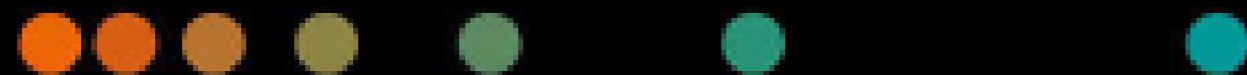


Siemens Healthineers Business Conduct Guidelines

Shaping the future of healthcare

[siemens-healthineers.com/BCG](https://www.siemens-healthineers.com/BCG)



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Business Conduct Guidelines

Preface

Dear Healthineers,

For more than 120 years our company has stood for a tradition of excellent products, innovation, committed people, and the common purpose of helping people live healthier and longer. From the very beginning, with the rise of modern medicine and fundamental advancements in science, visionaries like Erwin Reiniger, Max Gebbert or Emil von Behring were driven by this purpose. And around the world it still drives all of us each day to give the best we can.

On March 16, 2018, our company entered a new period in its history by debuting on the Frankfurt Stock Exchange. From a division of Siemens AG we have grown into a separate company – with our own brand and our own entrepreneurial freedom. However, such freedom comes with a responsibility that we all share – toward society, customers, patients, partners, shareholders, and employees. We want to be a fair player in competition, a reliable partner for customers and stakeholders and we strive for the highest ethical and moral standards every day. Only clean business is the business of Siemens Healthineers.

We have committed ourselves to the Principles of Healthineers and live them day by day. We are convinced that this will help us become more successful and a more relevant partner for our stakeholders. Whenever it comes to enabling customers to deliver high-value care, we want to be our clients' partner of choice. And we also want to be the company where people love to work and take pride in what they do for a common mission.

We are one of the largest and most successful medical technology firms with about 50,000 highly dedicated employees, operating in more than 70 countries. We strive to be a company that fosters talent and diversity and a company where people respect each other. Together around the globe it is up to us to make Siemens Healthineers a place to grow and excel – a place where a speak-up culture and honest discussions are fostered. Only in such a company will we be able to master all the challenges we face in an increasingly complex world and achieve our ambitions.

The following guidelines are the basic rules that everyone has to observe. They are non-negotiable and violations will not be accepted. The Business Conduct Guidelines support us in achieving our goals through fair play. Every employee must be familiar with these rules and I ask you personally to read them. If anything is unclear, please ask our Legal & Compliance team or any other relevant person for advice and support.


Bernd Montag
CEO Siemens Healthineers



Business Conduct Guidelines

Preface

Dear colleagues,

At Siemens Healthineers we now have our own Business Conduct Guidelines. They are the basic rules for our company, which we must observe each day – in everything we do for our company and everywhere that we are. It is up to us to protect the reputation of our company through the right behavior in the external world and internally towards our colleagues. It is not only because of reputation, it is because we want to do things right and we want to be proud of what we do.

The Business Conduct Guidelines are designed to be easy to understand and to guide us toward the right way of doing business. Whenever you have the feeling that something is not in line with our Business Conduct Guidelines you can report this to Legal & Compliance directly or, in an anonymous form, through our reporting tool “Let Us know”. Or you can reach out to the ombudswoman Sibylle von Coelln.

Please make yourself familiar with our common rules and let us protect our reputation and our company’s successful future.

With best regards

Dagmar Mundani
Head of Legal & Compliance
at Siemens Healthineers

Benedikt Knothe
Head of Compliance
at Siemens Healthineers



From left: Benedikt Knothe, Dagmar Mundani



We shape the future of healthcare

Who we are

Our purpose

Our products, services and solutions are at the center of clinical decision making. They help physicians, medical staff and healthcare providers keep people from getting sick or make the right diagnosis and decide for the right treatment helping them recover faster.



Benefit from our medical technology*

*1 day = 5 million people

“What connects us is the belief in improving patients’ lives through technology and data. What drives us is the will to increase value for our customers. We are pioneers, seeking new paths to better care.”

Bernd Montag

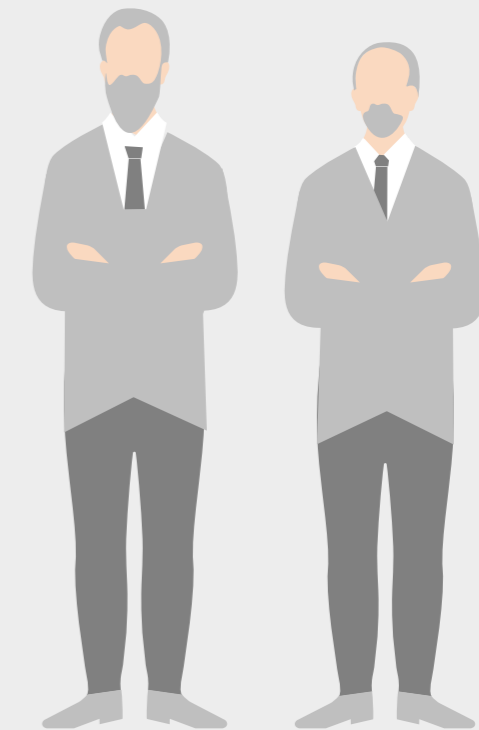
CEO Siemens Healthineers

Our heritage

We are pioneers in the healthcare industry with an ambition to lead in innovation.

We are a young company with a long tradition.

With our innovations we have been shaping progress in healthcare for over 120 years.



Röntgen & Behring
1901 Nobel prize winners
(Physics & Medicine)

Our mission

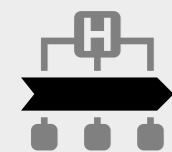
We enable healthcare providers to deliver high-value care.



Expanding precision medicine



Improving patient experience



Transforming care delivery



Digitalizing healthcare

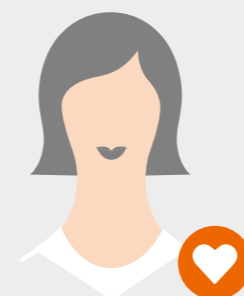


Our culture

Our sense of common culture is reflected in our “Principles of Healthineers” which guide our actions and decisions every day.

Principles of Healthineers

- A day without passion for healthcare is a lost day
- Missed opportunities are our biggest risk
- We don’t compromise on quality
- Today is about tomorrow
- We say what we do, we do what we say
- We listen more than we talk
- We lead by being lean



A day without passion for healthcare is a lost day

~ 50.000 employees



Our people

We value our people as the most important resource of our company. We believe they are inherently trustworthy, want positive impact and to be treated on eye level, like to learn and support and are willing to take the lead.

We embrace and value different viewpoints, backgrounds, experiences, expertise and individual qualities. We are the employer of choice for all those who seek to continuously learn and contribute to both business and society.

Our compliance compass

Our Business Conduct Guidelines provide orientation and guide our path. They set forth our behavioral expectations and obligations.



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Our basic principles

Our basic principles guide our decisions and overall conduct as employees of Siemens Healthineers





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A | Our behavior

We behave correctly

We comply with the applicable laws of the countries in which we operate and follow our internal rules, processes and controls.

Siemens Healthineers is a member of various leading industry associations around the world and both shapes and commits to follow their codes of conduct. While these codes are not law, they provide appropriate guidance to the industry and to employees for interaction with healthcare providers.

We must be aware of and comply with these laws, codes and our internal rules that govern our daily work. If we are uncertain or have questions, we contact Legal & Compliance.

When making decisions on behalf of Siemens Healthineers, we should always ask ourselves the following questions:

- Is it right for Siemens Healthineers? Is it consistent with the Principles of Healthineers?
- Is it legal?
- Is it consistent with applicable Industry Codes of Conduct and our internal rules?
- Could it negatively affect our brand, if our actions (or those of our agents) were made public?
- Is it something I am willing to be personally accountable for?

What is a “healthcare provider”?

The term “healthcare provider” includes individuals (healthcare professionals) as well as institutions (healthcare organizations) delivering healthcare services for patients.

Healthcare providers include physicians, nurses and laboratory technicians as well as hospitals, clinics or laboratories in accordance with applicable local law.



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A | Our behavior

We behave correctly



What are potential consequences of violations for our company and us as employees?

Violations of the law or failure to comply with our internal rules can have serious consequences for our company and the responsible employee(s).

These consequences include, for each of us:

- Disciplinary action
- Fines and damages
- Imprisonment

For our company:

- Damage to our brand, reputation and market value
- Significant fines and damages
- Reduction of profit (disgorgement)
- Exclusion (debarment) from public and private contracts



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B | Our teamwork

Our core values for successful collaboration

Respect

We respect the personal dignity, privacy and rights of everyone. We believe diversity and inclusion enrich our workplace. We work together without regard to ethnic origin, culture, religion, age, disability, gender, gender identity, gender expression, sexual orientation or any other legally protected characteristics.

We do not tolerate discrimination or any form of harassment, retaliation or inappropriate behavior toward individuals or groups.

We apply these principles of respect to each other and third parties with whom we interact, including our suppliers, customers and business partners. We expect these principles to be followed by such third parties.



- What are some examples of unacceptable behavior?**
- Material that is offensive to people of different ethnic groups, nationalities or cultural background and that is displayed within a work environment (including on desks and in lockers)
 - Innuendos or comments that are hostile or disrespectful to disabled people
 - Gender-specific harassment or violence, including assaults, unwanted advances, or improper remarks or jokes
 - Displaying offensive or improper images or objects, including those with graphically explicit content (e.g. sexual, violent)





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B | Our teamwork

Our core values for successful collaboration

We interact with each other in a respectful and reliable manner.

Trust

In our daily work we are open and honest. We take our responsibilities seriously, we are reliable and we only make promises we can keep.

We are sincere. We help clarify and eliminate potential deficiencies, problems and misunderstandings. We strive to fulfill the trust placed in us by our customers and their patients.

We all make mistakes at work. We foster a culture where we learn from our mistakes and endeavor not to repeat them. We deal openly with mistakes and we continuously give and seek feedback – from and to managers, peers and employees. This is a highly effective way to learn from mistakes and help prevent them from recurring.

While most mistakes are minor, some can have potentially serious consequences and must be reported.

What do we do if we observe a violation of the Business Conduct Guidelines?

We do not look away when we recognize possible violations of the Business Conduct Guidelines, even if they do not involve us personally. The company has numerous outlets to report possible violations of the Business Conduct Guidelines (see chapter [“Our reporting procedures”](#)).

In many cases, timely reporting is important to avoid or minimize harm or negative consequences to the company and our employees.



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C | Corporate protection

We protect our company

We protect and promote our reputation and principles. They are essential for our business success and ensure the sustainable future of our company. If we act illegally or inappropriately, we can cause considerable damage to the company.



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Our responsibility as a leader

With our Siemens Healthineers Leadership Model we take into account various aspects of leadership to create a trustful working environment for all employees. Leaders at Siemens Healthineers know how to best lead, support and develop their employees and they accept feedback.

Managers’ special responsibilities and duties do not release them from their own responsibilities as employees. We work together to comply with the law and our internal rules.

Our leadership model consists of the following four roles:

- Leader:** Provide direction, give and seek feedback, engage and inspire
- Expert:** Advise others, solve challenges, share experiences
- Coach:** Create autonomy, enable problem solving, support self-learning
- Manager:** Set goals and priorities, create accountability, take decisions and drive compliance

Our managers have special responsibilities towards employees by:

- Creating a working environment based on trust and collaboration and being available to discuss with our employees about uncertainties on compliance with legal or regulatory requirements, Industry Codes of Conduct or internal rules. The same applies to questions from employees or professional and personal concerns
- Setting a good example and ensuring the teams understand the importance of acting in accordance with the Business Conduct Guidelines
- Taking every credible indication of possible misconduct seriously while reporting in an appropriate form
- Protecting the identity of employees who report potential misconduct and not tolerating retaliation against them
- Fulfilling all organizational and supervisory duties



What are our organizational and supervisory duties?

- We carefully select employees based on their professional qualifications, skills and suitability. The duty of care increases with the importance of the employee’s task
- We define binding tasks precisely and completely, especially in regard to compliance with legal requirements
- We take care that compliance with legal requirements is continuously monitored
- In our day-to-day business, we consistently communicate the importance of responsible business conduct, compliance with legal requirements and the consequences of our misconduct



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We look after each other and ourselves

Siemens Healthineers protects our fundamental rights as employees, our health, our personal security and occupational safety at all locations throughout the world and when we are on business travel.



“Appreciation for our employees also means providing a safe and motivating working environment. Only if we enjoy the work we do each day, we’ll be successful in the long term.”

Bernd Montag
CEO Siemens Healthineers



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E | Respect for each other

Basic working conditions

Siemens Healthineers fosters fair cooperation among management, employees and employee representatives and protects the fundamental rights of its employees.

No discrimination or intimidation
The principles of equal opportunity and equal treatment are guaranteed without regard to ethnic or social origin, culture, religion, age, disability, gender, gender identity, gender expression, sexual orientation or any other legally protected characteristics. In accordance with the labor and employment laws of the countries in which Siemens Healthineers operates, discrimination or harassment based on these characteristics or any other legally protected characteristics, retaliation or other inappropriate behavior toward individuals or groups will not be tolerated.

Free choice of employment
No one should be employed or forced to work against their will. All forms of forced labor are prohibited.

Prohibition of child labor
Child labor is strictly prohibited.

Adequate compensation
Siemens Healthineers pays fair wages for labor and follows all applicable wage and compensation laws as well as equal pay principles.

Working hours
Siemens Healthineers globally adheres to applicable working-hours regulations.

Freedom of association and collective bargaining
Siemens Healthineers recognizes the legal rights of workers to form or join existing trade unions and to engage in collective bargaining. Members of employee organizations or trade unions are neither disadvantaged nor preferred. Siemens Healthineers constructively cooperates with employees, employee representatives, and trade unions.

Even in the event of disputes, Siemens Healthineers strives to ensure sustainable and constructive cooperation in the long term and for solutions that reflect the legitimate interests of the company and its employees.



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E | Respect for each other

Health, occupational safety, and personal security

Siemens Healthineers cares about us as part of its corporate responsibility.

Our health

Siemens Healthineers protects and promotes our health and well-being, guards us from health threats and offers a wide range of support to maintain and promote our physical and mental health.

Our occupational safety

Our vision are accident-free, health-preserving workplaces. We achieve this through a safety culture that is lived by our employees and managers. Safe working conditions and procedures are a necessary prerequisite for this.



How can I report an incident/accident?

Always inform your manager and/or your responsible EHS person. Siemens Healthineers maintains various reporting tools that differ among our sites. However, if you are unsure, your EHS responsible will be able to support you. Please refer to the global QT EHS intranet page for more information.

This is what we do:

- We follow the safety rules and procedures
- We avoid risky behavior
- When we recognize unsafe situations, we timely take appropriate action
- We report unsafe conditions and behavior as well as near misses and incidents to our managers, facility manager or other responsible person for Environmental Protection, Health Management & Safety (EHS)
- We consider mistakes as learning opportunities for our safety culture



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Health, occupational safety, and personal security

Our personal security

Siemens Healthineers is active worldwide, including in areas and situations where the security situation is less predictable. To protect our employees, the company and our business in the best possible way, global security risks and their potential impact on the business are continually being monitored and analyzed.

This is what we do:

- We educate ourselves in advance about the security risks in the countries to which we will be traveling and follow prescribed security procedures and requirements
- We do not expose ourselves nor our colleagues to unnecessary hazards through reckless behavior or by ignoring security regulations
- We react quickly in a critical situation, contact the emergency hotline at +49 (89) 636 – 12345 (staffed 24x7), and follow the relevant security instructions
- We report security incidents promptly to our manager or via defined reporting processes



How does Siemens Healthineers take care of its employees during business travel, especially into higher-risk countries?

There are processes in place to promote conditions for safe and secure business travel and delegations, particularly in countries with heightened security risks. These include a global travel security process, online trainings, guidances on various topics or pocket guides for certain countries.



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We act fairly and reliably

Fair competition

We place integrity at the heart of everything we do. Siemens Healthineers stands for fair competition in which only market economy criteria (quality, price, innovation, service, etc.) are the decisive factors for business decisions. Competition should not be distorted by unfair methods or means.



We reject all forms of corruption and bribery

We do not tolerate corruption in our business interactions anywhere in the world. This includes our business interactions through our external business partners.

Corruption includes dishonest or illegal behavior, especially by those in power or exercising decision-making. The most common forms of corruption are bribery, fraud and embezzlement.

Bribery is the act of offering, promising or giving money, gifts or other benefits to a healthcare provider, a public official, public or private employees with the aim of receiving improper advantages.

The term “public official” covers any person employed or mandated by a public authority. This includes all government officials and employees of non-governmental institutions who are regarded as public officials in accordance with applicable law.

Benefits – yes, but only to a reasonable extent

In many countries providing benefits, such as gifts, meals, travel and accommodations, is an important part of business interactions. If provided unreasonably or inappropriately, such benefits may affect the recipient’s decision-making or create the appearance of improper influence. Therefore, some jurisdictions do not allow benefits in business interactions at all or require that they be publicly reported under country specific transparency laws; or codes of conduct of industry associations (Industry Codes of Conduct) to which we commit may also require such disclosure.



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Benefits must be in accordance with:

- Applicable laws
- Our internal rules
- Applicable Industry Codes of Conduct
- The internal rules of the recipient's organization

Our business counterparts, especially healthcare providers and public officials, typically have own internal rules that restrict their employees' ability to accept benefits (personally or on behalf of the employer). These rules can be very strict, and we must be aware of and adhere to them.

In the same way we are expected to follow our internal rules by:

- Being transparent and recording benefits correctly in the company's books and records
- Providing only benefits which are reasonable in terms of type, value, frequency, occasion as well as the position of the recipient
- Not offering, providing, demanding, or accepting benefits with the expectation of any type of improper advantage
- Not creating the appearance of dishonesty or inappropriateness





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What are facilitation payments?

A facilitation payment is the payment of a relatively small amount of money or the granting of any other benefit, usually to low-ranking public officials, for their personal benefit or to expedite the performance of a routine governmental action.

Facilitation payments are prohibited and can be prosecuted.

We do not:

- Provide or accept improper benefits in exchange for business or other benefits
- Provide invitations to entertainment events
- Give or accept inappropriate donations or sponsorships
- Give or accept inappropriate monetary payments
- Use third parties to conduct prohibited or inappropriate activities on our behalf
- Give or accept facilitation payments



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Sponsorships, donations and charitable contributions – yes, but only to promote corporate goals

Sponsorships, donations and charitable contributions are important to our social commitment and the pursuit of our corporate goals.

This is what we do:

We report all suspected corrupt activity to our Legal & Compliance organization.

When the company provides sponsorships, donations and charitable contributions, these:

- Must be carefully examined to determine whether they promote our company's legitimate objectives
- May not be promised, offered or made to obtain improper business advantages or for other unethical purposes
- Must not support any religious group or political party
- Must be intended to strengthen our brand or advance our social commitments



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Political engagement

Continuous dialog with political decision-makers is highly relevant for the success of a global company. Our activities with respect to politicians, parties and positions will be non-partisan and solely in support of our legitimate business goals. We comply with the law and our internal rules.

Outgoing payments – yes, but only if used lawfully

Payments to third parties are made every day in the course of business at Siemens Healthineers. Processes and tools help us ensure these payments are properly documented and provided for proper purposes.

This is what we do:

- We only maintain accounts or funds for legitimate purposes
- We only make payments to third parties that are legal and have legitimate purposes
- We only make payments when there is proper documentation

While meeting with a potential customer in the United States you plan to present a branded gift of minor value as a welcome present. Is this allowed?

No. While a branded gift of minor value may be acceptable in other countries, the Anti-Kickback Statute in the United States prohibits such gifts from being given to healthcare providers.

Depending on the applicable federal or state laws, gifts may be provided to United States healthcare providers but these must relate to the benefit of patients or serve a genuine educational function.



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We are successful
in fair competition

Respecting antitrust law and fair competition

Antitrust law protects free, undistorted and effective competition for the benefit of customers, companies and society as a whole.

Antitrust violations can have serious consequences for our company and the employees involved, such as high fines, exclusion from public tenders (debarment), claims for damages, damage to reputation and imprisonment.

*"I will not sell the future
for instant profit."*

Werner von Siemens



What are anticompetitive agreements?

Anticompetitive agreements (tacit or express, formal or informal, written or verbal) include price agreements, market, customer or territory allocations between competitors and bid-rigging agreements with competitors. While simply having a high market position is not problematic, abuse of a dominant position (indicator: more than 30 to 50 percent market share) is prohibited.

This is what we do:

- We do not enter into anticompetitive agreements with competitors, customers, distributors, sales agents or suppliers
- We do not engage in unfair and discriminatory conduct impacting either our customers or competitors in the market
- We only communicate with competitors when we have a compelling business reason to do so and when there are no antitrust concerns



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We are successful
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Respecting antitrust law and fair competition

We never communicate with
competitors about:

- Prices, price components or other conditions
- Market, customer or territory allocation
- Business opportunities or incoming orders
- Capacities, production volumes or quotas
- Corporate strategies or future market behavior; for example, sales strategies, current and future product developments, investments and boycotts
- Offers and tenders (unless we have clearance from Legal & Compliance for the specific business model or tender)
- Conduct during tenders or the submission of rigged offers

This is what we do:

- We support open competition in our relationships with customers, sales partners and suppliers
- We never communicate with customers, sales partners or suppliers about:
 - Maintaining a level of resale prices. In certain jurisdictions, however, non-binding recommendations, without pressure or incentives, regarding resale prices and the establishment of maximum sale prices are permissible
 - Obstruction of exports or re-imports
- We handle confidential information from Siemens Healthineers and third parties, such as competitors, customers, sales partners and suppliers, with care
- We do not solicit or accept any information in circumstances raising antitrust concerns (competitively sensitive information or confidential information)
- We treat sensitive information from third parties confidentially, share it only with authorized personnel on a “need-to-know” basis and use it exclusively for the purpose for which it is provided
- We fully respect the main objectives of public tendering laws: transparency of tendering processes and fair and equal treatment of all bidders



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A few examples of what we need
to consider:

- We never obtain confidential information from third parties without justification and use it in an unlawful manner, for example in the bidding process
- We do not collect or use confidential documents from previous employers or store them on our networks



What is confidential (competitively sensitive) information
that deserves special protection?

Confidential information is information that is not intended to be made public. This may include non-public information from or about Siemens Healthineers, suppliers, customers, employees, agents, consultants or other third parties (including but not limited to competitors) that is protected under legal and contractual requirements.

This can for example include:

- Details of a company's organization and facilities, prices, sales, profits, markets, customers and other business matters
- Offer documents
- Information on manufacturing, research and development processes
- Technical information
- Know-how
- Internal reporting figures



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This is what we do:

- To ensure that business is conducted in compliance with applicable laws, we contact Legal & Compliance when presented with the following types of conduct regarding products or services where Siemens Healthineers may have a dominant position (indicator: greater than 30 to 50 percent market share):
 - Exclusivity agreements
 - Rebate or discount schemes
 - Excessively high or low prices
 - Tying sale of a “strong market” product with other products
 - Unequal treatment of business partners (except where there is an objective justification)
 - Refusal of delivery or license (without an objective justification)
- We have potential business relationships examined in advance by Legal & Compliance, such as:
 - Working/bidding partnerships, consortia
 - Joint research and development
 - Specialization/joint production
 - Standardization and harmonization
 - Joint purchasing
 - Exclusive distribution/exclusive procurement
 - Market information systems/benchmarking
 - Exclusivity agreements and exclusive territory allocation in distribution and licensing agreements
- We only participate in association meetings with other competitors if there is a written invitation with an agenda, representatives of the association are present, and minutes are kept. In the case of antitrust issues or discussion of competitively sensitive topics, we leave under protest and have this recorded in the minutes. We inform Legal & Compliance immediately. Further information can be found in the “Recommendations for action in working with associations” on the Legal & Compliance intranet page



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We comply with regulations

Trade and export controls

As a company with international operations where our products help patients around the world, it is essential for Siemens Healthineers to comply with the export control and customs regulations applicable to national and international trade.

We expect all functions in our company to know and follow the requirements that apply to the movement of our products, services and technologies.

We only sign documents related to foreign traffic, if we are trained and authorized to do so.



Can I sign a certificate of origin?

Do not sign a certificate of origin unless you have been trained to do so. A knowingly incorrect statement may result in false declarations to the customs authorities and may lead to fines and penalties. In case of doubts or questions, contact your export control and customs department.

This is what we do:

- We take care that the applicable customs and foreign trade regulations, including regulations on security in the supply chain, are checked, implemented and followed when goods are traded or transported, services are provided, or other technical know-how or software is transferred
- We thoroughly monitor and audit our business activities in sanctioned countries
- We check and follow applicable export control regulations (such as those of the European Union and the United States) in our business activities, even outside the respective territories
- When we see any indications of possible infringements or unauthorized use of our products, services, or industry solutions, we alert export control and customs (ECC) and, if problematic, do not pursue the transaction



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“Export Control and Customs is an integral part of our international trade efforts and performs an important governance role. As part of our value chain, ECC requires the alignment with and cooperation of almost all functions within our company.”

Jochen Schmitz
CFO Siemens Healthineers



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Our commitment to clean markets pays off

Collective Action

Siemens Healthineers faces significant compliance risks in numerous markets. Collective Action is our strategic response to this challenge. Together with other responsible companies, the public sector and civil society, we enter into integrity and compliance pacts with our partners for business conduct standards and support binding agreements for individual sectors and markets in healthcare.

Through these joint efforts, we aim to create fair, level and clean market conditions for all participants and thereby reduce levels of corruption.





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We enable healthcare providers to deliver high-value care

“Our brand is what we make of it. We influence its value every day, with everything we do. Every single one of us is an ambassador for Siemens Healthineers. So, I’m counting on you.”

Bernd Montag
CEO Siemens Healthineers



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Siemens Healthineers

A premium/high value medtech brand

Positioning Siemens Healthineers as a premium/high value brand underlines the value of our offerings. It addresses our strengths like 'innovation leadership' and 'enabling digitalization'. Our long heritage and the name Siemens give us tailwind and open doors.



What is a brand?

A brand is the sum of all experience, information and expectations that define an organization or offering for its target audiences. Brands differentiate, influence choice, build relationships, create value, add to the bottom line and drive stock market performance.





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A premium/high value medtech brand



How do I handle the brand Siemens Healthineers as we should?

The brand Siemens Healthineers is an asset of great value. In January 2019, it was valued at EUR 6.4 bn.

We are all held accountable for ensuring consistency and discipline in all applications. Brandville contains all specifications and requirements for implementation.





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Siemens Healthineers

A premium/high value medtech brand

We avoid every behavior which is not in line with the Business Conduct Guidelines and endangers our reputation and the value of our brand.

In addition to the brand Siemens Healthineers, intellectual property rights, such as patents, utility models, trademarks, designs, copyrights and trade secrets and their protection, are essential for our business success.

This is what we do:

- We, as inventors, support Siemens Healthineers by disclosing inventions in a timely manner in order to enable early protection
- We report suspected violations of our intellectual property rights
- We use computer software only in accordance with applicable license terms and ensure compliance with all license requirements of integrated third parties software, commercial, and open source software, in our products and solutions
- We respect the intellectual property rights of third parties

Handling of our brand and other intellectual property rights

Why are intellectual property rights so important to Siemens Healthineers?

If our innovations are not protected, third parties can copy our products, which leads to a loss of competitive advantage. When our innovations are jeopardized, we lose the value of our investments in research and development unless we enforce our rights.



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We only make business decisions in the interest of Siemens Healthineers

Conflicts of interest

We are not influenced by personal interests when making business decisions. Such conflicts of interest hinder the success of Siemens Healthineers, especially if economically irresponsible decisions are taken. Reputational damage or loss of trust by customers can be the result.

There is a potential conflict of interest in day-to-day business if our personal interests differ from those of Siemens Healthineers.

Conflicts of interest may, for example:

- Harm Siemens Healthineers if contracts are awarded on the basis of personal relationships, but not on objective evaluation of offers
- Lead to reputational damage if they are made public

This is what we do:

- We make business decisions in the best interest of our company and not based on personal interests
- We anticipate and avoid situations in which the appearance of a conflict of interest may arise
- Without disclosing the potential conflict, we do not, as part of our work for Siemens Healthineers, engage companies with which we have a personal interest if it could personally benefit us, whether or not we have or can exert direct or indirect influence on the business decision of Siemens Healthineers
- We inform our managers of any personal interest that might exist in connection with the performance of our duties in the company





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Conflicts of interest

To protect ourselves and our company, we pay close attention to possible conflicts of interest.

The following questions help us assess whether there is a conflict or an appearance of a conflict:

- Is the decision we make for Siemens Healthineers influenced by personal interests?
- What impression would the situation make on third parties, such as customers, business partners or investors?
- How would the public react to my business decision?

Competition with Siemens Healthineers

A conflict of interest may also arise in business relationships with or through involvement with or investments in a competitor or customer of Siemens Healthineers.

Typical examples of a competitive situation:

- The employee also works for or advises a competitor of Siemens Healthineers
- The employee himself competes directly with products or services of Siemens Healthineers
- There are personal or family ties to competitors

This is what we do:

- We do not operate or work for a company that competes with Siemens Healthineers
- We do not engage in any activity that competes with Siemens Healthineers

Here is a classic example of an internal conflict of interest:

There is an intimate relationship between an employee and a manager. The manager is obliged to disclose the conflict of interest at an early stage and change the reporting relationship.



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Secondary employment

A conflict may also arise in the performance of secondary employments that prevent us from properly performing our duties at Siemens Healthineers.

Secondary employment can be prohibited, and previously granted permission can be revoked, if it leads to an impairment of the employee's work performance, interferes with his or her duties within the company or if there is a risk of a conflict of interest.

Investment in third-party companies

Conflicts of interest can also arise through investments in third-party companies.

This is what we do:

- Before we engage in paid secondary employment, we consult with our managers. We inform Human Resources in writing that we would like to take up paid secondary employment and will only do so after obtaining written consent

We inform Human Resources in writing of any direct or indirect investment in companies that:

- are business partners of Siemens Healthineers if we are engaged in business with the company or have a board or management role in the company. With respect to publicly traded companies this only applies if the investment exceeds three percent of the total capital
- compete with our company if we can influence the management of the competitor through this investment. This is presumed if the interest exceeds three percent of the total capital of the company



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Money laundering and the funding of terrorism – not with us!

Money laundering prevention

Delivery and supply activities entail the risk of being abused for money laundering or terrorist financing.

Siemens Healthineers strives to maintain business relationships only with reputable customers, partners and companies whose business activities comply with legal requirements and whose financial resources are of legitimate origin.

Money laundering is the disguising of the origin of money or other assets derived from criminal activities and moving them into the legitimate economy to launder them. In addition to monetary support, the funding of terrorism may include other asset such as goods or merchandise.

This is what we do:

- We use a risk-based approach to verify the identity and economic background of customers, business partners and other third parties and the origin of payments to ensure they come from legitimate sources
- We immediately inform Legal & Compliance and/or our manager in the event of suspicious activity. When necessary, Siemens Healthineers reports suspicious activity to law enforcement authorities





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How do we strengthen the trust placed in us?

Financial integrity

As an international company, Siemens Healthineers is committed to accurate and truthful reporting to investors, employees, customers, business partners, the public and government agencies. We follow applicable laws, regulations, standards and practices.

This is what we do:

- We ensure that our books and records are kept completely, accurately and truthfully. They are prepared on time and in accordance with the applicable rules and standards
- We comply with the Financial Reporting Guidelines and follow internal control processes
- We provide correct and complete information for financial reporting purposes
- Our accounts and records include all data, certificates and other written materials provided for financial reporting and disclosure purposes





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How do we strengthen the trust placed in us?

Financial integrity

We are all responsible for tax matters in the context of our business activities. The correct fiscal representation of a business activity is not only the responsibility of the Finance or Tax department. All transactions must be reflected correctly for tax purposes. For example, a customer invoice must contain, among other things, accurate information about the content of the service provided and the correct VAT.



I am planning a business transaction with a customer abroad. What do I have to do from a tax perspective?

If you are unsure about the tax consequences of the transaction, contact the Tax department for advice.

This is what we do:

- When applying tax laws, or in the event of conflicts between tax regulations, we ensure the tax result is consistent with the relevant economic and legal circumstances and our business models
- We do not use artificial structures or letterbox companies whose sole purpose is to obtain unlawful tax advantages
- We provide tax authorities with transparent information on our tax strategy and business activities in accordance with existing regulations



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Neither by us, nor for others!

Insider trading

Trading stocks based on insider information is prohibited. Further, insider information shall not be disclosed without authorization.

What is an insider and what are the consequences of being an insider?

An insider is someone who has insider information. This person is subject to strict legal requirements. In almost all countries in which Siemens Healthineers operates, there are severe sanctions for misusing insider information.

Such misuse could have considerable consequences for the insider and the company concerned and result in personal and criminal liability, which may include imprisonment.



What is insider information?

In our work, we often encounter confidential information. If it becomes public, some of this information may even be important enough to have a material effect on the stock market price of Siemens Healthineers AG, Siemens AG or other companies, such as publicly listed customers, suppliers or joint venture partners. Such confidential information is called insider information as long as it continues to have importance for the stock market price and has not yet been published. Insider information can also consist of an aggregation of individual pieces of information that we have gained, for example from discussions or documents inside or outside the company or that we have received accidentally.

It is always our individual knowledge of the situation that matters.



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Insider trading

Can we be sure that we are not violating the prohibition against insider trading when participating in employee stock ownership programs?

Siemens Healthineers strives to offer the opportunity to participate in employee stock ownership programs where possible. However, the prohibition of insider trading applies also to any transactions under such programs if the respective employee has insider information when making or altering the selection in the online tool to participate in the employee stock ownership programs. When actively participating in employee stock programs, particularly in connection with making buy or sell decisions or altering purchasing or selling selections, every employee should always ask themselves whether they can make the buy or sell decisions without making use of potential insider information. The same applies if they wish to make a selection in the context of share matching (i.e. if they wish to deviate from the standard selection "sell to cover" as further explained in the selection process, since "hold all and pay taxes via payroll" qualifies as a purchase of shares).

How do we know if we are an insider?

Each of us must consider whether they have or receive information that can have, if disclosed to the public, a significant impact on the stock market price of Siemens Healthineers AG, Siemens AG or the share price of another publicly listed company, such that it qualifies as insider information. Siemens Healthineers cannot make this decision for us. Being an insider does not require the person to be formally included in an insider list, it is sufficient to actually have insider information. Whether an insider list is opened and who is included in it has to be seen as a separate decision which is to be made by the respective company.

This is what we do:

- We neither purchase nor sell shares or options based on insider information. If we have insider information, we also refrain from other securities transactions, such as the cancellation of a share purchase
- We neither enable nor induce others, such as family members, friends or bank advisors, to engage in securities transactions based on insider information and we do not recommend such transactions to them
- We treat insider and potential insider information with strict confidentiality and take appropriate precautions that unauthorized persons do not gain access to it



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How we responsibly protect information and company assets

Information and other company assets are essential to our business success. For this reason, each of us ensures that they are handled responsibly. We systematically identify and evaluate our critical information and company assets to adequately protect them.

Furthermore, our own identities (at work, at home or online, for instance on Social Media) are at risk as they are the target of attackers to gain access to information.

We handle company equipment and facilities with due care

We treat with care the company equipment and facilities at our disposal for our daily work.

We take responsibility for ensuring that the company equipment and facilities provided to us, such as telephones, laptops, e-mail and intranet, internal Social Media platforms, copiers, mailrooms and tools, are only used for business purposes consistent with local company policy.

We are permitted to use company internet access for private purposes – including external Social Media – consistent with local company policy.

We are aware that our communication on Social Media sites can pose significant legal, regulatory or other risks to the company and/or the employees using Social Media and identifiable as affiliated with Siemens Healthineers. This also holds true for communication that was intended to be private (not purely business-related). In addition, non-compliant communication can also damage the reputation of Siemens Healthineers.

We do not retrieve or share information that supports or encourages behavior or content prohibited in Chapter B “Respect”.

We do not use company equipment for any illegal downloads, recording or copying.

This is what we do:

- We identify and classify critical information and other company assets according to their potential impact to the business
- We all help develop and implement holistic protection measures
- We ensure their sustainable protection by regular reviews and audits

We treat company information with due care

Siemens Healthineers attaches great importance to ensuring that sensitive information cannot fall into the hands of unauthorized persons or third parties. In this way, we create the trust required for worldwide cooperation with customers and partners.



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How we responsibly protect information and company assets

Siemens Healthineers can suffer serious consequences if for example,

- important know-how or information is disclosed to unauthorized parties like competitors (breach of confidentiality)
- important information is not delivered, such as fiscal year closure (lack of availability)
- we cannot rely on the information we use for decision making or production (integrity of information)
- the physical security of sites and facilities is breached

Therefore these risks must be avoided or minimized.

Ground Rules of Communication

- We take the confidentiality of internal company information into account in all communications
- We check non-public information for its potential status as insider information prior to publication
- We adhere to the defined core messages to ensure the company-wide consistency and reliability of the messages

- We are particularly cautious with forecasts and other forward-looking statements
- We respond to rumors and speculation with “No comment”
- We are careful during our private conversations
- We do not communicate within the “quiet period”. At Siemens Healthineers, the quiet periods last from the start of each subsequent quarter or fiscal year until the publication of the respective quarterly or fiscal-year-end results

We embrace and promote the principles of the Charter of Trust:

- Protecting the data of individuals and companies
- Preventing harm to people, companies and infrastructures
- Establishing a reliable foundation on which confidence in a networked digital world can take root and grow

More information about the Charter of Trust can be found at: www.charter-of-trust.com

This is what we do:

- We classify information and treat it in accordance with its classification as “unrestricted”, “restricted”, “confidential”, or “strictly confidential”
- We manage access controls and permissions to ensure information is accessed by authorized individuals only
- We do not share personal passwords and access codes with third parties
- We always adhere to the Ground Rules of Communication when dealing with company information. This also applies to business and personal use of Social Media



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Data Privacy

The protection of personal data plays an important role in our ever more digitized world. We handle personal data carefully and responsibly, respecting individuals’ privacy. The loss or improper use of personal data can have serious consequences for the individuals concerned. We expect all our employees to notify the Data Privacy organization of potential data privacy incidents.

Special categories of personal data:

We may process special categories of personal data, in particular health data. We respect the limitations of use and comply with the data privacy requirements in that regard.

We are aware that violations of confidentiality or data secrecy can not only have serious consequences for the affected individuals but can also have consequences for us under criminal law and labor law.



What is “personal data”?

Personal data is any information relating to an identified or identifiable natural person, such as a name, an identification number, location data or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

This is what we do:

We take care to collect and process personal data only

- in a secure and confidential manner
- as long and to the extent required for legitimate, predetermined purposes
- in a transparent manner
- if it is protected against loss, modification and unauthorized use or disclosure by appropriate technical and organizational measures

How do I report potential data privacy incidents?

We encourage our employees to use our “Let Us Know Data Privacy” portal and follow the instructions. All notifications will be treated confidentially, and they can be made anonymously.

All of us who handle personal data of employees, customers, patients or other third parties bear a high level of responsibility.



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World-class products, services and solutions

Technical compliance

Siemens Healthineers stands for world-class quality and strives to inspire its customers with excellent and innovative products, services, and solutions.

We place very high priority on the security of our portfolio, its legal conformity, quality and environmental aspects, for customers and all those who come into contact with it. Compliance with applicable technical regulations for approval and marketing in our markets is a fundamental requirement for the design and distribution of our products and services. We keep our technical promises (technical compliance).

In a world of “smart products” and ever increasing digitalization, our aim is to fulfill the trust placed in Siemens Healthineers.

This is what we do:

- In our areas of responsibility, we help ensure that our products, services and industry solutions are safe and comply with applicable legal requirements in our market countries for their safety, approval, marketing and use
- We keep our technical promises
- If we become aware of quality, safety or other conformity defects in our area of responsibility, or if there are credible indications of such defects, we will follow-up and report them to the quality organization

Where can violations occur in the area of technical compliance?

- Active deception: Making declarations that contain false product information
- Deception by omission: Omitting material information about product defects at any point in their development, marketing or use (even if these only occur after production start or market entry)



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We work with responsible partners

Business relationships with our customers, suppliers and other business partners are fundamental to Siemens Healthineers.

We maintain business relationships only with reputable partners who are committed to comply with the law.

We protect the interests of our customers by carefully selecting suppliers and other business partners and through the standards we set for our own actions.

That is why we cooperate with responsible partners worldwide.

Involvement of third parties – yes, but without bribery

The integrity and careful selection of business partners is important to protect our company. Inappropriate influence on public officials or private individuals to secure any improper advantage is not tolerated. We therefore evaluate business partners and monitor them throughout the course of the complete business relationship.





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This is what we do:

- We carefully select our suppliers and other business partners
- We contractually oblige our suppliers and business partners to adhere to a uniform Code of Conduct for Suppliers and Third Party Intermediaries
- Sustainability is a core element of our supplier management

The following principles apply to cooperation with our partners:

- We work closely with our suppliers and other business partners
- We work closely with our suppliers and help them enable mutual improvement
- We constantly analyze our current business relationships and react promptly to emerging risks
- We only work with suppliers who are prepared to mitigate problems or implement risk reduction measures
- We conduct appropriate due diligence reviews, including compliance with export controls and anti-money laundering laws and other important principles
- We assess project risks when deciding whether to pursue a project



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We want to engage a new distributor or sales agent, what do we need to do?

Compliance due diligence for this company needs to be conducted and approved in the Business Partner Compliance Tool (BPC tool). Further steps related to the business partner on-boarding processes have to be taken into consideration.

The BPC tool can be found on the Legal & Compliance intranet page.

Here are some alert signs we must examine and clarify:

- Inconsistencies in records and payments
- High prices with deep discounts or oddly high profit margins
- Contractual partners with unclear responsibilities or questionable qualifications
- Suspicious personal relationships or business arrangements
- Unusually high fees, commissions, gifts, entertainment or hospitality
- The rejection of compliance contract clauses
- The demand for prepayment without plausible business reasons
- Demands for cash payments or transfers to offshore bank accounts or third parties

This is what we do:

- We evaluate and monitor business partners and take into account their respective risks
- We demand that our partners know and adhere to our values and compliance standards
- We insist on contractual commitments requiring our business partners to act in compliance with all applicable rules and regulations



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Our responsibility to society and the environment

Siemens Healthineers respects society around the world. As a globally active company with innovation and investment competency, Siemens Healthineers holds itself to a high standard for sustainable development worldwide and makes a variety of contributions to this development. In addition, Siemens Healthineers is voluntarily and purposefully committed to advancing social issues and meeting needs.





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Our commitment to international agreements and recommendations

Siemens AG is participant of the United Nations Global Compact. Its ten principles and the Global IndustriALL Union framework agreement are considered binding for the entire group of companies.

We as Siemens Healthineers are committed to promoting these principles within our sphere of influence. Respect for human rights, fundamental employee rights, environmental protection and the ban on corruption are an integral part of our business.

In line with the commitment of Siemens AG under the United Nations Global Compact, we and our suppliers and business partners worldwide are expected to comply with the following guidelines:

- International Bill of Human Rights, consisting of:
 - Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
- European Convention on Human Rights
- ILO (International Labour Organization) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at Work (in particular, on the following topics: elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association, and the right to collective bargaining), and fundamental freedoms

- OECD Guidelines for Multinational Enterprises
- Agenda 21 on sustainable development (final document of the fundamental UN Conference on Environment and Development, Rio de Janeiro)
- UN Convention against Corruption
- OECD Convention against Bribery of Foreign Public Officials

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Human Rights

Siemens Healthineers is committed to human rights as a core element of responsible business conduct and advocates human rights throughout its operation and value chain. Siemens Healthineers operates in close alignment with the United Nations' Guiding Principles for Business and Human Rights.

Compliance with the human rights laws and regulations is essential. Siemens Healthineers expects us to act in accordance with the principles of the UN Global Compact.

Key principles of the UN Global Compact are:

- Principle 1: Businesses support and respect the protection of internationally recognized human rights
- Principle 2: Businesses should ensure that they are not complicit in human rights abuses
- Principles 3-6: Businesses recognize the essential requirements regarding workers' rights

This is what we do:

- We examine decisions that we make on behalf of our company at an early stage for possible adverse effects on the human rights of others inside and outside Siemens Healthineers
- We strive to avoid or mitigate negative effects on human rights that occur in connection with our business activities, regardless of whether Siemens Healthineers has caused or contributed to these effects
- We respect the human rights of local communities and of people who are particularly vulnerable or belong to a group that is particularly in need of protection

Which groups are particularly in need of protection?

These include – depending on the specific facts and legal circumstances – members of indigenous peoples, children, people with disabilities and people who are disadvantaged or exposed to special risks because of ethnic origin, culture, religion, age, disability, gender, gender identity, gender expression, sexual orientation or any other legally protected characteristics.



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Environment

Environmental protection is a corporate responsibility, our social responsibility, and also an important success factor for Siemens Healthineers. In all units of the company and in all countries in which we operate, it is our goal to protect the environment and conserve resources.

We work on environmental protection within the company and together with our customers, for example by continuously improving energy and resource efficiency.

Siemens Healthineers expects us to engage in environmentally conscious behavior every day. We should be aware of our exemplary roles when it comes to the environment.

Our environmental programs are designed to conserve resources throughout the entire product life-cycle, reduce disposal waste, and reduce carbon emissions.

Our environmental portfolio is our and our company's response to climate change, resource scarcity and threats to the environment.

Our company meets the ecological demands of its partners by developing future-oriented and resource-efficient solutions, products and business models. Consistent and innovative environmental protection management is an integral part of our business processes and goes beyond legal requirements. We exert influence on environmental impacts at an early stage in product and production planning, not only in the manufacturing phase, but also in the design, sales, utilization, service and disposal phases. Climate protection plays a particularly important role for our company.

This is what we do:

- Climate protection is closely linked to energy consumption. We use energy rationally and efficiently
- We minimize or recycle waste if avoidance is not possible
- We design our processes to achieve optimal environmental compatibility of products and plants and avoid unnecessary emissions and noise pollution



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What to do if there are signs of possible misconduct?

Siemens Healthineers expects us to report possible violations of the Business Conduct Guidelines. In doing so, we help to identify and eliminate misconduct and grievances and protect ourselves and the company against risks or damages that may result.

We may report circumstances that indicate a violation of the Business Conduct Guidelines to the following persons or entities:

- Managers (who shall advise on how to further report to Legal & Compliance or to alternative reporting channels listed below);
- Head of Compliance
- Legal & Compliance personnel
- Human Resources personnel
- Global whistleblower-hotline "Let Us Know"
- Siemens Healthineers ombudswoman
- Employee representatives

Information on possible violations of the Business Conduct Guidelines can be provided confidentially and anonymously as needed.

Siemens Healthineers will examine all reports and take appropriate measures.

Siemens Healthineers does not tolerate any retaliation against complainants or whistleblowers. Violations of this prohibition of retaliation will be treated as compliance violations.

All allegations of possible violations of the Business Conduct Guidelines are responded to in accordance with formal company-wide processes. These processes take into account the presumption of innocence and the participation rights of employee representatives where required by local policy.

Siemens Healthineers will take appropriate disciplinary action in the event of demonstrable violations.

Siemens Healthineers will apply the same principles to allegations of wrongdoing brought by third parties, to the extent legally permissible.

Contact information

Dr. Sibylle von Coelln

E-mail: shs-ombudsfrau@hvc-strafrecht.de

Phone: +49 (0)211 - 44 03 57 78

Possible misconduct can be reported via the ombudswoman Dr. Sibylle von Coelln.

The ombudswoman can be contacted via e-mail or phone in a spirit of trust, anonymously and free of charge.

The ombudswoman will not disclose the identity of the reporter to Siemens Healthineers; unless the reporter explicitly wishes and approves a disclosure. Dr. Sibylle von Coelln speaks German and English.

"Let Us Know" provides a secure channel for reporting suspected non-compliant or otherwise problematic actions:

- 24 hours a day
- online (and via phone in the U.S.)
- anonymously if desired
- in several languages

Technical administration of "Let Us Know" is maintained by the independent company Business Keeper AG which stores the application on secured servers in Germany.

"Let Us Know" contact:

www.bkms-system.net/healthineers



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