Siemens Healthineers Business Conduct Guidelines

We pioneer breakthroughs in healthcare.
For everyone. Everywhere. Sustainably.

siemens-healthineers.com/BCG



SIEMENS Healthineers

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Business Conduct Guidelines

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Christian Bleiweiß & Benedikt Knothe

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Preface

Dear Healthineers,

We pioneer breakthroughs in healthcare.
For everyone. Everywhere. Sustainably.

Our purpose comes with a high level of responsibility towards society, patients, customers, partners, shareholders, and towards each other in our Team Healthineers. We want to be a reliable partner for all stakeholders and a fair player in competition. We strive for the highest ethical and moral standards every day. “We own it” is one of our core values and only if we take ownership of doing our daily work in a compliant way, we will achieve our purpose in a sustainable manner. Let’s win together – for the benefit of our customers and their patients.

To help all of us in this daily effort, the Business Conduct Guidelines have been written by Healthineers for Healthineers. They are the guiding framework for all interactions with customers, partners, shareholders, and each other. I expect you to read them and apply them in your daily work.

If you have questions, please ask your supervisor, the Legal & Compliance team, or your Human Resources partner. Whenever you have the feeling that something is not in line with our Business Conduct Guidelines, please report it through one of the provided reporting channels.

Bernd Montag
CEO Siemens Healthineers



Business Conduct Guidelines

Preface

Dear Healthineers,

Pioneering breakthroughs in healthcare is an important and noble purpose that requires Siemens Healthineers to keep pace in developing state of the art technology so that we can reach everyone, everywhere, sustainably. But no matter how fast and far we move, no matter how boldly we step, it will always be on the basis of our values.

Our Business Conduct Guidelines are our cornerstone when it comes to complying with the law and business ethics in our daily work. They are a crucial resource that will allow you to:

- Comply with applicable laws, regulations, industry codes and Siemens Healthineers policies and procedures.
- Promote integrity and the highest standards of conduct.
- Address situations that you could encounter in your work.
- Understand the importance of speaking up and know the different channels available to speak up and report concerns.

Our Business Conduct Guidelines apply to all Siemens Healthineers employees worldwide, and we are all expected to comply with them in every aspect of our work. We are all expected to own them. Ask the Legal and Compliance Team for advice in case of questions or concerns.

With best regards



Christian Bleiweiß
Head of Legal & Compliance
at Siemens Healthineers



Benedikt Knothe
Head of Compliance
at Siemens Healthineers



Christian Bleiweiß, Benedikt Knothe

Who we are as a company

Our compliance compass

Our Business Conduct Guidelines provide orientation and guide our path. They are the foundation for our behavioral expectations and obligations.

Our heritage

Built on a history of innovation we are a global player with a strong engineering heritage:

We have been pushing the boundaries in medical technology for more than 125 years and will continue to do so in the areas of imaging, diagnostics, and cancer therapy.

Our Purpose

With our purpose, values, and unique strengths as our strong foundation, our current strategic chapter is driven by a bold ambition Elevating health globally. We are sharpening our focus on making the greatest difference in advancing health around the world.

We pioneer breakthroughs in healthcare.
For everyone. Everywhere. Sustainably.

Elevating Health Globally

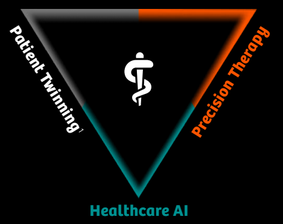
Our Values

Guided by our values, we are building a more inclusive culture, embracing diversity in all its forms at every level of our company.



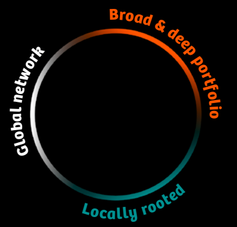
Our unique strenghts

We take on the greatest challenges in healthcare with our unique combination of strengths in:



We are partnering with care teams around the world to address their most pressing challenges, so that healthcare providers can

- expand access to healthcare,
- advance clinical excellence, and
- improve efficiency across healthcare



Our strategy

As a leading medical technology company, we help improve access to healthcare for underserved communities worldwide and overcome the most threatening diseases. We are a team of around 74,000 Healthineers in over 70 countries passionately pushing the boundaries of what is possible in healthcare so that patients can live with hope, not fear of disease.

Our strategic priorities are:

- Overcoming the **most threatening diseases**
- Improving **access to healthcare** for underserved communities
- Empowering **clinical excellence**
- Driving **efficiency**

Our responsibility

Sustainability is a priority for our business, we focus our efforts on:

- Improving quality of life through access to care
- Contributing to a regenerative and healthy environment
- Promoting a culture of diversity, inclusion and belonging (DI&B)

We are an active participant in the UN Global Compact. Our contribution to the UN Sustainable Development Goals includes emission reduction targets that are approved by Science Based Targets initiative (SBTi).

[1] *Early detection, accurate diagnosis, individualized therapy selection, simulation and planning, continuous monitoring, and aftercare.*

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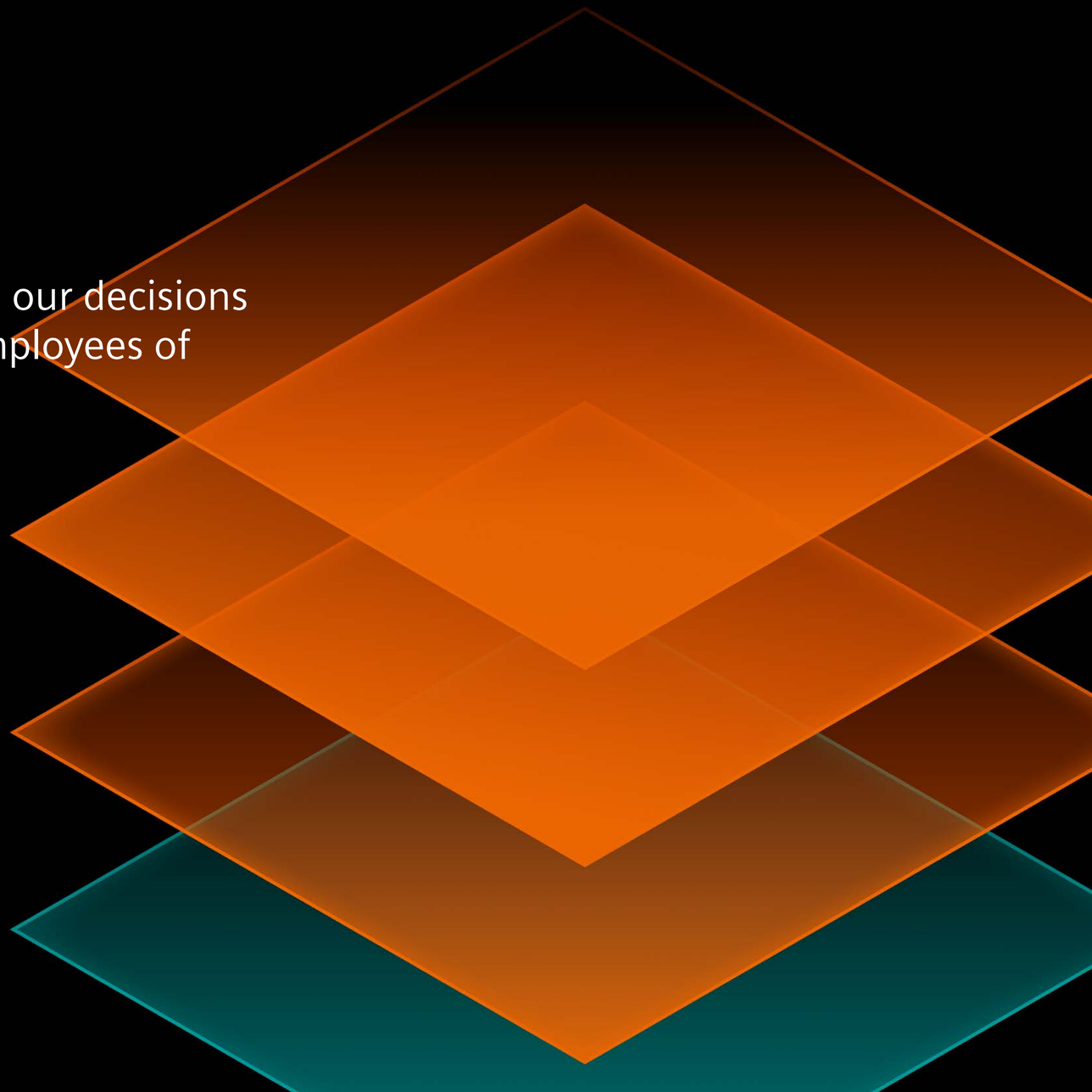
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Our basic principles

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 industry and 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.

We also regularly review our knowledge and understanding of the BCGs as applicable to our work.

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 values of Siemens Healthineers?
- Is it legal?
- Is it consistent with applicable Industry Codes of Conduct and our internal rules?
- Will it enhance the reputation of our brand, if our actions (or those of our partners) 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 work together and embrace the multitude of different characteristics including ethnic, national or social origin, culture, religion, age, disability, gender, gender identity, gender expression, sexual orientation and/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 have the right to tell someone harassing us that their conduct is unwelcome and/or report our concern to our manager,HR or the global reporting system “Let Us Know.”

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.

Diversity, Inclusion and Belonging
At Siemens Healthineers, diversity, inclusion, and belonging (DI&B) are foundational to our purpose of **pioneering breakthroughs in healthcare. For everyone. Everywhere. Sustainably.**

We promote an inclusive culture by embracing diversity in all its forms, at every level of our company, and in the communities where we work and live.

We drive DI&B to enhance our leadership position in the markets we serve and positively impact the broader healthcare industry.

Our purpose, values, and behaviors are fundamental elements of our Siemens Healthineers culture. Together, they serve as a roadmap to fostering an inclusive culture for all employees.

Employees who feel included, valued, and respected are more likely to be engaged, motivated, and productive.

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 a desk and lockers)
- Innuendo or comments that are hostile or disrespectful to disabled people
- Gender-specific harassment or violence, including assaults, unwanted advances, stalking or improper remarks or jokes; or
- Displaying offensive or improper images or objects, including those with graphically explicit content (e.g. sexual, violent)
- Treating others differently based on their reaction to unwelcome advances
- Exclusion from group discussions or meetings or social isolation

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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 own it 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.

"Personal integrity, transparency and courage are essential pillars of an ethical organization. We strive to create an environment where employees are encouraged and feel safe to speak up on behaviors and actions that are not consistent with our core values or are in breach of our Business Conduct Guidelines. The individual commitment of each employee to uphold these values and safeguard our license to operate shape the type of company we all want to be a part of."

Darleen Caron
CHRO & Labor Director, Siemens Healthineers

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C | Corporate protection

We protect our company

We protect and promote our reputation and values. 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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D | Our responsibility as a manager

Our managers lead by example and set the appropriate tone from the top

As managers, we have the responsibility to take seriously our duty of care for the employees entrusted to us:

We create a trusting work environment and are available to discuss employees' uncertainties, questions, and professional or personal concerns.

We set a good example and ensure our teams understand the importance of acting in accordance with the Business Conduct Guidelines.

We take indication of possible misconduct seriously and report it in appropriate form. We protect the identity of employees who report potential misconduct and protect them from retaliation or other negative impact.

We fulfill our organizational and supervisory duties.

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

What are our organizational and supervisory duties?

- We carefully select employees based on their professional qualifications, skills, and suitability (Duty of Selection)
- We define binding tasks precisely and completely, especially regarding compliance with legal requirements (Duty to Issue Instructions)
- We take care that compliance with legal requirements is continuously monitored (Duty to Monitor)
- 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 (Duty to Communicate)

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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. Siemens Healthineers rejects all forms of slavery or practices similar to slavery.

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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Health & wellbeing, occupational safety, and personal security

Our health & wellbeing
Siemens Healthineers protects and promotes our health and wellbeing and offers a wide range of support to maintain and foster our physical, social and mental health and wellbeing.

Our occupational safety
Our vision is zero accidents where everybody cares about one another's safety. We achieve this through a safety culture that is lived by our employees and role modeled by our managers. Safe working conditions and operational control procedures are necessary prerequisites for this.

How can I report an incident/ accident?

Always inform your manager and/or your local EHS function. Within Siemens Healthineers, myCority is the common reporting tool for any type of EHS incidents globally. However, if you are unsure, your local EHS function will support you. Please refer to the global HR EHS intranet page for more information.

This is what we do:

- We follow the safety rules, processes and operational control procedures
- We avoid at-risk behavior
- When we recognize unsafe situations, we timely take appropriate action
- We report unsafe conditions and behavior, near misses and incidents to our managers, facility managers or responsible Environmental Protection, Health Management & Safety (EHS) personnel via the myCority tool
- We consider mistakes as learning opportunities for continuous improvement of our safety & health culture

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E | Respect for each other

Health & wellbeing, occupational safety, and personal security

Our personal security
Siemens Healthineers employees as well as Siemens Healthineers as a company are confronted by a wide range of Corporate Security related risks.

To protect the life and the physical integrity of employees, company assets worldwide and to ensure that relevant decision-makers are adequately informed of existing risks and available mitigation measures, specific standards and rules need to be followed.

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 security situation and contact one of the Travel Security Assistance Centers (24/7) on the intranet or via the Travel Security App and follow the relevant security instructions
- We report security incidents promptly to our manager or via defined reporting processes

Siemens Healthineers is committed that human rights are respected when using or contracting security forces for the protection of business projects.

How is Siemens Healthineers taking care of its employees during business travel, especially into higher risk countries?

The security and health situation in a country could require special personal security, medical assistance, and protection measures for employees on business related travel.

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 tool and process, access to 24/7 security and medical assistance, a Travel Security App, Web-based trainings, guidance on various travel security and medical topics or specific security measures 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 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.

However, gifts given on cultural or social occasions that are unrelated to patient care or education are not permitted. While we respect the diversity of cultural traditions worldwide, Siemens Healthineers applies uniform standards to ensure fairness, transparency, and ethical interactions across all markets.

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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 their 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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Fair competition

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

For a customer event in the United States, it is planned to provide all participants with a branded pen bearing our company logo. Is this allowed?

No. The Anti-Kickback Statute prohibits to provide such branded items 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 servea genuine educational function. For healthcare providers from other countries, different rules may apply; the applicable local laws, relevant industry codes, and internal policies are always decisive.

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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, extradition 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 strong 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 make independent business decision and do not enter into anticompetitive agreements with competitors, customers, distributors, sales agents, suppliers or any third-parties
- We compete solely on the merits of our products and services and do not engage in unfair and discriminatory conduct impacting either our customers or competitors in the market
- We only meet, discuss or communicate with competitors when we have a compelling business reason to do so and we are sure there are no antitrust concerns

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We are successful in fair competition

Respecting antitrust law and fair competition

We never communicate with competitors about:

- Prices, price components or other conditions (on the sales as well as the procurement side)
- Market, customer or territory allocation
- Bid rigging (i.e., manipulating the outcome of a tender)
- Offers and tenders (unless we have clearance from Legal & Compliance for the specific business model or tender)
- Identity of customers, business opportunities
- Capacities, production volumes or quotas
- Corporate strategies or future market behavior; for example, sales strategies, current and future product developments, investments and boycotts
- Limiting innovation
- Hiring each other's employees
- Salaries, benefits, and other sensitive HR information

We never communicate with customers, sales partners or suppliers about:

- Maintaining a fixed or minimum 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 never or support a customer to draft tender specifications which favor Siemens Healthineers or otherwise limit competition.

This is what we do:

- We support open and fair competition in our relationships with customers, business partners and suppliers
- We treat so called Independent Service Organizations (ISOs) in a fair manner and strictly follow the Global ISO policy for provision of services to ISOs
- We handle confidential information from Siemens Healthineers and third parties, such as competitors, customers, business partners, and suppliers, which we receive lawfully, with care, 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 do not do:

- We never solicit or accept confidential or competitively sensitive information from third parties without justification and use it in an unlawful manner, for example in the bidding process or other sales and marketing activities
- We do not discuss or share competitively sensitive information with competitors
- 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 or contractual requirements.

This can for example include:

- Details of a company's organization and facilities, prices, sales, marketing, bidding activity, markets, customers, and other business matters
- Offer documents
- Information on manufacturing, research, and development processes
- Technical information
- Know-how
- Internal reporting figures, including any internal financial data such as revenues, orders, profits/margins, costs

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We are successful in fair competition

Respecting antitrust law and fair competition

This is what we do:

- We have potential business relationships examined in advance by Legal & Compliance, such as:
  - Working/bidding partnerships, consortia, sub-supply relations
  - Sales and marketing cooperation
  - Joint research and development
  - Specialization/joint production
  - Standardization and harmonization
  - Joint purchasing
  - Intellectual property licensing
  - Market information systems / benchmarking
  - Exclusive distribution and procurement agreements and any territorial and non-compete restrictions in distribution and licensing agreements
- 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 third parties including business partners (except where there is an objective justification)
  - Refusal to supply or license (without an objective justification)
- 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.

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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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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 societies, 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 corruption.



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Siemens Healthineers

A high value innovation brand and highly respected corporate citizen in medtech

Every employee is held accountable for ensuring consistency and discipline in all applications of the brand. Our personal preferences should never jeopardize professional judgement.

Our brand specifications and requirements are globally binding and cover everything to be used by or represent Siemens Healthineers inside and outside the company.



"Siemens Healthineers stands for innovation and the quality of our products and solutions for our customers. At the same time, we want to be a company that wins against competitors through fair play and Compliance with the law. Compliance and integrity in all our activities are part of our DNA at Siemens Healthineers."

Bernd Montag
CEO Siemens Healthineers

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Siemens Healthineers

A high value innovation brand and highly respected corporate citizen in medtech

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.

Why are intellectual property rights so important to Siemens Healthineers?

If our innovations are not protected, third parties can copy our products, which lead 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.

This is what we do:

- We are proud of our name Siemens Healthineers, so we use it in full; not Siemens, not Healthineers and no abbreviations
- We ensure that we appear as one distinct brand and consistently apply our brand design, including product and user-experience (UX) design
- 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-party software, commercial, and open-source software, in our products and solutions
- We respect the intellectual property rights of third parties
- We never disclose trade secrets and other confidential or proprietary information to any unauthorized person or organization or use it for any unauthorized purpose

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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 based on 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
- In case we could personally benefit from engaging a company we also deal with as part of our work for Siemens Healthineers, we disclose this conflict of interest, especially if we have 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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We only make business decisions in the interest of Siemens Healthineers

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 leave 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 involvements 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 a potential internal conflict of interest:

There is a consensual intimate relationship between an employee and a manager. The manager and the employee is obliged to disclose this potential conflict of interest at an early stage to HR. This enables the company to implement suitable mitigation measures, if deemed necessary.

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We only make business decisions in the interest of Siemens Healthineers

Conflicts of interest

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 especially in situations involving competitors.

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 assets 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

We are entitled to a large payment from a customer if we certify that project installation has been completed. We are not sure whether a few small items have been installed by us yet, but they should be soon. It is getting close to year-end, and we would like to book the payment. Can we submit our invoice and certification now?

No. You cannot submit the invoice and certification until we have received confirmation that the installation has been completed by us in accordance with the contract.

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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.

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

"For me Compliance is an undisputed boundary condition to do successful business. We are a trusted partner for our stakeholders based on a solid Compliance culture."

Jochen Schmitz
CFO Siemens Healthineers

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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 received incidentally.

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

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Neither by us, nor for others!

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 share ownership programs where possible. However, the prohibition of insider trading applies also to any transactions under such programs if the respective employee has inside information when making or altering the selection in the online tool to participate in the employee share ownership programs. When actively participating in employee share programs, particularly in connection with making buy or sell decisions or altering purchasing or selling selections, every employee should always ask themself whether they can make the buy or sell decisions without making use of potential inside information. The same applies if employee wishes 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 and “sell all” qualifies as a sale of shares).

How do we know if we are an insider?

Each of us must consider whether they have or receive inside 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 in accordance with internal policies.

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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We protect information and company assets

All employees, including managers and Board members, need to protect the company's assets, both tangible and intangible, against loss, theft, misuse, and improper disclosure, and ensure their efficient use. For this, we systematically identify and evaluate our critical information and company assets.

Every Healthineer shares responsibility for protecting our company's confidential information.

We handle company equipment and facilities with due care

We have to treat the company equipment and facilities at our disposal for our daily work with due care as misuse has a direct impact on the company's profitability.

Therefore, we use company assets only for legitimate business purposes, though incidental personal use of certain assets may be appropriate as aligned with one's supervisor. This, of course, must be consistent with local laws and local company policies and regulations (e.g., use of company internet access may be permitted for private purposes – including external social media). We exercise good judgment and discretion at all times and use these systems in a professional, ethical, and lawful manner.

We must be aware that our communication on social media sites can pose significant legal, regulatory or other risks to the company and/or the employees who can be identified as being associated with Siemens Healthineers in the process. This also holds true for communication that was privately intended (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 treat company information with due care

Business and personal data such as our own identities (at work, at home or online, for instance on social media) are extremely valuable. Attackers frequently target corporate, government, and individual networks in attempts to gain access to this information. Cyberattacks are on the rise and 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 have to be avoided or mitigated.

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We protect information and company assets

Any device that uses the internet for communication can be hacked, and email is especially vulnerable to attack. We do not open any email that comes from an unknown person, and never open attachments or click on any link in an email unless we know the sender.

We need to be on the alert for suspicious activity, such as anyone trying to get unauthorized access to our systems or data. If we suspect a system or information is compromised, we use the relevant reporting channel which you can find on the Cybersecurity homepage and, for example, disconnect a device from the network until it is cleared again by IT.

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 from the Charter of Trust:

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

This is what we do:

- We classify information and treat it in accordance with their classification as “unrestricted”, “restricted”, “confidential”, or “ strictly confidential”
- We manage access controls and permissions to ensure information is accessed by authorized individuals only
- We use our company assets for legitimate purposes only and in accordance with local laws and company policies
- We keep our personal passwords and access codes secret
- 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
- We are vigilant and report incidents

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

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Data Privacy

In our increasingly digitalized world, the protection of personal data plays an important role. Every day, we have contact with personal data of our employees, our customers, their patients and our suppliers. The improper use of personal data can have serious consequences for the data subject, for the company concerned, and for the individual who commits a data protection breach. We therefore expect all our employees to handle personal data carefully and responsibly. We expect all our employees to inform our data protection department about possible data protection incidents.

Special categories of personal data:

We will also process special categories of personal data, in particular health data. We respect existing processing restrictions and comply with the related data privacy requirements. We are aware that breaches of confidentiality or data secrecy may not only have serious consequences for the individuals concerned but may also have consequences for us under employment law and criminal law (see Section 203 of the German Criminal Code).

What is “personal data”?

Personal data is any information relating to an identified (e.g. by name) or identifiable (e.g. by job title or combination of individual characteristics) natural person. Examples include clear names, email addresses, dates of birth, telephone numbers, GIDs, IP addresses, location data, health data, etc. Particularly the latter is subject to special enhanced protection due to its sensitivity in all jurisdictions.

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.

This is what we do:

- We process personal data only within the scope of our duties in accordance with the specified purpose
- We do not disclose personal data to unauthorized third parties, even within Siemens Healthineers
- We exercise particular caution when sending personal information by email, especially when selecting the distribution list so that each recipient receives only the information that pertains to him or her
- When filing and storing personal data, we comply with the relevant information security requirements, in particular that access to drives is created exclusively on a need-to-know basis, thus preventing access by unauthorized third parties/departments
- We report any breaches of data protection that are discovered to the data protection department without delay

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H | Our portfolio

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 starts or market entry)

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I | Our partners

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 careful selecting suppliers and other business partners and through the standards we set for our own actions.

We desire to work with partners committed to improving the communities in which they do business.

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.

“We win customers with innovative products and pioneering solutions. Ethical behavior and Compliance is an integral part of our business decisions – without compromise. This is the responsibility of all employees, and we expect the same from our business partners. I count on everyone’s commitment to clean business as the only way to a successful and sustainable business.”

Elisabeth Staudinger
Member of the Board, Siemens Healthineers

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We work with responsible partners



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 as partners with our suppliers and 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 work with responsible partners

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 in 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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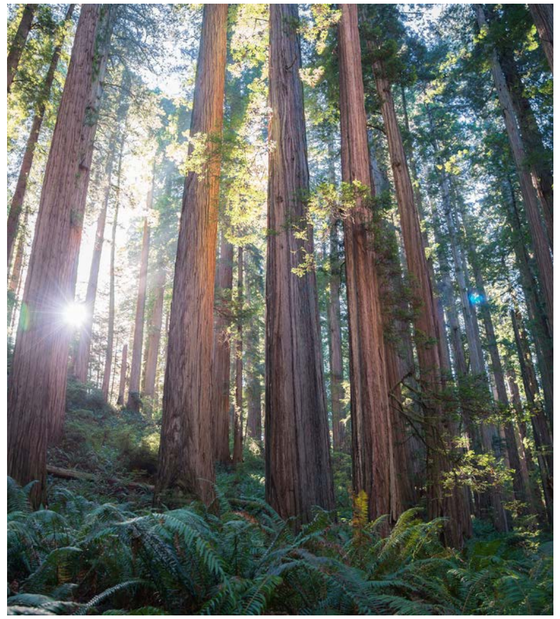
As Siemens Healthineers, we act both responsibly and innovatively – in other words, sustainably. Sustainability has always been a guiding principle for us. For more than a century we have been working to improve healthcare products, services, and solutions for the benefit of patients, medical professionals, and society. We will continue to do so as part of an unequivocal commitment to sustainability by all of us at Siemens Healthineers.

In addition, Siemens Healthineers is voluntarily and purposefully committed to raising awareness of social concerns and needs.

We are an active part of the global endeavor formulated in the United Nations Sustainable Development Goals (UN SDGs).

As one of the leading medical technology companies, Siemens Healthineers wants to make an important contribution to achieving these goals. That is why we focus our efforts on improving access to care as well as on environmental and social issues. We do this in a comprehensive and transparent way and disclose relevant facts with our annual sustainability report.

Our Managing Board is responsible for business ethics issues, we have implemented operational policies and measures to prevent violations, and we are committed to addressing all major business ethics risks.



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Our commitment to international agreements and recommendations

As Siemens Healthineers is an active participant in the United Nations Global Compact. We regard its Ten Principles and the Global IndustriALL Union framework as binding for the company.

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.

We therefore expect our employees, suppliers, and business partners worldwide to comply with – among others – 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
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal

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Human Rights

Our commitment to respecting human rights and to implementing the UN Guiding Principles on Business and Human Rights is led from the top. Our efforts on human rights topics are overseen by the Managing Board, the Human Rights Officer, Legal & Compliance, and the heads of our Business and Regional Units.

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

Our overall approach is to raise awareness and to minimize or eliminate any adverse effects for employees as well as people outside of the company.

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, national or social origin, culture, religion, age, disability, gender, gender identity, gender expression, sexual orientation and/or any other legally protected characteristics.

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

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Animal Ethics and Culture of Care

Animal Ethics Policy

Despite our and the industry's progress with alternative methods, animals and animal-derived materials remain essential for preserving and promoting human health.

Siemens Healthineers understands the ethical responsibility of balancing the use of animals with addressing the challenges of diagnosing and treating serious illnesses. We minimize the use of animals in research, development, and production and treat these animals with care and respect. We adhere to animal-welfare legislation and the "**three Rs**" principle: **replace**, **reduce**, **refine**.

Culture of Care

Siemens Healthineers Culture of Care policy adds a "**fourth R**" to recognize our **responsibility** to human, societal and operational factors relevant to animal husbandry, research, and use of animal-derived materials.

Our Culture of Care is based on four pillars in which we implement that responsibility: animal welfare, human welfare, societal expectations, and operational excellence.

This is what we do:

- We **replace** the use of animals with other methods and technologies whenever appropriate.
- We **reduce** the number of animals used to the lowest level necessary.
- We **refine** the operating processes, procedures, and protocols to enhance animal care.

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Animal Ethics and Culture of Care

Four pillars of our Culture of Care:

- **Animal welfare**
  We focus on animal care practices. Consistent with the “three Rs” principle and legislation, we continually review and incorporate modern technologies in animal science related to proper housing, handling, and procedures to minimize pain, suffering, and distress.
- **Human welfare**
  We recognize the importance of our employees’ mental and physical health; we provide a working environment conducive to facilitating transparency and communication.
- **Societal expectations**
  We proactively seek alternatives to animal use. Compliance with legal and ethical requirements in operations is of utmost importance to us.
- **Operational excellence**
  We regularly review and improve our animal care practices, research policies, and production processes to promote animal welfare and reduce use of animals, where possible. We train and develop our employees so they are qualified to their task. We require all third parties maintain similarly high standards and to comply with all applicable laws and regulations.

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Environment

Environmental protection is a corporate responsibility, our social responsibility, and 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 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 an 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:

- we aim to be carbon neutral in our own operations including reducing all relevant value chain emissions
- We minimize waste and believe that the take-make-dispose model is no longer an appropriate framework for production and consumption given increasing global demand for raw materials
- We are working toward a circular economy by increasing the proportion of reused, repaired, refurbished, and recycled parts, components, and products

We are convinced that our efforts in the areas of decarbonization, resource efficiency, and resource conservation are a sustainable response to societal expectations, a promise to future generations, a lever to increase our customers' competitiveness, and a crucial component for our own resilience and future.

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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
- Human Rights Officer
- Legal & Compliance personnel
- Human Resources personnel
- Global reporting system “Let Us Know”
- Ombudswoman for Siemens Healthineers
- 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 reporters. 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.

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What to do if there are signs of possible misconduct?

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

The ombudswoman can be contacted via email 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**

Contact information

Dr. Sibylle von Coelln
E-mail: shs-ombudsfrau@hvc-strafrecht.de
Phone: +49 (0)211 44 03 57 78

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