# Foreword by Martina Maier

Dear Colleagues,

This Compliance Handbook is a “one-stop-shop” for binding Compliance rules and regulations as well as additional information under the roof of our [Business Conduct Guidelines](https://findit.compliance.siemens.com/content/10000101/Compliance/CL_CO/CL_CO_AT/findIT_CL_CO_AT_55.pdf), [Circular No. 226](https://circulars.siemens.com/documents/circulardownload.aspx?id=sc_226.pdf) “Global Compliance” and the [Compliance Operating Model](https://regulations-admin.siemens.com/content/SST/4/en) . It is applicable for all Siemens employees and accessible online, offline as well as mobile. The Compliance Handbook offers a search function allowing information to be found easily and is furthermore clearly structured in three parts:

* **Part 1: Compliance activity fields**

relates to the different activity fields that the Compliance Organization covers: [Anti-Corruption](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Cooperation-with-Business-Partners,3.2.-Business-Partner-Categorization,3.2.3.-Value-add-Reseller-with-Red-Flag), [Antitrust](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,B.-Antitrust), [Anti-Money-Laundering](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering,2.-AML-Due-Diligence,2.2.-AML-KYC-(tool-supported-process),2.2.1.-Step-1:-Identification-of-the-Counterpart-and-verification-of-data), [Data Privacy](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,D.-Data-Privacy), [Human Rights](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,E.-Human-Rights), [Export Control](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,F.-Export-Control) and [Collective Action](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,G.-Collective-Action-and-Siemens-Integrity-Initiative).

* **Part 2: Compliance from a business perspective**

intends to provide access to the different risks and regulatory fields by explaining them in the context of [Compliance Due Diligences and Approvals](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,G.-Compliance-Due-Diligences-and-Approvals,1.-Due-Diligences) as well as [Compliance in Business Processes and Projects](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects). Also, the integration of compliance aspects into [Mergers & Acquisitions](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,I.-Compliance-in-Mergers-and-Acquisitions) is covered.

* **Part 3: Compliance internal tasks**

addresses the employees of the Compliance Organisation. It covers the mainly Compliance internal tasks of [Communication and Training](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training) as well as [Risk Management and Reviews](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,K.-Compliance-Risk-Management-and-Reviews,0.-Introduction-to-risk-management-and-reviews) and our detective and responsive processes of [Case Handling, Discipline and Remediation](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling,2.3.-Case-tracking-tool-%E2%80%93-TRACI/TreuInfo).

Thanks a lot to the all the stakeholders responsible for the content of the different chapters, to the editors as well as Ines Zins and Peter Lohse for putting together this impressive collection of our rules, regulations and explanations.

Best regards,

Martina Maier  
Chief Compliance Officer

# 1. Legal basis and regulatory Landscape

Legal basis

As a globally active company, Siemens must comply with a large number of laws and other regulations in its markets. This is accompanied by just as many criminal and other liability risks and legal disadvantages for the company, its employees and its management at all levels of the company. Accordingly, the requirements for compliance at Siemens are complex. The aim is to provide reliable protection against these risks - and at the same time protect against damage to the reputation and business success of Siemens that could result from compliance violations within the company.

Initially, the legislation of the European Union, for example, on competition law, data protection or export controls, is decisive for compliance.

Important national laws such as the U.S. Foreign Corrupt Practices Act and the Bribery Act of the United Kingdom, for example, prohibit corruption and bribery. Both also affect business activities outside of both countries to a considerable extent. In addition, there are numerous other national laws around the world prohibiting corruption and bribery and on other topics such as the prohibition of money laundering and the financing of terrorism, violations of competition law, data protection and export controls, as well as official regulations, particularly on export controls.

These laws and regulations are subject to constant change, especially with regard to export controls. Overall, a tendency towards increased regulation can be observed. For example, in important markets of our company, the legal regulations, for example on the prohibition of corruption, have been tightened and there are also clear signs that state and international institutions are paying more attention to the enforcement of the relevant legal provisions. The guidelines and recommendations of national authorities - such as the U.S. Department of Justice, the French Agence Francaise Anticorruption (AFA) or the Serious Fraud Office (SFO) of the United Kingdom - play an important role in this regard, but at the same time they provide companies with essential guidance on how to adequately structure their compliance with regard to the fulfillment of legal due diligence requirements.

Finally, there are the agreements and recommendations of international organizations such as the UN Convention against Corruption and the OECD Convention on the Prohibition of Bribery of Foreign Public Officials, as well as international standards such as DIN ISO 37001 or DIN ISO 19600.

Regulatory Landscape

The [Compliance Organization](https://intranet.siemens.com/en/compliance/organization/index.htm) (LC CO) has governance responsibility for the implementation of the Siemens Compliance System in the Company Units. It is responsible for the legal risk areas of anti-corruption, antitrust[[1]](#footnote-2), data privacy, anti-money laundering, export control and human rights[[2]](#footnote-3). These risks are covered by our Activity Fields including Collective Action and the approach of “Prevent, Detect and Respond”.

The Compliance System of the Company Units is based on a comprehensive set of rules and regulations.

The following regulations contain “What” is expected of employees in the context of compliance obligations:

* The [Siemens Business Conduct Guidelines (BCG)](https://findit.compliance.siemens.com/content/10000101/Compliance/CL_CO/CL_CO_AT/findIT_CL_CO_AT_55.pdf) set forth the fundamental principles and rules governing how we act within the Company Units and in relation to our customers, external partners and the general public.
* The [Siemens Circular (SC 226)](https://srs.siemens.cloud/c/fs8o2k) sets forth the obligations for all employees of Siemens and respective controls to ensure the implementation of the Siemens Compliance System.   
    
  SC 226 is available in different languages:

|  |  |
| --- | --- |
| [German](https://soc.siemens.cloud/c/8j8nib) | [Chinese](https://findit.compliance.siemens.com/content/10000103/Compliance/NorthEast%20Asia%20Cluster/RCo_China/findIT_RCo_China_1383.pdf) |
| [French](https://findit.compliance.siemens.com/content/10000102/Compliance/SouthWest%20Europe%20Cluster/RCo_Belgium/findIT_RCo_Belgium_2692.pdf) | [Belgian / Dutch](https://findit.compliance.siemens.com/content/10000102/Compliance/SouthWest%20Europe%20Cluster/RCo_Belgium/findIT_RCo_Belgium_2692.pdf) |
| Spanish |  |

The following regulations contain detailed guidance on “How” to perform the individual obligations anchored in the BCG and SC 226:

* **The** [Compliance Handbook](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Compliance-Handbook) and the [Internal Control Program Export Control (ICP EX)](http://intranet.siemens.com/ex/icp/en) **[set forth topic-specific working instructions with respect to compliance processes and tools as well as additional guidance and supporting information.](http://intranet.siemens.com/ex/icp/en)**

The [Compliance Operating Model](https://srs.siemens.cloud/#/c/ykgeor) contains binding guidelines for employees of the Compliance Organization of the Company Units. It defines the responsibilities within the Compliance Organization and how the Compliance System is organized.

**Company Units may only issue specific or deviating compliance-related regulations that are within the scope of this Circular if they are required by law and/or are necessary to address or mitigate specific business risks. **Any such regulation must undergo the Compliance Portfolio Management process according to the**** [Compliance Operating Model](https://srs.siemens.cloud/#/c/ykgeor)****. As necessary, Legal and Compliance may issue guidance to implement the requirements set forth in this Circular.****

Other regulations

The Managing Board of Siemens AG and the CEOs / heads of the business units, supported by the General Counsels and Compliance Officers, have overall responsibility for Compliance and thus the corresponding organizational and supervisory duties. A summary of the basic principles of the organizational and supervisory duties for Germany can be found in the internal guidelines on [organizational and supervisory duties (White Book).](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_RG_PL/findIT_LC_CO_RG_PL_4387.pdf)

In general, Siemens-internal regulations shall be published only on corporate level. It is also necessary to ensure that Siemens-internal regulations are binding for our Affiliated Companies according to [Siemens Circular 105 “Implementation of Siemens-internal regulations in Affiliated Companies”](https://regulations-admin.siemens.com/content/SC/105/en). Insofar, the [Siemens Conformance Process](https://wse04.siemens.com/content/P0003980/EN/SRR_Wiki/Conformance%20Process.aspx) applies.

Deviating local or business specific regulations are only permitted if required by laws or to address specific compliance risks and require corporate approval via the Compliance Portfolio Management Process according to the [Compliance Operating Model](https://regulations-admin.siemens.com/content/SST/4/en).

# 2. Definitions and Abbreviations

|  |  |
| --- | --- |
| **Additionally informed entity** | Siemens entity which is not directly affected by a compliance case but holds a stake (e.g. Division if a case is related to a Division business activity in a Regional Company). |
| **Affiliated Company** | Please refer to [Siemens Circular No. 105](https://regulations-admin.siemens.com/content/sc/105/en) |
| **AML** | Anti-Money Laundering *(*[*C.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering)*)* |
| **ARE** | Accounting Unit within the Siemens group of companies (Abrechnungseinheit) |
| **AREA** | Antitrust Risk Exposure Assessment *(*[*B. Antitrust*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,B.-Antitrust)*)* |
| **BCG** | [Siemens Business Conduct Guidelines](https://findit.compliance.siemens.com/content/10000101/Compliance/CL_CO/CL_CO_AT/findIT_CL_CO_AT_55.pdf) |
| **BPC** | Business Partner Compliance *(*[*A 4. Business Partner*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Cooperation-with-Business-Partners)*)* |
| **Business Partner** | The English term “business partner” merely describes a commercial entity with which another commercial entity has business relations. However, the term “Business Partner” with capital letters in the Siemens compliance context only includes such business partners which are covered by SC 226 and therefore need to undergo a Compliance Due Diligence *(*[*A 4. Business Partner*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.3.-Reseller-/-Distributors,A.1.3.2.-Value-Add-Reseller)*)*. |
| **CCP** | Compliance Control Program |
| **CCO** | Chief Compliance Officer |
| **CDC** | Corporate Disciplinary Committee *(*[*L 4. Disciplinary Measures*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,4.-Disciplinary-Measures)*)* |
| **CEA** | Corruption Exposure Assessment |
| **CDD** | Compliance Due Diligence(s) – Overview of CDD [H.2.8](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,8.-Compliance-Due-Diligences-and-Approvals) |
| **CF** | Controlling and Finance |
| **CF A** | Controlling and Finance Audit |
| **CF R 6** | Controlling and Finance - Accounting Reporting and Controlling - Shareholder Controlling |
| **CISS** | Corporate Information on Siemens Subsidiaries |
| **Clearance Case** | Investigation resulting in allegations against individuals not being able to be substantiated *(*[*L 2.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling) *Case Handling,* [*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) *Remediation)*. |
| **Clearance Case +** | Similar to Clearance Case. Nevertheless (process) deficiencies were observed. Remediation measures (e.g. training measures) are usually defined *(*[*L 2.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling) *Case Handling,* [*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) *Remediation)*. |
| **Closure Case** | Investigation resulting in the investigated allegations not being able to be substantiated. In contrast to a clearance case, there is no involvement of individual employees *(*[*L 2.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling) *Case Handling,* [*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) *Remediation)*. |
| **Closure Case +** | Similar to Closure Case. Nevertheless (process) deficiencies were observed. Remediation measures such as training are usually defined *(*[*L 2.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling) *Case Handling,* [*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) *Remediation)*. |
| **CMC** | Compliance Management Council, see [Compliance Operating Model](https://regulations-admin.siemens.com/content/SST/4/en) |
| **CO** | Compliance Officer |
| **Compliance Case** | Plausible allegation regarding a possible violation of the Siemens Business Conduct Guidelines and/or the applicable law which could lead to criminal or administrative sanctions ([L.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling) Case Handling, Discipline and Remediation). |
| **Cooperation /**  **Consortium Partner** | See [A 4.A.1.4](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.4.-Cooperation/Consortium-Partners). |
| **Counterpart** | Any third party including but not limited to customers, suppliers, as well as third parties such as intermediaries, resellers, distributors, agents, consultants, consortium partners, EPC contractors and joint venture partners.  *Relevant definition inter alia for chapters* [*A 4.A.1.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.4.-Cooperation/Consortium-Partners) *Compliance Due Diligence for Business Partners and* [*C. 2.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML),2.-AML-Due-Diligence) *AML Due Diligence.* |
| **CRA** | Compliance Risk Assessment *(*[*K 1.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,K.-Compliance-Risk-Management-and-Reviews,1.-Compliance-Risk-Assessment)*)* |
| **CRB** | Compliance Review Board *(*[*K 2.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,K.-Compliance-Risk-Management-and-Reviews,2.-Compliance-Review-Board)*)* |
| **Customs Agent** | Subtype of a Non-sales related Intermediary, see [A 4.A.1.2.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.2.-Non-sales-related-Intermediary) |
| **DI** | Degree of Implementation |
| **Distributor/other Reseller** | See [A 4.A.1.3.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.3.-Reseller-/-Distributors,A.1.3.2.-Value-Add-Reseller) |
| **Employee** | Members of the Managing Board, senior executives and any other persons working for Siemens AG and its affiliated companies worldwide. |
| **Engineering, Procurement and Construction Contractor (EPC)** | Example of a Value add Reseller, see [A 4.A.1.3.2.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.3.-Reseller-/-Distributors,A.1.3.2.-Value-Add-Reseller) |
| **ERM** | Enterprise Risk Management |
| **EY** | Ernst & Young – external auditors employed by Siemens. |
| **FRG** | [Financial Reporting Guidelines](https://webbooks.siemens.com/public/FRG/IGen/) |
| **Government Official** | The term “Government Official” includes anyone working at or on behalf of a government entity (including a government-controlled company) or public international organization, as well as any candidate for political office, political party official or employee, or a political party. A Government Official also includes an officer, director, or employee of a non-governmental institution whose employees are treated, because of their status or other reasons, as Government Officials under applicable local law, German law or U.S. law.  Examples of Government Officials are: police officers; members of the military; customs officials; officials of the World Health Organization, the European Council, the World Bank or the United Nations; candidates for the office of mayor; members of parliament; judges, public prosecutors or judicial staff; employees of public hospitals, public utilities or other public-sector companies.  *Relevant definition inter alia for chapters* [*A 1.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,1.-Gifts-and-Hospitality,1.3.-SpoDoM-Approval-for-providing-benefits) *Gifts and Hospitality,* [*A 4.A.4.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.4.-Compliance-Due-Diligence-(CDD)) *Compliance Due Diligence for Business Partners,* [*A 5.1.5*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,5.-Conflict-of-interest,5.1.-Typical-constellations,5.1.5.-Employment:-Job-rotation-public/private-sector) *Conflict of Interest,* [*A 3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Facilitation-Payments) *Facilitation Payments.* *Please also see “****Politically Exposed Person*** *(PEP)” as a high ranking Government Official might also be a PEP.* |
| **Government Entity** | The term “Government Entity” is defined broadly to include national, state or local governments or government departments, bodies, agencies and other government entities, as well as “public international organizations” and political parties. “Public international organizations” include any organization with two or more governments as members. “Government entity” also includes “government- controlled enterprises,” meaning any entity, whether organized under public or private law, in which one or more government entities has a sufficient interest to give it control. Any entity that is at least 50% owned by any government entity would qualify as would any entity that is controlled in fact (e.g. via veto rights) by any government entity.  *Relevant definition inter alia for chapters* [*A 1.3.*](_layouts/15/hypernet/custom/link.aspx?bid=00010023&pt=1._x0020Gifts_x0020and_x0020Hospitality&tt=1.3._x0020SpoDoM-Approval_x0020for_x0020providing_x0020benefits) *Gifts and Hospitality and* [*A 4.A.4.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Cooperation-with-Business-Partners,3.3.-Compliance-Due-Diligence-(CDD)) *Compliance Due Diligence for Business Partners.* |
| **HR** | Human Resources |
| **Intermediary** | See [A 4.A.1.2](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.1.-Sales-related-Intermediary). and [A 4.A.1.2.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.2.-Non-sales-related-Intermediary) |
| **Investigation** | Activity designed to:  • determine whether a wrongful act has occurred • identify the persons responsible for the wrongful act • or clear the persons wrongfully accused of misconduct or rules violations. |
| **ICP EX** | [Internal Control Program Export Control](https://intranet.for.siemens.com/wll/0067/en/Pages/Default.aspx) |
| **JV** | Joint Venture |
| **KYC** | Know Your Counterpart / AML Due Diligence, see [C.2.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML),2.-AML-Due-Diligence) |
| **LC** | Lead Country |
| **LC CO RFC RC** | Risk Management and Controls department |
| **Legal Representative** | The legal representatives are all persons who are allowed by law to represent the company (not to be confused with all persons having a contractual power of attorney to sign on behalf of a company).  *Relevant definition inter alia for chapters* [*A 4.C.2.2.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,C.-Relevance-only-for-Tool-Users-(Tool-description),C.2.-Business-Partner-CDD-Process,C.2.2.-Business-Partner-Key-Data-%E2%80%93-How-to-create-a-Business-Partner,C.2.2.3.-Extended-Key-Data) *Compliance Due Diligence for Business Partners and* [*C 2.1*.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML),2.-AML-Due-Diligence) *AML DD.* |
| **Lobbyist** | Subtype of a Non-sales related Intermediary, see [A 4.A.1.2](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.2.-Non-sales-related-Intermediary) und [A.5.1.5.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,5.-Conflict-of-interest,5.1.-Typical-constellations,5.1.5.-Employment:-Job-rotation-public/private-sector) und [A.5.2.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,5.-Conflict-of-interest,5.2.-Dos-and-Don%E2%80%99ts) |
| **Key Employee** | Any employee of the Signatory who will carry out work for Siemens and who will have direct contact with Siemens personnel (other than mere support activities, like assistants) *(*[*A 4.C.2.2.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,C.-Relevance-only-for-Tool-Users-(Tool-description),C.2.-Business-Partner-CDD-Process,C.2.2.-Business-Partner-Key-Data-%E2%80%93-How-to-create-a-Business-Partner,C.2.2.3.-Extended-Key-Data)*) and (*[*I.1.3).*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,I.-Compliance-in-Mergers-and-Acquisitions,1.-Compliance-Due-Diligence,1.3.-Scope) |
| **Key Person** | Any individual who has a considerable influence on the Company’s business activities due to their position or their shareholding – this includes  legal representatives (see separate definition),  directors, officers as well as  shareholders (see separate definition) with a significant amount of shares or voting power (more than 10%).  *(*[*A 4.C.2.2.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,C.-Relevance-only-for-Tool-Users-(Tool-description),C.2.-Business-Partner-CDD-Process,C.2.2.-Business-Partner-Key-Data-%E2%80%93-How-to-create-a-Business-Partner,C.2.2.3.-Extended-Key-Data)*)* *and (*[*I.1.3).*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,I.-Compliance-in-Mergers-and-Acquisitions,1.-Compliance-Due-Diligence,1.3.-Scope) |
| **M&A** | Mergers & Acquisitions *(*[*I 1.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,I.-Mergers-and-Acquisitions-/-Permanent-Establishments,1.-Mergers-and-Acquisitions)*)* |
| **MoM** | Minutes of Meeting |
| **“Need-to-know” principle** | General principle ruling the exchange of information relating to compliance investigations: Information is only shared with persons having a real need to know the respective details (e.g. in order to fulfill their managerial duties or to perform certain tasks during the remediation phase). |
| **Non-sales-related Intermediary** | See [A.4.A.1.2.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.2.-Non-sales-related-Intermediary) |
| **OR** | Operational Review |
| **Original Equipment Manufacturer (OEM)** | Example of a Value add Reseller, see [A 4.A.1.3.2.](javascript:navigateTo('t-wbfpro3c64bd95-9-_A.1.3.2._Value-Add_Reseller',%20true)) |
| **PCMB** | Policy Control Master Book *(*[*K 3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,K.-Compliance-Risk-Management-and-Reviews,3.-Compliance-Control-Framework) *Compliance Control Program)* |
| **PE** | Permanent Establishment *(*[*I 2.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,I.-Mergers-and-Acquisitions-/-Permanent-Establishments,2.-Permanent-Establishments)*)* |
| ***Politically Exposed Person (PEP)*** | *While there is no global definition of a PEP, most countries including the EU* [*Anti-Money Laundering Directive*](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32015L0849) *have based their definition on the* [*Financial Action Task Force on Money Laundering*](http://www.fatf-gafi.org/) *(FATF) standard.*  ***FATF definition*:** Individuals who are or have been entrusted with prominent public functions by a foreign country, for example Heads of state or Heads of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials. Further, persons who are or have been entrusted with a prominent function by a state owned enterprise or an international organization refers to members of senior management, i.e. directors, deputy directors and members of the board or equivalent functions.  Requirements for a PEP apply to family members or close associates, that is any individual publicly known, or known by the financial institution to be a close personal or professional associate. The definition of “Politically exposed Person” does not include middle-ranking or more junior individuals.  ***EU-AML Directive*:** Any individual who is entrusted with prominent public functions, including members of legislative bodies, government ministers, judges, high ranking members of the armed forces and senior officials of state-owned enterprises. This includes domestic citizens, as well as foreign ones. Family members or known close associates of a PEP must also be dealt with under PEP rules. This means applying enhanced due diligence. A family member of a PEP includes; a spouse or civil partner, children of the PEP and their spouses or civil partners, and parents of the PEP. A known close associate of a PEP means an individual known to have joint beneficial ownership of a legal entity or any other close business relationship, or an individual who has sole beneficial ownership of a legal entity known to have been set up for the benefit of the PEP.  *Relevant definition inter alia for chapter* [*C 1*.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML),1.-AML-Red-Flags) *AML Red Flag. Please also see “****Government Official****” as most likely a PEP is also a Government Official and “****Related Parties****” as requirements for a PEP apply to family members or close associates.* |
| **R&D** | Research & Development |
| **Recommendation** | *In the case of Remediations (*[*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)*):* Recommended measure or set of measures defined to remedy a deficiency identified during a compliance investigation. The recommendations are defined during the investigation phase and are described in the investigation report. A recommendation may result in one or more remediation measures. |
| **Related Parties** | Close relatives (i.e. parents and their siblings, children including their spouses/life partners, siblings including their spouses or life partners and first nieces and nephews); spouses or life partners and close friends.  *Relevant definition inter alia for chapter* [*A 1.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,1.-Gifts-and-Hospitality,1.3.-SpoDoM-Approval-for-providing-benefits) *Gifts and Hospitality.* |
| **Remediation** | “The act of setting back into proper condition” (Webster) The process of closing control or process gaps *(*[*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)*)*. |
| **Remediation Measure** | Structured set of tasks defined to close (remedy) a compliance violation *(*[*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)*)*. |
| **Red Flag** | Warning sign or concern that might trigger further measures, e.g. a Compliance Due Diligence for Resellers ([A 4.A.1.3.1.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.3.-Reseller-/-Distributors,A.1.3.1.-Reseller-/-Distributors-with-Red-Flag)) or an AML Due Diligence ([C 1.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML),1.-AML-Red-Flags)). |
| **Remediation Team** | Project Team consisting of regular team members and additional team members *(*[*L 5.*](https://workspace.c6.siemens.com/content/300000007/Compliance%20WebBook/General%20Introduction/_layouts/15/hypernet/custom/link.aspx?bid=00010023&pt=5._x0020Remediation)*)*. |
| **Reseller** | See [A. 4.A.1.3.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.3.-Reseller-/-Distributors) |
| **RIC** | Risk and Internal Controls *(*[*K 3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,K.-Compliance-Risk-Management-and-Reviews,3.-Compliance-Control-Framework) *Compliance Control Program)* |
| **RM** | Remediation Manager *(*[*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)*)* |
| **SCM** | Supply Chain Management |
| **Sales Agent** | Example of a Sales related Intermediary, see [A 4.A.1.1.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.1.-Sales-related-Intermediary) |
| **Sales related Business Consultant** | Example of a Sales related Intermediary, see [A 4.A.1.1.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.1.-Sales-related-Intermediary) |
| **Sales related Intermediary** | See [A 4.A.1.1.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.1.-Sales-related-Intermediary) |
| **SC 226** | [Siemens Circular No. 226 “Global Compliance”](https://circulars.siemens.com/documents/circulardownload.aspx?id=sc_226.pdf) |
| **Shareholder** | A shareholder is a natural or legal person who has an ownership share in a company. Depending on the legal form of the company in which the shareholder holds an investment, he may be referred to as a shareholder, partner or co-entrepreneur.  *Relevant definition inter alia for chapters* [*A 4.C.2.2.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,C.-Relevance-only-for-Tool-Users-(Tool-description),C.2.-Business-Partner-CDD-Process,C.2.2.-Business-Partner-Key-Data-%E2%80%93-How-to-create-a-Business-Partner,C.2.2.3.-Extended-Key-Data) *Compliance Due Diligence for Business Partners and* [*C 2*.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML),2.-AML-Due-Diligence) *AML DD.* |
| **System Integrator (SI)** | Example of a Value add Reseller, see [A 4.A.1.3.2](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.3.-Reseller-/-Distributors,A.1.3.2.-Value-Add-Reseller). |
| **Task Force** | *In the case of Remediation (*[*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)*):* Specialist sub-set of the Case Remediation Team, consisting of management representatives from, for instance, the local organization, the Division or the Division and technical experts. It is formed when confidential or critical measures have to be implemented. |
| **TRACI** | Tracking of Compliance Cases Internationally *(*[*L 2.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling,2.3.-Case-tracking-tool-%E2%80%93-TRACI/TreuInfo)*)* |
| **Ultimate beneficial owner (UBO)** | An ultimate beneficial owner is any one or more natural person(s) who own or control the Counterpart, or on whose behalf the Counterpart acts. A person holding a participation of more than 25% of the company’s shares or having control over an equivalent amount of voting rights (even indirect) is legally defined as an example of an UBO.  Where no Ultimate Beneficial Owner (UBO) exists or where no UBO can be found the main legal representative of the Counterpart is legally deemed as UBO (“deemed” UBO).  *Relevant definition inter alia for chapters* [*A 4.C.2.2.3.*](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,C.-Relevance-only-for-Tool-Users-(Tool-description),C.2.-Business-Partner-CDD-Process,C.2.2.-Business-Partner-Key-Data-%E2%80%93-How-to-create-a-Business-Partner,C.2.2.3.-Extended-Key-Data) *Compliance Due Diligence for Business Partners and* [*C 2*.](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML),2.-AML-Due-Diligence) *AML DD.* |
| **Value-add Reseller** | See [A 4.A.1.3.2](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners,A.-Relevance-for-Business,A.1.-Business-Partner-Types,A.1.3.-Reseller-/-Distributors,A.1.3.2.-Value-Add-Reseller). |

# 3. Change history and process

In the following chapters you will find an editorial history of changes that shows an overview of all chapters of the Compliance Web-Book that have been subject to significant changes. A detailed history of changes will be available in each chapter.

Chapter two contains overall information on the change process for all authors and spelling and notation remarks and the mandatory template for new Compliance Web-Book chapters.

## 3.1. History of changes

|  |  |  |
| --- | --- | --- |
| **Date** | **Chapter** | **Major changes of binding content** |
| January 1, 2019 | [Part 2, I. Mergers and Acquisitions; Permanent Establishments](_layouts/15/hypernet/custom/link.aspx?bid=00010023&pt=2._x0020Permanent_x0020Establishments) | First release through the Compliance Handbook.  Changes to former “Guidance for Compliance Officers in implementing the Compliance System in Permanent Establishments” (version 1.0) are: Process simplification, abolition of “ISA-I for PE’s” and Compliance Service Applicability Evaluation (SAE) and introduction of a Compliance Questionnaire. |
| April 1, 2019 |  | Adaption to new Company Structure |
| July 1,2019 | [Part 1, A. 3.3., Cooperation with Businesss Partners- CDD](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Cooperation-with-Business-Partners) | Technical user handbook integrated in Chapter 3.3.1\_CDD-Tool; general information and 3.3.2\_CDD Process |
| Jan. 1, 2020 | [Part 1, A.1.2.5. Gifts and Hospitality - Non-economic benefits](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,1.-Gifts-and-Hospitality,1.2.-Types-of-Benefits,1.2.5.-Non-economic-benefits)  [Part 1, A.3.3. Cooperation with Business Partners - CDD](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Cooperation-with-Business-Partners,3.3.-Compliance-Due-Diligence-(CDD)) | More detailed instruction regarding „the dealing with principles“, compliance structure and links update, minor corrections.  Update of Chapter 3.3.2.4.7 automatic SETIS Searches and Chapter 3.3.2.4.10 High Risk approvals of CMC member (or designated deputy) |
| [Part 3, L. 6. TreuInfo](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,6.-TreuInfo) | Update regarding responsibilities of recording of fiduciary cases (former TreuInfo cases). |
| April 1, 2020 | [Part 1, A.1 Gifts and Hospitality](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,1.-Gifts-and-Hospitality) | Chapter 1.2.4. and 1.3.4. Adaption of Risk Group of Contributions without Consideration |
| [Part1, A.3.3. Cooperation with Business Partners - CDD](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Cooperation-with-Business-Partners,3.3.-Compliance-Due-Diligence-(CDD)) | Unpdate in Chapter 3.3.2.4.10. High risk approval only of CMC members, no designated deputy any more  Update in Chapters 3.3.2.4.10/3.3.1.1:  Chapter 3.3.2.4.10.1. Special CDD - approval requirements is deleted  Chapter 3.3.2.4.10.2. How to handle CDDs which require CMC Approval in the CDD-tool is deleted  Chapter 3.3.2.4.10.3 Management Approval becomes Chapter 3.3.2.4.10.1  Chapter 3.3.2.4.10.4 Withdrawal of a CDD becomes Chapter 3.3.2.4.10.2 Withdrawal of an Approval or Disapproval |
| [Part 1, A.6. Collective Action](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,6.-Collective-Action-and-Siemens-Integrity-Initiative) | Chapter 6.4. Siemens Integrity Initiative - new facts regarding the Third Funding Round of the Siemens Integrity Initiative |
| [Part 1, C. Anti-Money Laundering](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML)) | Redactional changes in chapter C. introduction, C.1. and C.1.1.  Allocation of responsibilities C.3.  Chapter about AML Red Flags created C.1.  List of AML High Risk Countries included C.1.1.5.  Former separate binding documents for AML Red Flags and AML High Risk Countries abolished |
| [Part 2, H.2. Compliance in Procurement](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,2.-Compliance-in-Procurement) | Chapter 2.1. Supplier Registration - Anti-Money-Laundering (AML) assessment in case of AML Red Flags |
| [Part 2, H.4. High risk Payments](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,4.-High-Risk-Payments) | Deletion of CRB Q 3 references |
| [Part 2, H.5. Compliance@production facilities](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,5.-Compliance@Production-Facilities) | Initial Version |
| [Part 2, H.6. Compliance In Minorities](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,6.-Compliance-in-Minorities) | Initial Version |
| [Part 2, H.7. Compliance In Permanent Establishments (PEs)](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,7.-Compliance-in-Permanent-Establishments) | Structural switch from Capter I.2. to Chapter H.7. |
| [Part 3, J.1. Training](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,1.-Training) | Adaptation to CTCircle setup and processes |
| [Part 3, J.3. Ambassador Program](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,3.-Ambassador-program) | Chapter 3.6. Compliance Ambassador plus - Inclusion of the Mobility specific Compliance Ambassador plus program as Chapter 3.6. of this guidance |
| [Part 4, M.1. Mobility](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-4-Company-specific-and-Regional-Regulations,M)-Company-specific-Regulations,1.-Mobility) | Chapter M.1. Mobility – Deletion of chapter, as there are no deviations to the ICP EX for Mobility anymore. |
| June 1, 2020 | [Part 1, A.3.3. Cooperation with Business Partners - CDD](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Cooperation-with-Business-Partners,3.3.-Compliance-Due-Diligence-(CDD))  No historization of this version 1.5 V.2 in the online archive, because in V.1.6. (July 1, 2020) no changes in this chapter | Chapter 3.3.1.1: Role description “Monitoring Responsible” deleted due to introduction of new CDD Update Process  Chapter 3.3.2.6: Revision due to the introduction of the CDD Update Process  Chapter 3.3.2.6.1: Revision due to the introduction of the CDD Update Process  Chapter 3.3.2.6.2: chapter deleted due to the introduction of the CDD Update Process |
| July 1, 2020 | [Part 3, L. 2. Case Handling](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,2.-Case-Handling) | Chapter 2.2.3 Other Cases  Update on handling of DP and EX cases in TRACI.  Update on HR Compliance cases categorization. |
| [Part 4, M. 1. Mobility](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-4-Company-specific-and-Regional-Regulations,M)-Company-specific-Regulations,1.-Mobility) | Chapter 1.1.: Cooperation with Business Partners: Deviations for CDD Review und Approval introduced |
| Oct. 1, 2020 | Structural amendments | Due to structural changes in the Compliance Handbook, the following chapters and/or sub-chapters within received new links.  [**A. 3** Facilitation Payments](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,3.-Facilitation-Payments)  [**A. 4** Cooperation with Business Partners](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners)  [**A. 5** Conflict of Interest](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,5.-Conflict-of-interest)  [**G.** Collective Action](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,G.-Collective-Action,G.-Collective-Action-and-Siemens-Integrity-Initiative,3.-Guidance-on-Antitrust-in-Collective-Action)  [**H. 1** Compliance in Project Business](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,1.-Compliance-in-Project-Business)  [**H. 8** Compliance Due Diligences and Approvals](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,8.-Compliance-Due-Diligences-and-Approvals) |
| [Part 1 A.2. Sponsoring, Donations, Memberships](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,2.-Sponsoring,-Donations,-Memberships) | Revision of Danger Sign questions  Change of approval sequence  Responsibility of Compliance in the approval process |
| [Part 1, A.4. Cooperation with Business Partners](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners) | Completely revised and restructured into three user-oriented parts  Chapter: A.1., A.1.3.: Definition of "Integrity Concern" among resellers has been rephrased.  Chapter A.1.2.: Various subgroups of Non-sales related Intermediaries removed from the scope of the NextGen tool  Chapter A.3.2.: New section with recommendation for dealing with value-add reseller  Chapter: B.3.: "Whitelisting process" for EPCs without Red Flags discontinued.  Chapter: C: Update of tool description  Chapter C.6.: Data retention concept added |
| [Part 1, C. AML](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML)) | Chapter C.2. AML DD: Implementation of Fresh Eyes Project changes, Replacement of KYC-Tool process by AML DD process including direct access of Compliance Officers to ORBIS information and flexible factual clarification and assessment in absence of specific legal requirements. Handling of Red Flags in relation to German AREs by LC CO IR experts due to particular local law.  List of AML High Risk Countries C.1.1.5. adjusted: Added US Virgin Islands |
| [Part 2, H. 1. Compliance In Project Business](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,1.-Compliance-in-Project-Business) | Implementation of CMC decision (February 2020/August 2020) regarding Compliance in Project Execution (CiPE)  Discontinue the mandatory use of the [criteria used to identify projects in scope of the Compliance in Project Execution process](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,1.-Compliance-in-Project-Business,1.3.-Compliance-in-project-execution,1.3.1.-Projects-in-scope).  Instead, the responsible Compliance Officer selects projects which are relevant for the project execution process as a mandatory risk mitigation measure during the PM070 sign-off or at any point during the project execution lifecycle. |
| [Part 2, H.4. Outgoing and Incoming payments](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,4.-Outgoing-and-Incoming-payments) | New title of the Chapter (formerly high risk payment)  New Chapter structure with specific focus on involvement of Corporate Compliance and obligations resp. contribution of Compliance Officers |
| [Part 2, H.6. Compliance In Minorities](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-2-Business-Perspective,H.-Compliance-in-Business-Processes-and-Projects,6.-Compliance-in-Minorities) | Responsibilities clarified |
| [Part 3, J.1. Training](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,1.-Training) | 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), section 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, section 1.2.7.1 |
| [Part 3, K.2. CRB](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,K.-Compliance-Risk-Management-and-Reviews,2.-Compliance-Review-Board) | Chapter 2.3. Update of mandatory content and frequency as defined in the Fresh Eyes Project |
|  | [Part 4, M.1. Mobility](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-4-Company-specific-and-Regional-Regulations,M)-Company-specific-Regulations,1.-Mobility) | Chapter 1.2.: Export Control: Information on export control responsibilities added. |
|  | [Part 4, M.2. SRE](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-4-Company-specific-and-Regional-Regulations,M)-Company-specific-Regulations,2.-Siemens-Real-Estate-(SRE)) | New Chapter 2,  Content comes from former SRE Intranetpage |
| Jan. 1, 2021 | [General Introduction](https://webbooks.siemens.com/public/LC/chen/index.htm?n=General-Introduction,1.-Legal-basis-and-regulatory-Landscape) | White Book added |
|  | [Part 1, A.4 Cooperation with Business Partners](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners) | List of Global Business Partners added under A.4.3. |
|  | [Part 1, C. AML](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML)) | List of AML High Risk Countries C.1.1.5. adjusted (deleted: Iceland)  Legal requirements for Lawyers and other professionals in Germany only added in German Version |
|  | [Part 3, J.1. Training](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,J.-Communication-and-Training,1.-Training) | Consideration of EX Training Audit results:  - Invitation of new employees in CO-relevant functions to mandatory training within 3 months,  - Use of alternative training formats in case of missing language versions of mandatory trainings  - Annual review process  Concretization of training processes:  - Update of the list of training products  - Connection of technically not integrated employees to SABA within 3 months  - Inclusion of onboarding checklist and buddy concept for new CO employees |
|  | [Part 4, M.2. SRE](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-4-Company-specific-and-Regional-Regulations,M)-Company-specific-Regulations,2.-Siemens-Real-Estate-(SRE)) | Revision of the texts and adaptation of the CRE description  Particularities for the prevention of money laundering (AML) in SRE |
|  | [Part 4, M.3. Siemens Logistics (SL)](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-4-Company-specific-and-Regional-Regulations,M)-Company-specific-Regulations,3.-Siemens-Logistics-(SL)) | Initial Integration of SL specific instructions. |
| April 1, 2021 | [Part 1, A.4 Cooperation with Business Partners](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,A.-Anti-Corruption,4.-Cooperation-with-Business-Partners) | A.4.3. List of Global Business Partner updated |
|  | [Part 1, C. AML](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-1-Activity-Fields,C.-Anti-Money-Laundering-(AML)) | List of AML High Risk Countries C.1.1.5. adjusted (deleted: Mongolia) |
|  | [Part 3, L.8 Data deletion and retention](https://webbooks.siemens.com/public/LC/chen/index.htm?n=Part-3-Compliance-Internal-Tasks,L.-Case-Handling,-Discipline-and-Remediation,8.-Data-deletion-and-retention) | New Chapter L.8: Transition and consolidation of key Compliance Case handling regulations from the "Data deletion and retention policy"; concurrently: repeal of this policy |

## 3.2. Instructions for authors

The Compliance Handbook includes all regulatory direction with view to our Siemens Compliance System.

Due to the changing environment and emerging risks, we need to update and adjust our regulations continuously to fit the new requirements and cover the risks.

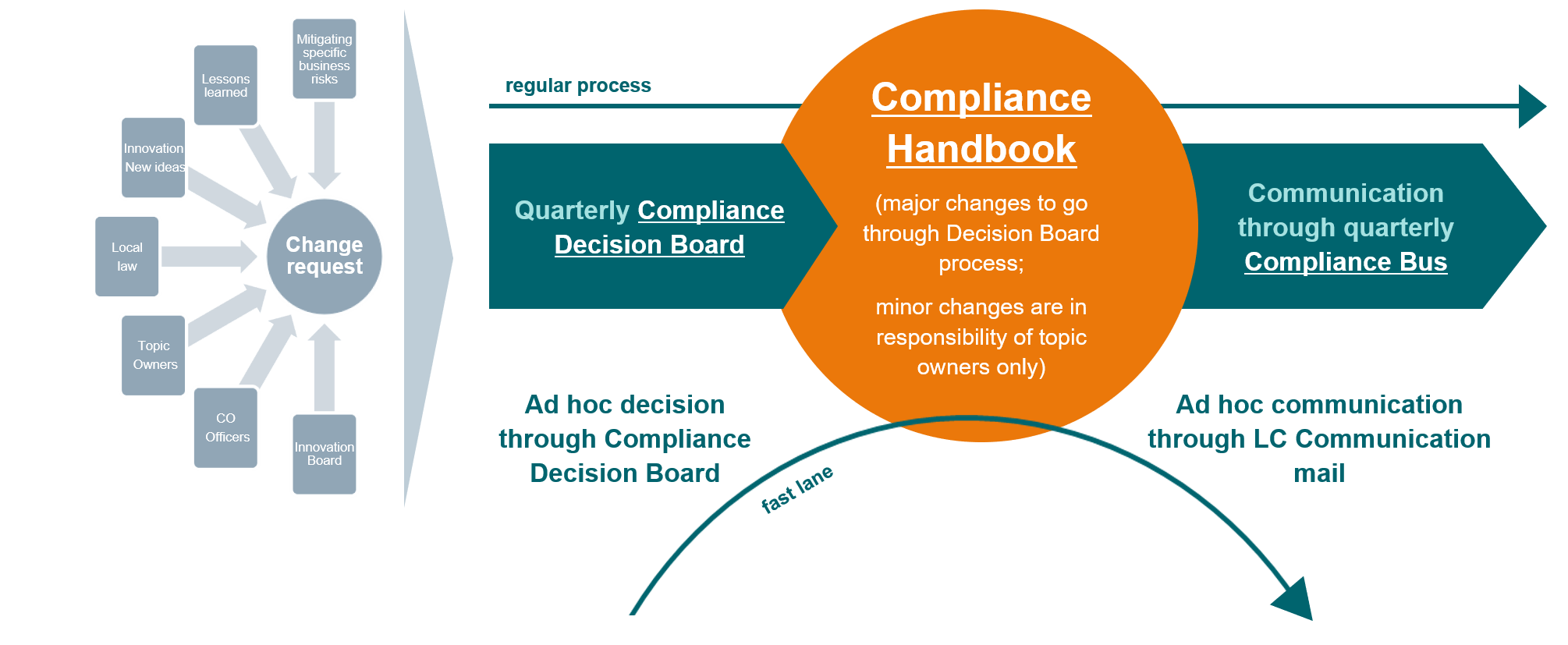
A Change Management Process for adjustments in the regulations contained In the Compliance Handbook has been established. All content owners and authors are required to adhere to the instructions given in the following section.

#### 3.2.1. Change Management

All change requests and / or development proposals to Siemens Compliance System must undergo the [Compliance Portfolio Management process](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_STR_SP/findIT_LC_CO_STR_SP_7355.pptx).

Certain change requests may be approved for release by the respective coordinator if they have a minor impact to the Siemens Compliance System, whereas significant[[3]](#footnote-4) changes must always be approved at the Decision Board Meeting by the Decision Board ([Decision Board Charter](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_STR_SP/findIT_LC_CO_STR_SP_5259.pdf)).

Upon decision of the Chief Compliance Officer, major development activities that are performed in a project structure do not have to undergo the Compliance Portfolio Management process.



Changes that have been approved by the Compliance Decision Board or in the respective project structure through a Steering Committee or similar can be integrated into the Compliance Handbook.

1. The Changes have to be integrated into the respective chapter in the Word template uploaded In the [Compliance Handbook SharePoint](https://workspace.c6.siemens.com/content/300000007/Compliance%20WebBook/Forms/AllItems.aspx). The “Track Changes” modus of Word must be used for the integration of changes. The changes will only be visible in the Compliance Handbook Preview Version after creation of a new Preview Version.[[4]](#footnote-5)
2. A short summary of the changes should be included in the section “History of Changes” of the respective Chapter.
3. The Editor of the Compliance Handbook should be informed about the changes implemented. The Editor has the final approval authority and decides in close collaboration with the authors and topic owners about the release of the updated contents.
4. For major changes in the Compliance Handbook we recommend a communication through the quarterly Compliance Bus. (Contact: Ines Zins, LC CO RFC CA, [ines.zins@siemens.com](mailto:ines.zins@siemens.com))

The Compliance Handbook will be updated on a quarterly basis. Updated Versions of the Compliance Handbook will be published by the editor in the so-called Web-book format and additionally as PDF version.

#### 3.2.2. Style Guide and Templates

In order to ensure that wording is consistent throughout the Web-Book and even more crucial, that the content is widely understood by employees, please use the following examples:

1. For **binding regulations**, please use expressions: ***must, is/are prohibited* and *is/are not permitted****. These are* probably most easily understood. Depending on the context, however, you can also use ***is/are binding, is/are mandatory, is/are to be complied with, is/are necessary****,* and *may not.*

Constructions with *have to*, *shall*, *ought to* or *must not* should be avoided since they’re not really appropriate for regulations.

1. To express the idea that **exceptions** are possible, you can use, for example, *is* ***permitted if*, *is permitted provided that***and***is prohibited unless***.
2. For **recommendations**, *should* is generally OK. But you can also use ***is/are recommended, is/are suggested* and *is/are advisable***.
3. For **voluntary** actions, ***is permitted*** and ***may*** are often used. But you can also use simply ***is/are possible***.

The template that has to be used for the Compliance Handbook can be found here:

[General Template for authors](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_STR_SP/findIT_LC_CO_STR_SP_7975.docx)

1. In conjunction with LC M&A CMP. [↑](#footnote-ref-2)
2. In conjunction with SU. [↑](#footnote-ref-3)
3. Significant change means, but is not limited to:   
   1. Any new topic area or approach,   
   2. Change that has a major impact on the implementation of the Compliance System (and affects the operational work),   
   3. Change that affects several departments (e.g. a regulatory change affecting tools),   
   4. In case none of the above mentioned criteria is fulfilled and the change requires an investment of more than 30.000, 00 EUR.   
   In case of ambiguity whether a topic shall be approved by the Decision Board, final decision is made by the respective Coordinator. The Coordinator can also decide to escalate a minor topic to the Decision Board at its own discretion. [↑](#footnote-ref-4)
4. [How to create an updated Preview Version](https://findit.compliance.siemens.com/content/10000101/Compliance/LC_CO/LC_CO_STR_SP/findIT_LC_CO_STR_SP_7963.ppt) [↑](#footnote-ref-5)