

COMPLIANCE

LORENZ PAN AG

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INTRODUCTION

Communication of values is one of our basic principles. This will only be possible, when values and principles, which we represent, are reflected in our entrepreneurial behavior. The successful implementation of the Compliance and the fundamental corporate values can be achieved by the respect of laws and rules. Compliance processes and measures are the basics for fair trade by LORENZ PAN SPA worldwide.

DEFINITION AND OBJECTS

We would like to protect and strengthen our company, our employees and our good reputation with an effective Compliance-system. We achieve this goal by strict adherence with regulations and corporate guidelines as well as moral principles.

This Compliance shall be an effective requirement for decisions and actions taken by employees. Compliance does not mean execute by following formal criteria. It is rather intended that our employees take more direct responsibility „to do the right thing“ – this responsibility cannot be delegated. The following corporate principles shall be a help and guidance for a correct behavior:

1. Quality assurance and product safety

We can guarantee our customers the quality and safety of our products.

2. Human rights and business activities

In all our business activities we want to provide a good example respecting the human rights and labour rights.

3. Management and responsibility

Our employees are the basis for our success. We treat each other with dignity and respect and we expect our employees to take responsible professional actions. We recruit competent and enthusiastic employees, who will respect our values. We are committed to the principle of equal opportunities and offer training and development, we protect employees privacy and we do not tolerate any form of mobbing, harassment or abuse.

4. Clients and suppliers

Our employees will treat clients and suppliers with respect and dignity and ensure that no-one is disadvantaged.

5. Health and safety at work

In the interest of protecting our employees and contractors, we are committed to preventing cases of occupational illness, injury and disease.

6. Environmental sustainability

We are committed to environmentally sound business practices. We endeavour the efficient use of natural and renewable resources and the efficiency of a waste-free production during the entire lifecycle of the product.

Furthermore we guarantee the labour principles established in the „*Base Code der Ethical Trading Initiative*“. The „*Base Code*“ is available on the website www.ethicaltrade.org/eti-base-code.

COMPLIANCE-VIOLATIONS

Events, which might be a violence of the presente Compliance must be valuated first before taking concret actions. Every reported infringement of this Compliance can be in every time forwarded to: Management (e-mail: klemens.pan@lorenzpan.com) or Compliance Management (e-mail astrid.mayer@lorenzpan.com).

WHISTLE BLOWING-POLICY

We are committed to eradicating bribery and corruption throughout our operations and we will not tolerate dishonest or unethical conduct. If employees observe such a conduct they are required to disclose it to the Compliance Manager.

All of our employees must comply with our Code of Business Conduct. To ensure this happens we need to make it as easy as possible for them to report potential compliance violations.

Whistleblower is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within an organization that is either private or public.

Due to the special kind of information we can consider only written notifications. All notifications are bound by a duty of confidentiality and preserve the anonymity. Any justified accusation shall be subject of a meticulous internal investigation and subsequent any necessary act to remedy the maladministration or to prevent any crime shall be undertaken. The Compliance Manager ensures that the Whistleblower will have no fear of retaliation.

CEO
Klemens Pan

Compliance Manager
Astrid Mayer