



**A
COMMITMENT
TO INTEGRITY**

**SIRVA SUPPLIER
CODE OF
BUSINESS CONDUCT**

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Message from SIRVA Supply Chain Management

SIRVA is committed to working with suppliers who share its commitment to the highest quality and integrity. We require assurance from our suppliers that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that their environment is both legally compliant and conducive to success.

To ensure our suppliers meet these expectations, SIRVA has developed this Supplier Code of Conduct (“Code”). We require each of our suppliers to support this Code and to conform to its standards in the areas of employee labor conditions, health and safety, environmental management, anti-bribery and corruption laws and regulations, best pricing, and integrity. SIRVA’s Supplier Code of Conduct explicitly communicates the social responsibility expectations we have for our suppliers and their respective suppliers. While the majority of our suppliers already meet these standards, and even have established standards for their own suppliers, we continue to work closely with our suppliers to ensure compliance with SIRVA’s Supplier Code of Conduct and to ensure they have integrated these standards into their own supplier contracts.

While many of the areas covered in this Code are easily understood and simple to follow, some elements require additional clarification and discussion in order to ensure a common understanding and level of expectation. If you have any questions about this process, please reach out to your designated SIRVA contact, SIRVA’s Senior Vice President of Supply Chain, or email suppliercomments@sirva.com.

Purpose and Scope

This Supplier Code of Conduct sets forth the standards SIRVA expects of its suppliers. This Code covers suppliers, vendors, contractors, consultants, authorized representatives, franchisees, agents and other providers of goods and services who do, or seek to do, business with SIRVA entities worldwide.

SIRVA relies on independent household goods moving companies, real estate brokers, appraisers and other suppliers to provide its relocation and household goods moving and storage services. We expect our suppliers to meet our integrity and compliance standards. SIRVA associates must report integrity and compliance concerns arising from the actions of our suppliers to a SIRVA manager, compliance champion, the SIRVA Legal or Human Resources Department, or the SIRVA Compliance Helpline.

Supplier Conduct Standards

SIRVA expects its suppliers to conduct their business responsibly, with a focus on compliance, integrity, honesty and transparency. All SIRVA suppliers are expected to adhere to the following standards:

- 1) Comply with all applicable laws and regulations of the countries of operation.
- 2) Compete fairly for our business, without paying bribes, kickbacks, or giving anything of value to secure improper advantage.
- 3) Encourage a diverse workforce and provide a workplace free from discrimination, harassment, retaliation, or any other form of abuse.
- 4) Treat employees fairly and honestly, particularly with respect to wages, working hours, and benefits, and other applicable labor and fair employment laws and regulations.
- 5) Respect human rights and prohibit all forms of forced and unfair labor practices.
- 6) Ensure that all child labor laws are followed in any operations.
- 7) Respect employees' right to freedom of association, consistent with local laws.
- 8) Provide safe and humane working conditions for all employees.

- 9) Conduct business with a goal toward improving environmental conditions (such as reducing carbon footprint, and reducing excess paper usage) and comply with all applicable environmental laws and regulations.
- 10) Keep financial books and records in accordance with all applicable legal, regulatory, and fiscal requirements and accepted accounting practices.
- 11) Deliver products and services that meet applicable quality and safety standards.
- 12) Support compliance with this Code by establishing appropriate operating and management processes and cooperating with reasonable assessment processes requested by SIRVA.
- 13) Observe SIRVA's policy regarding gifts and entertainment and conflicts of interest when dealing with SIRVA's employees, customers, other suppliers, or anyone else in a position to influence business decisions.

SIRVA places orders for services to suppliers based on their merit. SIRVA wins *through integrity and excellent service, never through bribes or conflicts of interests*. Bribery and kickbacks violate the law. Personal gifts or lavish entertainment can create conflicts of interest. We make no improper payments, and SIRVA does not permit anyone to make improper payments on SIRVA's behalf.

When you are interacting with SIRVA or acting on SIRVA's behalf:

Never offer money, goods, services or anything of value to influence anyone's decision, such as people who work for customers, agents and suppliers.

Never offer money, goods, services, or anything of value to government officials.

Offer courtesies only to develop business relationships. Reasonable meals and entertainment are acceptable. Any gifts should be nominal (less than U.S. \$25 and not to

exceed a total of U.S. \$50 to any person in any calendar year). Make sure you comply with the policies of the other company involved.

Never provide or accept gifts of more than nominal value or excessive entertainment to customers, suppliers, transferees, or competitors.

Screen any service providers for whom you may provide a referral to a customer before you do business with them. Make sure they follow our policies against improper payments.

Never tip or compensate a government employee directly (for example, a customs clerk) to expedite a routine action.

Never give company money or use company resources for political purposes on behalf of SIRVA. Never use SIRVA money for political purposes.

Never make a charitable contribution at the request of a customer, supplier, agent, or government official on behalf of SIRVA without securing prior review and written approval from SIRVA. Never solicit a charitable contribution from any SIRVA associate.

Keep accurate records of all payments.

- 14) Ensure compliance with laws and directives providing for the protection, transfer, access, and storage of personal information SIRVA requires all its suppliers to comply with all applicable privacy and data protection laws. In particular, those suppliers that handle personal data of EU citizens are required to comply with the EU Data Protection Directive. Suppliers are required to provide access and cooperate with audit, review, and testing of their privacy and security procedures and protocols
- 15) Emergency situations and events are to be identified and assessed, with their impact minimized by implementing emergency plans and response procedures. Suppliers should have an emergency preparedness protocol.

An emergency may constitute a natural or unnatural disaster such as a storm, flood, earthquake, landslide, act of civil unrest or terrorism, or any other situation, including political events or orders, that may put a shipper, transferee, assignee, their family, or property in danger, or may cause a serious inconvenience or delay in the process of a shipment or relocation.

If an emergency happens, follow your emergency preparedness protocol. This includes promptly notifying SIRVA of the emergency. Work with SIRVA to anticipate any effects the emergency may have and work with SIRVA during and after an emergency to ensure that SIRVA shippers, transferees, assignees, and their property are safe and secure.

Notify SIRVA quickly if an emergency situation happens without prior notice;

- Call your SIRVA Supply Chain manager directly (Supply Chain managers provide their direct and cell phone numbers)
- If you are unable to contact your SIRVA Supply Chain manager, please call 001-763-525-3642 or 001-612-802-6179 to notify SIRVA's Senior Vice President of Supply Chain
- If a SIRVA shipper, transferee, or assignee is in any type of danger, contact SIRVA immediately.
- Work with SIRVA Supply Chain managers and service delivery teams to ensure the safety and security of all SIRVA shippers, transferees, and assignees.
- Provide any information as requested from SIRVA.
- Identify the impact of the emergency situation, how long the impact is expected to last and the timeline for recovery.

Client-Specific Codes of Conduct

SIRVA serves clients in multiple industries around the world. To the extent that our clients have their own supplier codes of conduct, as a SIRVA supplier, you will also be obligated to comply with the client's code of conduct as well.

The following are several general topics that should be included in developing your own Codes of Conduct and compliance policies:

Workers Treated with Respect & Dignity	Evaluate & Control Exposure to Hazards	Global Environmental Stewardship	Uphold the Highest Standards
Freely Chosen Employment Child Labor Avoidance Working Hours Wages & Benefits Humane Treatment Non-Discrimination Freedom of Association Appropriate & Reasonable Management Policies	Emergency Preparedness Occupational Injury & Illness Industrial Hygiene Physically Demanding Work Machine Safeguarding	Permits & Reporting Pollution Prevention Hazardous Substances Wastewater & Solid Waste Air Emissions Product Content Restrictions	Compliance with Applicable Laws & Safety Standards Business Integrity No Improper Advantage Disclosure of Information Intellectual Property Fair Competition Protection of Identity Privacy Non-Retaliation Workplace Diversity