Speak Up: Information about data protection and consent

With its whistleblower system ("Speak Up"), provided through this application and a telephone dialogue system, Siemens Energy[1] provides a means for reporting specific indications of compliance violations. Compliance violations are violations of legal requirements or internal Siemens Energy regulations, particularly the Business Conduct Guidelines. Speak Up allows you to report specific indications of corruption, violations of financial reporting and accounting rules, theft, fraud, forging of documents, embezzlement, antitrust violations, unfair competition, securities trading violations, insider trading, disclosure of trade secrets or proprietary information, conflicts of interest and other criminal conduct that may be penalized with an administrative fine.

The information you report will be evaluated by Siemens Energy and, if necessary, its subsidiaries and other Siemens Energy companies (collectively "Siemens Energy"). It may result in the initiation of internal and external investigations conducted by the authorities and have other negative consequences for those affected. You should therefore give us only information which you assume to be correct to the best of your knowledge. Giving knowingly false or misleading information will have consequences for you. The intentional dissemination of false information is liable to criminal prosecution in many countries. In general, please do not provide us with information if this is subject to prosecution in your country.

Technical protection of the whistleblower system:

Technical maintenance of Speak Up is performed by Business Keeper AG, an independent operator located in 10789 Berlin, Bayreuther Str. 35 (subsequently "BK AG"). The data is provided on protected servers of Telekom Deutschland GmbH in Germany. Only Siemens Energy is responsible for processing the content of the reports.

Personal data that is entered in the whistleblower system is stored in a database operated by BK AG. All data is encrypted, password-protected and stored at a secure location so that access to the content of the data electronically stored in Speak Up is limited to a narrow circle of authorized persons of Siemens Energy. BK AG cannot view the content of the data electronically stored in this database.

As long as you do not enter data which makes it possible to draw conclusions about your identity, this whistleblower system protects your anonymity automatically using a certified technical solution which is protected through numerous technical and organizational measures.

Processing and sharing your report within Siemens Energy:

Once your report has been received, the Compliance Department checks whether an in-depth investigation is required. An investigation can be conducted by internal or external investigation specialists. External specialists whom we engage are bound to Siemens Energy by contractual or legal confidentiality obligations to keep confidential the information provided by you.

Depending on the content of your report, the Siemens Energy personnel responsible for further processing of the issue reported will receive the information provided by you. These are primarily the responsible members of the Compliance Department. The information will also be given to the management responsible within Siemens Energy, which also has to correct the shortcomings that may have been discovered during processing of the report. The Audit, Legal and HR Departments are frequently also involved in processing

[1] Siemens Gas and Power GmbH & Co. KG, Headquarters: Munich, Germany; Court of Registration: Local Court of Munich, HRA 111200; Personally liable partner: Siemens Gas and Power Management GmbH; Headquarters: Munich, Germany; Court of Registration: Local Court of Munich, HRB 241345. The Compliance Legal Department can be contacted at Otto-Hahn-Ring 6, 81739 Munich, Germany

compliance reports. If your report involves a subsidiary, the responsible units in these companies will be notified.

If the content of your report does not fall under any of the compliance categories listed above, we will forward your report to the responsible Siemens Energy department, provided we conclude that this is necessary and appropriate. For personnel matters, for instance, this may be the HR Department in charge. The general rule, however, is that Speak Up is only used to record reports related to the report categories listed above.

Siemens Energy can also involve external specialists such as attorneys, auditors or forensic experts who will examine your report as commissioned by Siemens Energy.

Please let us know if you do not want us to share your personal data, particularly your name, with persons outside the Siemens Energy Compliance Department (unless this is necessary for safeguarding the legitimate interests of Siemens Energy). Please note, however, that, as a consequence, we may not be able to give full consideration to your report.

Access of government agencies:

Siemens Energy may also be required by law to provide certain government agencies, including, without limitation, government investigative agencies or courts with information about compliance violations. If we are obligated to provide information, as well as in the event of confiscations, we are not able to withhold the information provided by you.

In some instances, Siemens Energy is not obligated to share personal data with government agencies, but has the legal right to do so voluntarily. **Please let us know** if you do not want us to voluntarily share your personal data, including, without limitation, your name, with government agencies (unless this is necessary to safeguard the legitimate interests of Siemens Energy). Please note, however, that, as a consequence, we may not be able to give full consideration to your report.

Sharing information with other countries:

Personal information that you may have provided in your report, may be transferred to other EU countries or countries outside the EU where the confidential treatment of personal data is not guaranteed by law to the same extent as it is in Germany. This applies particularly to countries which are not considered to have an adequate level of data protection as provided for in the EU provisions. Within Siemens Energy, however, an adequate level of data protection is guaranteed through binding internal data protection guidelines also in countries other than Germany.

Please let us know if you do not want us to transfer your personal data, including, without limitation, your name, to countries other than Germany (unless this is necessary to safeguard the legitimate interests of Siemens Energy). Please note, however, that, as a consequence, we may not be able to give full consideration to your report.

Notification of affected parties:

It is frequently required by law that the persons about which a report on indications of a compliance violation has been received have to be notified and heard. In the course of the investigation, these persons will have the opportunity to present their view about the report.

Please **let us know** if you do not want us to give your name as the whistleblower. Please note that the person affected may have legal rights to information which may require us to disclose your name. Government agencies may also have similar rights to information or confiscation which will result in disclosure of your name. This may be the case in particular if the person affected claims that the information brought forward against him/her is knowingly or negligently untrue and decides to file charges.

Storing personal data:

The personal information you provided will be retained as long as necessary for investigating and resolving the compliance report including the remediation of any shortcomings discovered and the handling of any ensuing litigation. Your personal data will be retained even longer if this is required due to legal, regulatory or contractual obligations to retain records or if it is permitted by law. Your personal data will be deleted as soon as this is required by law.

Consent and voluntary nature:

As you enter information into the whistleblowing system, the system will ask for your consent to the collection, processing and use of your personal data included in the information as described above. Please note that you can only proceed to the report form after you have clicked on the data processing consent box.

If you do not want Siemens Energy to collect, process or use your personal data as described, you may submit your report anonymously. The disclosure of your personal data is voluntary, as is the use of the whistleblower system. We would, however, appreciate it, if you could give us your name. Many investigations can be conducted more quickly and efficiently if the name of the whistleblower is known, since the person handling the report can get in touch with the whistleblower directly.

By using this whistleblower system, you agree that your personal data, to the extent provided by you, will be collected, processed and used as described above.

Siemens Energy, Compliance Legal