



Statement of the Kazakhstan National Contact Point

This Statement completes the specific instance submitted by citizen I. Beisekeyeva (*hereinafter referred to as the Applicant*) regarding the actions of Amadeo Central Asia LLP, the official representative of Pandora – the Danish Multinational Jewelry Company (*hereinafter referred to as the Company*) – in the Republic of Kazakhstan, and considered by the National Contact Point of the Republic of Kazakhstan.

Information on the Case

On February 15, 2022, the Applicant submitted an appeal to the Kazakhstan NCP, in which it indicated that the Company did not comply with the following provisions of the OECD Guidelines: Human Rights (Chapter IV) and Consumer Interests (Chapter VII). According to the Applicant, when handing over Pandora jewelry to the jewelry store located in the Keruen Shopping Point, Nur-Sultan, Republic of Kazakhstan, for cleaning, it faced the situation when it was asked to pick up the items (after cleaning services were provided) without entering the retail premises, thereby not distorting the entrance/exit statistics.

The Applicant believes that its rights and interests have been violated. Namely, such an attitude towards customers does not comply with international principles of responsible business conduct and also repels the consumer from further acquisition and use of Pandora jewelry.

Information on the consideration of the Case in the NCP

In accordance with Procedure for considering complaints on violations of the OECD Guidelines approved by the NCP Decision No. 1 of August 25, 2020 (*hereinafter referred to as the Procedure*), the NCP confirmed receipt of the appeal and proceeded to verify the appeal according to the following criteria:

- 1) identification of the author of the appeal;
- 2) the materiality and relevance of the appeal;
- 3) the existence of a link between the activities of the multinational company and the appeal;
- 4) applicability of other legal procedures (including court proceedings) in the situation described by the author of the appeal;
- 5) checking the possibility of conducting proceedings in the NCP if the proceedings on the same appeal are conducted in another body;
- 6) consideration of such appeals in the framework of other domestic or international procedures;
- 7) analysis of similar cases considered by the OECD NCPs in other countries;
- 8) whether the participation of the NCP in the consideration of the appeal contributes to the introduction of new best practices in the field of responsible doing business.

On February 21, 2022, the NCP notified the Company of the receipt of the appeal and sent it a request to establish the circumstances that served as the basis for filing the appeal, as well as confirmed the connection between the Company and the author of the appeal.

On March 17, 2022, in accordance with paragraph 16 of the Procedure, the NCP Secretariat informed the Danish NCP about receiving a request on a possible violation of the OECD Guidelines by Pandora.

According to the information provided by the Company on April 4, 2022, based on an internal audit, the situation described in the appeal was confirmed. The Company held an explanatory conversation with its sales consultants and brought them to disciplinary responsibility. In addition, the Company expressed its readiness to resolve the situation with the Applicant.

On April 14, 2022, the NCP Secretariat invited the Applicant to hold a special meeting to consider the details of the appeal and the issues that arose.

On April 15, 2022, the Applicant expressed a desire to withdraw its appeal from further consideration by notification via e-mail.

NCP Decision

According to Paragraph 13 of the Procedure, the Applicant has the right to withdraw its appeal. Based on the receipt of the appeal withdrawal from the Applicant and, accordingly, the lack of justification for continuing consideration of this specific instance, further proceedings on it were suspended.

**Kazakhstan NCP
July 1, 2022**