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Siemens and its Compliance Program



Compliance Mission

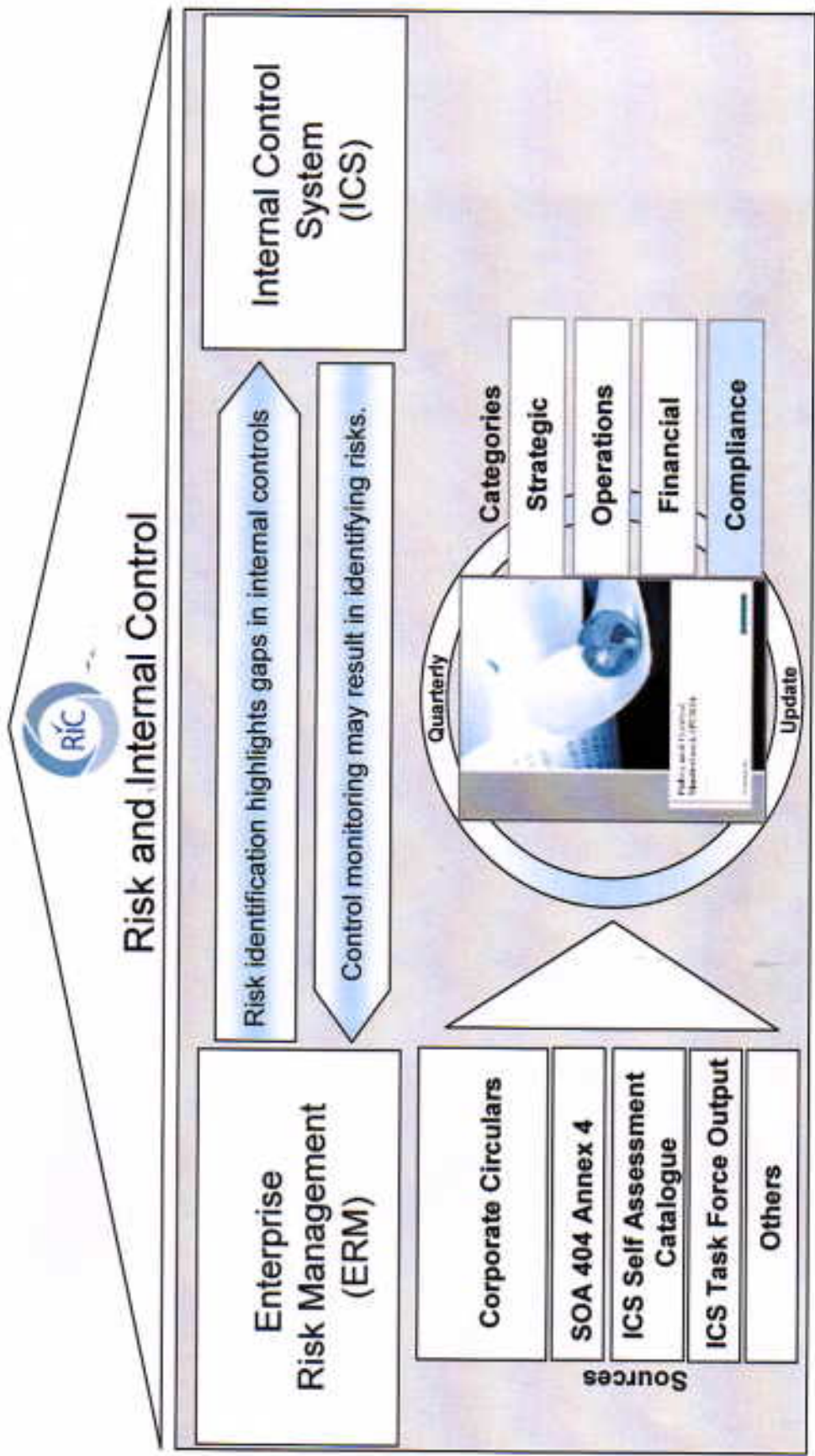
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The mission of the Regional Compliance Office is to act as a trusted advisor of the organization in order to allow it to prevent non compliance behavior and to enable the development of a culture based on values.

The Regional Compliance Office is mainly focused on prevention on compliance issues but also supports and advise on detection and response on non compliance behavior.

Compliance is one integral part of Siemens' Risk and Internal Control System

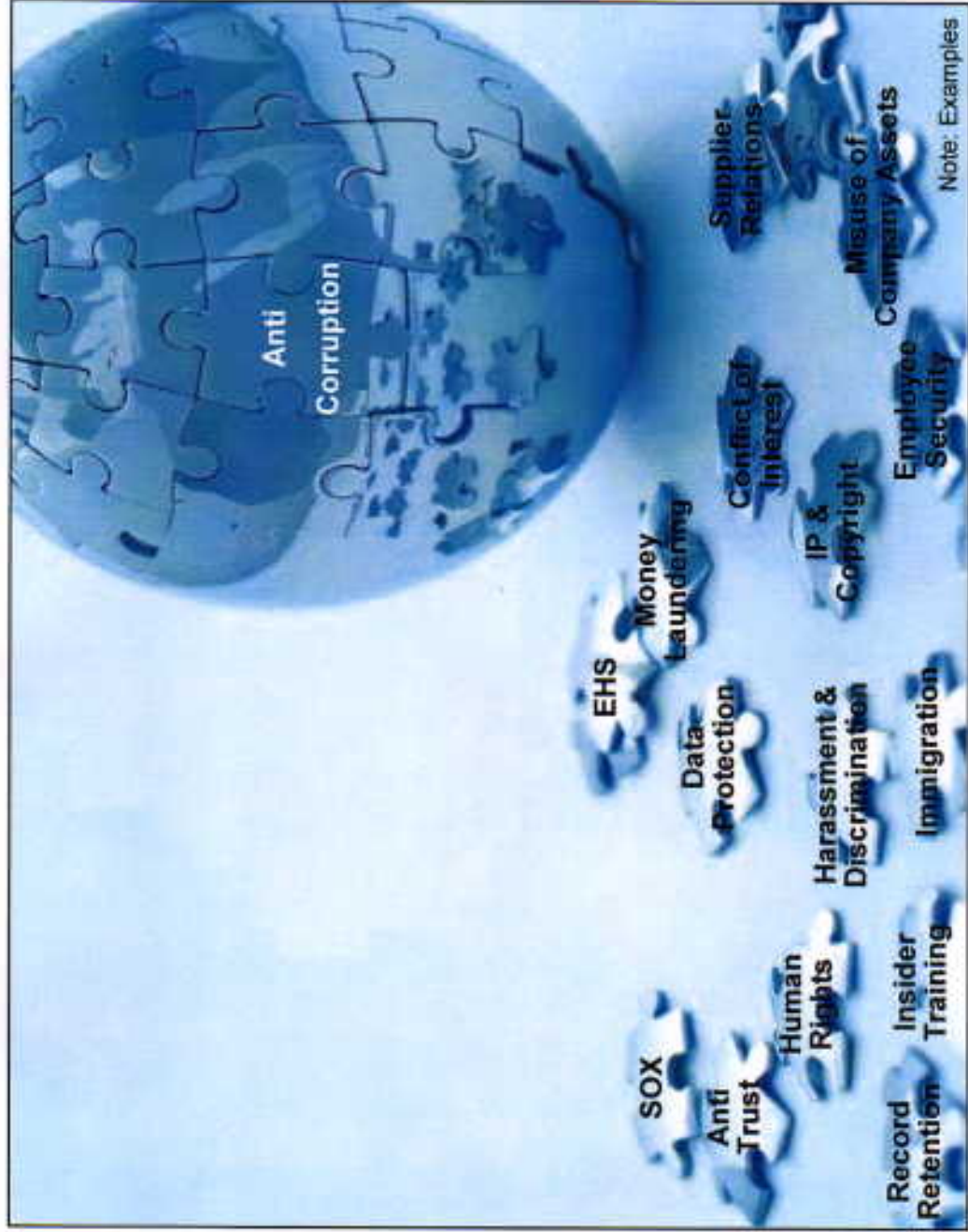


We have progressed significantly implementing a comprehensive Compliance Program



1) Incl. Global Ombudsman function

There is more than just anti-corruption, which needs to SIEMENS comply with external laws and internal policies



Compliance with

External laws and regulations



Internal policies and procedures based on the Business Conduct Guidelines

**... however, ultimately, controls are not enough.
We need to continue fostering an integrity culture**

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Questions to guide Siemens employees towards compliant and responsible behavior

1 Is it the right thing for Siemens?

2 Is it consistent with Siemens core values and mine?

3 Is it legal? Is it ethical?

4 Is it something I am willing to be held accountable for?

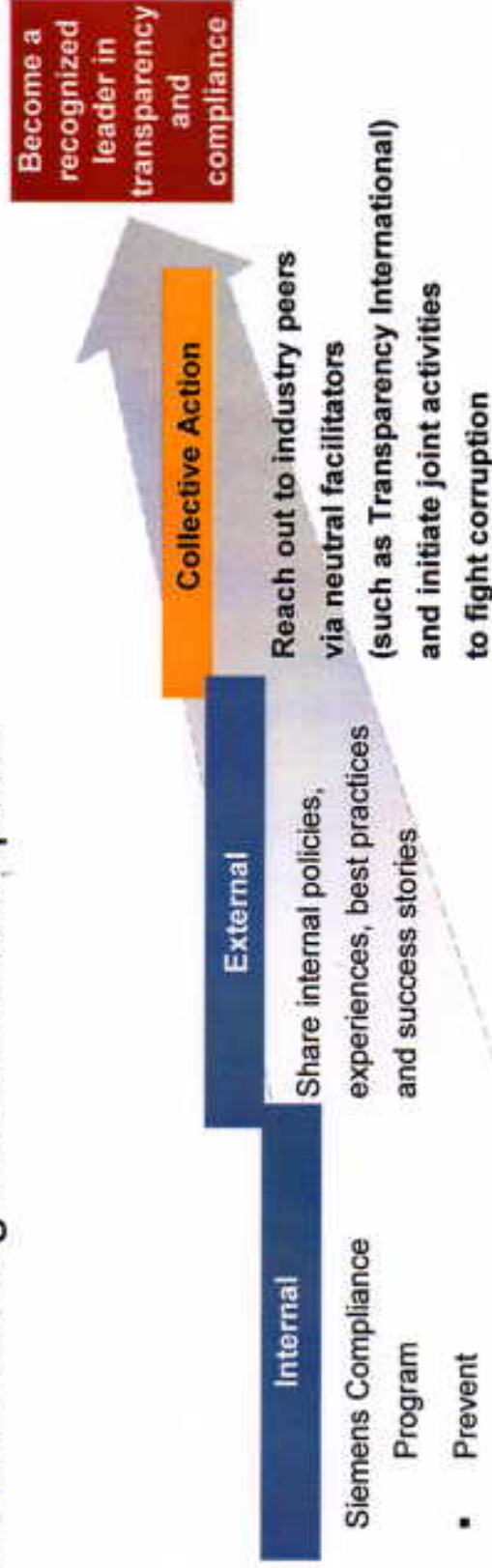
**If the answer is YES to all of those questions,
DON'T WORRY, BE CONFIDENT!**



Siemens needs to go beyond internal programs in order to become a recognized leader in compliance

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"Collective Action" can have a key role fostering equal compliance standards for all market players and thus reducing the risk of corruption.



Siemens achieved best score in the 2008 Dow Jones Sustainability Index (Electronic Equipment industry) regarding category code of conduct / compliance



Siemens is a Member of the World Bank Initiative on "Collective Action"

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The Collective Action Guide and the comprehensive web portal www.fightingcorruption.org was successfully launched on June 19, 2008 in London

Results of World Bank Institute Initiative

Published pragmatic guide on how to implement Collective Action

- Written 'by business for business'
- Decision trees and process descriptions
- Based on real life experiences
- Templates available



Launched Web-Portal www.fightingcorruption.org (hosted by World Bank)

- Providing guide download, country specific information, updated case stories, background info, etc...

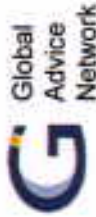
Pilot implementation ongoing

Working Group

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Promoting knowledge and learning for a better world



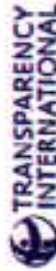
Grant Thornton



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United Nations Global Compact



Supporting partners:

- InWEnt Capacity Building International, Germany
- Transparency International, USA

Advice & Feedback from:

- BDI, Germany
- Microsoft, USA
- Pacto Elitico Comercial, Paraguay
- Sanlam, South Africa
- Prince of Wales International Business Leaders Forum, UK
- ThyssenKrupp AG, Germany