FRESENIUS MEDICAL CARE

METACOMPLIANCE GUIDANCE FOR EXTERNAL USERS

FME Business Partner
Compliance Trainings - 2020

Table of content

1) General introduction to the Business Partner Trainings

At Fresenius Medical Care, all business partner relationships are managed in accordance with a structured Third Party Management Lifecycle. The lifecycle warrants that business partners are selected, instructed and monitored in a way that mitigates compliance risks in the best possible way.

One of the relevant topics in the lifecycle are “Trainings”. Through them, Fresenius Medical Care educates its business partners about compliance basics, explains its compliance program, its values, and the expectations regarding ethical business practices.

These trainings will help business partners to act appropriately, to make the right choices, and to prevent misconduct that could lead to sanctions or reputational damage.

2) MetaCompliance Platform

FME uses a web-based, external e-learning tool to deliver compliance trainings to Business Partners. The tool enables proper assignment of contents, follow-ups, tracking and reporting.

The training tool is a product of MetaCompliance Limited, a UK-based training platform provider. For considerations of autonomy and data privacy, business partners self-manage the training activities of their organization in the Meta e-Learning platform **(“Meta Platform”)**.

3) Roles in MetaCompliance tool

FME Role	Role in MetaCompliance Platform	Task Description
Corporate Compliance Department	Administrator	Full control of the training platform and access to all functionalities 1) Create content in Meta Platform such as policies, trainings and Compliance Brochure. 2) Create User Management Admins
LCO/RCO	User Management Admin	Access to user management, user groups and permissions; no other admin rights 1) Create and manage Business User 2) Send registration e-mail 4) Target Permissions to Business Users (Assign Category and Group) 5) Assign the course (Business Partner Compliance Training) policies (Privacy notice & consent, Compliance Brochure for FME Business Partners)

Business Partner Admin User	Business User	Restricted/customized permissions that generally has less permissions than an (FME) User Management Admin; Business User can manage assigned user groups and categories within the platform. 1) Create Users. 2) Send registration e-mail 3) Read and confirm the Privacy Notice (and Consent) in their languages prior to starting the Business Partner Compliance Training 4) Perform and complete Business Partner Compliance Training 5) Read and confirm the Compliance Brochure for FME Business Partners.
Business Partner representatives/employees	User	General end user that has been added into the system for targeting only. 1) Read and confirm the Privacy Notice (and Consent) in their languages prior to starting the Business Partner Compliance Training. 2) Perform and complete Business Partner Compliance Training. 3) Read and confirm the Compliance Brochure for FME Business Partners.

Business Partner Admin Users are assigned the role of **Business Users**, therefore, are the designated contacts for Business Partner Compliance Training within the Business Partner.

Due to Data privacy requirements the platform structure has been configured to allow the Business Users to add Users to their assigned group (the Legal Entity name).

Please consider the following structure that should be reflected in the platform:

4) Business User View

a) Logging in

To access the Site, Business users must register via the Registration email sent to their assigned email address – this will be received from:

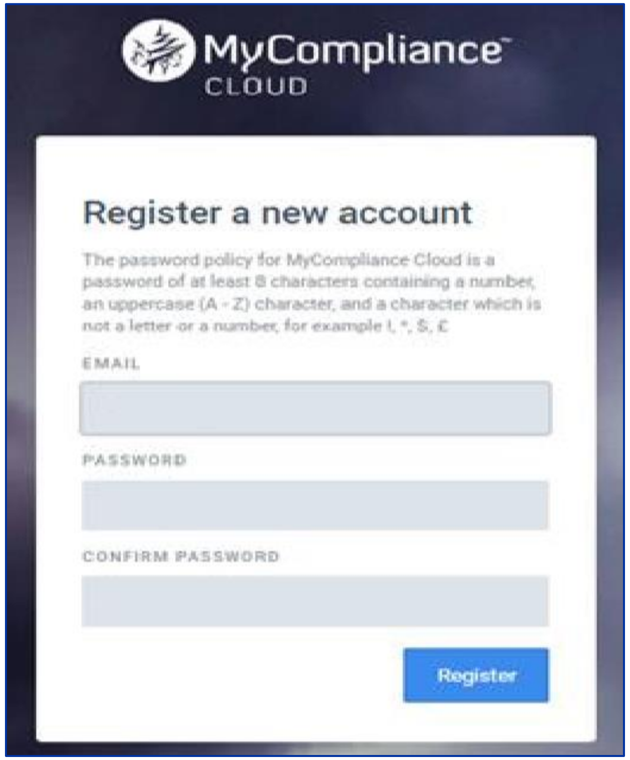
no-reply@metacompliance.com

Otherwise, to access the Cloud platform, navigate to **https://cloud.metacompliance.com**

Once you (the user) click on the "**Register**" button within the email you will then be taken to the Registration page on the Cloud site.

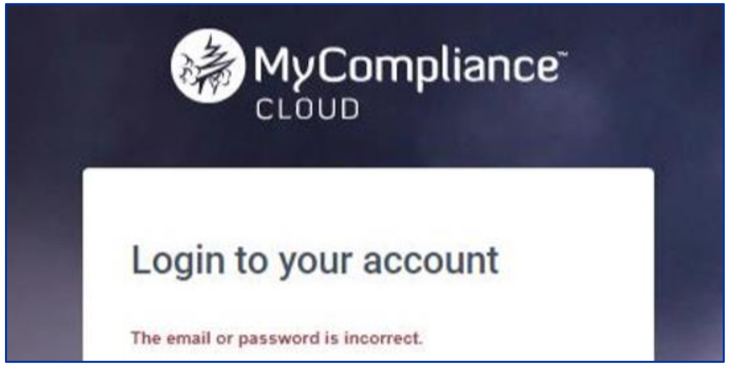
On this page you will need to assign a Password to their registered Email Address

Once an email and password have been registered, you will now be able to gain access to the Cloud portal.



Forgot Password

If you are attempting to log into the platform with an incorrect email address or password, the following message will appear:



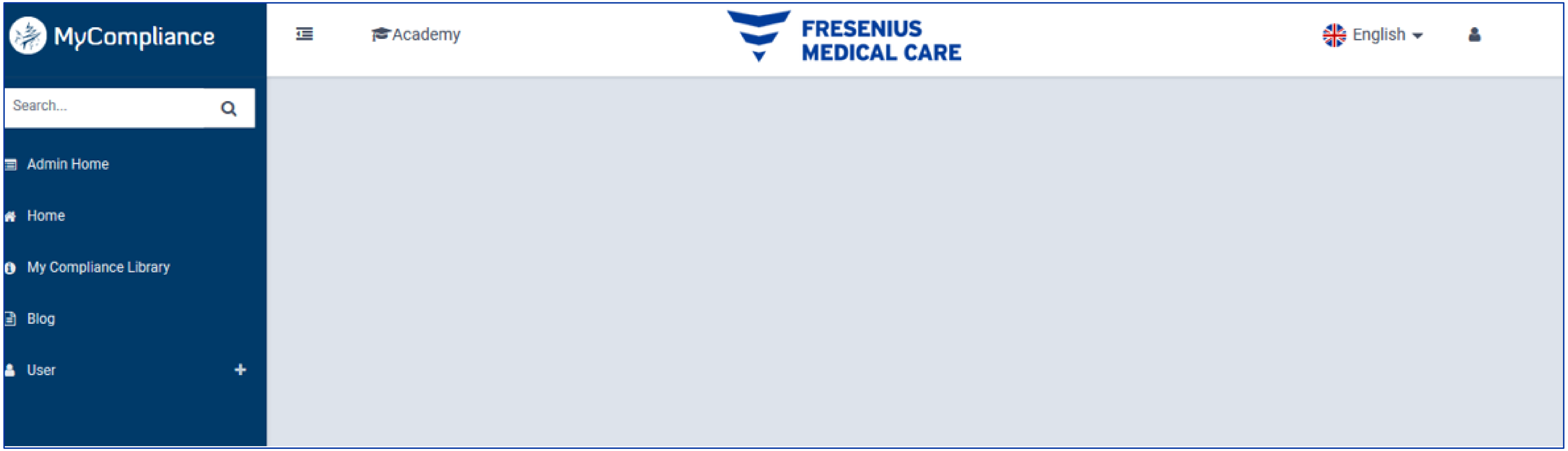
To reset a password, follow the below steps:

1. Navigate to the https://cloud.metacompliance.com Login page.
2. Click on the '**Forgot your Password?'** link.
3. This will then direct to the Reset Password page and prompt you to enter their email address.
4. This will then send a link to this email address provided it is a valid registered account.
5. Please check your inbox for an email from '**no-reply@metacompliance.com**' containing a unique '**Password Reset**' link.
6. Click on the '**here**' link within this email to be directed to the Reset Password page.
7. Once on the Reset Password page, you can then enter a new password.
8. Once the password has been successfully reset, you will now be able to log in with your new assigned password by clicking on the '**here**' link. This will take you to the login page.

b) Homepage

The Homepage is the first page that will display upon logging into the system. The Business User has the option of displaying the '**Admin Home**' view, or an end user '**Home**' view.

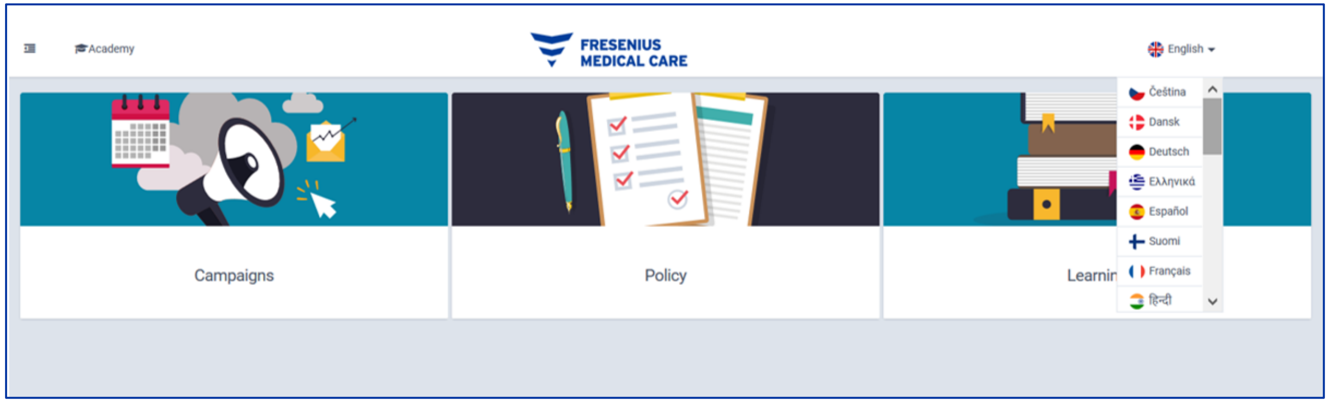
"**Admin Home**" will only appear for admin users.



“**Home**” is the homepage for all users.

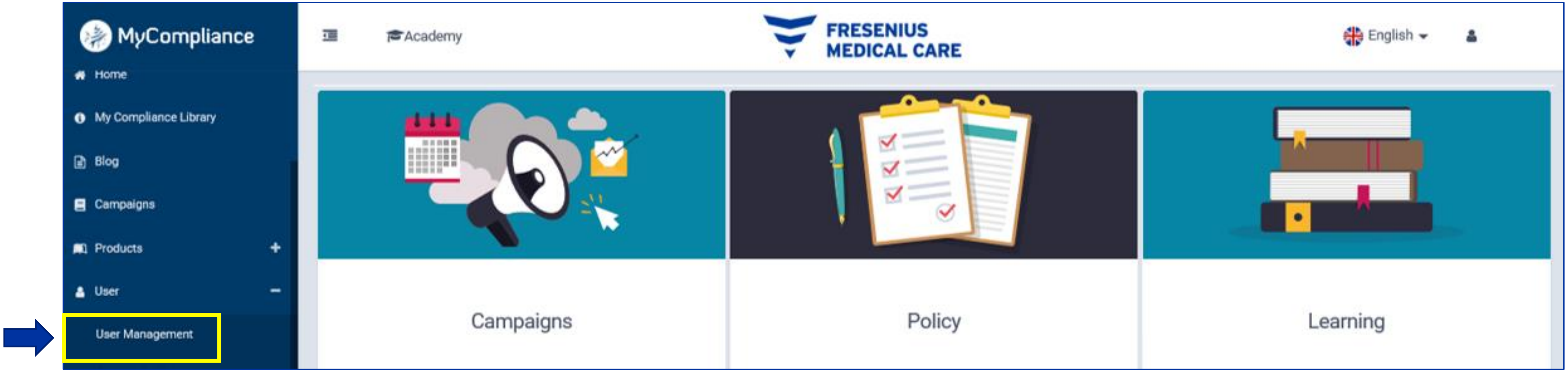
c) Site Translation

The site has a built-in translator which will translate the platform into the end user’s language of choice. It can be located on the home screen and can be implemented by simply selecting the desired language. There are 24 languages to choose from.

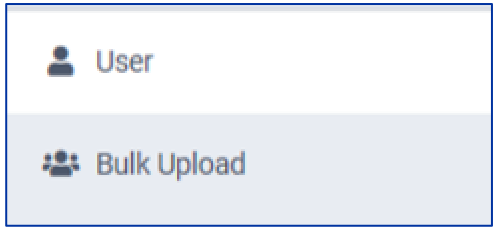


d) Create new Users

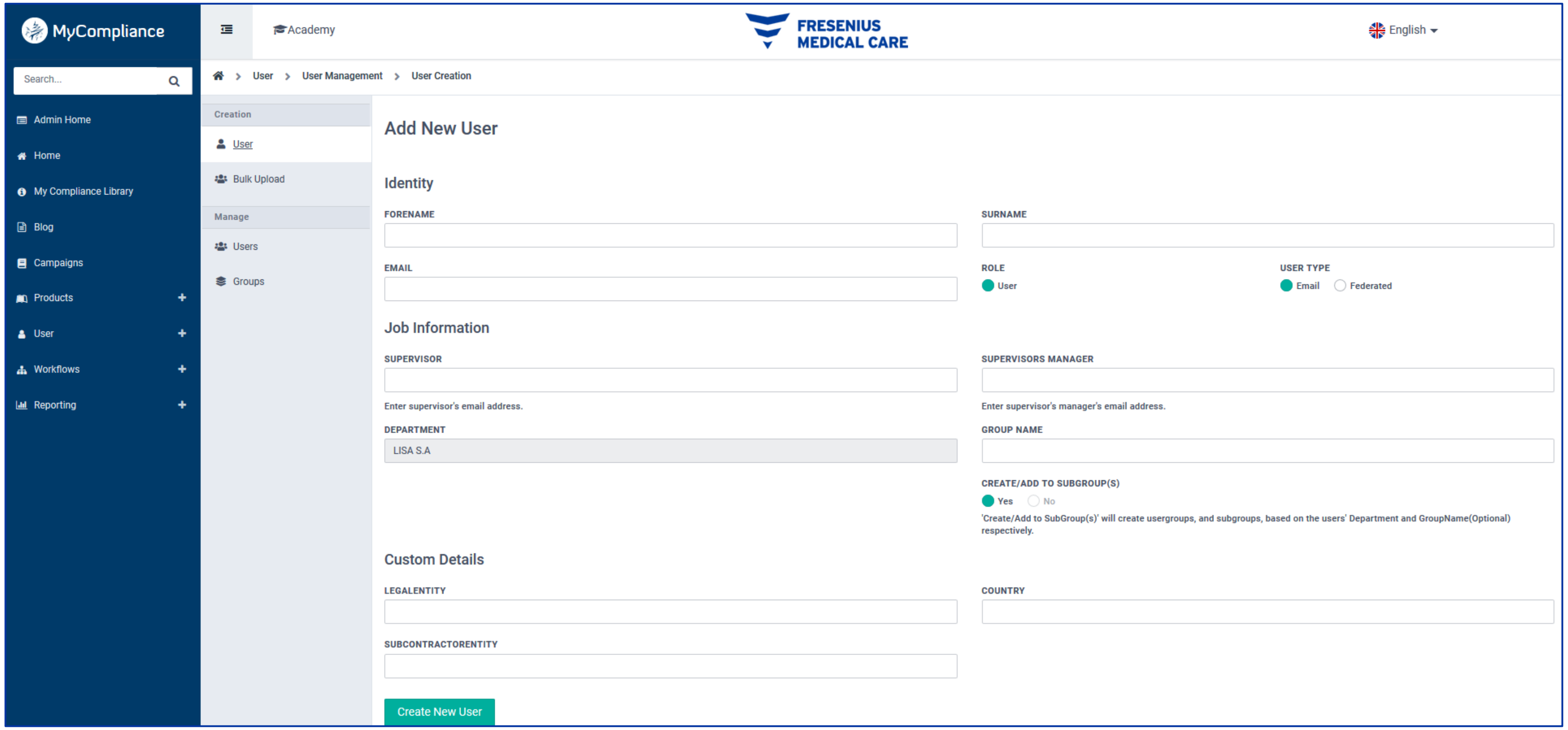
New users can be added to the Platform by navigating to **User > User Management**. This will open the "**Creation**" section of the User Management.



Once you click in the **User**, you can find two options to add new users in the platform: **User** (Individual upload) or **Bulk Upload** (Massive upload).



1) If you selected “**User**” (individual upload), the following screen will be shown to fill in the user’s details:



The user details which are to be filled in are listed below:

General Fields (“Identity”) - Mandatory

- **Forename** – please enter the employee’s first name
- **Surname** – please enter the employee’s surname
- **Email Address** – please enter the company e-mail address of the employee
- **Role** – please select “**User**”
- **User Type** – please always select the option “**Email**”
- **Department** – The legal entity name is already included by default; thus you should not take action on this field.
- **Create/add to subgroups** – please select “**yes**”

Additional Fields ("Job Information") - Optional

- **Supervisor** – this field is only optional
- **Supervisors Manager** – this field is only optional
- **Group Name** – this field is only optional

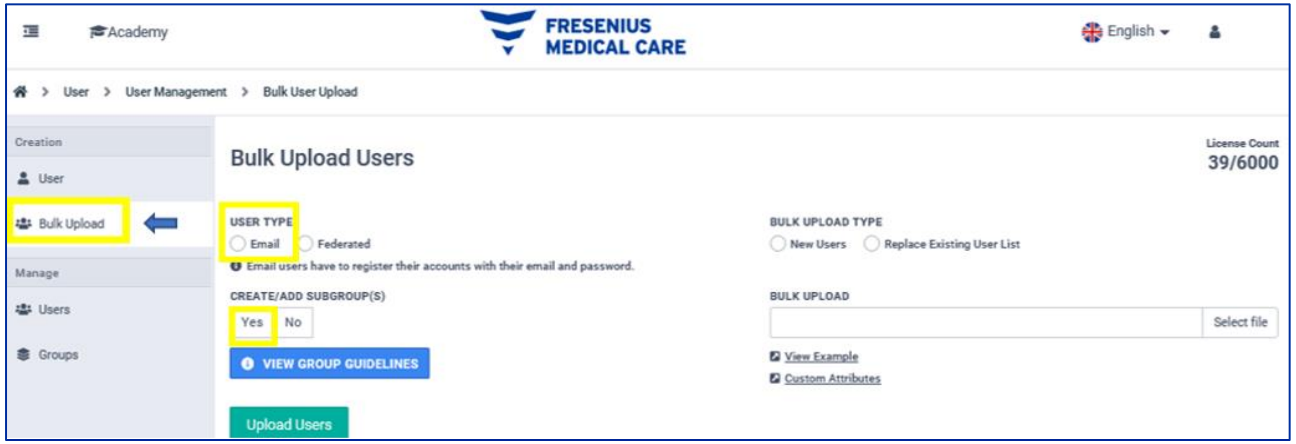
"Custom Details" - Mandatory

- **Legal Entity** – please enter the legal name of the Business Partner (please note that the Legal Name needs to match with the field "**Department**")
- **Country** – please enter the country where your Business Partner is based/ has the registered seat / Country where activity is performed.
- **Subcontractor** –Any individual or entity contracted by the Business Partner in order to fulfil a part of its engagement with FME.
- If you are not making use of any subcontractors, please enter "**Not applicable**"

Please note: If you do not include the mandatory fields properly, you cannot assign roles, policies and courses in the platform.

To finish this task, please click on "Create New User" to save.

2) In case you have several employees which you have to create, you can select "**Bulk Upload**". Ensure you select User Type as "**Email**" and Bulk Upload Type as "**New Users**". Choose "**Select File**" to locate the file and in "**Create/add subgroups**" select **YES**. The file must be uploaded as a CSV file or Excel file, required field headings can be seen in the example below.



There is an example of how the CSV file or Excel file should be prepared. Please pay close attention to the rows in the excel shown below, otherwise the user's creation will not be successful. Please remember that each box has a detailed explanation of how it should be filled in (point 1 - user creation)

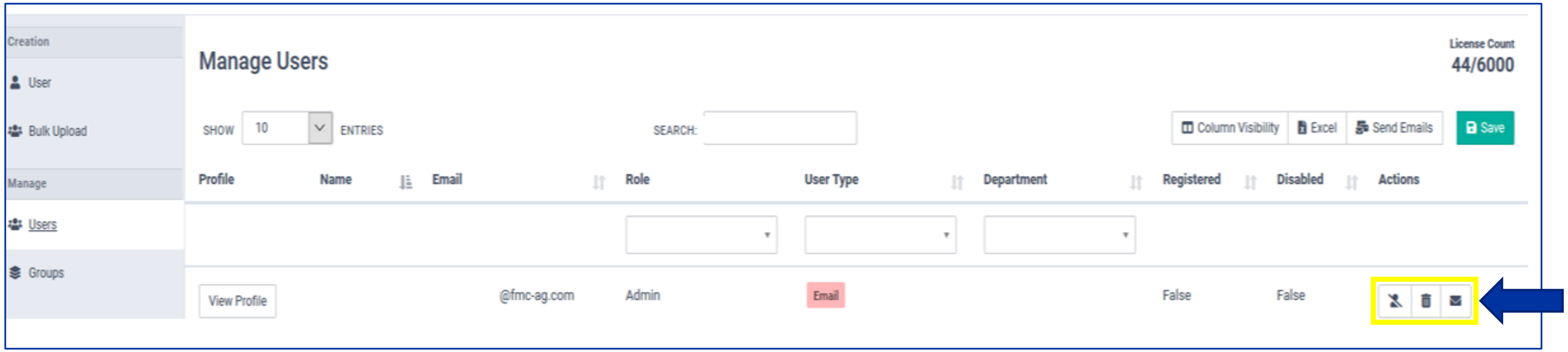
ALERT! We ask you to not use the template that is embedded in the MetaCompliance tool and only consider the template you can find in this guidance.

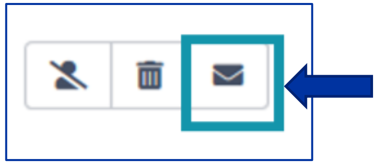
GroupName, SupervisorEmail, SupervisorManagerEmail, LegalEntity, SubcontractorEntity; should be in the excel file <u>without leaving any space</u>, as shown in the example below.

	A	B	C	D	E	F	G	H	I	J
1	**Forename**	**Surname**	**Email**	**Department**	**GroupName**	**SupervisorEmail**	**SupervisorsManagerEmail**	**LegalEntity**	**Country**	**SubcontractorEntity**
2	REQUIRED	REQUIRED	REQUIRED	REQUIRED	CAN BE LEFT BLANK	CAN BE LEFT BLANK	CAN BE LEFT BLANK	REQUIRED	REQUIRED	REQUIRED

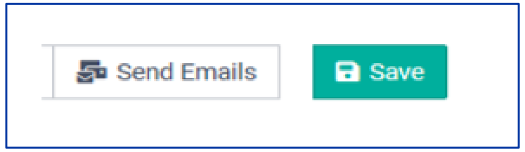
e) Sending Registration Emails

Individual registration email: Once a user has been added, you will need to send a registration email with a link to register their access. This can be sent by clicking on the **small Envelope icon** next to their account within the "**Actions**" column

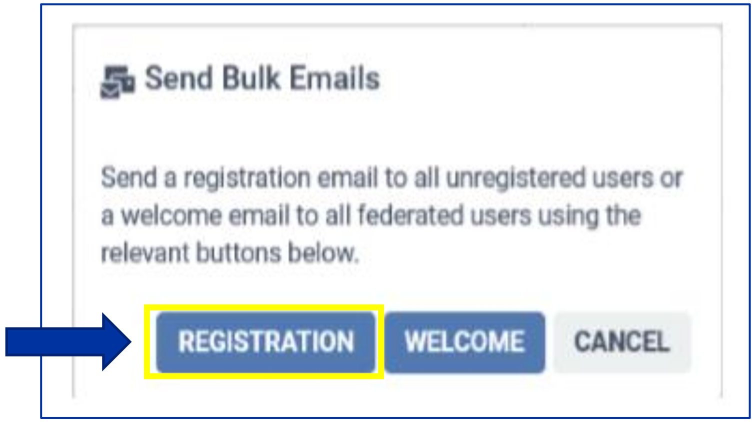




Send bulk registration email: In case you have several employees which you have to send registration emails. You can send registration emails to **all** unregistered users by selecting the **Send Emails button**.



You will be prompted if you want to send a registration email to unregistered email-based users or a Welcome. Please select only "**Registration**"



Finally, please go to the **User view guidance** to:

1. Read and confirm the Privacy Notice (and Consent) in their languages prior to starting the Business Partner Compliance Training.
2. Perform and complete Business Partner Compliance Training.
3. Read and confirm the Compliance Brochure for FME Business Partners, this document can be download for your perusal.

5) User View

a) Logging in

To access the Site, Business users must register via the Registration email sent to their assigned email address – this will be received from:

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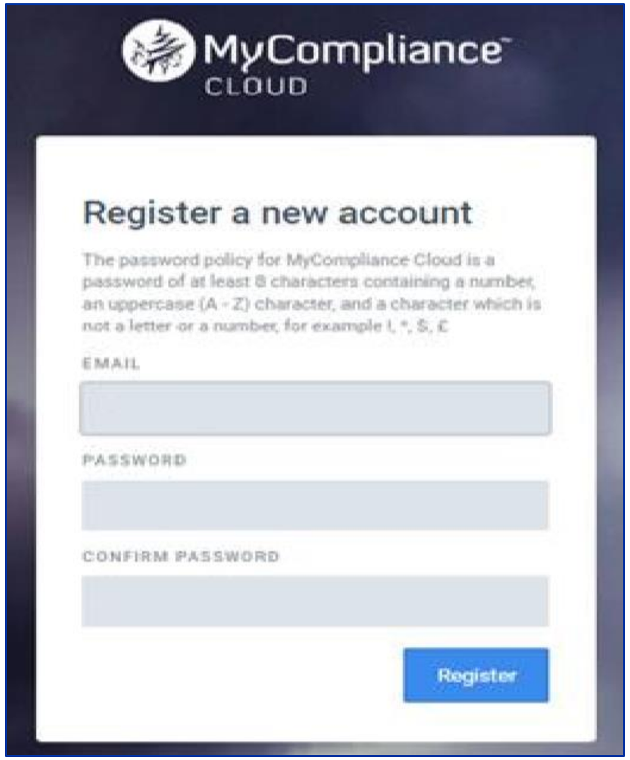

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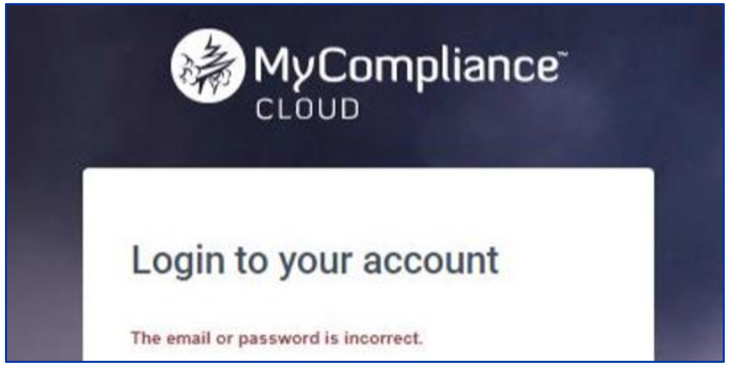

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2. Click on the '**Forgot your Password?'** link.
3. This will then direct to the Reset Password page and prompt you to enter their email address.
4. This will then send a link to this email address provided it is a valid registered account.
5. Please check your inbox for an email from '**no-reply@metacompliance.com**' containing a unique '**Password Reset**' link.
6. Click on the '**here**' link within this email to be directed to the Reset Password page.
7. Once on the Reset Password page, you can then enter a new password.
8. Once the password has been successfully reset, you will now be able to log in with your new assigned password by clicking on the '**here**' link. This will take you to the login page.

b) Notification Email

Once you have created your password and login, a notification email will come where it is mentioned that you have been assigned a policy and a course – this will be received from:

no-reply@metacompliance.com

FRESENIUS MEDICAL CARE

You have received the FME Business Partner Compliance Training.

You have a training to complete in MyCompliance Cloud.

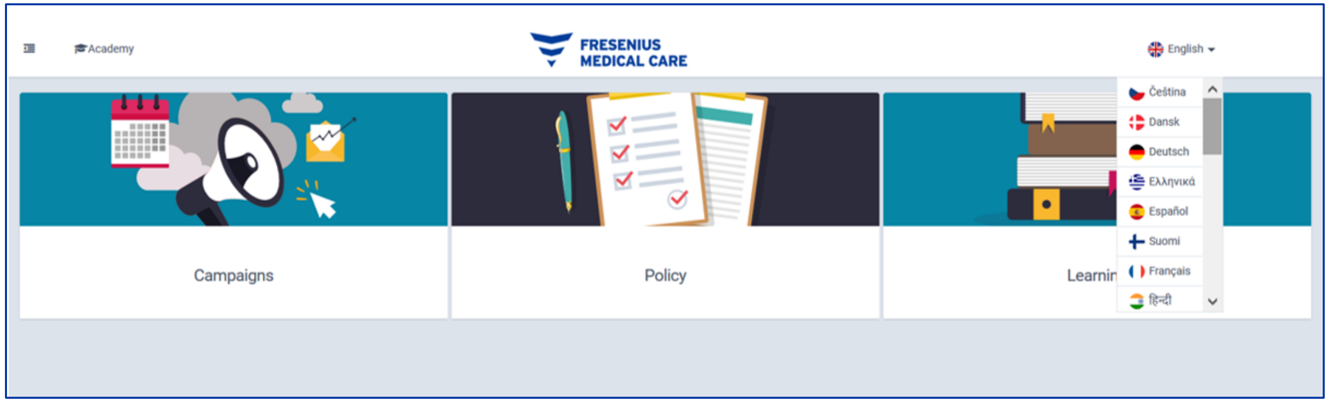
Please log into your MyCompliance Cloud Account to take training - Business Partner Compliance Training

c) Homepage

The Homepage is the first page that will display upon logging into the system.

d) Site Translation

The site has a built-in translator which will translate the platform into the end user’s language of choice. It can be located on the home screen and can be implemented by simply selecting the desired language. There are 24 languages to choose from.



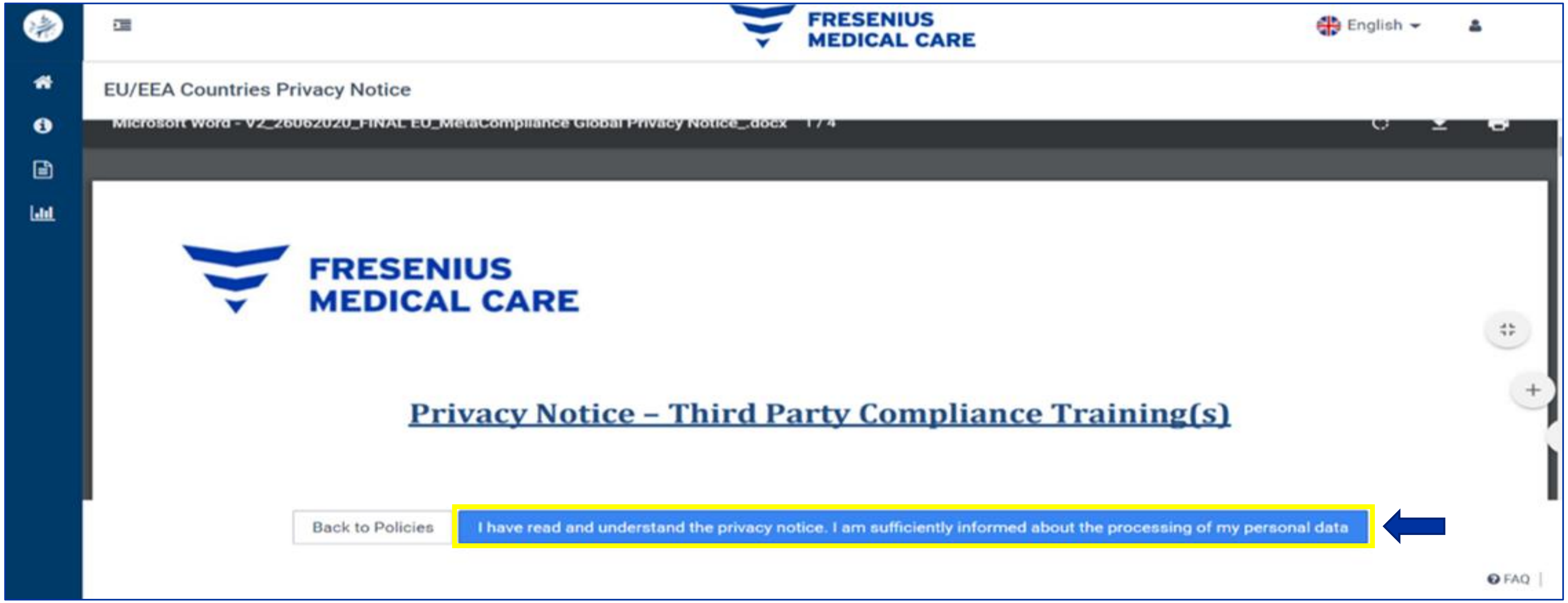
e) Privacy Notice (and Consent)

All Users must **read and confirm** the Privacy Notice (and Consent) in their languages **prior** to starting the Business Partner Compliance Training. A Privacy Notice (and Consent) for EU and ROW (rest of the world) countries will be included in our new training platform to ensure compliance with international data protection requirements.

Please click on Policies "**Active**", here you will find the pending policies for review and confirm.

Then the following screen will appear, please go to the **"Action" > "View Policy"** button.

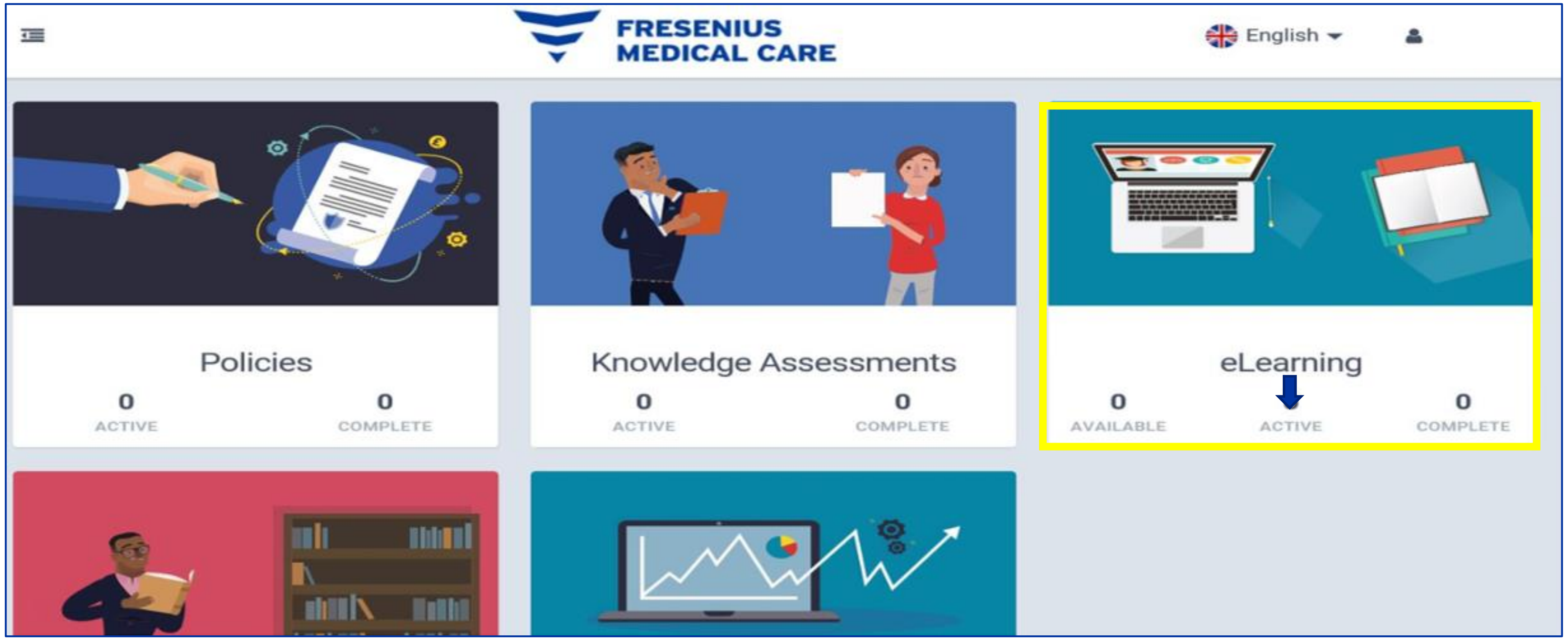
In this document you can choose the applicable language. Finally, you will have to click on the blue check box, on this way you read and confirm the Privacy Notice (and consent)



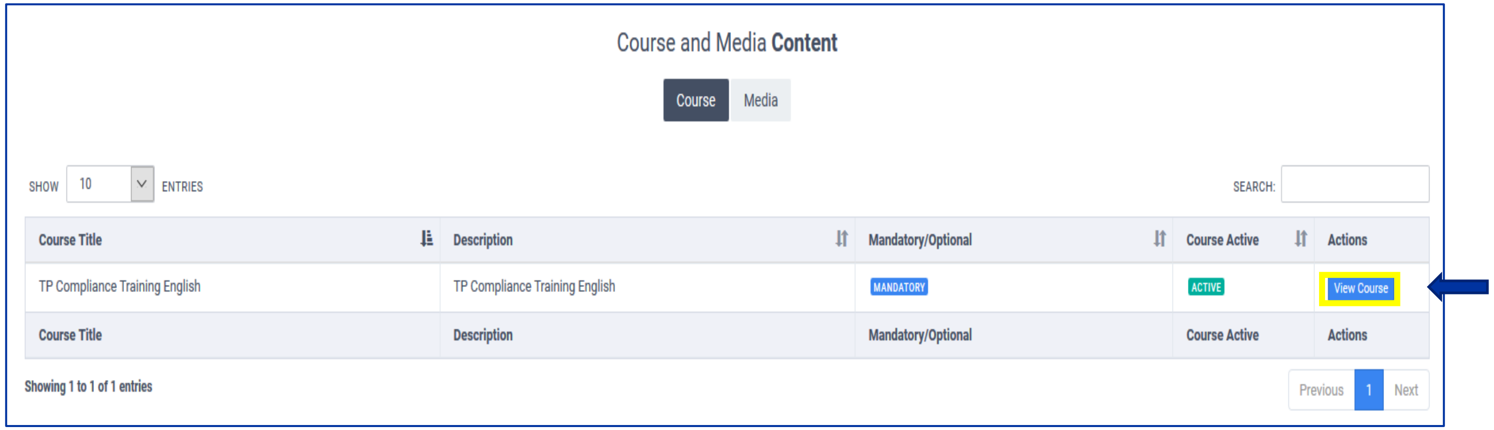
f) Business Partner Compliance Training

Users must perform Business Partner Compliance Training and answer the questionnaire which has been created at the end of the training.

Please click on eLearning "**Active**", here User will find the Business Partner Compliance Training that has been assigned to the Legal Entity.

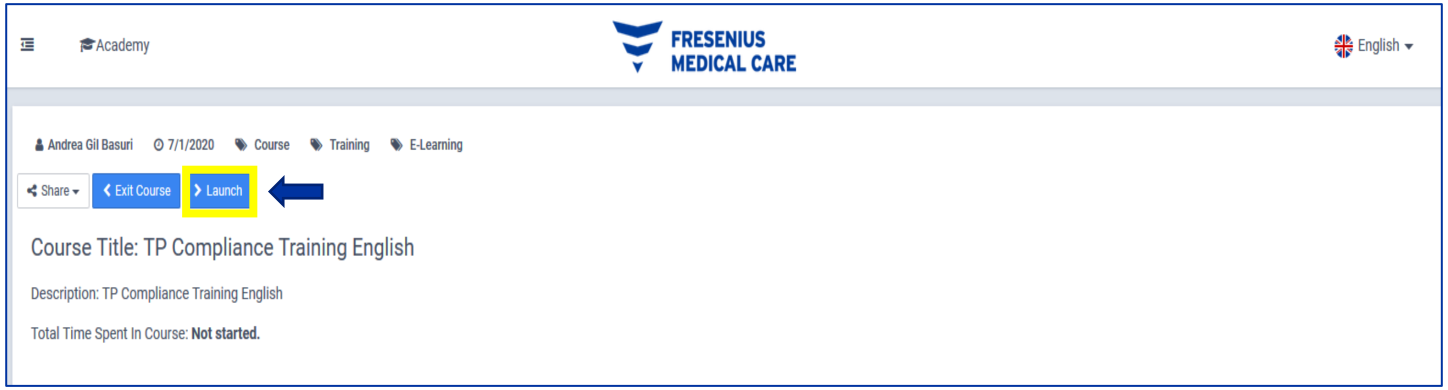


Then the following screen will appear, please go to the **"Action" > "View Course"** button.



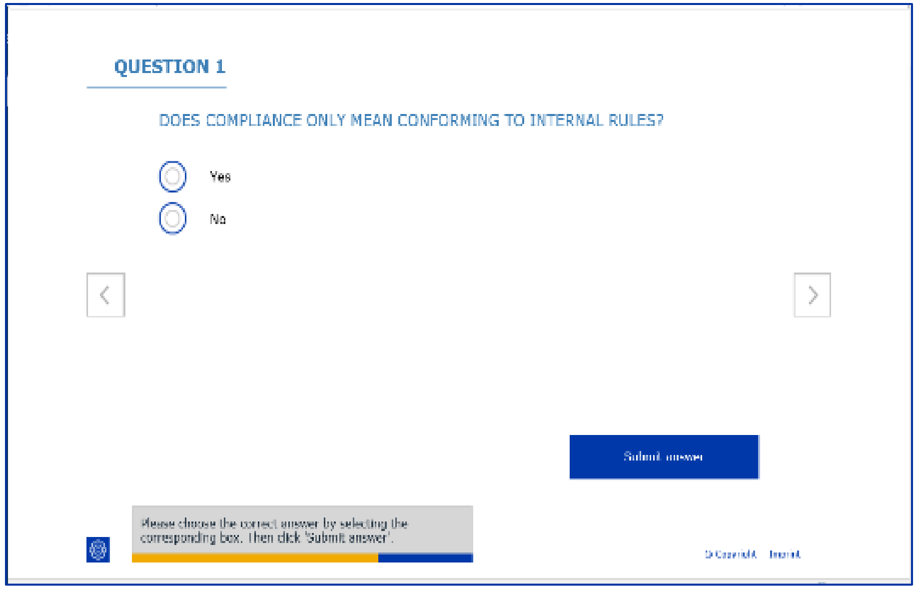
The following window will be displayed, and the user should click **OK**.

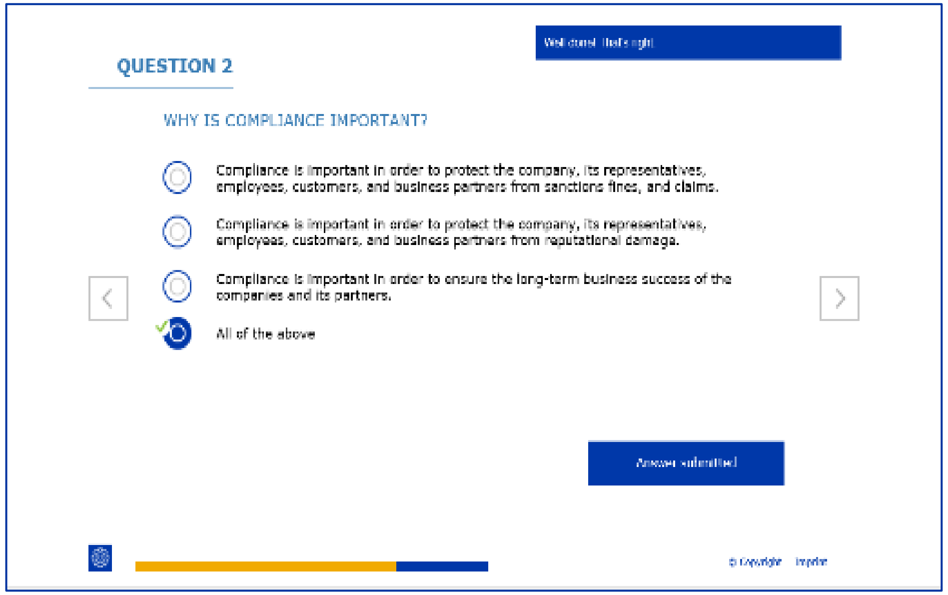
And click **"Launch"**. After that, the Training will start to run.



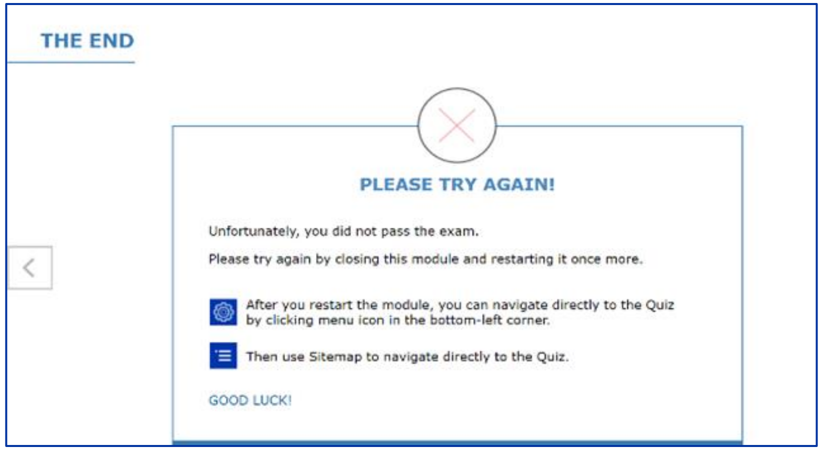
You should click through the content and perform the Business Partner Compliance Training.

At the end, you will find a **"Quiz"** with 12 questions to be answered. To pass the test and get a final Training certificate, you must answer correctly minimum 9 of 12 questions.

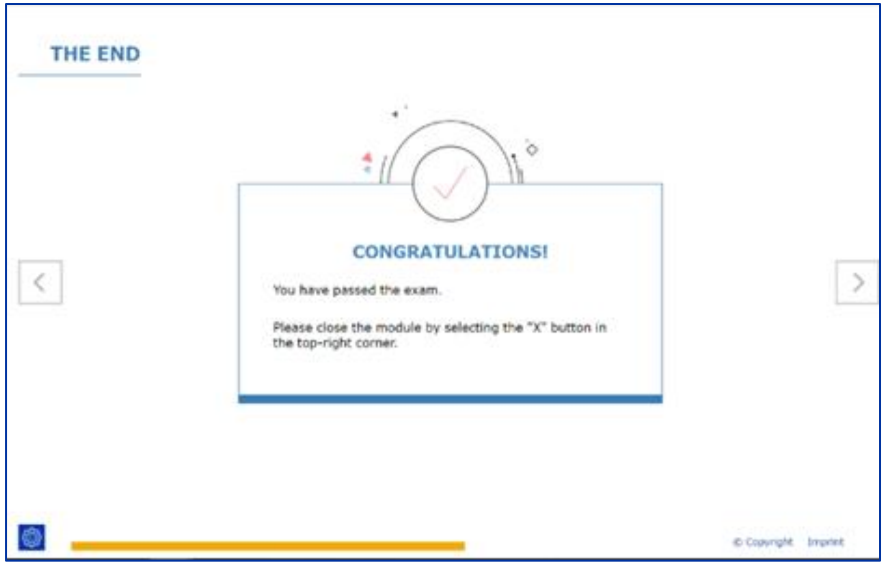




In case you fail the **“Quiz”**, you must try again the Business Partner Compliance Training.



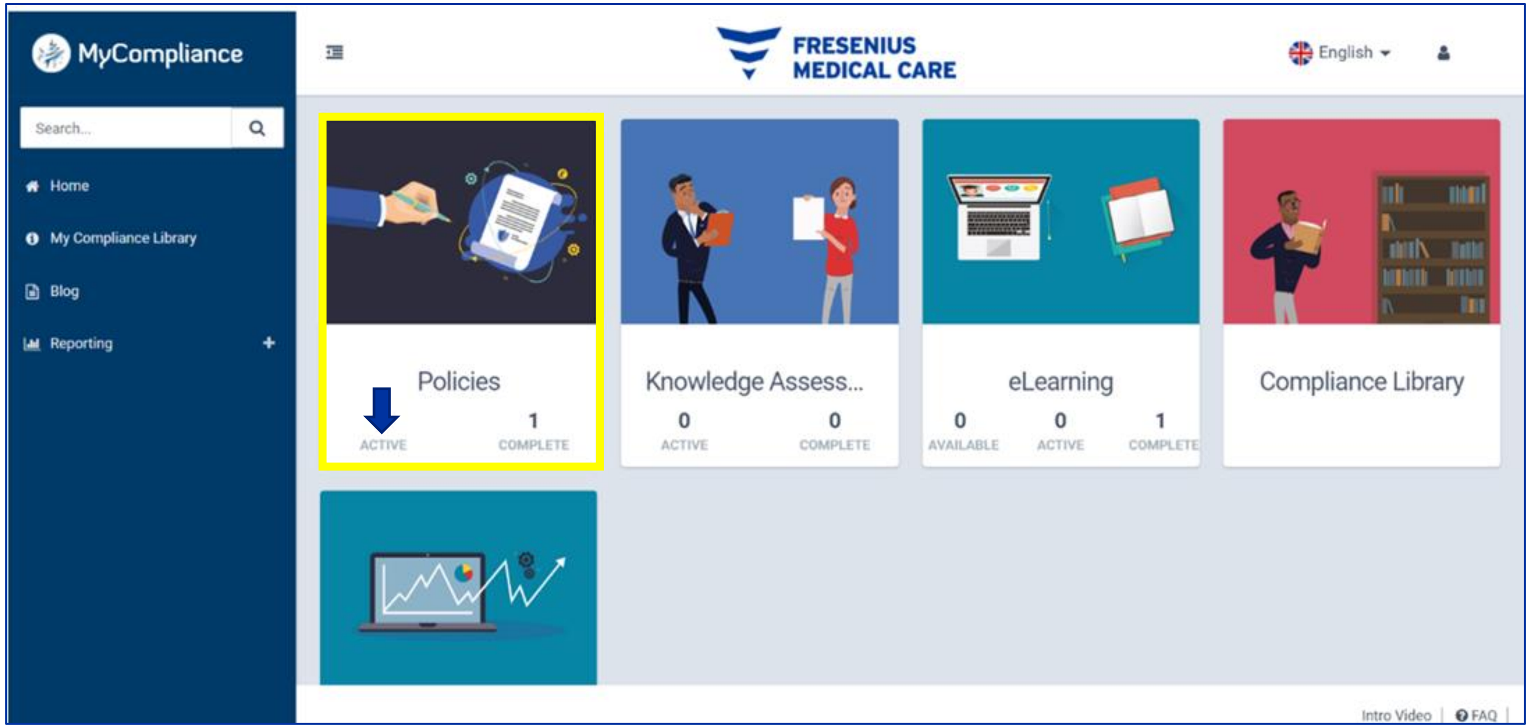
After successfully passing the **“Quiz”**, a certificate will be shown for download.



Please consider that the Business Partner Compliance Trainings must be completed at least within 4 weeks after the enrollment Date, otherwise, further escalations measures will follow immediately, starting with notification of your entity management.

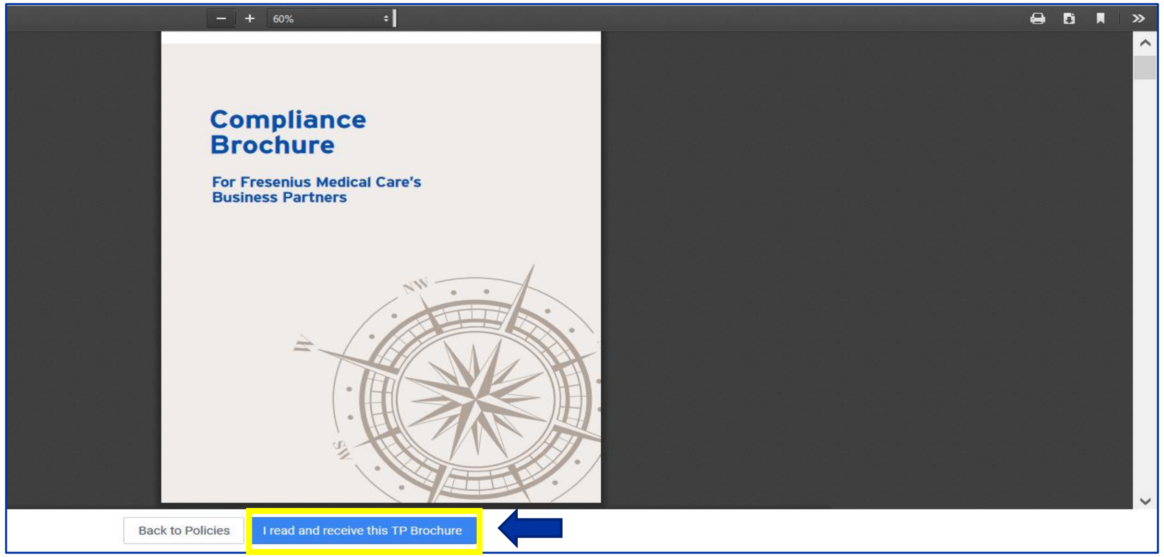
g) Compliance Brochure for FME Business Partners.

Please click on Policies "**Active**", here you will find the pending policies for review and confirm. In this case Compliance Brochure for FME Business Partners.



Then the following screen will appear, please go to the **"Action" > "View Policy"** button

You should click through the content and read it. Finally, you will have to click on the blue check box, on this way you read the Compliance Brochure.
*The tool provides you the option to download this version.



Dealing with FME business, your participation is of great importance. Together, we create a culture of compliance in our business.

6) Contact Details

In case of questions about the Business Partner Trainings content, please contact: TP_trainings_CCD@fmc-ag.com

In case of technical issues which could not immediately be solved, MetaCompliance provides technical support made via e-mail contact support@metacompliance.com or via phone +44 (0)20 7917 9527 from 8 am to 10 pm UK time. Delay of reply: 2 hours.

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