B/S/H/

Compliance and Legal: Defining Boundaries: BSH Bosch and Siemens Home Appliances Group

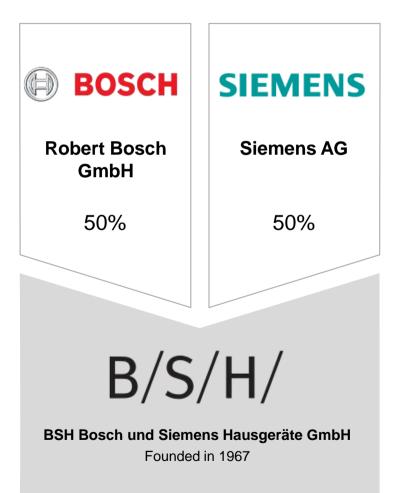
Compliance Week Europe

October 14th 2014 Alfred Spencer III

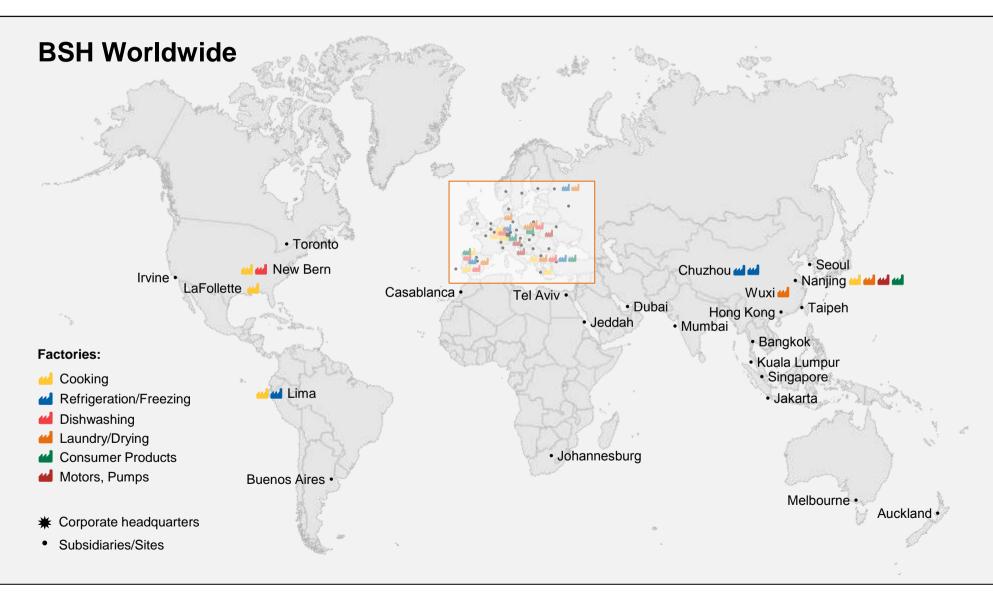


BSH at a Glance

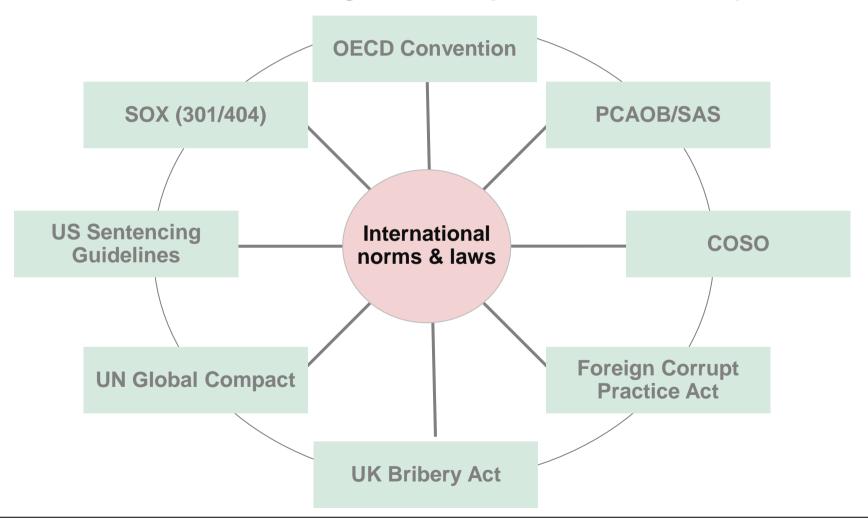
- Founded in 1967 as a joint venture between Siemens AG and Robert Bosch GmbH
- Market leader in Europe, No. 3 in the world
- Sales revenue: 10.5 billion Euros
- Product portfolio: all modern home appliances
- Employees worldwide: approximately 50,000



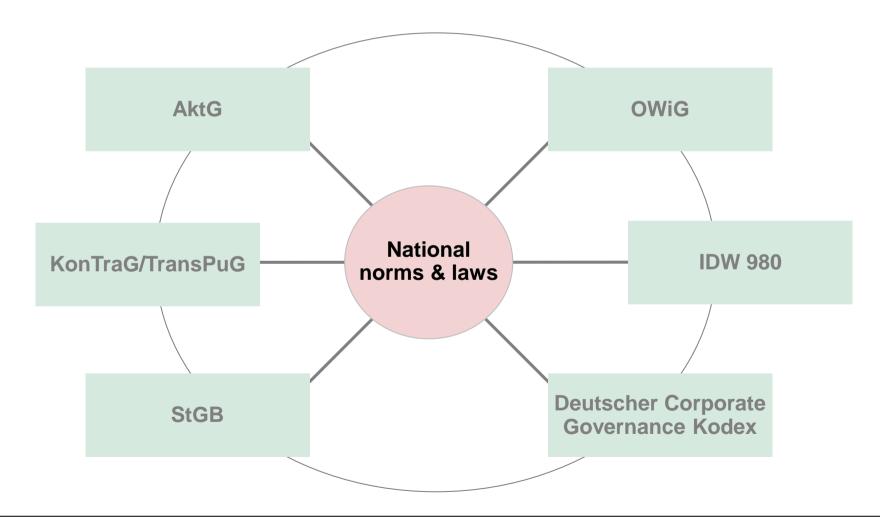
as of 31st of December 2013



International normative and legislative requirements for Compliance



National normative and legislative requirements for Compliance



Four Legal Risk Management Functions -

Compliance

Legal

Tax

Human Resources

Legal . . . Compliance

Legal

Represent Board

Legally advocate for the company

Define legal/regulatory framework for business activities

ID, interpret/advise on laws and regulations

Contract Negotiation

Litigation

Fair Employment Practices

Legislative/advocacy/regulatory interaction

Investigations

- ➤ Protect privilege
- ▶Legal advice
- ➤ Define priorities, objectives and issues
- ≽ID

resources/team

Subject Matter Experts

>Competition

Law

➤ Data Protection

Law

Compliance

Prevention

- ➤ Compliance Review Board
- ➤ Compliance Communications
- ➤ Compliance Risk Assessment
- ➤ Policies and Procedures

Operationalize

Draft/editorial lead

Subject matter experts

- ➤Training
- ➤ Systems and Controls

Detection

- ➤ Annual Compliance Review
- ➤ Hotline (colleagues & customers)
- **≻**Audits
- > Metrics/Scorecards

Response

- > Remedial Actions (process fixes)
- > Recommend employment actions
- **≻**Disclosure

Compliance Main Risk Areas

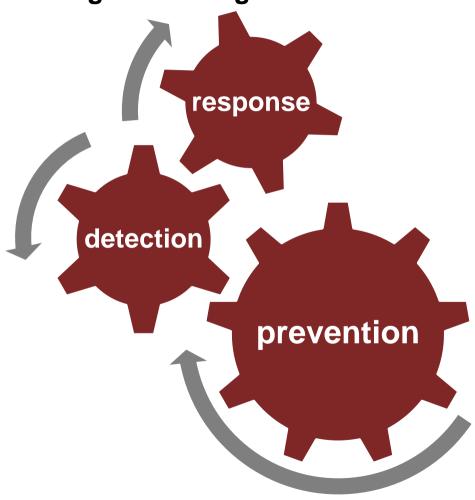
Anti-Corruption

Anti-Trust

Anti-Money Laundering

Major Financial Fraud Data
Protection
Law

Our Compliance Management Program

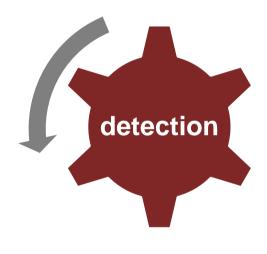


Our tools to manage compliance risks



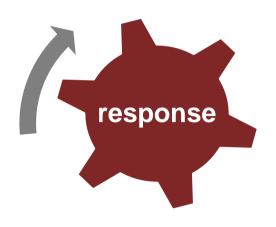
- Tone from the top
- Code of Conduct
- Training
- Helpdesk
- Communication
- Systems
- Risk Management

Our contribution to increase transparency



- Allegations
- Trust and tell
- Ombudsman
- Reviews

Our response to incidents of non-compliance



- Investigations
- Sanctions
- Organizational learnings
- Individual consequences

Adding value to the operative business is our focus

