

**Siemens Healthineers**

Act on Corporate Due Diligence Obligations  
in Supply Chains

# Rules of procedure for the handling of complaints



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## Which incidents can be reported?

You can report any violation of laws, governmental regulations or Siemens Healthineers' internal regulations related to our business.

Please do not send us information if that could be punishable under the laws of your country.

Please provide only information that you believe to be true. Knowingly providing false or misleading information is prohibited.

## In which form can reports be submitted?

We provide internal and external whistleblowers with various reporting channels.

### Let Us Know reporting system

„Let Us Know“ provides a secure reporting channel for reporting information about non-compliant or otherwise problematic actions around the clock – online, anonymously if desired, and in several languages.

### The Siemens Healthineers ombudswoman

In addition, Dr. Sibylle von Coelln, a lawyer from the Düsseldorf-based law firm HEUKING·VON COELLN, has been appointed as our external ombudswoman. Employees and third parties can turn to her anonymously and confidentially if they observe incorrect business practices within the company.

Furthermore, all employees may report circumstances that indicate a possible violation or misconduct to the following persons or entities:

- Manager (who will then advise how to further report to Legal & Compliance or in the alternative reporting channels listed below)
- Head of Compliance Siemens Healthineers
- Human Rights Officer
- Employees of Legal & Compliance
- Employees of Human Resources
- Employee representatives.

## **Can reports also be submitted anonymously?**

We also process reports that we receive anonymously. Please note: In many cases, further dialog with you will facilitate clarification of the facts or even make it possible in the first place. Therefore, we encourage you to stay in contact with us after your report. Should you be concerned, that inclusions could be drawn about your identity, based on the content of your report and information, please let us know.

For anonymous communication, you may contact us via our reporting system "Let Us Know" or via the ombudswoman we have appointed.

## **How will my report be processed at Siemens Healthineers?**

Siemens Healthineers has set up a central team for processing and reviewing reports within the Compliance department. The employees of the Compliance department are bound to special confidentiality, are professionally trained and independent in the performance of their duties.

After receipt of your report, you will receive a confirmation of receipt immediately, at the latest after seven days, if we have received the relevant contact options from you. In addition, we will be happy to maintain a dialog with you (via phone, email, video telephony or in a personal meeting). This often serves an efficient and target-oriented clarification of facts.

After the receipt of your report, the Compliance department checks whether an in-depth investigation is required. An investigation can be carried out by internal or external investigative specialists. In many cases, employees from our global compliance organization must be involved locally. Your report may also be forwarded to other departments outside of Compliance, such as Human Resources, if those departments are responsible for the topic you have reported to us. Internal forwarding will be done in a manner that preserves confidentiality.

As part of the internal investigation, our investigation team determines the facts of the case through a variety of measures. During this process, the accused will be given the opportunity to comment on the circumstances you have reported to us. If you have provided your name but do not want the accused to come to know about it through our investigation, please indicate this in your report. If required, information may also be forwarded to the responsible authorities.

We will inform you about the result of your report. However, for data protection and – depending on the nature of the case – other legal requirements, we are not always allowed to communicate details of the outcome of the investigation and implemented measures.

## Which principles do you apply when handling compliance complaints?

- We conduct our activities in accordance with applicable legal and professional standards in an objective and diligent manner.
- We show fairness and respect to all parties involved and grant you the right to be heard.
- We avoid presuming the fault or culpability of the parties involved and draw conclusions only after sufficient information is available to validate such conclusions.
- We allow the presence of a lawyer and/or a member of the workers' council / spokesperson committee during an interview.
- We disseminate information during the fact-finding process exclusively based on the "need-to-know" principle.
- We maintain the confidentiality of information in accordance with internal and external regulations and applicable law.
- We comply with company policies and applicable laws regarding the protection of personal rights and the collection of data.
- We avoid actual or potential conflicts of interest or the occurrence of actual or potential conflicts of interest.

## What should I do if I am retaliated against?

Retaliation against individuals who raised compliance concerns in good faith is strictly prohibited. If you have reason to believe that you have been subjected to retaliation, please notify the Compliance department directly so that we can respond accordingly. Retaliation in response to compliance concerns that you have raised to the best of your knowledge can be reported via our reporting system "Let Us Know" under the last category "Other Violations" or through the ombudswoman.

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