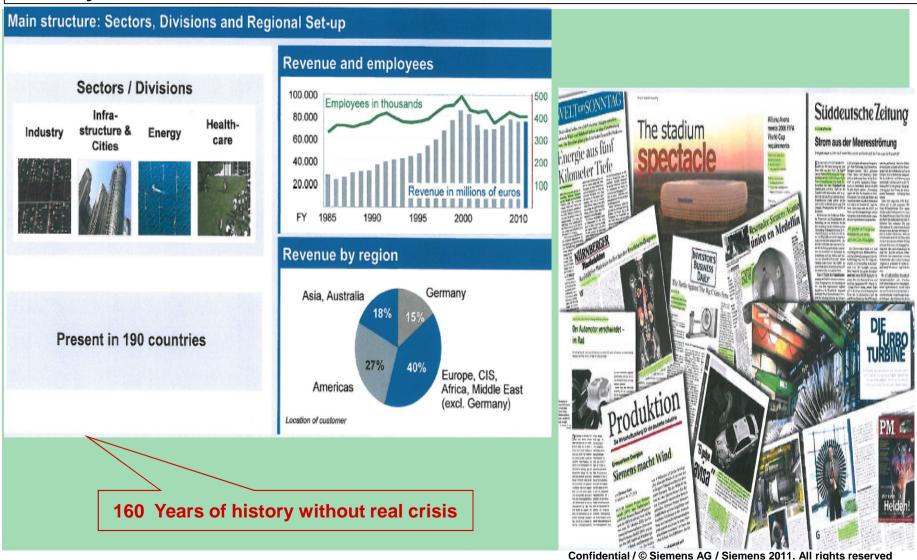


Siemens: one of the global leaders of the electrical engineering and electronics Industry.



#### Siemens corruption scandal: grievous experience and lessons learned



#### Siemens: establishing best-in-class Compliance Program

Support sustainable **Immediate Actions Implementation** business 2008 2009 2006 2010 2007 Exchange of Compliance World Bank Leadership Program Settlement Team Compliance SIEMENS Values & Tone from Organization Integrity the Top Compliance Collective Independent Tools Action investigation Settlement with DoJ/SEC & Sustainable Centralization **Monitor** Development of bank appointment accounts

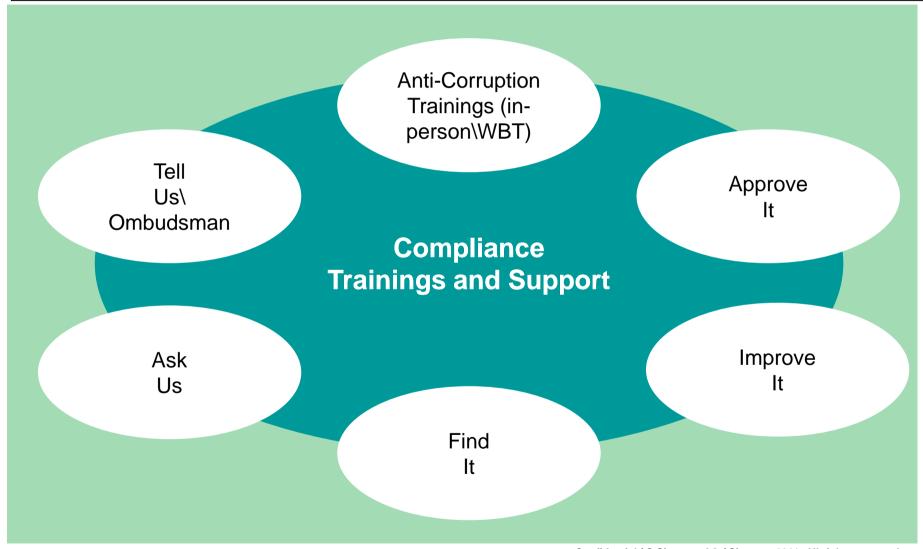
# **Siemens: comprehensive Compliance Program**

Prevent	Detect	Respond
	"Tone from the Top"	
	Compliance Organization	
<ul> <li>Training Program</li> <li>Policies, Procedures and Compliance Tools</li> <li>Internal Communication Program</li> <li>Integration in personnel processes</li> </ul>	<ul> <li>Compliance Investigations</li> <li>Compliance Reviews</li> <li>Compliance Controls</li> <li>Compliance Audits</li> </ul>	<ul> <li>Consequences for misconduct</li> <li>Global case tracking</li> <li>Monitoring effectiveness</li> </ul>

#### Siemens Compliance: Organizational System Structure

Compliance in the business sectors Regional **Cross-Sector** Compliance **Functions Compliance Control System** comprises 6 aspects of activities Compliance Helpdesk Compliance Compliance implementation Legal and development Service, Compliance Investigation Trainings and External communication

## **Siemens Compliance: Organizational System Structure**



#### Russia today: Difficult Conditions

Russia is up from 154-th place to 143-rd Russia - 2.4 (last year 2.1)

Changes of the RF Criminal Code: On 04.05.2011 the President of Russian Federation signed a law introducing multiple penalties for bribes. Start of the negotiation the acceptance legislation covering the corruption to foreign governmental officials

# Russia Today

Barometer of the world corruption:2010" shows opposite results: 47 % of RF citizens suppose that during the last 3 years the level of corruption is growing on

Readiness of Moscow
Government to join the
Organization for Economic
Cooperation and
Development (OECD)
Convention covering the fight
against corruption

The Report of Social
Chamber:" The corruption in
the RF has reached that
level, by which the economic
and low are broken down,
and in the society the
depression and social
unfairness are growing

#### Compliance by Siemens Russia: Standards for the Region

Regular support from the Management side – TONE FROM THE TOP

According to the last
Corporate Survey
Results is the Level of
Support the Compliance
Policy in Russia more
than 91 %

Compliance standards are uniform in all the countries where the company is present

Compliance Standards

Collective Action in the Strategic for OOOS Regions

The Compliance
Program of Siemens
was certified by the
SEC Monitor (The
United States Securities
and Exchange
Commission)

Effective Compliance System is recognized in the market, as well as public organizations

#### **Siemens: Collective Action Program**

#### **Text**

- ■Collective action in Russia beginning March 11, 2010 by the German Chamber of Commerce
- ■Corporate Ethic Initiative: Currently over 100 companies who signed Russian and International, 46 companies have signed initially
- SII: International Business Leadership Forum (IBLF)



# Thank you for attention

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I won't sell the future for short term profit

Werner von Siemens

XIX century

