B. Antitrust

Compliance with Antitrust law is of highest importance for Siemens.

Infringements of Antitrust law result in very significant risks: they range from very large fines and Siemens’ exclusion from public tenders to prison sentences for Siemens employees. In addition, the risks of private damages actions being pursued on the basis of Antitrust law infringements continue to increase. The internationalization of Antitrust enforcement has multiplied these risks – significantly more than 100 countries have now introduced Antitrust laws. For an internationally active company such as Siemens, it is therefore all the more important to conduct its worldwide business operation in compliance with Antitrust law.

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| Antitrust principles  Employees must comply with all applicable Antitrust laws in accordance with their obligations under such laws and with their obligations under Circular 226 and [Chapter G2 of the Business Conduct Guidelines (“Fair competition and anti-trust laws”)](https://intranet.legal-compliance.siemens.com/docs/2019_SAG_BCG_English_FINAL.pdf) and this chapter.  The basic principles of Antitrust law are clear and simple: competitors must not enter into anti-competitive agreements with each other, in particular if they concern hard core conduct such as price fixing or market sharing.  All (possible) breaches of Antitrust law must be reported without delay. Employees can use any of the following reporting options: Line managers, Legal and Compliance, “Tell us” or the Siemens-Ombudsman. |

## 1. Siemens Antitrust Compliance Program

Senior management and line managers must ensure that, in accordance with their statutory organizational and supervisory obligations, no infringements of Antitrust law are committed and that the company and its employees are protected.

Siemens management does not tolerate any violations of Antitrust law and will take rigorous action against persons guilty of intentional infringement. All employees must be aware of Antitrust-related risks, comply with applicable Antitrust rules and consult the experts in Legal and Compliance if in any doubt in any particular case.

The Siemens Antitrust Compliance Program is based on the following principles:

* clear communication from management regarding the necessity of Antitrust Compliance;
* targeted identification of Antitrust-related risks by way of a regular “Antitrust Risk Exposure Assessment” (“AREA”) and monitoring of new developments and lessons learned;
* professional and comprehensive Antitrust advice and [Antitrust training programs;](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/legal_cmp.aspx)
* rigorous investigation of, and the imposition of disciplinary sanctions for, infringements of Antitrust law and
* regular review and further development of the Antitrust Program.

## 2. Training and supporting material

Basic information and supporting material on Antitrust and Trade Secrets law and the relevant Compliance requirements are available on the [Homepage of LC M&A CMP](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/legal_cmp.aspx). There, employees may find general guidance documents as well as papers and presentations dedicated to specific topics like trade association meetings or competitive intelligence.

In case of questions, direct contact to the legal experts of LC M&A CMP should be sought.

## 3. History of changes

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| **Date** | **Author** | **Major changes of binding content** |
| January 1, 2019 | Gordon Christian  Felix Gloeckner | First release through the Compliance Handbook based on Siemens Circular SC No. 226 “Global Compliance”, Appendix 1. |
| July 1, 2020 | Julia Wirth | Addition of links to supporting material |
| October 1, 2020 | Georg Böttcher, Hubert Klinger | Shortening and streamlining of whole chapter in accordance with changes to Circular 226 |

## 4. Contacts

Compliance Officer

The Compliance Officer responsible for your unit can be found through the following [link](https://intranet.for.siemens.com/cms/059/de/about/org/Pages/compliance_organization.aspx).

Corporate Governance Owner

The contact person for Antitrust is:

[Georg Boettcher](https://scd.siemens.com/luz/IdentitySearch?cn=BOETTCHER+FRIEDRICH+GEORG+Z001PJ1T&tcgid=Z001PJ1T&c=CO&o=SIEMENS&ou=EM&l=TEJ+B&department=LC+LAM+RC-CO&&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A) (Chief Counsel Competition)

The contact persons for the Compliance Handbook content Antitrust are:

[Annette Kraus (LC CO IR)](https://scd.siemens.com/luz/IdentitySearch?cn=KRAUS+ANNETTE+Z002K99S&tcgid=Z002K99S&c=DE&o=SIEMENS&ou=LC&l=MCH+P&department=LC+CO+IR&&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A)

[[Georg Boettcher](https://scd.siemens.com/luz/IdentitySearch?cn=BOETTCHER+FRIEDRICH+GEORG+Z001PJ1T&tcgid=Z001PJ1T&c=CO&o=SIEMENS&ou=EM&l=TEJ+B&department=LC+LAM+RC-CO&&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A) (LC M&A CMP)](https://scd.siemens.com/luz/IdentitySearch?cn=BOETTCHER+GEORG+Z001PJ1T&tcgid=Z001PJ1T&c=DE&o=SIEMENS&ou=LC&l=MCH+P&department=LC+M%26A+CMP&&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A)