



CASE STUDY

Data Analytics Solutions Help Fresenius Medical Care to Successfully Complete DOJ and SEC Monitorship



Case IQ



THE NEED

Fresenius Medical Care entered into a non-prosecution agreement with the U.S. Department of Justice (DOJ) and an Order with the U.S. Securities and Exchange Commission (SEC) in 2019 related to violations of the Foreign Corrupt Practices Act. Those agreements mandated that Fresenius Medical Care enhance its compliance program and internal controls and retain an Independent Compliance Monitor (“Monitor”) for a period of two years to certify those enhancements. To meet these obligations and satisfy the Monitor, Fresenius Medical Care selected Case IQ’s* Compliance Monitoring software to enable monitoring and remediation of compliance risk in global vendor spend and distributor/reseller transactions.

Prior to implementing the software, Fresenius Medical Care did not have a dedicated platform to actively monitor compliance risk in vendor spend and distributor/reseller transactions. Fresenius Medical Care performed periodic and sample-based monitoring and needed to enhance its monitoring program to be far more real-time and comprehensive.



**FRESENIUS
MEDICAL CARE**

INDUSTRY

Medical Devices

USE CASES

- FCPA Monitorship Resolution
- Risk Mitigation
- Risk Aggregation
- Data Visualization

BUSINESS ISSUE

Fresenius Medical Care sought a software solution to resolve their FCPA Monitorship, reduce risk and prevent further violations.

*Lextegrity was acquired by Case IQ in 2025 and is now offered as an end-to-end suite of compliance tools.

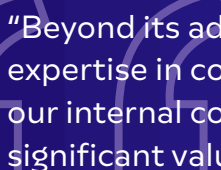
THE SOLUTION

Fresenius Medical Care sought a software provider to supply technical solutions to enhance their global program related to continuous real-time monitoring of financial transactions. They ultimately chose Case IQ's Compliance Monitoring solution for a variety of reasons: i) the software was a proven compliance platform that had already been deployed by other global life sciences customers, ii) the software had been implemented in similar situations before enforcement agencies, including resolving another monitorship and helping to secure a DOJ declination and iii) Case IQ's software was able to meet their requirements from the DOJ and SEC.

Fresenius Medical Care accelerated its data analytics and compliance monitoring efforts using Case IQ's Continuous Monitoring software. Beyond Healthcare Professional (HCP) and Healthcare Organization (HCO) payments, the software monitors all vendor payments and will monitor all customer revenue/distributor transactions across connected ERP instances.

Case IQ's Continuous Monitoring software enables Fresenius Medical Care's compliance team to risk-score vendor spend and customer revenue transactions globally. Fresenius Medical Care has access to dozens of behavioral, statistical, and policy-based analyses, all highly configurable within the platform. End users do not need data expertise or data engineering skills to configure or maintain those analytics. The Fresenius Medical Care compliance team has access to a user interface that allows them to modify their settings and analyses and create multiple custom analyses without any further technical skill required. Case IQ's team worked with Fresenius Medical Care's compliance and finance teams to calibrate their risk settings, add custom keywords, and test those risk settings multiple times before going live with the platform. Currently, Case IQ's team is working together with a cross-functional Fresenius Medical Care team on ways to set up needed risk settings for additional customer scenarios.

The monitoring tool escalates certain transactions as higher risk, to be reviewed by an internal team at Fresenius Medical Care. All follow-up steps, including remediation, are documented directly within the platform. Reporting is also available in real-time for the Fresenius Medical Care Compliance team to present the results of their monitoring program to internal stakeholders.

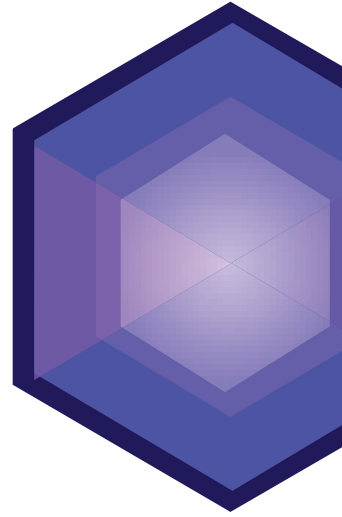


"Beyond its advanced compliance technology, the Lextegrity team brought their expertise in compliance risk management and design. They helped us re-imagine our internal compliance monitoring program using technology and provided significant value beyond their software."

Wendy Millette
Chief Compliance Officer

THE RESULTS

The Case IQ continuous Compliance Monitoring solution has dramatically accelerated Fresenius Medical Care's use of data to manage risk and detect non-compliance. Compliance teams now have near real-time visibility into spend and revenue transactions almost globally and can identify any potential process issues or non-compliance in near real time.



Lextegrity's software solutions provided us the most robust, scalable, and intuitive solution for our compliance data analytics and monitoring needs. What we accomplished in the last year of our monitorship in partnership with Lextegrity was profound, not only in terms of preventing and detecting non-compliance but also in terms of the user experience."

Wendy Millette
Chief Compliance Officer

"Ultimately, the enhancements to our compliance program from the implementation of Lextegrity's product enabled Fresenius Medical Care to satisfy our obligations under our agreements with the DOJ and SEC. Lextegrity interfaced expertly with dozens of people within the company as well as our outside counsel and the Monitor team, to help us achieve our aims with respect to our program enhancements and our monitorship. But most importantly, we now have a long-term scaled solution driven by technology to support effective monitoring of Fresenius Medical Care's transactions going forward."

Patrick Murphy
Global Head - Litigation and Investigations

ABOUT FRESENIUS MEDICAL CARE

Fresenius Medical Care is the world's leading provider of products and services for individuals with renal diseases, of which around 3.9 million patients worldwide regularly undergo dialysis treatment. Dialysis is a vital blood cleansing procedure that substitutes the function of the kidneys in case of kidney failure. Fresenius Medical Care offers products and services along the entire dialysis value chain from a single source and cares for approximately 345,000 patients globally through over 4,100 dialysis clinics. Fresenius Medical Care also operates 42 production sites on all continents to provide dialysis products such as dialysis machines, dialyzers, and related disposables.

ABOUT CASE IQ

Case IQ offers an end-to-end compliance and case management solution that consolidates compliance monitoring, whistleblower solutions, third-party risk oversight, investigative case management and compliance approval and disclosures workflows. Lextegrity was acquired by Case IQ in 2025 and is now offered as an end-to-end suite of compliance tools.

Case IQ

Learn how Case IQ can help you achieve end-to-end compliance with confidence.

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