


LINET Group



 wissner-
bosserhoff



LINET Group

COMPLIANCE PROGRAM

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1 INTRODUCTION

Linnet Group SE (hereinafter the Company) is committed to establishing and maintaining an effective Compliance Program. Our Compliance Program is one of the key components of our commitment to the highest standards of Linet Group stated in Code of Ethics/Code of Business Conduct.

The purpose of our Compliance Program is to prevent and detect violations of law, non-compliance with industry regulations, product non-compliance and or violations of company policies and procedures. Implementation of such a program cannot guarantee that improper employee conduct will be entirely eliminated. Nonetheless, it is Company expectation that employees will comply with Code of Ethics/Code of Business Conduct. In the event that Company becomes aware of violations of law or company policy, we will investigate the matter and, where appropriate, take disciplinary action and implement corrective measures to prevent future violations.

Company has described below the fundamental elements of Compliance Program, which is tailored to fit the unique environment of the Company. Moreover, our Compliance Program is dynamic; we regularly review and enhance our Compliance Program to meet our evolving compliance needs.

2 OVERVIEW OF COMPLIANCE PROGRAM

2.1 Leadership and Structure

Company has designated a Compliance Officer. Our Compliance Officer has the ability to effect change within the organization as necessary and to exercise independent judgment. The Compliance Officer is charged with the responsibility for developing, operating and monitoring the Company Compliance Program.

2.2 Written Standards

Company's Code of Ethics is an expression of the company's expected standards of behavior for everyone who conducts business on behalf of the Company. The code establishes compliance responsibilities, supports applicable laws and regulations, and reinforces corporate policies and procedures. The Code articulates our fundamental principles, values and framework for action within our organization. Company's Conduct Guide for Field Professionals provides principles and standards for our interactions with Linet Group business partners.

2.3 Education and Training

A critical element of our Compliance Program is the education and training of our employees on their legal and ethical obligations under applicable requirements. Company is committed to taking necessary steps to effectively communicate our standards and procedures to all affected personnel. Moreover, Company will regularly review and update its training programs, as well as identify additional areas of training on an "as needed" basis.

2.4 Lines of Communication

Company is committed to encouraging dialogue between management and employees. Our goal is that all employees, when seeking answers to questions or reporting potential instances of fraud and abuse, should know to whom to turn for a meaningful response and should be able to do so without fear of retribution. To that end, we have adopted principles regarding confidentiality and policies prohibiting retaliation as outlines in the Company Code of Ethics/Code of Business Conduct. Employees are expected to report suspected violations of company policy by contacting the Legal Department, Human Resources, or the Office of Corporate Compliance, call provide tel. number + 420 312 576 100 , or email us at compliance@linetgroup.com

2.5 Auditing and Monitoring

Company's Compliance Program includes efforts to monitor, audit, and evaluate adherence to the company's compliance activities. The nature of our reviews as well as the extent and frequency of our compliance monitoring and internal auditing varies according to a variety of factors, including new regulatory requirements, changes in business practices, and other considerations.

2.6 Responding to Potential Violations and Corrective Actions

Company's Compliance Program strives to ensure that the consequences of violating the law or company policy are clearly understood and the appropriate, consistent disciplinary action is enforced. Additional efforts are underway to create a Compliance Program that increases the likelihood that unlawful and unethical behavior is identified and prevented. However, HHS-OIG recognizes that even an effective compliance program may not prevent all violations. As such, our Compliance Program requires the company to evaluate each case and respond promptly to potential violations of law or company policy, take appropriate disciplinary action, assess whether the violation is in part due to gaps in our policies, practices, or internal controls, and take action to prevent future violations.

2.7 Related LG Policies

- LG Corporate Governance
- LG Code of Business Conduct
- LG Anti-Fraud program
- LG Anti-corruption policy

3 CONTACT INFORMATION

For questions or comments regarding Company's Compliance Program, or to request printed copies of the Compliance Program, please call + 420 312 576 100, or email us at compliance@linetgroup.com.

4 POLICY APPROVALS

Approved on September 24, 2014

Approved by Ing. Zbyněk Frolík, Managing Director Linet Group SE, Dr. Michael Rosada, Managing Director Linet Group SE

REVISION HISTORY			
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1	Document ID change, #2.7 added, LGSE replaced by Linet Group	November 2015	LG Management Board
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