

Publicly accessible RULES of PROCEDURE for the complaint procedure of Gambro Dialysatoren GmbH for information pursuant to § 8 of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – “LkSG”)

Preface

Baxter Healthcare Corporation (hereinafter referred to as "Baxter"), headquartered in Deerfield, USA, is the parent company of Gambro Dialysatoren GmbH, which is obliged to implement the corporate due diligence obligations regulated in the LkSG. Baxter operates the complaint procedure, which allows employees and third parties to submit information regarding suspected corporate misconduct or misconduct in the workplace relating to Baxter and all companies in its group, including Gambro Dialysatoren GmbH. The scope of the complaint procedure allows any interested or affected party to report complaints about **human rights and environmental risks** in the supply chain and **violations of human rights and environmental obligations, in addition to suspected cases relating to the company**. The purpose of the complaint procedure is to receive information about possible violations of laws, policies and/or ethical standards by Baxter or its suppliers and ensure its impartial investigation. The complaint procedure is administered by the investigations team of Baxter Ethics & Compliance Department (hereinafter referred to as “E&C Investigations”). This complaint procedure for Gambro Dialysatoren GmbH was adopted in accordance with Paragraph 8(2) of the LkSG.

1. Who can contact Baxter’s Ethics and Compliance Helpline?

Complaints can be made by anyone. The Ethics and Compliance Helpline (hereinafter referred to as the “Helpline”) is available to everyone, including Gambro and Baxter employees* as well as third parties. Third parties can access the Helpline via the German Baxter website under “Baxter Suppliers” and within this section under “Ethics and Compliance Standards” or via Baxter’s global website at the “Our Governance” page.

2. What complaints can you file?

All concerns that fall within the scope of the German Supply Chain Due Diligence Act (LkSG) and whose information serves to detect human rights and environmental risks as well as to clarify, minimize, and put an end to violations of human rights-related and environment-related obligations can and should be reported.

If you have any questions or concerns, or if you see actual or potential misconduct and/or violations of the law, please report them.

3. How can you contact the “Helpline”?

The Helpline can be contacted either via the website or by phone, both offering a choice of languages, including German. On the Helpline website under the heading “Report a Concern”, you will find the option of reporting online or by calling a toll-free telephone number (number listed on the webpage).

Submissions to the Supply Chain Due Diligence Act can be made in the reporting form under the heading “*Manufacturing / EHS / R&D / Regulatory / Quality*”.

4. What happens to the report?

When you submit a report to the Helpline online using the form, you will receive a unique investigation identifier (report key) and will be asked to choose a password to allow you to follow up with the investigation team and/or check the status of your report.

You will receive an acknowledgement of receipt within 24 hours.

When you dial the number listed on the Helpline website, you will be connected to a call center agent who speaks the language you have chosen. If no employee is available who speaks your preferred language, an interpreter can participate in the conversation. When submitting a report by phone, you will also receive a unique investigation identifier.

The report submitted in the Helpline will be forwarded to E&C Investigations, which is an independent group within our company and will be responsible for the initial triage of the report.

E&C Investigations will assess the complaint and will investigate the concerns or allegations, and to the extent necessary will involve subject matter experts from other departments to investigate or help investigate the issue(s), e.g., Procurement, Legal Quality or EHS departments. When involving anyone outside E&C Investigations in the investigation, this is always done in a manner that ensures the continued independence and impartiality of the investigation.

The duration of each investigation is affected by a combination of several factors, including: complexity of investigation-specific issues; the process and effectiveness of engaging with the reporter, especially anonymous reporters for whom no alternative channels of communication exist besides the Helpline platform; coordination among multiple functions involved in an investigation (e.g. E&C, Quality, Legal, EHS, HR, etc.); and time needed for confirmation of remediation activity.

Based on the outcome of the investigation, E&C Investigations and other stakeholders within the company will determine the measures to remediate any non-compliance with applicable regulations and/or Company policies and inform you of the outcome of the complaint process.

The processing time may vary depending on the investigation, but the aim is to process all reports and requests quickly. At any rate, you will receive a status update within three months.

You have the option of providing additional information about the facts of the case by entering your username and password, to make enquiries, to query the processing status, etc.

5. Do I have to fear retaliation if I make a report?

Baxter enforces a non-retaliatory environment, making it safe for employees and other stakeholders to raise ethics and compliance concerns in good faith. We do not tolerate retaliation against anyone who reports, in good faith, observed or suspected illegal or unethical behavior or violations.

6. Is the Helpline confidential and anonymous?

Yes, reports can be submitted anonymously. The Helpline system that we use through the third-party provider "Navex®" removes IP addresses to maintain anonymity.

The staff responsible for handling the reports must maintain confidentiality.

7. What is EthicsPoint®?

EthicsPoint® is the name of the Helpline platform from third-party provider "Navex®," which provides a comprehensive internet and phone-based reporting tool to help E&C Investigations and other Baxter stakeholders handle complaints and collaborate on their resolution in a secure and highly controlled manner.

8. Efficacy testing

The operational effectiveness of the complaint procedure is reviewed regularly (yearly).

9. Queries

If you have any questions, please contact us at lksg@baxter.com

* The masculine form is representative of people of any gender.