2. Sponsoring, Donations, Memberships

Siemens supports organizations and activities around the world through Sponsoring Activities, Donations, Charitable Contributions and Memberships (“Contributions”). The support of certain groups, institutions, projects and activities is an essential part of our communications programs and initiatives to strengthen the Siemens brand, of our company’s social commitment as well as of its leadership in industry associations.

Communications (CM) has strategic responsibility (governance) for Sponsoring Activities, Donations and Charitable Contributions, and Memberships. Insofar, this chapter serves for information purposes only.

To bundle these activities in line with the relevant strategic objectives, to create transparency, to ensure compliance with all applicable statutory regulations and to strengthen control over the associated costs, Siemens has implemented the SpoDoM tool for registering and approving the activities. The Compliance Danger Sign questions to be answered in the SpoDoM tool in this context were fundamentally revised as of 01.10.2020.[[1]](#footnote-1) Compliance is now only included in the approval process for sponsorships and donations if the Danger Sign questions are answered positively.

The approval sequence in the SpoDoM tool for all ARE is as follows:

1. Communications
2. Compliance (in case of positively answered danger sign questions)
3. Management
4. CM CUS (only for donations > EUR 20,000 and sponsorships > EUR 50,000).

In agreement with the Siemens Business Conduct Guidelines, these Principles set out the mandatory requirements for the registration and approval of Contributions. They may not be circumvented either directly or through the use of third parties. The relevant managers are responsible for the appropriate, efficient and cost-conscious utilization of the company resources that have been allocated to such activities.

Additional information about Sponsorships, Donations and Memberships as well as Mandatory Contributions for social purposes can be found in the [Siemens Circular 186 “Principles for Sponsoring Activities, Donations, Charitable Contributions and Memberships”](https://circulars.siemens.com/documents/CircularDownload.aspx?ID=SC_186.pdf) and on the [“Sponsoring, Donations and Charitable Contributions, Memberships, Other Contributions (SpoDoM)”](https://intranet.for.siemens.com/cms/059/en/processes/publications/Pages/compliance_spodom.aspx) intranet page.

## 2.1. Training and supporting material

Training and supporting material can be found on the [SpoDoM](https://intranet.for.siemens.com/cms/059/en/processes/publications/Pages/compliance_spodom.aspx) intranet page, in the tab “Supporting Materials”.

## 2.2. History of changes

|  |  |  |
| --- | --- | --- |
| **Date** | **Author** | **Major changes of binding content** |
| January 1, 2019 | Panagiotis Chalioulias / Ulrike Desimoni / Soeren Kupich | Revision of structure and format, text streamlining and integration into the Compliance Handbook. |
| Oct. 1, 2020 | Ulrike Desimoni/Soeren Kupich | Revision of Danger Sign questions  Change of approval sequence  Responsibility of Compliance in the approval process |

## 2.3. Contacts

* **Compliance Officer**

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).

* **Corporate Governance Owner**

For these topics please contact Communications (CM). The responsible Governance Owners can be found on the [SpoDoM](https://intranet.for.siemens.com/cms/059/en/processes/publications/Pages/compliance_spodom.aspx) intranet page.

**For Compliance questions in this context:**

Ulrike Desimoni (LC CO RFC LF)

Soeren Kupich (LC CO PT CO)

1. The Compliance Danger Sign Questions implemented in SpoDoM, which are to be answered in the "Risk Assessment" section, have been fundamentally revised with the aim that the actual Compliance risks today are reflected in these questions and the number of questions are reduced as well as simplified. [↑](#footnote-ref-1)