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Government Affairs at Siemens ↩



Siemens is politically neutral. With around 377,000 employees worldwide and operations in more than 200 countries/regions we are a truly global company and we work with our customers to provide innovative solutions to some of the most pressing issues facing the planet, such as digitization, de-carbonization and urbanization. As a result, we think that it is important to engage in dialogue with our external stakeholders and contribute to the development of public policy in a responsible way. And we are regularly asked our views by governments, international organizations, non-governmental organizations, business associations and the civil society. All of our political and external engagement is governed by the guidelines outlined below and carried out in

full accordance with our company commitment to [responsible and sustainable business.](#) ([/global/en/home/company/sustainability.html](#))

☰ You are here: Overview



Topics ↩

Topics

We prioritize our political engagement according to our business strategies and innovation fields. These can be found here ([/global/en/home/company/topic-areas.html](#)). As part of this, our advocacy activities include the following topics and policy areas: combating Climate Change; Connected and Automated Mobility for rail and road; Cyber Security; Data/Digital Economy; Energy; Research; and Trade Policy.

Examples of recent activity include:

Digitalization:

Siemens works with policy-makers to promote policies which increase the adoption of digitalization throughout entire economies and all industry sectors. Another aim is to enhance protection of assets, data, businesses and infrastructure through policies that build trust in the connected and digital world. Recent initiatives include:

- **Cyber Security:** Siemens Charter of Trust (</global/en/home/company/topic-areas/digitalization/cybersecurity.html>) for a secure digital world, published on 16 February 2018 at the Munich Security Conference
- **Think Digital:** Conference series (<http://www.kas.de/bruessel/en/events/78039>) conducted by the "Konrad Adenauer Foundation" on what our digital future will look like

Energy:

Through dialogue with policy makers and stakeholders, Siemens campaigns to see the adoption of smart market regulation based on three major paradigm shifts in the global energy transformation: digital energy; enhanced flexibility and adequacy; and sectoral integration. Recent initiatives include:

- **Make Power Clean Campaign** (<http://makepowerclean.eu>) to support the European Commission in limiting capacity mechanisms to technologies emitting less than 550gCO₂/kWh
- **European Alliance to save Energy** (<http://euase.net/>): campaign to make Europe more energy efficient

Guidelines 

Our Government Affairs Guidelines for Political Activities

Guiding Principles

Siemens operates in nearly every country of the world, with customers in both the private and public sectors, covering a wide range of industries.

As a result, Siemens is directly impacted by the formation of parliamentary policy, government policy, regulation and legislation. Therefore dialogue with political decision-makers is of major importance for our company's success and our commitment to corporate citizenship.

Siemens defines political activities as any communication and policy advocacy with political leaders, policy-making institutions and authorities (collectively "Policy Makers"), whether directly, by Siemens employees, or indirectly, through our memberships of associations and use of external agencies. These activities are aligned to company goals and positions and carried out in a coordinated and consistent way, as per the policies and guidelines below.

Governance and Accountability

As per the Siemens internal mandate, "Governance & Markets, Government Affairs", the overall responsibility for dialogue with Policy Makers lies with our Management Board, which has mandated a dedicated Government Affairs (GA) department with the necessary company-wide coordination tasks and corresponding governance responsibilities. The GA department reports to the Corporate Governance and Markets (GM) Function, which, in turn, reports directly to our President and CEO, Joe Kaeser.

The central GA department - as well as the local units in our Regional Companies - is responsible for developing political and advocacy strategies to advance Siemens interests and to advise and support management regarding communication and advocacy with Policy Makers. In addition our GA department manages and coordinates our participation in relevant industry and membership associations.

Siemens has an integrated approach to managing our political activities in accordance with our company wide compliance principles and procedures. Our employees must obey the laws and regulations of the legal systems within which they are operating and compliance is firmly embedded throughout our company, primarily through our mandatory Business Conduct Guidelines (<https://www.siemens.com/content/dam/internet/siemens-com/global/company/sustainability/compliance/pdf/business-conduct-guidelines-e.pdf>) (BCG). These guidelines contain the basic principles and rules governing the way we act within our company and in relation to our partners and the general public.

The relevant BCG provisions and passages relating to political activity are:

Section A.1. Behavior which complies with law

"All employees must obey the laws and regulations of the legal systems within which they are operating in addition to applicable Siemens policies... All employees guilty of a violation will be subject to disciplinary consequences."

Section B.2. Anti-corruption: offering and granting advantages

"We compete fairly for orders with the quality and the price of our innovative products and services, not by offering improper benefits to others. As a result, no employee may directly or indirectly offer, promise, grant or authorize the giving of money or anything else of value to a government official to influence official action or obtain an improper advantage. The same applies to a private commercial counterparty in a business transaction in consideration for an improper advantage."

Section B.3. Anti-corruption: demanding and accepting advantages

"Employees are not permitted to use their jobs to solicit, to demand, accept, obtain or be promised advantages."

Section B.4. Political contributions, charitable donations and sponsoring

"Siemens does not make political contributions (donations to politicians, political parties or political organizations)."

Section B.5. Government procurement

"In all of Siemens' dealings and interactions with governments, we act in a manner that is transparent, honest and accurate."

Section C. Avoiding conflicts of interest

"It is the duty of Siemens employees to make business decisions in the best interest of Siemens, not based on their own personal interests."

Section H. Conventions and Recommendations of International Organizations

"In addition to the laws and regulations of individual countries, there are a number of Conventions and Recommendations from international organizations... [which] function as important guidelines for the conduct of multinational companies and their employees. Siemens supports the requirements of these conventions and recommendations."

Other provisions and further details may be found in our Compliance Brochure (<https://www.siemens.com/content/dam/internet/siemens-com/global/company/sustainability/downloads/responsible-business-behavior-compliance-at-siemens.pdf>) and in our internal Siemens policy "Global Compliance" on regulations with regard to external business partners, conflict of interests, anti-corruption and high risk payments.

"Revolving Door" Guidelines

Siemens has adopted internal guidelines around the so-called 'Revolving Door' (<https://www.siemens.com/content/dam/webassetpool/mam/tag-siemens-com/smdb/corporate-core/government-affairs/siemens-and-the-public-sector-unrestricted-version-v2.pdf>) practice between private and public sector to avoid for example conflicts of interest. With respect to this guideline inter alia the following principles apply:

- Examination and maintenance of legal requirements
- Thorough subject and environment check (previous activity - planned position) to avoid conflicts of interest – Government Affairs and Legal & Compliance must be involved in any decision
- Transparent and documented selection process
- In all cases: Siemens Business Conduct Guidelines need to be observed as well

As part of this, Siemens adheres to 'cooling off' periods as required by local regulations.

Responsible Lobbying ↩

Responsible Lobbying

No tolerance with non-compliant behaviour

At Siemens, we take a zero-tolerance approach to corruption, violations of fair competition principles, and breaches of applicable law as well as our own internal regulations including our government affairs provisions. This applies to our employees, our suppliers and our business partners. If these do occur, we respond vigorously – this applies worldwide and at all levels of the organization. For Siemens, integrity means acting in accordance with our values – responsible, excellent and innovative – wherever we do business. For more information, please refer to our Compliance Brochure (<https://www.siemens.com/content/dam/internet/siemens-com/global/company/sustainability/downloads/responsible-business-behavior-compliance-at-siemens.pdf>).

Siemens offers a number of channels for reporting compliance concerns to internal and external parties and you can find out more here (<https://www.siemens.com/global/en/home/company/sustainability/compliance/reporting-channels.html>). The handling of compliance cases at Siemens follows a clearly structured approach that encompasses all steps in the process, ranging from reporting channels to internal investigations of possible compliance violations to our responses.

Transparency

Siemens is registered on the European Union's Transparency Register and, in the United States, the Lobbying Disclosure Act Registration Database. You can view our most recent entries below:

EU Transparency Register (
<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=4266797770-31>)

US Lobbying Disclosure Act Registration
(<http://disclosures.house.gov/ld/ldxmlrelease/2017/Q4/300937155.xml>)

Expenditure:

Siemens does not make political donations and contributions (donations to politicians, political parties or political organizations). In addition Siemens is politically neutral, therefore all contributions that support political purposes or the representation of political interests (for example, election events for political campaigns) are prohibited under our internal guidelines.

However, Siemens employees in the US may make personal contributions to the Siemens Corporation Political Action Committee (SCPAC) as allowed by US law. These are not Siemens Corporation contributions.

- Siemens may and does provide administrative support to the SCPAC, which includes the costs of operating the PAC including supplies and other operating costs (for example legal and banking) as governed by the applicable federal U.S. elections law.
- More information on the applicable federal U.S. elections law can be found at www.fec.gov (<http://www.fec.gov/>) and

www.fec.gov/rad/pacs/FederalElectionCommission-RAD-PACs.shtml
(<http://www.fec.gov/rad/pacs/FederalElectionCommission-RAD-PACs.shtml>)

All sponsorships, donations, gifts and hospitality, as well as memberships and the engagement of external business partners, agencies and lobbyists throughout the company are subject to a mandatory approval process. Our internal rules clearly state that sponsorships may not be politically or religiously motivated (sponsoring of politicians, political parties, political organizations, churches, etc). In addition, invitations of public officials to an entertainment event have to be approved by a compliance officer. Further restrictions apply as described above, in particular to company donations.

The above mentioned regulations are taken from our internal policy, "Principles for Sponsoring Activities, Donations, Charitable Contributions and Memberships".

Relationship with third parties 

Relationship with Third Parties

I) External Agencies and Lobbyists

Although the majority of our Government Affairs activity is carried out in-house, we engage the services of some external agencies to assist us. Siemens employees must adhere to an internal policy defining strict rules for engagement of such agencies and external lobbyists and, as with all our external business partners, we use comprehensive procedures to select them. The selection of external lobbyists is subject to both our business partner process and approval from the Government Affairs department and the Chief Compliance Officer. These relationships are continuously monitored and audited.

All our Suppliers and Third Party Intermediaries are contractually obliged to adhere to our codes of conduct (<http://w5.siemens.com/cms/supply-chain-management/en/supplier-at-siemens/basic-information/code-of-conduct/Pages/corp-responsibility.aspx>), and compliance is monitored on an ongoing basis. Additionally we apply special contract clauses for some business partner categories, e.g. external lobbyists. This process covers the entire life cycle of the business partnership. Our compulsory company-wide Business Partner Compliance Tool supports implementation of the process and ensures documentation of relevant information and activities. Further details can be found here

(<https://www.siemens.com/global/en/home/company/sustainability/compliance.html#Zerotoleranceformisconduct>;

II) Membership Organizations

Siemens and its consolidated subsidiaries participate in a wide range of business and membership organizations, some of which undertake political engagement on behalf of their members. All such memberships are subject to mandatory approval processes to ensure compliance with the Business Conduct Guidelines and, above all, to prevent any violation of the prohibition against corruption and the principles of fair competition. The most important memberships in our three main markets (at European Union level, the United States of America and China) are:

Europe:

Bundesverband Informationswirtschaft, Telekommunikation und neue Medien e.V. (BITKOM); BUSINESSEUROPE (only ASG); CER - Centre for European Reform European; DIGITALEUROPE; Roundtable of Industrialists (ERT); HEA - Fachgemeinschaft für effiziente Energieanwendung; ICC Germany; IBC - International Business Congress; Verband Deutscher Maschinen- und Anlagenbau e.V. (VDMA); Zentralverband Elektrotechnik- und Elektroindustrie e.V. (ZVEI)

USA:

US Chamber of Commerce, Business Roundtable; National Association of Manufacturer; National Electrical Manufacturers Association; National Foreign Trade Council; Organization of International Investment; American Petroleum Council; American Wind Energy Association; Alliance to Save Energy

China:

CAEFI; EUCCC; German Chamber

(<https://www.siemens.com/global/en/home/company/sustainability/compliance.html#Zerotoleranceformisconduct>)

Contacts 

Contacts

Siemens' global Government Affairs team is led by Eva Schulz-Kamm (<https://www.siemens.com/press/pool/de/biographien/biography-kamm-e.pdf>).

For general enquiries contact: governmentaffairs.gm@siemens.com
(<mailto:governmentaffairs.gm@siemens.com>)

For sales and supplier enquiries (<https://w5.siemens.com/cms/supply-chain-management/en/supplier-at-siemens/Pages/supplier.aspx>).

Siemens offers a number of channels for reporting compliance concerns, you can find out more here (<https://www.siemens.com/global/en/home/company/sustainability/compliance/reporting-channels.html>).

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