

Compliance-Management-System

Compliance involves the observance of legal requirements and internal Group rules. PNE AG has a Group-wide compliance organization that is continuously being improved. The Compliance Officer, appointed by the Board of Management, reports directly to the Chief Financial Officer and is supported by further Compliance delegates/-contact persons regarding certain sections of the Group. The Compliance Officer coordinates the Compliance Management System, draws up and revises guidelines, advises employees, receives complaints and tip-offs, including those made anonymously, and leads investigations aimed at clarifying compliance-related cases. In addition, the Compliance Officer carries out regular compliance training measures for employees, in particular the prevention of corruption and anti-trust-law. The particular significance attached to compliance is underlined by the decision to pool all compliance activities in the Board of Management department for Finance, Controlling, Risk-Management and Legal Affairs and corresponds to the self-image of PNE AG. Regarding essential questions the Board of Management admits his global responsibility. Herewith PNE AG underlines its clear commitment to absolute compliance with the law and to maintaining ethical standards, which protect the legitimate interests of employees, suppliers, customers and shareholders, safeguard PNE's reputation, and which nevertheless take account of its needs. In addition to meeting the traditional compliance objectives, such as risk mitigation and increases in efficiency and effectiveness, compliance is promoted with a view to strengthening PNE's image as a reliable and fair business partner and thus contributing to its overall success.

The compliance management system of PNE AG includes the Code of Conduct, and several guidelines, i.e. Anti-Corruption Policy, Antitrust Law Policy and Insider Policy. The Code of Conduct defines how employees and management should practice value-based and legally compliant conduct in their daily business activities. It obliges these individuals to comply with the principles of honesty, integrity, transparency and ethical conduct. The Anti-Corruption Policy shall avoid any appearance already that a business decision could have been made owing to inappropriate considerations, personal interests or relationships. The objective of the Antitrust Law Policy is to inform PNE Group employees about the basic requirements of German and European antitrust laws and to make them aware of the concrete risks involved if these laws are violated. The aim of the Insider Policy is to prevent price manipulation and punishable insider trading by members of PNE Group. At the same time the Insider Policy should protect all involved persons and companies of the PNE Group against unjustified suspicions, before these can arise already.