0. Introduction to Case Handling, Discipline and Remediation

The overall governance for the handling of compliance cases at Siemens is with Compliance Regulatory:

* Compliance Regulatory is responsible for investigating compliance cases where required and for taking actions including disciplinary and remediation measures when chargeable violations by Siemens employees are identified.
* There is no differentiation between “local” and “central” cases.
* All cases are being classified following a risk based approach as “low”, “medium”, and “high” risk cases; this classification is being done from a corporate view in the meaning that “high” risk cases can have a big impact on the global Siemens company, “medium” risk cases usually have an impact on the involved business unit and / or the country only, and “low” risk cases have no immediate risk for the company (but still could turn out to be “medium” or “high” risk cases in course of the case development).

Compliance cases concern in particular violations of criminal or administrative law and related internal regulations as well as criminal or administrative proceedings against the company or its employees.

Therefore, each compliance case handled at Compliance Investigation & Regulatory has a designated lawyer from Compliance Investigation & Regulatory Central Function assigned to the case for its whole lifecycle. The lawyer is handling the case from the receipt of allegations, the plausibility check, the preparation of the mandate to be issued, the investigation together with the investigator, the remediation together with the remediation manager and labor lawyer, to the final legal aspects before closing the case. The lawyer is giving legal advice on all compliance related matters caused by the case.

The legal advice from the team members of Investigation & Regulatory Central Function together with the fact finding activities from the Investigation & Regulatory Case Handling team as well as the specialized input from the Remediation & Discipline team safeguards company interests worldwide in major investigations by public prosecutors and other law enforcement authorities against Siemens AG, Siemens Regional Companies, affiliates and/or employees. In this context, the lawyers at Compliance Legal also handle information requests from authorities (in Germany and worldwide).

The Compliance Investigation & Regulatory Remediation & Discipline team ensures proper response to the findings form investigations. It supports the business and tracks the implementation of recommendations included in the investigation reports in order to ensure that identified deficiencies are eliminated and has governance responsibility for the disciplinary process resulting from non-compliant behavior, including steering the (regular and accelerated) Central Disciplinary Process,

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| Principles  If you become aware of a plausible allegation of a compliance case, e.g. of   * + a violation of criminal or administrative law or   + a violation of a Siemens-internal regulation relating to criminal or administrative law (for example, the Business Conduct Guidelines)   use for reporting one of the following contacts   * + the [Chief Compliance Officer](https://intranet.siemens.com/cco),   + the Compliance Officer responsible for the [Division, Business Unit or country](https://intranet.siemens.com/compliance-divisions),   + the [Tell Us](https://intranet.siemens.com/tellus) reporting channel or   + the [Siemens Ombudsman](https://intranet.siemens.com/ombudsman)   + [or the colleagues from Compliance Investigation & Regulatory Central Function](https://scd.siemens.com/luz/IdentitySearch?sn=&sngenau=&gn=&gngenau=&tcgid=&psn=&psngenau=&nn=&nngenau=&c=&cgenau=&o=&ogenau=&l=&lgenau=&dep=LC+CO+IR+CF&depgenau=&bau=&bauUml=&baugenau=&room=&roomUml=&roomgenau=&tn=&tns=all&tngenau=contains&fax=&faxgenau=contains&mail=&mailgenau=&are=&aregenau=&cost=&costgenau=&orgid=&orgidgenau=&sponsor=&gidMan1=&utI=I&utX=X&utT=T&rtH=H&rtS=S&rtZ=Z&rtAktiv=A&rtO=O&maxanz=50&suchart=detail&utG=G) |

History of changes

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| **Date** | **Author** | **Major changes of binding content** |
| April 1, 2019 | Bernd Plagemann | Discontinuation of the differentiation between central and local cases. |