3. Compliance Control Program

The Compliance Control program (CCP) is one of the core elements of the Compliance system at Siemens and is implemented in Siemens entities and its affiliated companies on a global scale. It is an integral part of the [Policy & Control Masterbook (PCMB)](https://apex2.cit.siemens.de/pls/apex/f?p=101:10:33676766247531::NO:::), which covers all compliance-related areas, such as Business Partners, SpoDoM Compliance activities,Export Control ICP etc.. They are assessed through the Risk and Internal Control (R/IC/) System to identify Compliance risk areas.

## 3.1 Overview

All Siemens entities are required to implement an effective and efficient Risk and Internal Control (R/IC/) System within their area of responsibility. The LC CO Organization is in place to provide the guidance, support and expertise needed to successfully implement, monitor and maintain an effective Compliance Control Program.

R/IC/ supports the Managing Board in its responsibility to manage risks effectively and provide reasonable assurance that the organization’s assets are safeguarded, financial reporting is reliable, and laws and regulations are complied with.

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| **Compliance Control Program (CCP) – Overview** |
| * Are basically controls within R/IC/ to ensure that the established Compliance process is working properly * Forms part of the Policy and Control Master Book (PCMB) of CF A IC * Consists of 3 Compliance Controls Requirements from LC CO RFC RC * Fosters compliance throughout all three compliance dimensions (Prevent – Detect – Respond) in the activity fields of Anti-Corruption, Antitrust, Anti-Money Laundering, Data Privacy, Export Controls and Human Rights * Promotes continues improvement of the Siemens Compliance System |

*Chart 1: “CCP -Overview”*

## 3.2 Goal and scope

The Compliance Control Program aims at ensuring the adherence and implementation of the globally applied Compliance System and Processes. The CCP is being continually refined and customized in order to comply with the current Siemens Guidelines. Changes within the Siemens Group and suggestions for improvement from operative units are incorporated into the revision on a regular basis.

**Current priorities**

The PCMB contains control requirements from LC CO to foster Compliance throughout all Compliance dimensions in the fields of Anticorruption, Antitrust, Anti-Money Laundering, Data privacy, Export Control and Human Rights.

## 3.3. Training and supporting material

* [R/IC/ Methodology and Manual](https://intranet.for.siemens.com/cms/054/en/processes/publications/Documents/RICManual.pdf)
* [CCP Homepage](https://intranet.for.siemens.com/cms/059/en/processes/publications/Pages/compliance_control-framework.aspx)

## 3.4. History of changes

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| --- | --- | --- |
| **Date** | **Author** | **Major changes of binding content** |
| January 1, 2019 | Laszlo Nagy | First release through the Compliance Handbook based on Siemens Circular SC No. 226 “Global Compliance”. |
| January 1, 2020 | Koen Miezenbeek  LC CO RFC LF | Update due to organizational changes and for the new edition of the PCMB |
| September 16, 2020 | Axel Frey LC CO RFC RC C | Update due to new Compliance Control Program (CCP) |

## 3.5. 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 CCP is:

[Andrew Copland-Cale](https://scd.siemens.com/luz/IdentitySearch?cn=COPLAND-CALE+ANDREW+ZZZZZ9CK&tcgid=ZZZZZ9CK&c=DE&o=SIEMENS&ou=LC&l=MCH+P&department=LC+CO+RFC+RC&&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A) (LC CO RFC RC)