3. Requirements of third parties e.g. in tenders

Siemens may encounter compliance requirements of third parties in different constellations. Most commonly in business processes customers or suppliers might want to clarify if Siemens is a reliable company. This could happen in individual tenders or supplier qualification processes. The responsible Compliance Officer needs to be involved before:

* Signing off a Customer`s Codes of Conduct or related contract clauses in individual cases ([H 3.1.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,3.-Requirements-of-third-parties-e.g.-in-tenders,3.1-Customer-Codes-of-Conduct---related-Contract-Clauses))
* Answering to compliance questionnaires or making compliance declarations on an customer`s template ([H 3.2.](#_3.2_Compliance_Questionnaires))

On the other hand, Siemens might receive requests for information or cooperation from authorities which need to be handled by LC CO RFC LF. Please note that the Clearing Committee ([L 7.3.](https://workspace.c6.siemens.com/content/300000007/Compliance%20WebBook/Part%202%20Business%20Perspective/H)%20Compliance%20in%20Business%20Processes%20and%20Projects/_layouts/15/hypernet/custom/link.aspx?bid=00010023&pt=7._x0020Dealing_x0020with_x0020public_x0020authorities_x0020and_x0020other_x0020third_x0020parties&tt=7.3._x0020Clearing_x0020Committee)) needs to decide about providing other than standardized information in certain cases.

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| \\psf\Home\\Desktop\00_heute\SIE_SCL_140916_Wordtemplate_Legal_Handbook\Examples.png | Please be aware that the **legal entity Siemens AG** is subject to two  Antitrust-related decisions in Belgium and Greece.  Both cases require the Reliability Declaration for the **legal entity Siemens AG**  ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) to be handed over to prospective customers of the legal entity  Siemens AG.  The Greek case also leads to the necessity for the **legal entity Siemens AG** to admit to an infringement of Antitrust provisions in a **Single European  Procurement Document (ESPD)** or similar declarations. The ESPD Compliance  Guidelines for Siemens AG (available [here](https://intranet.for.siemens.com/org/lc/en/legal/templates/public/public/Pages/public.aspx)) provides information on filling out the  questions of the ESPD related to Compliance cases for the legal entity Siemens AG. |

Please keep in mind that besides the requirement above, this chapter not binding. It merely contains suggestions how to handle the challenges of the covered constellations.

For a list of contact persons for each individual legal topic, see [3.5 – Contacts](#_3.5._Contacts)

## 3.1 Customer Codes of Conduct & related Contract Clauses

Companies are increasingly publishing their conduct/ethical standards. There might be a requirement to accept the contractual partner’s code of conduct or required clauses in a contract. When agreeing to a customer code or contract requirements, these will form part of the legal relationship between the parties. Failure to adhere to the requirements may result in contractual breaches and consequences with respect to such breaches. Careful consideration must be given to assess whether the requirements can actually be met. Obligations can only be agreed upon if Siemens may actually and reasonably comply with them. Different sustainability topics besides Compliance like HR or EHS need to be checked by those departments[[1]](#footnote-1).

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| What to do in an individual business relationship:   1. check if customer  * has an **equivalent CoC** [accepted by SCM](https://intranet.for.siemens.com/cms/050/en/about/initiatives/Documents/Procurement_Standards/CoC/Equivalent_Supplier_Codes.pdf) which can be accepted for your contract; * has **agreed to Siemens CoC** as a Siemens **Supplier** (Corporate Master Database (LINK)) or **Business Partner** ([Due Diligence Tool](https://compliance-tools.siemens.com/due-diligence/)); * has agreed that **Siemens` standards are sufficient** or concluded an **agreement with Siemens on ethical standards** ([Sharepoint](https://l-collaboration.siemens.com/workspaces/mra/default.aspx));   and make use of the fact for your contract.   1. Suggest to customer that we stick to our high compliance standards rather than agree to his using this sample letter and clause ([EN](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7591.docx)/[DE](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7590.docx)). If he agrees, responsible Legal Counsel or Compliance Officer should document the unilateral recognition by the customer in this [Sharepoint](https://l-collaboration.siemens.com/workspaces/mra/default.aspx). 2. If customer insists on his compliance standards, check them according to this [guidance](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7629.docx):  * **Compliance view** to be assessed by Compliance Officer: Siemens can accept customer compliance standards in the course of this individual contractual solution **if they can be fulfilled and are not more stringent** than Siemens internal Compliance regulations * **Legal view** to be assessed by Legal Counsel: Siemens can accept customer compliance standards in the course of this individual contractual solution **if the legal consequences for their breach or the customers` legal rights in connection with them are acceptable** (e.g. audit, termination rights or damage claims  1. In case the customers` compliance standards are more stringent than Siemens`, a decision has to be made involving the superiors of the responsible Compliance Officer and the Legal Counsel if Siemens can accept them. Mitigation actions must be defined to prevent Siemens from inacceptable risk.   What to do for a framework solution:  Please see here for [Framework Agreements](https://l-collaboration.siemens.com/workspaces/mra/default.aspx) on ethical standards, e.g. with global partners or for framework agreements on ethical standards relating to a greater number of contracts with the customer. |

## 3.2 Compliance Questionnaires & Declarations

Often, public or private customers or other third parties request Siemens to answer questions or to make declarations regarding its integrity and reliability or relating to compliance cases. Different sustainability topics besides Compliance like HR or EHS need to be checked by those departments[[2]](#footnote-2).

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| What to do:   1. Suggest to customer / third party to verify with our [publicly available information](https://www.siemens.com/global/en/home/company/sustainability.html) that Siemens fulfills the highest standards by using this sample response ([EN](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7589.docx)/[DE](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7588.docx)). 2. Identify, if the request refers to a particular Siemens subsidiary, Siemens AG or the whole Siemens Group and try to answer using the information below. 3. Contact the responsible Compliance Officer and/or other contact person indicated below in case of questions. |

In case of a request of a sustainability or comparable rating agency please always align with LC CO RFC LF for Compliance aspects.

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| \\psf\Home\\Desktop\00_heute\SIE_SCL_140916_Wordtemplate_Legal_Handbook\Examples.png | Please be aware that the **legal entity Siemens AG** is subject to two  Antitrust-related decisions in Belgium and Greece.  Both cases require the Reliability Declaration for the **legal entity Siemens AG**  ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) to be handed over to prospective customers of the legal entity  Siemens AG.  The Greek case also leads to the necessity for the **legal entity Siemens AG** to admit to an infringement of Antitrust provisions in a **Single European  Procurement Document (ESPD)** or similar declarations. The ESPD Compliance  Guidelines for Siemens AG (available [here](https://intranet.for.siemens.com/org/lc/en/legal/templates/public/public/Pages/public.aspx)) provides information on filling out the  questions of the ESPD related to Compliance cases for the legal entity Siemens AG. |

### 3.2.1. Siemens Group

General information on the Compliance System

* *Publicly available sources / Internet*

If declarations or answers concerning the Compliance System are requested for the whole **Siemens Group**, respective public information and a brochure can be found on the public internet page about the [Compliance System of the **Siemens Group**](https://www.siemens.com/global/en/home/company/sustainability/compliance.html). It is a part of the homepage relating to the [Sustainability efforts of the **Siemens Group**](https://www.siemens.com/global/en/home/company/sustainability.html) which serves as entry page containing links to various topics applicable for the whole **Siemens Group**, e.g. the above mentioned Compliance page as well as Environment, Health and Safety or [Human Rights](https://www.siemens.com/global/en/home/company/sustainability/humanrights.html)).

* *Guidance on frequently asked questions*

Furthermore, information about the Compliance System of the Siemens Group contained in the [Guidance on Compliance Questionnaires and Declarations](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7639.docx) can be used.

* *2017 Self-Assessment for the U.S. Department of Justice (DOJ)*

In addition, and in more detail than in the [Guidance on Compliance Questionnaires and Declarations](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7639.docx), possible statements about the Compliance System of the **Siemens Group** which may be used in questionnaires and declarations can also be found in the [Detailed Self-Assessment](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7336.pdf) of the Compliance System of the Siemens Group (see [here](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_7335.pdf) for a short summary) that was submitted to the U.S. Department of Justice (DOJ) in 2017. The detailed self-assessment has concluded that the Siemens Compliance System is appropriately designed and implemented consistent with the DoJ’s expectations issued its Evaluation of Corporate Compliance Programs (“Evaluation Guidelines”) and includes all required elements of an effective compliance program. **Please note, that the DOJ self-assessment is not to be send out to third parties as a whole but may only be used for copy/paste of statements.**

* *Reliability Declaration*

A general description of the Compliance System of the **Siemens Group** can also be found in the **Reliability Declaration for** **Siemens AG** ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) (please be aware that the Compliance cases listed in the declaration only relate to Siemens AG)

Information regarding Compliance cases

Please be aware that the kind of Compliance cases which might be relevant depend on the exact scope of the third party’s request. It may therefore relate to **Siemens AG,** other **Siemens subsidiaries** or the whole **Siemens Group**. Please also be aware that the third party may ask for different offenses and compliance cases in different stages (e.g. mere allegations, internal investigations, official indictments or final convictions) or from different periods.

You may provide the **Reliability Declaration for** **Siemens AG** ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) as it contains the potentially relevant Compliance cases of **Siemens AG** in the context of public procurement law. Information on potentially relevant Compliance cases of other **Siemens subsidiaries** can be found below.

Please contact your [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx) or [Compliance Officer](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/compliance_organization.aspx) for respective advice. [Julia Wirth](mailto:julia-wirth@siemens.com) may support from a corporate perspective

### 3.2.2. Siemens AG

General information on the Compliance System

If declarations or answers concerning the Compliance System are requested for the **Siemens AG**, you may use the information provided for the **Siemens Group** above.

Please contact your [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx) or [Compliance Officer](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/compliance_organization.aspx) for respective advice. [Daniel Kronen](mailto:daniel.kronen@siemens.com) or [Yvonne Hamm-Düppe](mailto:yvonne.hamm-dueppe@siemens.com) may support from a corporate perspective.

Compliance Cases in the Single European Procurement Document (ESPD)

The ESPD Compliance Guideline for **Siemens AG** (available [here](https://intranet.for.siemens.com/org/lc/en/legal/templates/public/public/Pages/public.aspx)) provides information on filling out the questions of the Single European Procurement Document (ESPD) related to Compliance cases for **Siemens AG**. This or comparable documents are often used in the course of public tenders in the European Union. It requests information on final convictions or administrative decisions as well as settlements of the last five years relating to specific infringements.

The ESPD Compliance Guideline for **Siemens AG** has been formulated for the use in Germany but may also be used in other European jurisdictions after consultation of your [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx). It may also serve as a model for comparable documents for other **European Siemens subsidiaries**.

Please contact your [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx) or [Compliance Officer](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/compliance_organization.aspx) for respective advice. [Michael von Falkenhausen](https://scd.siemens.com/luz/IdentitySearch?cn=von+falkenhausen+michael&maxanz=50&suchart=schnell&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A) and [Julia Wirth](mailto:julia-wirth@siemens.com) may support from a corporate perspective. Please also ensure that the **Reliability Declaration for** **Siemens AG** ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) is always submitted together with the ESPD in Germany.

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| \\psf\Home\\Desktop\00_heute\SIE_SCL_140916_Wordtemplate_Legal_Handbook\Examples.png | Please be aware that the **legal entity Siemens AG** is subject to two  Antitrust-related decisions in Belgium and Greece.  Both cases require the Reliability Declaration for the **legal entity Siemens AG**  ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) to be handed over to prospective customers of the legal entity  Siemens AG.  The Greek case also leads to the necessity for the **legal entity Siemens AG** to admit to an infringement of Antitrust provisions in a **Single European  Procurement Document (ESPD)** or similar declarations. The ESPD Compliance  Guidelines for Siemens AG (available [here](https://intranet.for.siemens.com/org/lc/en/legal/templates/public/public/Pages/public.aspx)) provides information on filling out the  questions of the ESPD related to Compliance cases for the legal entity Siemens AG. |

Information regarding Compliance cases outside of the context of the ESPD

Please be aware that in cases outside of the context of the ESPD, the kind of Compliance cases which might be relevant depend on the exact scope of the third parties` request. It may therefore relate to **Siemens AG** or the whole **Siemens Group**. Please also be aware that the third party may ask for different offenses and compliance cases in different stages (e.g. mere allegations, internal investigations, official indictments or final convictions) or from different periods.

In any case, you may provide the **Reliability Declaration for** **Siemens AG** ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) as it contains the potentially relevant Compliance cases of **Siemens AG** in the context of public procurement law.

Information regarding the Compliance scandal in 2008 can be found [here](http://siteresources.worldbank.org/INTDOII/Resources/Siemens_Q&A_12_22_2009.pdf) and [here](https://siteresources.worldbank.org/INTDOII/Resources/Siemens_Fact_Sheet_Nov_11.pdf) from the World Bank. Here from the [DOJ](https://www.justice.gov/archive/opa/pr/2008/December/08-crm-1105.html) and the [SEC](https://www.sec.gov/news/press/2008/2008-294.htm).

Please contact your [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx) or for respective advice. [Julia Wirth](mailto:julia-wirth@siemens.com) may support from a corporate perspective.

General tender information and documents / Reliability Declaration

If **Siemens AG** is asked to provide a reliability declaration in the context of a public or private tender procedure, the **Reliability Declaration for** **Siemens AG** ([EN](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001677.docx)/[DE](https://lkb.siemens.com/content/00000008/LegalKnowledgeBase/y5t2v029dbqp/LKB001676.docx)) should be used.

Please contact your [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx) or for respective advice. [Michael von Falkenhausen](https://scd.siemens.com/luz/IdentitySearch?cn=von+falkenhausen+michael&maxanz=50&suchart=schnell&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A) or [Julia Wirth](mailto:julia-wirth@siemens.com) may support from a corporate perspective.

Further documents for **Siemens AG** which are frequently requested in tenders can be found [here](https://intranet.for.siemens.com/org/lc/en/legal/templates/public/public/Pages/public.aspx).

### 3.2.3. Siemens subsidiaries

General information on the Compliance System

If declarations or answers concerning the Compliance System are requested for a **Siemens subsidiary**, you may also use the information provided for the **Siemens Group** above.

Please contact your [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx) or [Compliance Officer](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/compliance_organization.aspx) for respective advice. [Daniel Kronen](mailto:daniel.kronen@siemens.com) or [Yvonne Hamm-Düppe](mailto:yvonne.hamm-dueppe@siemens.com) may support from a corporate perspective.

Information regarding Compliance cases

Please be aware that the kind of Compliance cases which might be relevant depends on the exact scope of the third parties` request. It may therefore relate to the **Siemens subsidiary**, **Siemens AG** or the whole **Siemens Group**. Please also be aware that the third party may ask for different offenses and compliance cases in different stages (e.g. mere allegations, internal investigations, official indictments or final convictions) or from different periods.

Relevant Compliance cases of other **Siemens subsidiaries** need to be clarified with the [Legal Counsel](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx) or [Compliance Officer](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/compliance_organization.aspx) responsible for your Siemens subsidiary. [Julia Wirth](mailto:julia-wirth@siemens.com) may support from a corporate perspective.

General tender information and documents

The following links lead you to the respective information regarding a specific **Siemens subsidiary** and jurisdiction. Please feel free to suggest intranet pages that we might have missed to be listed below.

[Siemens Schweiz AG](https://intranet.for.siemens.com/cms/080/de/business/references/Pages/daten-und-fakten.aspx) (Switzerland)

## Training and supporting material

Supplier requirements are on the SCM website – [Duty to comply with the Code of Conduct for Siemens Suppliers](https://intranet.for.siemens.com/cms/059/en/processes/publications/Pages/compliance_procurement.aspx).

Further documents for **Siemens AG** which are frequently requested in tenders can be found [here](https://intranet.for.siemens.com/org/lc/en/legal/templates/public/public/Pages/public.aspx).

## History of changes

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| --- | --- | --- |
| **Date** | **Author** | **Major changes of binding content** |
| January 1, 2019 | Henning Tabbert, Panos Chalioulias | First Release through the Compliance Handbook |
| October 1, 2019 | Henning Tabbert | Adaption to organizational changes |
| January 1, 2020 | Henning Tabbert | Update due to organizational changes |
| April 1, 2020 | Daniel Kronen | Editorial and contact updates |
| April 1, 2021 | Yvonne Hamm-Düppe | Editorial and contact updates |

## 3.5. Contacts

Compliance Officer / Legal Counsel

The Compliance Officer responsible for your unit can be found through the following [link](https://intranet.for.siemens.com/cms/059/en/about/org/Pages/compliance_organization.aspx), the responsible Legal Counsel can be found [here](https://intranet.for.siemens.com/org/lc/en/legal/expert/Pages/expert.aspx).

Corporate Governance Owner

The contact persons for requirements of third parties are [Daniel Kronen](mailto:daniel.kronen@siemens.com) and [Yvonne Hamm-Düppe](mailto:yvonne.hamm-dueppe@siemens.com).

The contact for public procurement law and tenders is [Michael von Falkenhausen](https://scd.siemens.com/luz/IdentitySearch?cn=von+falkenhausen+michael&maxanz=50&suchart=schnell&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtO=O&rtAktiv=A).

Contact Person for individual Topics:

* **Public procurement law and tenders**: Michael von Falkenhausen, LC SI RSS DE ([michael.falkenhausen@siemens.com](mailto:michael.falkenhausen@siemens.com))
* **Corruption****:** Christina Wolfgramm, LC CO RFC LF ([christina.wolfgramm@siemens.com](mailto:christina.wolfgramm@siemens.com)) or Ulrike Desimoni, LC CO RFC LF ([ulrike.desimoni@siemens.com](mailto:ulrike.desimoni@siemens.com)) or
* **Money Laundering:** Koen Miezenbeck, LC CO RFC LF ([Koen.miezenbeek@siemens.com](mailto:koen.miezenbeek@siemens.com)) or Juergen Krais, LC CO IR AT ([juergen.krais@siemens.com](mailto:juergen.krais@siemens.com)).
* **Criminal infringements:** Julia Wirth, LC CO IR AT ([julia-wirth@siemens.com](mailto:julia-wirth@siemens.com))
* **Human Rights:** Daniel Kronen, LC CO RFC LF ([daniel.kronen@siemens.com](mailto:daniel.kronen@siemens.com))
* **Tax:** Axel Rüttler, CF T 6 ([axel.ruettler@siemens.com](mailto:axel.ruettler@siemens.com))
* **Social Security:** Peter Schiessl, HR IE LLC LS ([peterschiessl@siemens.com](mailto:peterschiessl@siemens.com))
* **Income tax:** Frank Bub, CF T 6 5 ([frank.bub@siemens.com](mailto:frank.bub@siemens.com))
* **Breaches of environmental law:** Ronald Neuhaus, HR EHS EP IE ([ronald.neuhaus@siemens.com](mailto:ronald.neuhaus@siemens.com))
* **Breaches of social law:** Peter Schiessl, HR IE LLC PDE ([peterschiessl@siemens.com](mailto:peterschiessl@siemens.com))
* **Breaches of labor law:** Sigrid Mai, HR IE LLC LL&M&A ([sigrid.mai@siemens.com](mailto:sigrid.mai@siemens.com))
* **Agreements distorting competition****:** Anette Kraus, LC CO IR ([annette.kraus@siemens.com](mailto:annette.kraus@siemens.com)) or Georg Boettcher, LC M&A CMP ([georg.boettcher@siemens.com](mailto:georg.boettcher@siemens.com))
* **Grave professional misconduct:** Michael von Falkenhausen LC SI RSS DE, ([michael.falkenhausen@siemens.com](mailto:michael.falkenhausen@siemens.com))
* **Early termination, damages or other comparable sanctions of public contracts**: Susanne Gropp-Stadler LC C LIT ([susanne.gropp-stadler@siemens.com](mailto:susanne.gropp-stadler@siemens.com))
* **Misinterpretation, withholding information**:Michael von Falkenhausen LC SI RSS DE ([michael.falkenhausen@siemens.com](mailto:michael.falkenhausen@siemens.com))

1. The Compliance Organization can advise on compliance related topics (mandate as per [SC226](https://circulars.siemens.com/content/circulars/ca/_layouts/querplex/circularapplication/documents/CircularDownload.aspx?id=sc_226.pdf)). For non-compliance questions, the business team should consult with applicable experts e.g. the local Environment, Health and Safety Officers or locally responsible department for labor law related issues (HR or Legal). [↑](#footnote-ref-1)
2. The Compliance Organization can advise on compliance related topics (mandate as per [SC226](https://circulars.siemens.com/content/circulars/ca/_layouts/querplex/circularapplication/documents/CircularDownload.aspx?id=sc_226.pdf)). For non-compliance questions, the business team should consult with applicable experts e.g. the local Environment, Health and Safety Officers or locally responsible department for labor law related issues (HR or Legal). [↑](#footnote-ref-2)