

Human
rights

Environ-
mental
protection

ACT ON CORPORATE DUE DILIGENCE OBLIGATIONS IN SUPPLY CHAINS
(LIEFERKETTENSORGFALTSPFLICHTENGESETZ)

Policy statement

Our commitment to respect human rights and environment-related obligations

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The designation of persons or groups of persons in this document refers to persons of any gender for linguistic simplification and better readability. The term “employees” also includes managers at all levels and members of executive bodies.

Foreword

As a company operating worldwide and in numerous sectors, we are constantly faced with new challenges. With our innovative strength and our investments, we bear responsibility for sustainable social and ecological development. Our position is clear: for us, business success must be in harmony with ethically responsible action, characterized by the highest level of integrity. Our Business Conduct Guidelines serve as central guidelines and form the foundation of our business activities and corporate orientation. This includes our clear commitment to the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) and the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD Guidelines).

In implementing its human rights and environmental due diligence, Siemens is subject to the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG). We also see the Supply Chain Due Diligence Act as an important source of impetus: it supports us in our existing human rights and environmental due diligence activities. We are aware that every part of our value chain can have an impact on human rights and the environment – both positive and negative – in rapidly changing markets. This encourages us in our efforts not only to establish high standards in our own business activities that go beyond the legal requirements, but also to promote responsible business practices among our partners. Our ethical principles anchored in the Business Conduct Guidelines serve as a guideline for acting ethically beyond the applicable legal requirements and along our value chain.

This policy statement describes our company's strategy for protecting human rights and fulfilling its environmental obligations under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz). It applies to Siemens AG and all its affiliates with the exception of listed Siemens Healthineers AG, which publishes its own policy statement.

Berlin and Munich, March 5, 2024

Siemens Aktiengesellschaft
Managing Board

Human rights and environmental strategy

Our human rights and environmental expectations regarding our employees and suppliers

Respect for human rights

Our commitment to international standards

Siemens is a participant in the United Nations Global Compact. As part of our related obligations, we expect our employees worldwide to comply in particular with the following guidelines, which are embedded in our **Business Conduct Guidelines (BCGs)**:

- OECD Guidelines for Multinational Enterprises,
- UN Guiding Principles on Business and Human Rights,
- International Bill of Human Rights,
- European Convention for the Protection of Human Rights and Fundamental Freedoms,
- International Labour Organization (ILO) Tripartite Declaration of Principles on Multinational Enterprises and Social Policy,
- ILO Declaration on Fundamental Rights and Principles at Work,
- Ten principles of the UN Global Compact,
- International Framework Agreement on the Fundamental Rights of Workers (signed in 2012 jointly with trade unions and workers' representatives).

Implementation in the company

In addition to the full commitment to respect the human rights of all rights owners, the aforementioned agreements and guidelines, as well as our BCGs, set forth, among other things, the following fundamental rights, whose compliance Siemens guarantees to all of its employees worldwide and, at the same time, expects all employees to comply with; this is bindingly set forth in the BCGs and secured by further internal company regulations.

- prohibition of discrimination,
- respect for the principle of equal opportunities and equal treatment,
- free choice of employment (no forced labor),
- prohibition of child labor,
- appropriate remuneration,
- freedom of collective bargaining and association,
- compliance with safety regulations.

The full commitment to respect human rights contained in our company's BCGs includes the prohibition of operational effects of business activities pursuant to Section 2 para. 2 No. 9 LkSG, the prohibition of the unlawful taking of natural

resources according to Section 2 para. 2 No. 10 LkSG as well as the prohibition with regard to the hiring or use of security forces in accordance with Section 2 para. 2 No. 11 LkSG.

Human rights strategy

According to the BCGs, all business activities of our company must always be in compliance with the applicable law and the BCGs conduct requirements of our company. As far as possible, we integrate the human rights and environment-related due diligence requirements of the LkSG into our company's existing management systems, rules and procedures, for example for occupational health and safety, environmental protection, supplier management, site management and cooperation with security forces. We also use the company-wide compliance management system, for example in connection with the provision of protected complaint channels and the handling of incoming complaints, or for comprehensive risk analysis in accordance with the requirements of the LkSG.

The rules and procedures for respecting human rights and protecting the environment of Siemens go beyond the prohibitions set forth in the LkSG. In this regard Siemens is taking a comprehensive approach, which is embedded in the BCGs and additionally implemented in other internal regulations.

In addition to this Policy Statement and the [Complaints Procedure Rules](#) as per LkSG, more detailed information on this as well as on the respective rules and procedures can be found in the [Siemens Sustainability Reports](#) and on the [global Siemens website](#). Further information can be found in our company's financial reports, which are also published on the [global Siemens website](#).

Human rights in the supply chain

Maintaining sustainable and fair supply chains is a core element of our efforts with regard to our human rights strategy. Therefore, Siemens expects its direct suppliers to commit to comply with the Siemens Code of Conduct for Suppliers and Third Party Intermediaries ("**Code of Conduct**"). This Code of Conduct includes numerous behavioral obligations and, above all, safeguards the fundamental human rights of our suppliers' employees. In addition to the comprehensive obligation of our direct suppliers to comply with applicable law and other behavioral requirements, this includes in particular:

- ➔ Fair employment conditions (wages, working hours, holidays),
- ➔ the right to freedom of assembly and association,
- ➔ responsibility for health and safety standards,
- ➔ prohibition of discrimination,
- ➔ prohibition of forced and child labor,
- ➔ provision of anonymous complaint mechanisms.

These principles are part of our contractual agreements with our direct suppliers. We expect them to also commit to respect human rights and environmental protection, to commit to establish appropriate due diligence processes and to pass these principles on to their own suppliers.

Holistic environmental protection

As a company with many products, systems, solutions, and services, we have far-reaching impacts on the environment. Managing these environmental impacts goes beyond compliance with legal requirements to achieve the next level of environmental protection: We balance economic, environmental, and social requirements and embrace our social

responsibility. Our forward-looking commitment strengthens the competitiveness of our customers and creates the basis for our future success. Our objectives are to record and manage the environmental impact of the company's activities in the value chain. In many areas, this is also done in cooperation with our partners.

In accordance with the obligations associated with our participation in the UN Global Compact, we expect our employees worldwide not only to comply with the environmental principles of the UN Global Compact, but also to comply with the following guidelines, which are embedded in our BCGs:

- OECD Guidelines for Multinational Enterprises,
- Agenda 21 on Sustainable Development (final document of the fundamental UN Conference on Environment and Development, Rio de Janeiro).

With the Code of Conduct, Siemens comprehensively obligates the company's direct suppliers to protect the environment. Accordingly, our suppliers in particular have to:

- act in accordance with applicable legal norms and international standards relating to the environment,
- minimize environmental pollution and continuously improve environmental protection,
- establish and implement an appropriate environmental management system.
- reduce emissions of air pollutants and greenhouse gases as well as harmful soil and water pollution and noise emissions as far as possible,
- increase energy efficiency, use renewable energies and reduce water consumption as far as possible, and
- reduce waste and ensure its proper treatment and disposal.

We believe that responsibility for holistic environmental protection and compliance with environmental due diligence is an important factor for the long-term success of our company and therefore expect our employees and direct suppliers to adhere to these principles.

PART 2

Procedure description

Our procedures for implementing human rights and environment-related due diligence

Risk management

Identifying risks and potential impacts and deriving effective measures are core elements of implementing human rights and environment-related due diligence. We understand the fulfillment of this responsibility as a continuous improvement process. The early identification of human rights and environment-related risks plays a key role in an effective risk management system.

We therefore ensure that sufficient financial and human resources are available for monitoring the supply chain. Effective risk management enables us to deal more comprehensively and at an earlier stage with the assessment of any human rights and environmental risks in our operating business and to integrate the main risk areas. The central element for the identification and assessment of risks in accordance with the LkSG is the comprehensive risk analysis in relation to the prohibitions defined in the LkSG (see the following section for more details).

In addition to the specific risk management systems in place within the company for the individual areas affected by the prohibitions of the LkSG, we utilize our experience in dealing with controversial projects, the expertise of external human rights experts and findings from dialog with investors, Siemens shareholders, NGOs and peer groups. In this way, we also ensure that the situation and expectations of relevant rights owners are taken into account, as well as through regular company-wide surveys of our employees. The dialogues and cooperation with employee representatives and between the collective bargaining partners are also important sources in this context.

More detailed information is available on the [global Siemens website](#) and in the [Siemens Sustainability Reports](#).

To monitor the implementation of our human rights and environmental protection processes, we use our company's internal control system and our audit function for specific risk areas in addition to business-related controls. A person responsible for monitoring risk management in the company is appointed by the Human Rights Officer on the basis of a corresponding resolution by the Managing Board of Siemens AG, to which a report on the activities of the person responsible is submitted at least once a year.

Risk analysis

Siemens uses a risk-based approach to identify potential **risks in our supply chain**. The existing processes for risk analysis already cover the prohibitions of the LkSG to a large extent and in some cases go beyond the prohibitions set forth in the LkSG. Building on this, we have now further specified the risk analysis with regard to the requirements of the LkSG.

The risk analysis is carried out in two phases: (1) risk analysis for the individual prohibitions of the LkSG and (2) overall risk analysis. As part of the risk analysis for the individual prohibitions, we determine whether human rights or environmental obligations are violated or whether there is a risk of such a violation in our own operations or in the context of business activities of direct suppliers of Siemens (according to Section 9 para. 3 LkSG in the case of substantiated information also indirect). We have developed specifications for carrying out the risk analyses, which include the weighting and prioritization of individual risks (in accordance with Section 5 para. 2 and Section 3 para. 2 LkSG). In particular, the appropriateness criteria defined in Section 3 para. 2 LkSG - (1) type and scope of business activity, (2) capacity to influence, (3) severity, irreversibility, and probability of occurrence and (4) type of contribution to causation - are used for weighting. In this process, the risks for potentially affected rightsholders or the environment are determined, not the risks for Siemens itself, which are, however, additionally evaluated.

We have created a comprehensive process for the overall risk analysis for our company as per the LkSG, as well as for the weighting and prioritization of the identified risks, in particular on the basis of the criteria specified in Section 3 para. 2 of the LkSG, and the definition of any preventive measures beyond the existing regulations and procedures with the introduction of a joint workshop. Together with the responsible person within the meaning of Section 4 para. 3 LkSG and the Human Rights Officer, all functions of the company involved in the risk analysis take part in the workshop and provide the risk analyses for the individual prohibitions of the LkSG.

This risk analysis process is carried out regularly – at least once a year – and, if necessary, on an ad hoc basis. For this purpose, we use our experience from the compliance risk management of Siemens. The results of the risk analysis are communicated to the Siemens Management Board.

The risk analysis carried out for the first time for fiscal year 2023 (from the entry into force of the LkSG for Siemens AG), taking into account the regulations and procedures already introduced in the company, did not reveal any net risks – in particular no systematic risks – to such an extent that we considered further risk reduction measures beyond the existing regulations and procedures to be necessary. Accordingly, no prioritization was required. Further details can be found in Siemens AG's LkSG report for 2023, which is available on the company's website (<https://www.siemens.com/global/en/company/sustainability/humanrights.html>).

Preventive measures

Implementation of the human rights strategy in the relevant business processes and implementation of appropriate procurement strategies and purchasing practices

In the event of an identified risk, business units of Siemens are obligated to immediately develop and embed appropriate preventive measures in their own business unit or purchasing practices and to monitor them on a risk basis. The measures must be suitable for preventing or minimizing human rights and environmental risks. We also ensure that the defined measures are complied with and implemented in the individual business areas.

If a risk is identified with regard to direct suppliers, appropriate preventive measures are immediately established vis-à-vis the direct suppliers and their implementation is monitored. Siemens has also added further binding rules of conduct to the Code of Conduct.

If we have substantiated knowledge of factual indications that suggest a possible breach of duty by an indirect supplier, we will also take appropriate preventive measures in this respect and thus also support our indirect suppliers in complying with human rights or environmental obligations.

We have concluded – particularly as part of the risk analysis carried out for 2023 – that the preventive measures already implemented in our companies are appropriate and effective for countering the specific existing risks within the meaning of the LkSG.

Training and capacity building

Sustainability principles can only be lived effectively if they become a voluntary commitment based on conviction. Continuous and target-group-oriented competence building plays a key role in this. In addition to our training measures for suppliers, for example, we also rely on interactive training formats for employees and tailored competence development for global and regional sales and specialist functions, such as compliance and EHS. Existing training courses for employees will be expanded where necessary to include the topic of "Act on Corporate Due Diligence Obligations in Supply Chains". Employees are also trained on preventive measures or their adjustments where necessary.

The central component of the training for all employees is the web-based training on the Siemens Business Conduct Guidelines, which contains key elements and content of the LkSG (in particular on rights at work, environmental protection and the company's protected complaint and reporting channels).

With the Siemens Code of Conduct for Suppliers and our brochure “Sustainability in the Supply Chain”, we support and sensitize our suppliers and sales-related business partners to integrate the sustainability requirements of Siemens more strongly into their own supply chain. In addition, we offer web-based training on sustainability and human rights in the supply chain for our suppliers and employees, as well as global web-based training on environmental and human rights due diligence. We also provide further training material on our human rights knowledge hub on key topics such as modern slavery.

Implementation of risk-based control measures in the supply chain

The risk-based control measures in purchasing with regard to our direct suppliers include the sustainability self-assessments of our direct suppliers, internal quality audits with sustainability issues and external sustainability audits.

If a risk is identified in the supply chain, we immediately implement appropriate preventive measures vis-à-vis suppliers and monitor their implementation. We ensure that the defined measures are also implemented. Suppliers are monitored according to the results from the risk analysis.

Networks and coalitions

Through regular dialog with peer group companies, we create a trusting platform for a more in-depth exchange on the subject of human rights and our responsibility for environmental protection. From this, we derive continuous improvement measures for our company. The aim is to discuss challenges and solutions, address conflicting goals, and identify opportunities for joint action, because we can make faster progress through joint and concerted action than by solo effort.

Siemens is a member of [Global Business Initiative on Human Rights \(GBI\)](#), one of the leading international networking initiatives in the field of human rights, consisting of over 20 companies from all over the world. Siemens is also a member of the European Business and Human Rights Peer Learning Group of the [Global Compact Network](#) and is also involved in Germany in the working groups of [econsense](#) “Business and Human Rights” and “Human Rights in the Supply Chain”. At the same time, questions of environmental and climate protection as well as the access of rights owners to natural resources are addressed, namely their human rights implications.

In addition to regular dialogues with peer groups and think tanks, we regularly exchange information with external human rights consultants in the areas of training, awareness raising and due diligence. There is also regular communication with investors, shareholders, rating agencies and non-governmental organizations.

Remedies

If we become aware of possible imminent or actual violations of the prohibitions of the LkSG or our Siemens Code of Conduct for Suppliers, we will take immediate corrective action to prevent, end or minimize such violations. In this regard we will ensure that any information we receive or become aware of regarding possible violations of the provisions of the LkSG by Siemens or its suppliers is immediately forwarded to the responsible employees.

In its own business operations, the remedial measures shall result in the prevention or termination of the violation. In the case of (imminent) violations in the business area of direct suppliers, we work towards ensuring that the responsible purchase managers immediately draw up a corrective action plan and associated schedule for ending or minimizing (or avoiding) the violation together with the affected suppliers and monitor its sustainable implementation. In the case of indirect suppliers, in the event of substantiated knowledge of a (threatened) violation, we shall draw up a concept for the prevention, termination or minimization of human rights or environmental violations and implement it.

Based on the principle of “development before termination”, we reserve the right to terminate the business relationship in accordance with the requirements of the LkSG, at least in exceptional cases. Exceptional cases include:

- ➔ Very serious violations of the law,
- ➔ No remedy through implemented measures after the specified time has expired,
- ➔ No milder means recognizable and ability to exert influence does not appear promising.

Complaints proceedings

Siemens offers all employees and all external third parties protected reporting channels to report violations of external and internal rules, including human rights or environmental risks as well as violations of human rights or environmental obligations arising from the economic actions of a direct or indirect supplier. Reports made in this way are forwarded to our compliance organization and followed up.

The Compliance Whistleblower System “[Tell Us](#)” is a company-wide, transparent, public and barrier-free complaints procedure. “Tell Us” offers a more secure reporting channel, through which information can be given around the clock, seven days a week worldwide in 13 languages, online or by telephone, anonymously if desired. Siemens employees and managers as well as customers, suppliers and other stakeholders of our company can turn to “Tell Us”. The whistleblowing system is technically supervised by an independent operator. The data is stored on protected servers in Germany. The content of the reports is processed exclusively by Siemens.

In addition to “Tell Us”, whistleblowers will be given an external [ombudsperson](#) provided. Employees and third parties can turn to this neutral body confidentially and anonymously if they observe incorrect business practices in the company.

“Tell us” and the ombudsperson are Siemens's reporting channels for complaints within the meaning of Section 8 LkSG.

In addition, violations – especially by employees – can also be reported to the respective manager, the Chief Compliance Office, employees of Legal and Compliance, the responsible personnel managers, and the employee representatives of the company.

All incoming reports of possible violations of the BCGs are dealt with in a **binding company-wide procedure**. This procedure is impartial and takes into account the **presumption of innocence** in favor of the accused as well as the **participation rights of employee representatives**. The confidentiality of the whistleblower's identity is maintained unless the whistleblower has remained anonymous. In the event of verifiable violations by employees, appropriate disciplinary measures will be taken.

Siemens tolerates **no retaliation** against complainants or whistleblowers and strives to prevent them through comprehensive clarification. Violations of this prohibition will be punished as compliance violations.

The [Complaint Procedure Rules of Siemens](#) are available on the global Siemens website.

Reporting obligations

Our commitment to respect for human rights and environmental protection as well as the implementation of the UN Guiding Principles on Business and Human Rights are monitored by the Siemens Management Board and the Siemens Sustainability Board (SSB). Both progress and challenges are discussed, and improvement measures are derived.

The Chief Compliance Officer in her capacity as Human Rights Officer and the responsible person of our company (pursuant to Section 4 para. 3 LkSG) report regularly and on a case-by-case basis to the Management Board on compliance with human rights, environmental and other obligations under the LkSG.

The annual reports of Siemens pursuant to Section 10 LkSG are available in the [global Siemens website](#). Further information can be found in the [Siemens Sustainability Reports](#).

Regular review

The aforementioned procedures for the implementation of human rights and environment-related due diligence according to the LkSG are reviewed regularly – at least once a year – and on a case-by-case basis. The risk analysis for the individual prohibitions of the LkSG also includes continuous monitoring of risk developments.

Findings from the handling of information from the appeal proceedings shall be taken into account in the review of procedures.