



COMPREHENSIVE COMPLIANCE PROGRAM

1. RATIONALE AND OBJECTIVE

CSL Vifor believes that society and our business are best served by responsible and ethical business behaviors and practices. Fundamental to this belief is the understanding that a business must operate in full compliance with all applicable laws, rules and regulations. As part of this commitment CSL Vifor has implemented a comprehensive compliance program in line industry standards.

2. KEY ELEMENTS OF THE COMPREHENSIVE COMPLIANCE PROGRAMME

CSL Vifor has implemented and maintains a compliance system which contains the following key elements:

- **Written policies and procedures**

A Code of Conduct and a comprehensive set of policies are foundational for our compliance with laws and regulations in all areas of activities. These documents ensure, among others, that no remunerations are being made with the intention to induce or reward the referral or recommendation of business payable in whole or in part by any health care program. Management is obliged to include the values and standards of the Code in its leadership activities.

- **Designated compliance officer and compliance committee**

The compliance program is owned by all CSL Vifor employees based on clear direction from the leadership team and overseen by the Compliance function led by the Head of Compliance who reports to the CSL's Chief Risk Officer.

- **Conducting effective training and education**

All employees received training on the Code of Conduct and have access to all the policies. The introduction of new policies and procedures is properly communicated to all employees and the employees are appropriately trained.

- **Effective lines of communication**

CSL Vifor maintains a compliance hotline and encourages all employees to report concerns or illegal activities in the workplace without threat of reprisal, intimidation, or harassment. Such reports are communicated to the employee's line manager, Human Resources, and/or the Legal Department, as appropriate. Suspected serious compliance violations must also be communicated.

- **Conducting internal monitoring and auditing**

Compliance with law, regulations and policies is monitored by the company. Periodic audits are conducted to confirm that the policies were implemented and communicated, and that the policies are being followed.

- **Enforcing standards through well-publicized disciplinary guidelines**

CSL Vifor will conduct a fair and diligent investigation of reported issues. Employees who are not acting in compliance with this program may receive oral warnings, suspension, termination, or other sanctions, as appropriate. Such measures are taken in line with applicable laws.

CSL Vifor

- **Prompt response after detection of problems and undertaking corrective action**

CSL Vifor investigates and takes corrective action if needed. Such actions may include improving policies and procedures, additional training for employees as well as disciplinary action.

3. LIMITS ON GIFTS OR INCENTIVES PROVIDED TO MEDICAL OR HEALTH PROFESSIONALS

CSL Vifor sets an annual limit of USD 3,500 for promotional materials, items of values, or activities that may be given or otherwise provided to an individual health care professional.

This limit does not include:

- drug samples given to healthcare professionals intended for free patient trial,
- financial support for continuing medical education forums,
- financial support for health educational scholarships, or
- payments made for legitimate professional services provided by a health care or medical professional, including, but not limited to, consulting, provided that the payment does not exceed the fair market value of the services rendered, and those payments are provided in a manner that conforms to laws and regulations.

CSL Vifor is committed not to provide gifts or entertainment to healthcare professionals or healthcare organizations.

4. DECLARATION OF COMPLIANCE

CSL Vifor declares, based on the knowledge as of July 2022, its compliance with this Compliance Program.

Copies of CSL Vifor Comprehensive Compliance Program and written declaration of compliance may be obtained by calling +1 650-421-9500.