3. Ambassador Program

This guidance addresses the Compliance Officers in Regions, OpCos and Corporate units. The implementation of the Compliance Ambassador approach is on a voluntary basis. Compliance Officers may decide whether to introduce the concept in their entity by themselves.

The target of this Compliance Ambassador Guidance is to summarize, standardize and develop all the best practices in one common setup.

Globally we will only use the term „Compliance Ambassador“ (CoA).

Objectives of the Compliance Ambassador approach

The Compliance Ambassador performs a voluntary support function as „local first line contact“ between Compliance Officers as trusted business partners and local employees to facilitate a successful and sustainable business.

The Compliance Ambassador is a local point of contact for employees and the Compliance Officer. He or she answers employee's basic compliance questions (e.g. how to find information on the Compliance Intranet), supports compliance communication initiatives, and highlights potential risks or areas where Compliance training might be needed. He or she involves the Compliance Officers as necessary.

Compliance Ambassadors should be role models for Siemens values and integrity in daily business and make an important contribution to our Compliance System.

## 3.1 Set-up, selection and appointment

It is recommended that a Compliance Officer, who wants to introduce the Compliance Ambassador approach, takes into account the necessity, number of locations and resources etc. in close cooperation with the responsible management/business of the respective entity.

In the process of introducing the Compliance Ambassador approach, especially the selection of appropriate colleagues, it is recommended that a Compliance Officer consults the relevant management of the entity and employee´s manager (manager of the potential candidate).

Adequate platform for obtaining management´s approval for the implementation could be a Compliance Review Board meeting (CRB), if in place in the relevant entity. The selection of candidates could be agreed thereafter with the above mentioned parties bilaterally or in case of small entities as well within the CRB or another management team meeting.

### 3.1.1. Assignment

The Compliance Ambassador is not assigned to the Compliance Organization, but represents the link between his or her organizational unit and Compliance Officer, on a voluntary basis. The Compliance Ambassador takes on additional part-time responsibilities above his or her daily tasks and responsibilities that can be added to personal PMP targets, but at sole decision by the employee´s manager and the Compliance Ambassador. Headcount and related costs will not be charged to the Compliance Organization.

Before starting, the Compliance Ambassador shall receive an official appointment letter upon nomination, and after terminating he or she shall receive a release letter. Appointment and release letters shall mandatorily be co-signed by the relevant Compliance Officer and the employee´s manager (or other management representative according to the signature regulations in the entity, e.g. CEO in smaller or Functional Head in larger entities). Compliance Ambassador shall also sign the appointment letter to confirm his or her consent to the appointment to his or her new role.

It shall be mutually agreed by the above mentioned persons, for which period of time the Compliance Ambassador shall be appointed, whereby all parties should have the possibility of termination with an immediate effect.

A possible template of the appointment letter as well as a release letter is available on the Compliance Ambassador workspace (see point 5 of this guidance).

### 3.1.2. Profile

The following profile elements should be taken into consideration by the Compliance Officer when evaluating potential candidates for the role of a Compliance Ambassador:

Knowledge and understanding:

* adequate knowledge of the Siemens Compliance System,
* adequate knowledge about relevant Compliance processes and policies in his or her local environment,
* a good understanding of the processes in his or her business or functional environment,
* sense of responsibility, well respected in the organization,
* adequate experience in the relevant business environment,
* access to Management of the respective organization,
* overall understanding of the urgency of effective Compliance.

Capabilities:

* integrity,
* embraces Siemens values,
* effective communicator,
* takes initiative,
* power of persuasion,
* ability to learn,
* sensitivity to react according the priority / relevance of the situation.

## 3.2. Tasks of Ambassadors

In general, the following tasks could be performed by the Compliance Ambassador in his or her area of responsibility:

* answers questions about Compliance and passes on relevant questions to the Compliance Officer,
* communicates the importance of all/relevant Compliance related topics within his or her community/function/department/work environment/project,
* creates additional contacts between local employees and the Compliance Officers,
* participates in team/project meetings, representing the relevant Compliance topics,
* provides feedback and support on the updating and improving the Compliance System,
* may participate as guest speaker during Compliance training sessions if agreed with the respective Compliance Officer and the trainer, as well as he or she may support in a co-trainer role the Compliance Officer / Management in conducting other trainings (e.g. Integrity dialog),
* informs the Compliance Officer about Compliance related incidences and activities to prevent possible risks,
* indicates the need for Compliance training measures within its organizational unit to the responsible Compliance Officer,
* supports the local Compliance Organization by distributing continuously targeted information to local teams in a timely manner,
* supports the local Compliance Organization by collecting information, data in his or her respective organization, e.g. BP completeness checks,
* participates in information meetings with the responsible Compliance Officer,
* in large projects he or she may support during project execution phase,
* may discuss topics of common interest within the Ambassador community

The Compliance Officer may limit or – within the boundaries set out in the section 3.3. – extend the tasks according to the local requirements.

Therefore a Compliance Ambassador may not participate at trainings for the Compliance community like the CEP 1 or CEP 2 as above mentioned tasks are not covered by these trainings.

## 3.3. Out of scope tasks of Ambassadors

The Compliance Ambassador may not perform any Compliance governance tasks, including, but not limited to the following:

* review, release or approve business transactions from a Compliance perspective (e.g. SpoDoM, LoA, BPC Tool),
* control or issue directives,
* participate in Compliance investigations and clarifications as member of the investigation team,
* represent Compliance in audits or operational reviews,
* act as Control Requirement Contact (CRC), Deputy CRC for Compliance related controls;
* Compliance Ambassador might be appointed as an Independent Assessor with prior approval of the Compliance Officer.

## 3.4. Responsibilities of Compliance Officers

In order to ensure the necessary engagement with the Compliance Ambassador and to keep him or her up to date regarding its necessary knowledge, it is recommended, that the Compliance Officer:

* evaluates the effectiveness of the Compliance Ambassador concept within his or her entity and, if necessary, take the required steps in order to change or adapt the concept to best suit its needs,
* ensures that the Compliance Ambassador receives specialist guidance and regular information in order to stay informed about relevant Compliance related guidelines, circulars and processes,
* motivates the Compliance Ambassadors to be engaged in his or her role, e.g. by ensuring that he or she receives first hand information, giving the possibility to network with other Ambassadors and showing off the Compliance expertise to his or her management.
* supports the Compliance Ambassador in all questions and issues that might arise in connection to his or her role,
* takes the initiative for regular individual meetings with the Compliance Ambassador and Compliance Ambassador community on a local level

## 3.5. Communication measures

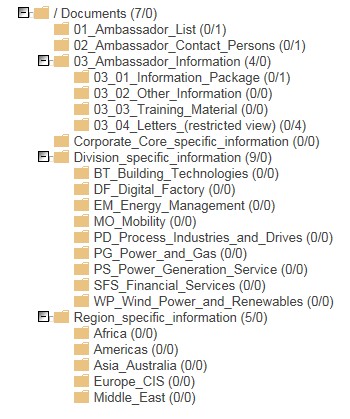
To fulfill his or her tasks the Compliance Ambassador has to receive adequate information about relevant topics. The Compliance Ambassador Program communication is supported by LC CB GF (Global Functions) and executed in close cooperation with OpCos / Countries/Corporate Compliance, especially LC CO RFC CA.

### 3.5.1. Workspace and Information Package

As essential piece of the Compliance Ambassador communication, LC CB GF will provide a workspace at the LC Collaboration Platform named “Compliance Ambassadors”.

The workspace fulfills the following main topics:

* Workspace structure:



Centralized storage platform

All relevant information (information package and further communication measures, list of appointed Compliance Ambassadors, etc.) will be stored on the workspace centrally.

Additionally, OpCos/Healthcare/ Countries/Corporate Compliance have a folder of their own to share entity specific information with the Compliance Ambassadors. Each Division/Healthcare/ Countries/Corporate Compliance unit is responsible for the administration of its own folder.

Information Package for Compliance Ambassadors

The main purpose of the information package is to support the Compliance Ambassadors with the latest compliance-related news in general.

The package will be updated on a regular basis by LC CB GF based on input from LC CO RFC CA, OpCos / Countries/Corporate Compliance.

All topics are addressing all Compliance Ambassadors – irrespective of the organization they belong to.

The information package will be stored on the workspace in the folder “[03\_01\_Information\_Package](https://l-collaboration.siemens.com/workspaces/comamb/i/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fworkspaces%2fcomamb%2fi%2fShared+Documents%2f03_Ambassador_Information%2f03_01_Information_Package)”. Compliance Ambassadors can download the news and activate the auto-alert function.

Training material on Compliance topics will be provided at the folder “[03\_03\_Training\_Material](https://l-collaboration.siemens.com/workspaces/comamb/i/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fworkspaces%2fcomamb%2fi%2fShared%20Documents%2f03%5fAmbassador%5fInformation%2f03%5f03%5fTraining%5fMaterial&FolderCTID=0x012000CB468985A794FB4FA24)”.

### 3.5.2. Appointed Compliance Ambassadors and contacts

The OpCos/Healthcare/ Countries/Corporate Compliance are responsible for the administration of the Compliance Ambassadors workspace (concerning content and access rights for own Compliance Ambassadors).

LC CB GF is responsible for technical support of LC Collaboration workspace.

The OpCos/Healthcare/ Countries/Corporate Compliance introducing Compliance Ambassadors must nominate an overall contact person that acts as first line contact for the Compliance Ambassadors. An actual list has to be stored at the workspace in the folder “[02\_Ambassador\_Contact\_Persons](https://l-collaboration.siemens.com/workspaces/comamb/i/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fworkspaces%2fcomamb%2fi%2fShared+Documents%2f02_Ambassador_Contact_Persons)”.

The OpCos/Healthcare/ Countries/Corporate Compliance are obliged to enter the names of appointed Compliance Ambassadors in the folder “[01\_Ambassador\_List](https://l-collaboration.siemens.com/workspaces/comamb/i/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fworkspaces%2fcomamb%2fi%2fShared+Documents%2f01_Ambassador_List)” on the workspace and update it accordingly due to personnel changes to ensure proper information flow.

## 3.6. Compliance Ambassador plus

Due to the specifics of the strategic company “Siemens Mobility” its setup and environment there was a need of enriching the profile of a “Compliance Ambassador” (as described in in chapter 3 of this webbook) by additional tasks. With this enhancement of the standard concept the Ambassador is of more value add for both, business and compliance organization. It is a real “plus” for the overall organization.

### 3.6.1. Business supporting tasks – additional tasks of an Ambassador plus

The **Ambassador plus supports** **business related tasks** (additionally to tasks described in chapter 3) in the following manner:

* Initial analyzing of internet findings related to business counterparts;
* Supporting bid mangers in performing the Compliance Risk Assessment;
* Supporting filling in the risk assessment of a CDD in the BPC Tool;
* Supporting the analysis whether an existing CDD may be used for a transaction;
* Supporting the execution of RIC controls (within the given boundaries – acting as Independent Assessor with prior approval of the Compliance Officer is possible);
* Information of DP responsible persons about DP related risks, incidents and other topics.

### 3.6.2. Support for the Ambassadors plus

In order to enable the Ambassador plus to perform relevant tasks, he/she will

* receive an education program for Ambassadors plus;
* be granted viewer rights in the (compliance) tools BP Next Gen, SpoDoM and LoA Live Tool;
* be invited to supporting communication channel in Yammer.

### 3.6.3. Appreciation

Ambassadors plus should experience that their efforts are valued and appreciated. This can be done e.g. by invitations to on-site events to strengthen the Compliance Ambassador network and encourage knowledge exchange. In addition, going the extra mile shall also be considered when performing staff reviews.

## 3.7. Training and supporting material

▌ Compliance Ambassador appointment letter / release letter:

[03\_04\_Letters\_(restricted view)](https://l-collaboration.siemens.com/workspaces/comamb/i/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fworkspaces%2fcomamb%2fi%2fShared+Documents%2f03_Ambassador_Information%2f03_04_Letters_(restricted+view))

▌ Compliance Ambassador information homepage:

[Compliance Ambassador Homepage](https://intranet.siemens.com/en/compliance/topics-tools/compliance-ambassador-program.htm)

▌ Compliance Ambassador workspace:

<https://l-collaboration.siemens.com/workspaces/comamb/SitePages/Home.aspx>

▌ ComplianceOrganization:

<https://intranet.siemens.com/en/compliance/divisions.htm>

▌ Compliance Regions:

<https://intranet.siemens.com/en/compliance/regions.htm>

## 3.8. History of changes

|  |  |  |
| --- | --- | --- |
| **Date** | **Author** | **Major changes of binding content** |
| January 1, 2019 | Ulrich Mueller (LC CO OC MAC), Tobias Maiwald (LC CB GF) | First release through the Compliance Handbook based on former Compliance Ambassador Guidance V 2.0. |
| April 1, 2019 | Ines Zins (LC CO GR CAS)  Tobias Maiwald (LC CB GF) | Editorial changes due to reorganization of the company. (Vision 2020+) |
| April 1, 2020 | Fran Girod (LC CO SMO RI)  Ines Zins (LC CO RFC CA) | Inclusion of the Mobility specific Compliance Ambassador plus program as Chapter 3.6. of this guidance |

## 3.9. 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

Ines Zins (LC CO RFC CA)