action.

Diaverum encourages reporting of compliance and other violations or such suspected violations via our online whistleblowing portal – the Diaverum SpeakUP! portal – which can be accessed through our internal website and is available in all languages spoken across the Group. All employee rights and Diaverum's obligations related to whistleblowing are governed and safeguarded by our SpeakUP! policy. This policy applies to all Diaverum Personnel and fulfils the requirements of the EU Whistleblowing Directive. Diaverum's SpeakUP! policy aims at promoting open communication and making Diaverum Personnel comfortable raising concerns. Diaverum's CEO and executive team are responsible for the policy and to ensure that serious allegations are dealt with accordingly. They are also responsible for periodically reviewing the policy's effectiveness. The Group Compliance function oversees the day-to-day application of the SpeakUP! policy, and resolves incidents brought to its attention – either via the SpeakUP! portal or otherwise – ensuring that adequate remedial measures are taken. These procedures are defined by the SpeakUP! policy and the Compliance Investigations policy. The Human Resources Department executes any necessary employment sanctions imposed.

Diaverum Personnel are able to access all relevant policies and procedures electronically in, among other languages, English. As part of its global annual compliance update, Diaverum is reviewing its implementation and translation/communication of policies. Important policies that have been implemented and communicated to the Diaverum Personnel include (without limitation): (i) Diaverum Code of Conduct; (ii) Anti Money Laundering and Anti-Corruption policy; (iii) Third Party Integrity Management policy; (iv) Gifts policy; (v) Event Management & Sponsoring policy; (vi) SpeakUP! Policy and (vii) Conflicts of Interest policy.

Due diligence

Diaverum has an established supplier code of conduct (the “Diaverum Supplier Code of Conduct”, available [here](#)), setting out its supplier evaluation process. Diaverum applies The Diaverum Supplier Code of Conduct to all its supplier relationships and the most important suppliers have explicitly signed it.

The Supplier Code of Conduct is based on international standards such as the Universal Declaration on Human Rights, the Core Conventions of the International Labour Organisation, the OECD Guidelines for Multinational Enterprises and the 10 principles of the UN Global Compact. It stipulates the minimum requirements that Diaverum's suppliers shall respect and meet within their own operations and within their supply chain. The Diaverum Supplier Code of Conduct covers the following topics: (i) compliance with legal requirements, (ii) regular and voluntary employment, (iii) freedom of association and right to collective bargaining, (iv) fair and equal treatment of employees, (v) fair remuneration and benefits, (vi) decent working hours, (vii) safe and healthy workplace, (viii) no child labour, (ix) sanctions and export controls, (x) bribery and corruption not allowed, (xi) caring for the environment and (xii) implementation and monitoring.

Risk assessment and management

Diaverum has carried out a risk assessment and believes that there is a low risk of slavery or human trafficking in its supply chains, including the manufacturing entities that produce products sourced by Diaverum. The company interacts with large international suppliers that publish sustainability and other reports on a regular basis and follow relevant industry standards. All of our major suppliers have systems in place to follow corporate social governance and most of their production sites are located in low risk areas such as the EU, Japan and/or the US. In exceptional cases where higher risk countries are involved, site visits have been conducted. Pursuant to our review of major suppliers, we have confirmed that the risk of slavery or human trafficking at these companies is low.

Diaverum has also carried out a group-wide global assessment project of the main risks and implementation of remedial measures at Diaverum, as a result of which its compliance systems and monitoring tools have been developed.

Training

As part of the global Diaverum training platform d.ACADEMY, Diaverum has

developed a mandatory Code of Conduct and a compliance e-learning program for all Diaverum Personnel, the participation rate of which is monitored globally. To date, almost all of the corporate Diaverum Personnel and the top management and at least 50% of clinic management of the Diaverum companies have completed the Code of Conduct and compliance e-learning program. Diaverum has translated the program into local languages for Diaverum Personnel below the top management level.

Further Steps

The majority of Diaverum's major and material suppliers are long-term (more than one year). In 2023, we initiated the development of a standardized questionnaire to review our approved suppliers on an annual basis. This questionnaire will assess various aspects, including compliance with the Diaverum Code of Conduct for Suppliers, certification under relevant industry standards, procurement, quality, and sustainability (including environmental impact and ethics). Based on the responses received, suppliers will be assigned a performance score. The full implementation of this questionnaire is expected by 2025.

Our major suppliers publish sustainability reports including on corporate social governance, describing the work they do and the standards they aspire to meet. These reports will be taken into account during our review process. Based on input from the local Diaverum offices and desktop research, the overall *performance score* will be used to inform our decision on whether the supplier is still approved or if further actions are needed. In some of Diaverum's contractual relationships, if a supplier is unwilling or unable to carry out corrective actions pursuant to the Code of Conduct for Suppliers, Diaverum retains the right to terminate the business relationship and any contract(s) with the supplier immediately.

Diaverum has an internal audit function to, among other things, support the compliance program, and continuously to monitor the application of its policies, procedures and relationships with third parties to ensure ongoing compliance. As part of its ongoing compliance monitoring, Diaverum conducts regular reviews of the content of the key policies and reflect on whether the policies require adaptation in the countries in which Diaverum operates, and if so, considers the legal implementation requirements in each country to ensure that the policies are fully enforceable.

This Modern Slavery Act Statement has been approved by the Board of Directors of Diaverum AB on 4 July 2024.

Dimitris Moulavasilis
Chairman of the Board of Directors, Diaverum