
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.

For questions or comments regarding this Business Integrity Policy, please contact Group Ethics, +45 3672 0044

At PANDORA, we believe in fair competition and we are dedicated to work against corrupt practices in 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. We will avoid this by referring to present policy. Any incident where bribes are demanded shall immediately be reported to management.
- To refuse paying facilitation payments to public officials by referring to present policy.
- 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 always comply with Applicable Law.

Whenever national law differs from this Business Ethics 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. If a concern is not properly addressed by your manager you can approach local/Group HR, Ethics or as a last resort use the PANDORA Ethics Hotline.