

DOCUMENT # COMP-INTL-008		Doc. Type: Policy	Version: 5.0
TITLE: Anticorruption Policy			
DEPARTMENT: International Compliance (Team Quest) AUTHOR: Georgia Albert, International CCO DOCUMENT OWNER: International CCO APPROVED BY: Robert Lang, International President / CEO		Effective date: August 1, 2023 Review Date: August 1, 2026	
This policy applies to:			
(a) Teammates (including guest teammates and Contract Teammates) and directors of all business units and entities managed and/or operated by DaVita International (https://www.davita.com/international), a division within the DaVita group of entities			
(b) US-based Teammates who are not employed by business units and entities managed and/or operated by DaVita International, to the extent that they are performing tasks related to DaVita International business.			
(c) Any vendor working with DaVita (Third Party) , with respect to its work for DaVita .			

- 3.1.1. Active corruption is giving, offering, promising, or authorizing the giving of **Anything of Value** (even of small value) to anyone, including but not limited to **Government Employees or Officials**, with a corrupt intent, in order to obtain a business advantage for **DaVita**. Examples of a business advantage are the award of a tender, a contract with a payor, the approval of a license, the referral of patients, or a good result on a tax audit.
- 3.1.2. Passive corruption is asking for, accepting, or receiving **Anything of Value** (even of small value) from anyone in exchange for favouring them in their business with DaVita ñ for example, accepting money from a potential vendor in exchange for selecting that vendor instead of another, or accepting money from a patient in exchange for giving that patient a better shift.

3.2. Corruption may also be ñdirectñ or ñindirect.ñ Both are strictly prohibited.

- 3.2.1. Direct corruption is when **Anything of Value** (even of small value) is given, offered, promised, or authorized to be given directly to the ultimate recipient ñ for example, directly to a **Government Employee or Official** or **Referral Source** ñBT/F4 1[()]T&TQ

TITLE:

Insufficiently justified requests for amended contract terms;

Requests for fees, bonuses, and other payments tied to the success of particular transactions;

Requests for payments to be made to a different entity than the one performing the work, or in a different country;

Requests by a **Government Employee or Official** to use a particular **Third Party**, including a relative of the **Government Employee or Official**; or

Invoices that do not appear genuine: e.g., backdated, duplicate, or consecutively numbered invoices or round-dollar transactions.

5.4. All Teammates (including **Contract Teammates**) and **Third Parties** must cooperate with any compliance inquiry, audit, investigation, or other activity related to this or other