1. Training

This Chapter on compliance training provides employees of the Siemens compliance organization who deal with training topics with comprehensive instructions on developing and holding compliance training for the business organization.

Compliance training comprises general compliance training, as well as measures related to the activity fields, including in particular export control. It does not cover training on processes or tools. If individual training measures are defined as part of an investigation, the regulations governing them are defined in [Chapter L.5](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,5.-Remediation).

This Chapter contains the required guidelines for Compliance Officers, including the content, suitable methods and time of training and its target groups.

## 1.1. Roles and responsibilities

### 1.1.1. Compliance Training Circle

The Compliance Training Circle (CTCircle) is the cross-organizational cooperation network with end-to-end responsibility for providing business-related compliance training materials and the related training infrastructure. The main institutions of the CTCircle are:

* **Core Team**:

The Core Team comprises at least three members (covering the perspectives of headquarters/governance, business and the regions/countries). It is responsible for the global training strategy and its operationalization. The Core Team defines all the stipulations and regulations in connection with internal compliance training activities centrally and in this context has global authority to issue guidelines in coordination with the Steering Committee.

* **Steering Committee (SteerCo)**:

The Steering Committee (SteerCo) consists of at least three members from the CMC and LC C GF. They decide on all requirements and regulations relating to compliance training activities on the basis of recommendations from the Core Team.

* **Country Compliance Officers**:

The Country Compliance Officers are responsible in the local Siemens organization for giving advice and recommendations on implementing training requirements on the basis of binding global standards and identified local risks (such as CRA results). In accordance with Circular 226, Chapter 2.2, the local CEO or Head of the Company Unit is responsible for ensuring appropriate training measures are held.

* **Regional Training Coordinators (RTCs)**:

The Regional Training Coordinators (RTCs) are distributed over five regions (incl. SMO) and are based solely on regional affiliation (not AREs). They are the interface between the Core Team and Compliance Officers and facilitate local implementation of the training requirements.

They are appointed by the Core Team following agreement in their area of responsibility and administered in the [Training Contact Data Base](https://intranet.legal-compliance.siemens.com/internal/training/compliance-contacts/).

Exception: SFS/CF F is not covered and represented by the RTCs, but is responsible on its own for all organization-related training measures.

### 1.1.2 Cooperation and communication

News, innovations and information are communicated promptly and comprehensively by the Core Team to the global training network.

The RTCs act as local multipliers for the regions/countries and communicate information from the Core Team to the units they represent, such as associated countries or Business Units, if such information is not communicated globally.

Information is communicated by e-mail, as well as by regular team meetings.

The Country Compliance Officers and RTCs are informed about current training projects of the CTCircle at a regular meeting (CTCircle Update).

In addition, a regular “CTCircle Update” newsletter is sent to the entire compliance organization (including antitrust law).

## Training portfolio

### 1.2.1. Types of training

Siemens’ compliance training portfolio differentiates between three types of training:

#### 1.2.1.1. Online training

**Online training** (web-based training (WBT), explainer videos, e-seminars) denotes all training activities that are to be held electronically without a trainer. Participants have flexibility in choosing when and from where to complete the training and can do so using various electronic devices.

#### 1.2.1.2. Moderated training (ILT)

**Moderated training** (in-person training, virtual training, jointly termed instructor-led training (ILT)) comprises any form of guided training, in particular by a trainer. If required, this training can also be held virtually by means of suitable conferencing technology (such as Microsoft Teams).

From 01 October 2021, all globally mandatory training will take place exclusively in the form of online training. From this date, ILTs can be offered as non-compulsory learning opportunities. In the period up to October 01, 2021, ILTs can continue to be held locally on a mandatory basis according to local requirements.

#### 1.2.1.3. Awareness measures

**Awareness measures** (such as Integrity Dialog, Yammer Nuggets) denotes training and/or communication measures to publicize and raise awareness about (new) topics. They are usually short, attention-grabbing formats. The focus here is less on conveying detailed knowledge, but rather on creating and maintaining constant awareness for compliance issues and integrity. They enable managers to discuss compliance issues that arise with their employees.

The annual **Integrity Dialog** can be staged in two ways:

* **“Integrity Moments”** (binding global minimum standard with four different formats at choice, to be conducted at least once a year):  
  1) In the spirit of “tone from the top/middle,” managers integrate a compliance issue lasting 2 to 5 minutes in the form of a short single-page slide presentation or   
  2) explanation videos (which are provided centrally) in other presentations/talks (e.g. Team jour fixes).   
  2) Top management (“tone from the top”) sends out a “hot topic e-mail/post (Yammer)” to as many employees as possible so as to create awareness for specific compliance issues.

3) Yammer Nuggets (tiny posters that can be sent by e-mail/Yammer) are provided to recapitulate and dig deeper into the content that is conveyed.

* **“Integrity Dialog Classic”** (in addition to the “Integrity Moments”):  
  These supplementary modules tend to deal with topics of an overarching nature and are less process-related, i.e. managers do not require any special prior knowledge of the subject. In this conventional approach, managers conduct a dialog with their employees at an in-person event or virtually. Optionally, managers can be trained/informed in advance by the compliance organization in a management briefing.

The decision on how the Integrity Dialog is held (“only” Integrity Moments or in combination with a conventional module or modules) is the responsibility of the local CEOs with the support of the Country Compliance Officer and is adopted once a year in the CRB. Its focus should be on the message conveyed in the “tone from the top/middle.”  
There is no obligation to document in detail the employees who take part in the Integrity Dialog; letters of invitation, minutes of meetings, etc., can be used as supporting evidence.

### 1.2.2. Training products

A distinction is made between global mandatory, local mandatory and optional training products.

The available training products, along with the global target group definition/recommendation and whether they are mandatory, are summarized in [this overview](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/CTC_Circle/findIT_CTC_Circle_9570.xlsx) below.

#### 1.2.2.1. Global mandatory training products

**Global mandatory training** must be rolled out worldwide to a uniformly defined target group. That applies to online training and ILT. The regulatory stipulations and obligation to furnish supporting evidence that a training topic has been dealt with are always the basis for defining whether the training is a global mandatory measure. The time of regional rollout is defined by local management following advice by the Country Compliance Officer in coordination with the Regional Training Coordinator. The period of time in which the training must be completed is stated in the individual letter of invitation.

From October 1, 2021, there will be one single target group for all globally mandatory training. This includes all employees with access to the SABA learning management system. In the period up to October 01, 2021, the target groups already defined and communicated will apply.

#### 1.2.2.2. Local mandatory training products

In the case of **local mandatory training**, the country CEOs are responsible for specifying that an available training product is mandatory based on the recommendation by the Country Compliance Officer. The basis for that should be a regional risk assessment. The Compliance Officer is also given global recommendations on the target group as guidance for this training and they are documented in the learning management system My Learning (SABA) to ensure that regulatory requirements to provide supporting evidence are met.

In individual cases (such as Export Control Basic Training), a training topic may be mandatory, but its content must be adapted locally to reflect the regional regulations and risk assessment. The Country Compliance Officer (in the case of EX in coordination with the EX business partner) is responsible for defining and controlling the content .

#### 1.2.2.3. Optional training products

The individual employee decides whether to take part in all other training measures, i.e. they are **optional**. Here, too, there are by and large recommendations on the target groups as guidance. Optional training can be undertaken using SABA or the integrated learning platform “My Learning World” and is documented in the respective systems.

### 1.2.3. Target group definition

The global target group defined differs depending on the subject matter of the training measure and its definition is adapted and made available every year.

From October 1, 2021, there will be one single target group for all globally mandatory training. This includes all employees with access to the SABA learning management system. In the period up to October 01, 2021, the target groups already defined and communicated will apply. For better orientation, there will be target group recommendations for learning offerings from October 01, 2021 (“curriculum”).

#### 1.2.3.1. All employees

The [Siemens Business Conduct Guidelines (BCG)](https://assets.new.siemens.com/siemens/assets/api/uuid:121e8fd4-aa7c-4a09-9a25-8c9f3ebefc2e/2019-sag-bcg-de.pdf) set forth the fundamental principles and rules governing how all employees must act within the Company Units and in relation to customers, external partners, and the general public.

Accordingly, the web-based training **“Our BCG – Our Core”** represents basic training across all compliance fields of activity and is mandatory for all Siemens employees. If employees do not have access to SABA, the content must be conveyed by the regional compliance organization in the form of in-person training. That must likewise be documented in SABA with the aid of the Regional Training Coordinators.

Further basic trainings (“**essentials**”) available specifically for the Activity Fields are usually rolled out to the vast majority of employees who have access to SABA. That does not include employees who work in processing (e.g. in the job family “Manufacturing”).

#### 1.2.3.2. Sensitive functions

There are also training measures that are designed on the basis of specific risks and rolled out for what are termed **sensitive functions**. The target group for this compliance training may vary depending on the topic and is defined for specific specialized training by the CTCircle Core Team in cooperation with the specialist department to reflect requirements. This applies to WBT and ILT.

#### 1.2.3.3. Different target groups

##### 1.2.3.3.1. External employees

It is necessary to examine and define – at the country level and on the basis of statutory stipulations – the extent to which external employees (with an e-mail address …ext@siemens.com) are required to undergo training. They are currently not included in SABA and must be connected to the system in a separate process. That is done through the RTCs. If it is legally necessary at the regional level for external employees to be included in the training measures, the costs of that are borne centrally. Apart from that, the countries bear the costs of training external employees voluntarily. The CTCircle Core Team must be involved before external employees are activated in SABA.

##### 1.2.3.3.2. Temporary employees

If a local Siemens company is provided with temporary staff or workers by an employment agency or another business partner, the CTCircle advises treating them as internal employees as regards training. That means these temporary workers should take part in the global and (if available) local mandatory training.

If the temporary employees do not take part in the mandatory training as internal employees do, there must be appropriate supervision of the employment agency or business partner providing the temporary staff or workers.

##### 1.2.3.3.3. Employees at subsidiaries and acquisitions

Employees at subsidiaries and acquisitions who do not (yet) have an entry in SCD/CHCM should be connected to SABA within three months by means of a manual workaround process so as to meet their training obligations. To enable that, a specific curriculum has been created in SABA and comprises the basic WBT measures (“Our BCG-Our Core,” “Antitrust Essentials,” “Data Privacy Essentials,” and “Export Control & Customs Global Awareness”). ILT measures are held after the employees have been integrated in the HR systems (in particular SCD, CHCM).

The requirements for compliance training at companies in which Siemens has a minority stake are defined in Chapter H.6.

#### 1.2.3.4. Customization options

It may be necessary for various reasons (such as a CRA decision, remediation measure or local legislation) to include additional participants or participant groups individually in one or more training measures.

There may be multiple reasons for expansion of the target group; the decision to do so lies with local management following consultation with the responsible Compliance Officer and should be documented transparently.

A reduction in the minimum global target group is only possible on an individual basis (i.e. not on the basis of individual sub-job families or position types). The reasons for removal from the target group must be documented transparently (e.g. by the RTC). Such deactivations must be reviewed after a reasonable period of time and reversed if necessary.

#### 1.2.3.5. Identification of participants

If SABA is used, all the relevant participants are selected automatically in accordance with global, binding minimum requirements. Manual action, such as a general query process at the operating units or through the HR organization, is not usually required and should be avoided.

The data sources are the HR systems SCD and CHCM and the entries in it. If replies are received to invitations as a result of incorrect coding in SCD/CHCM, it is the task and responsibility of the respective operating units, and not of the compliance organization, to initiate appropriate corrections in SCD/CHCM through the local HR organization.

If units are not (yet) connected to SCD/CHCM or no (sub-)job families and/or position types have been specified, the above instructions on identifying the target group must be implemented analogously. A manual transitional process for activating employees in the system is available for that (see [Chapt. J. 1.2.3.3.3](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,1.-Training,1.2.-Training-portfolio,1.2.3.-Target-group-definition,1.2.3.3.-Different-target-groups,1.2.3.3.3.-Employees-at-subsidiaries-and-acquisitions)). The CTCircle Core must be contacted here if necessary.

### 1.2.4. CRB requirements

The subject of training must be discussed in the CRB once a year, no matter in which quarter.

The rolling two-year Training Roadmap must be discussed and adopted at the (lead) country level. It contains the global and local mandatory training measures (including Integrity Dialog measures) and the status of the training measures for the past 12 months.

The global training measures must be presented at the business level. If the business-related CRBs reveal training requirements, the competent Country Compliance Officers must be notified so that they can be reflected in the Training Roadmap. That requires early coordination between the business and regional managers. Decisions on adapting the Training Roadmap during the year must be made at the next CRB meeting.

### 1.2.5. Training Roadmap

The country units are obligated to draw up and implement a Compliance Training Roadmap covering all the regional training activities for which the respective Compliance Officer is responsible.

If necessary, subordinate assigned countries may receive instructions on region-specific training measures from their superior country units. Adaptations at the level of the respective company unit are possible, but they must be agreed with the competent Compliance Officers at the regional level.

A separate Training Roadmap does not have to be drawn up at the business level.

From October 01, 2021, the globally mandatory training measures will be rolled out centrally to all employees (see Chapt. J.1.2.3.1). Only mandatory measures going beyond this and defined on the basis of local risks are to be decided at local level. No separate training roadmap is specified for this purpose.

#### 1.2.5.1. Minimum requirements for global mandatory training measures

The responsible Country Compliance Officer identifies the training measures that are defined as global mandatory measures in the Compliance Training Landscape (see [Chapt. J. 1.2.2.1.).](#_1.2.2.1._Global_mandatory)

#### 1.2.5.2. Supplementation of local mandatory measures

The competent Country Compliance Officer evaluates the requirement for additional mandatory measures on the basis of local regulations and risk assessments. He/she bases that evaluation on the local risk potential, local statutory requirements, the country or company risk scores, and other factors (such as requirements pursuant to local or business-related remediation measures, ERM risks, etc.).

He/she can choose the training measures from the portfolio of local mandatory measures (see [Chapt. J. 1.2.2.2](#_1.2.2.2._Local_mandatory).). That also includes defining the relevant Integrity Dialog measures.

There may be adjustments from local adaptation of training materials (see [Chapt. J. 1.2.7.5](#_1.2.8.4_Inhaltliche_Anpassungen)). Additional requirements for specific local training products must be qualified together with the CTCircle Core Team before the regional Training Roadmap is agreed.

#### 1.2.5.3. Structure of the Training Roadmap

The Training Roadmap has the following content:

(1) Time frame (period of validity) of the Training Roadmap

(2) Training plan, including a timeline, covering the global mandatory and the defined local mandatory training measures, as well as the proposed expansions and additional measures. The following details must be specified for every training measure contained in the training plan: topic, format (WBT/ILT), target group, training obligation (mandatory or optional), duration, implementation period

(3) Additional documents if required, such as detailed information on training measures, reasons for adaptation or expansion, expectations from implementing the measures, procedure for handling incomplete training measures.

There is no binding template for the Training Roadmap. However, the CTCircle provides an overview of the global and local mandatory training measures for the planning period.

#### 1.2.5.4. Implementation, monitoring and review of the training measures

The final Training Roadmap agreed in the CRB defines the binding framework for holding compliance training measures at the country level.

The Country Compliance Officer monitors implementation of the Training Roadmap on a regular basis (at least once a year).

### 1.2.6. Documentation

The (Lead) Country Compliance Officers must keep documentation on the Training Roadmap and the CRB approval. All mandatory Compliance training measures must be documented in SABA. The training history is documented and stored in SABA for ten years as of when a training measure is completed by an individual employee or as of migration from the former learning management system (LMS).

### 1.2.7. Administration and holding of training

Various structures and processes have been defined to ensure smooth processes.

#### 1.2.7.1. Learning management system

All WBT and ILT measures on the subject of compliance must be administered without exception in SABA, which is operated by the Global Learning World (HR GLW). Exceptions to obligatory use of SABA are permissible only if the conditions for using it have not been fulfilled due to the fact it has been rejected by the competent body/authority or bodies/authorities. In such a case, the CTCircle Core Team must be involved immediately.

Where necessary and not already done, the local compliance organization ensures in good time that all the necessary conditions for using SABA are fulfilled and provides regional coordinators (RTCs) to organize and coordinate the training. They receive the necessary system permissions from the CTCircle Core Team in close coordination with HR GLW and are trained in using SABA.

If a rollout is needed, the responsible RTC, if applicable with the further involvement of the Global SABA Support Team ([function mailbox](mailto:saba-mylearning.legal-compliance@siemens.com)), must be contacted.

#### 1.2.7.2. Local approval

All mandatory training measures have usually been presented to the Continuing Education and Training Committee of the Central Works Council and approved by the Central Works Council and in some cases by the Group Works Council.

Nevertheless, the Compliance Officer is requested – before the training measures (global and local mandatory training) are implemented – to examine whether there is an obligation to obtain approval from or notify public authorities or other bodies (such as a codetermination body) under statutory or other regulations. If so, the Country Compliance Officer must ensure that the relevant approval is obtained and/or the responsible authority/body is notified before the training measure is used.

If a training measure cannot be held due to the fact that approval for it has been not been given despite being applied for, the CTCircle Core Team must be notified immediately.

#### 1.2.7.3. Training materials

All the materials/modules required for holding centrally provided training are designed by the CTCircle in coordination with the respective topic owners or the Compliance Legal unit and made available worldwide on the [Compliance Marketplace](https://l-collaboration.siemens.com/content/10002000/workspaces/cotrma/SitePages/Home.aspx).

In general, internal training materials are not allowed to be used at external companies. This also applies in particular to companies in which Siemens has a minority stake. In the case of carve-outs, the rights to use WBT and ILT measures must be governed by license agreements with the holders of the rights. LC C GF must be contacted in this regard.

#### 1.2.7.4. Languages

The materials for the ILT are provided by the CTCircle at least in English and mostly also in German, while those for the WBT are provided in further languages to differing extents (complete new version or with subtitles).

The following applies to ILT:

The local compliance organization must have the materials translated into further languages. The local compliance organization is responsible for ensuring that

* The materials are translated correctly from English/German
* The English/German templates are fully translated into the new language
* The final version is approved by a qualified person (such as a local legal counsel).

The following applies to WBT:

Further languages are defined by the training projects to reflect needs and with regard to keeping costs down, subject to the approval of the CTCircle Core Team. The translations are coordinated by the project teams and agreed with the local compliance organization.

If a mandatory training product is not available in the required language, another format may be chosen locally (e.g. recorded ILT) to meet the training requirements. This is to be documented by the RTCs via the correspondingly provided alternative products ("containers") in SABA.

If further local translations/adaptations are necessary, the local compliance organization is responsible for ensuring the training materials are correct afterwards and also bears the costs for them.

#### 1.2.7.5. Adaptations to the content of ILT materials

Specific adaptation of the materials by the local compliance organization is possible subject to the following conditions:

* The adaptation focuses on local or organizational matters, such as local compliance guidelines
* The additional slides/topics are within reasonable limits
* The local compliance organization itself is responsible for creating additional slides and their content, which must be approved in advance by a qualified person (such as a local legal counsel).
* Fundamental adaptations to content must be approved by the CTCircle Core Team, if required with the involvement of the specialist departments (e.g. LC M&A CMP for antitrust)

#### 1.2.7.6. Provision of trainers and their qualification

ILT measures are held by trainers from the compliance organization.   
In the case of training related to data privacy, colleagues who deal with data privacy issues can also be entrusted with designing and holding the training subject to mutual agreement. In the case of training on antitrust and competition law, colleagues from LC M&A CMP (such as regional antitrust experts (RAEs), can also be integrated as trainers.

In general, it is necessary to ensure that all the nominated and used trainers are adequately qualified in terms of presentation/moderation techniques and also have sound, detailed knowledge of the compliance issues. That is the task and responsibility of the respective compliance organization and the competent RTCs.

#### 1.2.7.7. Letters of invitation/reminders

The invitations/reminders are e-mailed automatically by SABA to participants as soon as one of the following conditions has been met:

1. The employee is a member of the target group that has been bindingly defined worldwide and has not been deactivated in SABA by SCD/CHCM or the local compliance organization and has not previously taken part in the training in question;
2. The employee has additionally been nominated by the local compliance organization or his/her manager and activated manually and has not previously taken part in the training in question.

Employees who are not (yet) connected to the HR systems (esp. SCD, CHCM) should be connected to SABA within three months via a manual workaround process in order to gain access to the essential, mandatory training (see [Chapt. J. 1.2.3.3.3](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,1.-Training,1.2.-Training-portfolio,1.2.3.-Target-group-definition,1.2.3.3.-Different-target-groups,1.2.3.3.3.-Employees-at-subsidiaries-and-acquisitions)).

New employees in functions with Compliance relevant risk profiles must be invited to mandatory trainings within three months or at the next possible opportunity (max. six months).

All letters of invitation and reminders are drawn up in the defined languages and have a uniform layout and text worldwide.

The standard times for the (automated) reminders for the WBT measures are:

1st reminder: 5 weeks after the invitation

2nd reminder: 7 weeks after the invitation

3rd reminder: 9 weeks after the invitation

Overdue: 10 weeks after the invitation, after which the system sets the participant to “overdue,” i.e. he/she has not successfully completed the training in the envisaged period of 10 weeks

Queries from invited participants are answered by the local compliance organization. The letters of invitation/reminders contain a reference to that effect, as well as a link to the current contact persons and participant support team at Global Learning World (HR GLW).

#### 1.2.7.8. Follow-up activities for participants

In general, it is the task of the RTCs and responsibility of the competent Country Compliance Officers to identify overdue participants (if the deadline for completing the training has been exceeded) and initiate suitable measures to follow up on the training participants. Implementation of an escalation model at the local level is recommended. That can be used, for example, to define additional necessary actions (such as individual communication measures, involvement of the person’s manager).

In the case of training measures relating to data privacy or export control, the colleagues responsible for these topics might explicitly be involved; responsibility for that must be agreed on at the local level in good time.

From 01 October 2021, the manual follow-up will be replaced by an automated escalation process. Until then, the open follow-ups are to be closed as far as possible.

#### 1.2.7.9. Certificates

Every participant is sent a certificate that can be downloaded from SABA after successfully completing the training. All the certificates are created with a uniform layout and text worldwide and in the defined languages. Customized texts/supplements are not permitted.

The sole signatory is the CCO (Chief Compliance Officer) of Siemens.

In addition, successful participation in all global mandatory training products that are administered in SABA is reported automatically to Workday.

#### 1.2.7.10. Feedback, hosting and continuous quality assurance

Regular analyses of feedback on training is in principle essential to maintain a functioning quality assurance process. If SABA is used, a feedback questionnaire is sent out by the system together with the letter containing the certificate.

The global Compliance training products are hosted by LC C GF TR (see [Chapt. J. 1.2.2](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,1.-Training,1.2.-Training-portfolio,1.2.2.-Training-products)). Depending on the urgency, content feedback and necessary technical adjustments are implemented immediately or bundled. This happens in alignment with the departments responsible for the content (content owners). In addition, the content owners are asked once a year to review the global training content to ensure that it is up to date. Both activities are documented centrally. The accuracy and completeness of local training content must be ensured by the Country Compliance Officer (see [Chapt. J. 1.2.2.2](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,1.-Training,1.2.-Training-portfolio,1.2.2.-Training-products,1.2.2.2.-Local-mandatory-training-products)). This must be checked annually and documented locally in an appropriate manner.

## Training of the Compliance organization

The onboarding of new employees in the Compliance organization is supported by a variety of centrally provided web-based training courses, recorded training sessions and on-the-job training, which are summarized in the onboarding checklist. The onboarding checklist ensures that Compliance professionals are trained in the specific activity fields, including the legal framework, and are given an overview of how to use the relevant tools. In addition, the "buddy concept" provides a contact person who is available to answer questions and support the onboarding process. This person is to be appointed by the responsible manager. Apart from the provision of self-study material, the onboarding is being supported by the two-step Compliance Education Program (CEP).

Export Control employees will also be required to update their expertise via the EX-Brush-up training on a regular basis, i.e. at least every 2 years.

### 1.3.1. Compliance Education Program (CEP)

The two-stage program gives new compliance employees an introduction to and relevant know-how about the organization, regulations and processes of the Siemens compliance organization. The program also promotes global networking among compliance employees by means of pinpointed activities. It is mandatory for new employees in the roles of Compliance Officers and Compliance Experts at Siemens AG and affiliated companies. Participants are registered by their immediate manager with LC C GF, which organizes and implements the training.   
A virtual concept for the CEP was developed in the wake of the global COVID-19 pandemic as a temporary means of enabling the training measures to be continued by means of virtual methods.

#### 1.3.1.1. CEP 1

CEP 1 (in which employees participate within six months of joining the company) offers an overview of all compliance guidelines and processes, as well as the possibility of building a network with the compliance experts at Siemens’ headquarters and with other participants. It is held as in-person training in Munich-Feldafing over five days or virtually over approximately three weeks.

#### 1.3.1.2. CEP 2

CEP 2 (in which employees participate 12 to 18 months after CEP 1) offers participants in-depth compliance know-how in the relevant fields of compliance and methodological knowledge (such as in agile working, communication methods), as well as the chance to share knowledge among compliance experts. For Export Control Business Partners who focus solely on export control functions, participation in CEP 2 training is optional. It is held as in-person training in Munich-Feldafing over five days or virtually over approximately three weeks.

### 1.3.2. EX Brush-up

The EX Brush-up (for employees of the LC CO with an EX BP function, including EX BP deputies and team members with more than 2 to 3 years of experience) offers regular refresher training on export control regulations and on Siemens’ internal export control processes, procedures and systems. Participants are nominated by the Export Control Business Partner in the local compliance organization. The training is currently being held virtually with a 2-week curriculum, with the learning units condensed into three half-days.

## 1.4. Training and support materials

**Compliance Intranet (training for Business Units/regions):** https://intranet.for.siemens.com/cms/059/de/processes/publications/Pages/compliance\_trainings.aspx

**Compliance Intranet (training for compliance employees):**https://intranet.legal-compliance.siemens.com/internal/training\_compliance.cfm

**Compliance Marketplace (training materials and trainer guides):**   
<https://l-collaboration.siemens.com/content/10002000/workspaces/cotrma/SitePages/Home.aspx>

**CTCircle:** https://www.yammer.com/siemenscrosscollaboration/#/threads/inGroup?type=in\_group&feedId=4948418560

**CTCircle Coordinators (closed group for RTCs):** https://www.yammer.com/siemenscrosscollaboration/#/threads/inGroup?type=in\_group&feedId=9361481728

**CTCircle Trainer – Virtual water cooler (closed group for CO Trainers):** https://www.yammer.com/siemenscrosscollaboration/#/threads/inGroup?type=in\_group&feedId=23209279488

**ICP EX:** https://intranet.legal-compliance.siemens.com/compliance/icp/icpGer.cfm

**My Learning (SABA):** https://siemens-learning.sabacloud.com/

**Yammer groups (Siemens Cross Collaboration Network):**

**My Learning World LC Channel:**

**Integrity Dialog:**   
<https://intranet.for.siemens.com/cms/059/de/career/training/Pages/compliance_integrity-dialog.aspx>.

**Business Partner Export Control:**https://intranet.legal-compliance.siemens.com/compliance/icp/icpGer.cfm#icpContacts

**Compliance Academy:**   
https://intranet.legal-compliance.siemens.com/internal/ComplianceAcademy   
(access only for employees of the LC organization)

**Onboarding checklist for new Compliance employees:**https://findit.compliance.siemens.com/content/10000101/Compliance/CL\_CO/L\_GF/findIT\_L\_GF\_8635.pdf

## 1.5. Change history

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| **Date** | **Author** | **Significant changes** |
| Oct. 1, 2018 | Horst Hoffmann  LC C GF | Transition from the Compliance Training Manual to the Web Book and update for 2019 |
| April 1, 2019 | Horst Hoffmann  LC C GF | Adaptation to the new organizational structure and new processes |
| Oct. 1, 2019 | Utta Köhler  LC C GF | Adaptation to the new organizational structure, rollout of MyLearning (SABA) and transfer of OA to the CTCircle |
| Jan. 7, 2020 | Utta Köhler  LC C GF | Adaptation to the new organizational structure, rough revision of the training processes (CTCircle) |
| April 1, 2020 | Utta Köhler  LC C GF | Adaptation to the structure and processes of the CTCircle |
| Oct. 1, 2020 | [Julia Doernen](https://scd.siemens.com/luz/IdentitySearch?cn=Julia+Doernen&maxanz=50&suchart=schnell&tab=tabs-1)  [Dorothee Patzer](https://scd.siemens.com/luz/IdentitySearch?cn=Dorothee+Patzer&suchart=schnell)  [Magdalena Kalbarczyk](https://scd.siemens.com/luz/IdentitySearch?cn=Magdalena+Kalbarczyk&suchart=schnell)  [Utta Köhler](https://scd.siemens.com/luz/IdentitySearch?cn=Utta+Köhler&suchart=schnell)  CTCircle Core Team | Adaptation to the structure of the CTCircle and addition of new processes, streamlining of the content   * Simplification of the training obligation (global/local mandatory, optional), Chapter 1.2.2 * Reduction in CRB requirements, differentiation between Country CRB and Business CRB, section 1.2.4 * Requirements for regional training products, section 1.2.5.2 * Binding documentation in SABA, Chapter 1.2.7.1 |
| Jan 01, 2021 | Utta Köhler CTCircle Core Team | Consideration of EX Training Audit results:   * Invitation of new employees in CO-relevant functions to mandatory training within 3 months, chapt. 1.2.7.7 * Use of alternative training formats in case of missing language versions of mandatory trainings, recording in SABA, chapt. 1.2.7.5   - Annual review process for quality assurance, chapt. 1.2.7.10  Further concretization of training processes:  - Update of the list of training products, chapt. 1.2.2  - Connection of technically not yet fully integrated employees to SABA within 3 months, chapt. 1.2.3.3  - Inclusion of onboarding checklist and buddy concept for new CO employees, chapt. 1.3 |
| April 01, 2021 | Utta Köhler CTCircle Core Team | Announcement of structural adjustments in the training approach and process as of 01.10.2021:   * All globally mandatory trainings will be offered as online trainings, chapt. 1.2.1.2 * In the future, one global target group definition for all employees with access to SABA will apply, chapt. 1.2.2.1/1.2.3 * Globally mandatory training will be rolled out centrally in the future, omitted: specifications for (local) rolling training roadmaps, chapt. 1.2.5 * Replacement of manual follow-up by automated escalation process, chapt. 1.2.7.8 |

## 1.6. Contacts

The contact persons at LC C GF are on hand to answer questions at all times   
(in alphabetical order):

[Monika Biegner](https://scd.siemens.com/luz/IdentitySearch?cn=biegner,+monika&suchart=schnell) (Training management, Administration CEPs/EX Brush-up), LC C GF TR

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[Magdalena Kalbarczyk](https://scd.siemens.com/luz/IdentitySearch?cn=kalbarczyk&maxanz=50&suchart=schnell&tab=tabs-1) (CTCircle Core team, focusing on regional training coordination), LC CO SI ET

[Utta Köhler](https://scd.siemens.com/luz/IdentitySearch?cn=koehler,+utta&suchart=schnell) (CTCircle Core Team, focusing on the training portfolio and processes), LC C GF TR

[Dorothee Patzer](https://scd.siemens.com/luz/IdentitySearch?cn=Dorothee+Patzer+&suchart=schnell) (CTCircle Core Team, focusing on EX and the trainer network), LC CO SMO CF

[Regional Training Coordinators](https://intranet.legal-compliance.siemens.com/training/compliance-contacts/)