(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?

Row 1

Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate
Yes, we engage directly with policy makers
Yes, we engage indirectly through trade associations

Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?
Yes

Attach commitment or position statement(s)
siemens-energy-sustainability-report-2021.pdf

Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy
To coordinate all communications and policy advocacy activities relating to political leaders, policy-making institutions and authorities, Siemens Energy has an internal Government Affairs team. The Global Government Affairs team is directly reporting to the CEO, which ensures high visibility and accountability of the overall policy alignment on all climate and energy related issues worldwide. Any policy outreach on a country level is coordinated and supervised by the Global Government Affairs team, and, with regular reporting to the CEO.

With respect to climate change issues, there is a close coordination between the Government Affairs department and the Sustainability Office to ensure consistency in our strategy and our political as well as general communication.

When it comes to the process itself in order to ensure a common approach to multiple climate engagement activities across various businesses and geographies, our Government Affairs (GA) Department collaborates closely with the Divisions on different regulations and policies affecting the respective Division via the regularly established calls/exchanges with Strategy Departments of different Divisions. They’re also then reaching out directly on a regular basis to their business partners for further inputs. In some cases, the joint topic-dedicated workshops with Divisions are organized on respective activities to align on the messaging and positioning. Given GA department’s central role and the governance functions within, the outreach to political stakeholders should be aligned with GA. Often GA functions have oversights with the businesses, therefore close alignment is required in order to e.g. produce an explanatory statements or develop the targeted and timely messaging and positioning ahead of the outreaches. On leadership basis, GA has regular alignment calls being scheduled. E.g. on sustainability activities, we’re closely aligning with sustainability colleagues, and contributing by providing GA’s inputs on respective related topics via scheduled regular exchanges. For this purpose, we involve our GA HQ colleagues (Germany), and also GA colleagues from US, China, Brussels/EU.

Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate
<Not Applicable>
Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate

<Not Applicable>

C12.3a

(C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?

Focus of policy, law, or regulation that may impact the climate
Other, please specify (Renewable Energy Directive III)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
Revision of Renewable Energy Directive II

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization’s position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy actively participated in the discussions in the run-up to the publication and is actively following and participating in the discussions around the co-legislative procedure. Siemens Energy is active in the discussions by participating in public consultations by the European Commission, drafting and sharing a position paper on the matter and bilateral talks with decision makers at EU level. Siemens Energy engages with policy makers and other stakeholders individually and via trade associations.

Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation
Siemens Energy advocates for ambitious targets for wind energy, quotas for e-fuels in transport, Guarantees of Origin scheme for green hydrogen and global carbon footprint certification for hydrogen and its derivates; ensure broad regulatory eligibility for green hydrogen.
Focus on the proposed RFNBO quotas as the most effective instrument for reducing emissions by ramping up green hydrogen and derived fuels. Siemens Energy advocates for more ambitious RFNBO quotas in transport and more speed. Together with an ambitious mandatory RFNBO quota for industry, the commitment as referred to in the European Hydrogen Strategy can be met.

Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Focus of policy, law, or regulation that may impact the climate
Other, please specify (Emission Performance of Vehicles Directive)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
CO2 emission performance standards regulation for cars and vans

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization's position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy actively participated in the discussions in the run-up to the publication and is actively following and participating in the discussions around the co-legislative procedure. Siemens Energy is active in the discussions by participating in public consultations by the European Commission and bilateral talks with decision makers at EU level. Siemens Energy engages with policy makers and other stakeholders individually and via trade associations and is sharing a company position with the relevant stakeholders.

Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation
Siemens Energy advocates to allow e-fuels to contribute to emission reductions with a well-to-wheel approach.
The CO2 emission performance standards regulation for cars and vans should introduce a voluntary crediting system for renewable fuels. This creates an additional pull for investments, strengthens Europe's strategic autonomy and gives consumers more flexibility. In doing so, the level of ambition to decarbonize road transport must be maintained.

Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Focus of policy, law, or regulation that may impact the climate
Other, please specify (Energy Taxation Directive)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
Energy Taxation Directive

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization's position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy actively participated in the discussions in the run-up to the publication and is actively following and participating in the discussions around the co-legislative procedure. Siemens Energy is active in the discussions by participating in public consultations by the European Commission and bilateral talks with decision makers at EU level. Siemens Energy engages with policy makers in the European Parliament and in Permanent Representations by explaining and sharing the company position on the matter individually and via trade associations.

Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation
Siemens Energy advocates to strengthen CO2 link in energy taxation and possibility for Member States to exempt carbon-neutral fuels from energy taxation. The European Energy Taxation Directive is the strongest carbon-pricing lever for achieving price parity between climate-neutral and fossil fuels. The proposed 10-year zero tax rate for sustainable fuels should be mandatory and be extended to all sectors.

Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned.

Focus of policy, law, or regulation that may impact the climate
Other, please specify (ReFuelEU Aviation)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
REFuelEU Aviation Regulation

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization’s position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy actively participated in the discussions in the run-up to the publication and is actively following and participating in the discussions around the co-legislative procedure. Siemens Energy is active in the discussions by participating in public consultations by the European Commission and bilateral talks with decision makers at EU level. Siemens Energy engages with policy makers and other stakeholders individually and via trade associations.

Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation
Siemens Energy advocates to ensure ambitious quotas for e-fuels for aviation and maritime; encourage e-fuel investments over ICAO’s international offsetting scheme CORSIA. The synthetic jet fuel quota of the ReFuelEU Aviation regulation creates the strongest investment incentive to de-carbonize aviation in the entire Fit-for-55 package. However, the proposed quotas should be strengthened: The 0.7% e-kerosene quota should be brought
forward to 2027 and the 2030 target should be increased to 1.5% which would save up to 4.82 Mt of CO2.

**Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?**
Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**
Other, please specify (Energy Efficiency Directive)

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**
Energy Efficiency Directive

**Policy, law, or regulation geographic coverage**
Regional

**Country/region the policy, law, or regulation applies to**
Europe

**Your organization’s position on the policy, law, or regulation**
Support with minor exceptions

**Description of engagement with policy makers**
Siemens Energy is actively following the decision-making procedure of the review of the Energy Efficiency Directive. Siemens Energy is contributing to the discussions in bilateral talks and a position paper as well as through trade organizations.

**Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation**
Siemens Energy advocates for a roadmap that (1) incentivizes system efficiency to limit fossil-fueled operation and to ensure reliable supply, (2) phase-out carbon-intensive fuels and (3) prepare and implement the transition to carbon-neutral operation.

Siemens Energy’s proposed changes to the European Commission’s proposal include: strengthening the definition of high-efficiency cogeneration; strengthening the definition of efficient district heating; ensure the eligibility of energy savings from high-efficient cogeneration and efficient district heating; make high-efficiency

**Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?**
Yes, we have evaluated, and it is aligned

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**Focus of policy, law, or regulation that may impact the climate**
Other, please specify (EU ETS)

**Specify the policy, law, or regulation on which your organization is engaging with policy makers**
Review of the EU’s Emission Trading System

**Policy, law, or regulation geographic coverage**
Regional
Country/region the policy, law, or regulation applies to
Europe

Your organization's position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy actively participated in the discussions in the run-up to the publication and is actively following and participating in the discussions around the co-legislative procedure. Siemens Energy is active in the discussions by participating in public consultations by the European Commission and bilateral talks with decision makers at EU level. Siemens Energy engages with policy makers and other stakeholders individually and via trade associations

Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation
Siemens Energy advocates for:
Support the extension of carbon pricing to road, aviation and maritime transport
Ensure that fuel suppliers and transport operators receive free allocation equal to the amount of RFNBOs they supply or use in the market
Adapt this amount of free allocation after 2027 or when the rules for how to account captured CO2 in the EU ETS enters into force
Double free allocation for RFNBOs and sustainable fuels for aviation and shipping to set incentives beyond legal requirements

Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Focus of policy, law, or regulation that may impact the climate
Other, please specify (Taxonomy)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
EU Taxonomy

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization's position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy actively participated in the discussion in the run-up and aftermath of the publication of the Taxonomy Delegated Act. Siemens Energy participated in the discussion individually as well as via trade associations. Siemens Energy participated in the public consultation on the screening criteria and published position papers.
Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation

Siemens Energy advocates to ensure adequate thresholds for gas-fired PG and CHP, avoidance of excessive reporting requirements; identification of risks/opportunities from the renewed sustainable finance strategy.

Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Focus of policy, law, or regulation that may impact the climate
Other, please specify (F-Gas Regulation)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
Revision of the EU F-Gas Regulation

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization's position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy is actively participating in the F-Gases regulation review process with recommendations and proposals to European Commission's DG CLIMA. Siemens Energy participated in public consultations by the European Commission and stakeholder workshops and provided technical information on existing climate-friendly technologies in switchgear without F-gases. Siemens Energy supports an ambitious and wide-ranging review of the F-gases regulations that also takes into account the different nature of existing technologies in order to achieve the best environmentally efficient outcome. Siemens Energy engages with policy makers and other stakeholders individually and via trade associations

Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation
F-gases are no longer needed in grid technology. The European Commission’s proposal to set the technology benchmark for grid technology at a GWP < 10 is therefore the right approach. It paves the way for years of research and development investment in Europe to turn into jobs and industrial growth and to set new global standards. We recommend that the co-legislators complement this technology benchmark by extending the existing containment measures to all F-gases used in grid technology. This will further reduce negative impacts on the environment and human health and lead the way for F-gas free power grids.

Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned
Focus of policy, law, or regulation that may impact the climate
Other, please specify (State Aid Review)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
Revision of state aid for environmental protection and energy.

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization’s position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy participated in the European Commission’s Fitness Check as well as public consultation on the topic.

Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation
Siemens Energy advocates to enable more OPEX funding, higher co-funding rates in the General Block Exemption and to preserve a favourable framework for gas-fired power generation

Have you evaluated whether your organization’s engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Focus of policy, law, or regulation that may impact the climate
Other, please specify (Capital Requirement Regulation)

Specify the policy, law, or regulation on which your organization is engaging with policy makers
Capital Requirement Regulation

Policy, law, or regulation geographic coverage
Regional

Country/region the policy, law, or regulation applies to
Europe

Your organization’s position on the policy, law, or regulation
Support with minor exceptions

Description of engagement with policy makers
Siemens Energy actively follows the legislative procedure of the revision of the Capital Requirements Regulation. Siemens Energy individually and together with other stakeholders educates policy makers of shortcomings of the Regulation.

Details of exceptions (if applicable) and your organization’s proposed alternative approach to the policy, law or regulation
Siemens Energy welcomes the goals of the proposed review of the Capital Requirements Regulation. A robust and resilient financial system is an essential foundation to enable economic prosperity, entrepreneurship, and employment growth. Trade finance is fundamental to achieve these goals. However, some technical changes proposed by the European Commission would have an outsized impact on trade finance and the real economy as they would undermine competitiveness of EU companies. To ensure that the energy transition stays affordable, Siemens Energy advocates that the Credit Conversion Factor for Technical Guarantees will not be increased but instead maintained at the established 20%.

Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

C12.3b

(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.

Trade association
BusinessEurope

Is your organization's position on climate change consistent with theirs?
Mixed

Has your organization influenced, or is your organization attempting to influence their position?
We publicly promote their current position

State the trade association’s position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)
The association has focused mainly on the costs and challenges of the energy transition and on its impact on international competitiveness, whereas Siemens Energy looked primarily at the opportunities of the transition.

There has been no active engagement with Business Europe on regulatory options that could help to bridge the cost gap between fossil and carbon-neutral alternatives, but there has been partial engagement on Power-to-X and the Hydrogen topic in the margins of the EU Industrial Policy.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)
Describe the aim of your organization’s funding
<Not Applicable>

Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

**Trade association**
Federation of German Industries (BDI)

**Is your organization’s position on climate change consistent with theirs?**
Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**
We publicly promote their current position

**State the trade association’s position on climate change, explain where your organization’s position differs, and how you are attempting to influence their position (if applicable)**
As the leading organization of German industry, the BDI is advocating for a sensible energy transition while keeping the industry perspective in mind. BDI conducted a large study on industrial climate paths 2050.
Siemens Energy is actively participating in several working groups.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization’s funding**
<Not Applicable>

**Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?**
Yes, we have evaluated, and it is aligned

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**Trade association**
Other, please specify (Hydrogen Europe)

**Is your organization’s position on climate change consistent with theirs?**
Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**
We publicly promote their current position

**State the trade association’s position on climate change, explain where your organization’s position differs, and how you are attempting to influence their position (if applicable)**
Hydrogen Europe is a strong advocate for Power2X technologies and supports legislation in that regard.
Siemens Energy is actively contributing to the positioning in all working groups, in particular with regard to the renewable energy directive and CO2 emission performance standards of cars and vans.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**
Describe the aim of your organization’s funding
<Not Applicable>

Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Trade association
Other, please specify (EU Turbines)

Is your organization’s position on climate change consistent with theirs?
Mixed

Has your organization influenced, or is your organization attempting to influence their position?
We publicly promote their current position

State the trade association’s position on climate change, explain where your organization’s position differs, and how you are attempting to influence their position (if applicable)
EU Turbines now supports the shift from fossil fuels to green hydrogen and initiated a campaign whereby Siemens Energy commits to make its gas turbines ready for H2. Siemens Energy was a key driver and initiator of the campaign and is advocating for an ambitious commitment towards renewable fuels by the sector.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)
<Not Applicable>

Describe the aim of your organization’s funding
<Not Applicable>

Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Trade association
Other, please specify (ZVEI)

Is your organization’s position on climate change consistent with theirs?
Consistent

Has your organization influenced, or is your organization attempting to influence their position?
We publicly promote their current position

State the trade association’s position on climate change, explain where your organization’s position differs, and how you are attempting to influence their position (if applicable)
ZVEI is advocating for a number of measures helping to make the German Energiewende (energy transition) as efficient and ambitious as possible. Siemens Energy is leading several working groups such as one for power market design
Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)

Describe the aim of your organization’s funding
<Not Applicable>

Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Trade association
Other, please specify (VDMA)

Is your organization's position on climate change consistent with theirs?
Consistent

Has your organization influenced, or is your organization attempting to influence their position?
We publicly promote their current position

State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)
VDMA is advocating (amongst many other things) to further decarbonize the conventional power sector.
Siemens Energy is very actively contributing towards association position papers such as power-to-X. Siemens Energy is an active member of the VDMA Power-to-X platform.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)

Describe the aim of your organization’s funding
<Not Applicable>

Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Trade association
Other, please specify (DIHK)

Is your organization's position on climate change consistent with theirs?
Consistent

Has your organization influenced, or is your organization attempting to influence their position?
We publicly promote their current position

State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)
The DIHK is advocating for a fair and business-friendly energy transition in Germany and for green exports on the global markets.
Siemens Energy is actively participating in the foreign trade committee.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)

Describe the aim of your organization’s funding
<Not Applicable>

Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

Trade association
Other, please specify (DWV)

Is your organization’s position on climate change consistent with theirs?
Consistent

Has your organization influenced, or is your organization attempting to influence their position?
We publicly promote their current position

State the trade association’s position on climate change, explain where your organization’s position differs, and how you are attempting to influence their position (if applicable)
The DWV is Germany’s leading business association promoting green hydrogen and green hydrogen-based products.
Siemens Energy is one of the largest and most active members taking part in all association activities.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)

Describe the aim of your organization’s funding
<Not Applicable>

Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?
Yes, we have evaluated, and it is aligned

C12.4

(C12.4) Have you published information about your organization’s response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication