
PANDORA BUSINESS INTEGRITY POLICY

Corruption is a major obstacle to sustainable development, has disproportionate impact on poor communities and it is corrosive to fair and responsible business. Further, corrupt practices are in direct conflict with our commitment to promote responsible business practices and such practices represent clear legal and reputational risks.

At PANDORA, we believe in fair competition and we are dedicated to work against corrupt practices in our own operations as well as in the societies in which we operate.

In order to prevent and mitigate corrupt practices PANDORA will make sure:

- Not to act against national or international competition law regarding pricing, customer handling and competition.
- Never to offer, give or accept gifts, entertainment or any other advantages exceeding local triviality limits.
- Not to offer donations for political campaigns or political parties.
- To avoid conflicts of interest.
If such conflicts occur you shall immediately contact your manager for advice.
- Never to offer, authorise, give or accept bribery or extortion. Any incident where bribes are demanded shall immediately be reported to management.
- To refuse paying facilitation payments to public officials.
- Not to contribute to money laundering and financing of terrorism. Do this by ensuring that all financial transactions are legal and documented and by keeping records on the identity of your business partners.
- That cash payments comply with Applicable Law.

This Business Integrity Policy applies to all PANDORA employees, Board of Directors as well as all consultants and/or advisors acting on behalf of or representing PANDORA.

Whenever national law differs from this Business Integrity Policy you must adhere to the stricter of the two. If you perceive that current policy is being violated you are expected to raise your concern with management.

WHISTLEBLOWER

PANDORA has adopted a whistleblower guideline to make it possible for all employees, members of the boards, business partners and other stakeholders of PANDORA to report any serious and sensitive concerns.

Please find the internal whistleblower policy on the following link;

<https://pandoranet.sharepoint.com/sites/global-finance/Pages/Governancerisk&compliance.aspx>

PANDORA does not tolerate retaliation or retribution against people who submit reports in good faith. Any employee who reports a breach which the employee reasonably believes to be true in accordance with the provisions of this guideline, will be given protection and shall in no way be put at a disadvantage by the company as a result of his or her report.

CONTACT INFORMATION

For any questions about Business Integrity, please find the relevant contact information below:

Global Governance, Risk & Compliance; GRC@Pandora.net