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COMMITMENT TO INTEGRITY

SIRVA SUPPLIER

**CODE OF
CONDUCT**

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Message from SIRVA Supply Chain Management

SIRVA is committed to the highest quality and business integrity in its supplier standards. We want to ensure 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 as well as conducive to success.

To ensure our expectations and provide guidance for meeting these shared standards, SIRVA has developed this Supplier Code of Conduct (the “Supplier Code”). This Supplier Code applies to all SIRVA suppliers of products or services, including consulting firms, independent contractors, staffing agencies, or agency temps, regardless of title or the product or service that they provide. We refer to these groups collectively herein as “Suppliers.” SIRVA expects each Supplier to uphold this code and conform to its standards in the areas of employee labor conditions, health and safety, environmental management, anti-bribery and corruption laws and regulations, data privacy and security, and business integrity. Further, SIRVA encourages Suppliers to work closely with any third parties used to ensure third party compliance with these same business and ethical standards.

We look forward to working with you and your organization to bring the best in service to our clients and customers. As part of our commitment to transparency and a quality business relationship with Suppliers, we encourage open communication and discussion of any of the topics addressed in this Code of Conduct. If you have any questions about this Supplier Code or SIRVA’s overall process, please reach out to your SIRVA contact, a member of SIRVA’s Supply Chain department, or email us directly at suppliercomments@sirva.com.

Honesty & Transparency

SIRVA asks for your support in building a stronger, more transparent working relationship by establishing appropriate management processes and, when requested, by offering full cooperation with reasonable assessment processes from SIRVA.

Fair Dealing, Anti-Bribery, and Financial Integrity

Suppliers are expected to compete fairly for our business. This means that Suppliers must provide high-quality products and services without paying bribes, kickbacks, or giving anything of value to secure any sort of improper advantage.

SIRVA wins through integrity and excellent service, never through bribes or conflicts of interests. We apply this same principle to Suppliers, and award bids and place orders for services based on merit. Suppliers must not exchange information or enter into agreements or understandings with competitors, customers, or other suppliers in a way that improperly influences the marketplace or the outcome of any bidding process.

Suppliers must observe SIRVA's policy regarding gifts and entertainment and conflicts of interest when dealing with our employees, customers, or other Suppliers. SIRVA defines bribery as offering or providing anything of value to improperly or unfairly influence a recipient's actions. Bribery and kickbacks violate the law. Personal gifts or lavish entertainment can create conflicts of interest. We make no improper payments, and do 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 else of value to influence anyone's decision. This includes government officials and people who work for customers, agents and suppliers.
- **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** a government employee (for example, a customs clerk) to expedite a routine action without securing prior review and written approval from SIRVA's Legal Department for a specific payment or category of payments.
- **Never give** company money or resources for political purposes without securing prior review and written approval from the SIRVA Legal Department.
- **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 that are permissible.

Regardless of industry or where work may take place, Suppliers must comply with the anti-corruption and anti-bribery laws that apply to their business. Keep financial books and records in accordance with all applicable legal, regulatory and fiscal requirements and accepted accounting practices. Suppliers should refer to resources within their organization or their own legal counsel if there are any questions about applicable law or regulation. SIRVA is committed to providing high-quality, ethical services, and expects that all Suppliers will uphold these same values.

Audit

SIRVA monitors Suppliers via annual review of security reports (where available) and factor model risk questionnaires, through which it evaluates and ranks each supplier's overall risk level. SIRVA reserves the right to conduct further audits and monitoring of Suppliers at its discretion to ensure that all comply with the principles of the Supplier Code.

Social Responsibility & Respect

Workplace Diversity, Health & Safety

SIRVA believes that working relationships are strongest where there is respect for those who work for us and work alongside us. Suppliers should treat employees fairly and honestly, particularly when it comes to wages, working hours and benefits, and all other applicable labor and fair employment laws and regulations. A safe and humane working environment must be provided for all Supplier employees.

Employment-related decisions should be made on the basis of a worker's knowledge and skill, without regard to race, color, religion, national origin, age, medical condition or disability, marital status, pregnancy, or sexual orientation. and provide a workplace free from discrimination, harassment, retaliation, or any other form of abuse. SIRVA values a diverse workforce, which also includes diversity of thought. Suppliers must therefore respect employees' right to freedom of association, consistent with local laws.

Human Rights

Consistent with its own values, SIRVA requires that Suppliers respect human rights as outlined in the United Nations Declaration of Human Rights. Suppliers must prohibit and avoid all forms of forced and unfair labor practices. Child labor, slavery, and human trafficking are not tolerated under any circumstances.

Environmental Protection

SIRVA recognizes that we share one planet. To preserve and protect our Earth at every possible opportunity, Suppliers are expected to 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.

Partnership

Confidentiality & Data Protection

A key element of building a strong working relationship is mutual respect for the importance of each party's information. Suppliers must treat any information received from SIRVA about its people or its business as confidential. Only individuals who need to know SIRVA's information for the purpose for which SIRVA engaged the Supplier should receive access to it, and those who have such access should only use it for the reasons for which SIRVA made it available to the Supplier.

Further, Suppliers must ensure compliance with all applicable data privacy laws and directives providing for the protection, transfer, access, and storage of personal information. This includes a requirement for Suppliers to establish processes for managing the retention, maintenance, access, and disclosure of SIRVA's information.

SIRVA expects Suppliers to honor intellectual property rights. Suppliers are not permitted to obtain, distribute, or use unlicensed material without the authorization of the creator or license-holder. Your SIRVA contact can answer any questions that you may have about the proper use of materials subject to intellectual property restrictions.

Communication

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures.

An emergency may constitute a natural or unnatural disaster such as a storm, flood, earthquake, landslide, an act of civil unrest or any other situation 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.

The following is a high-level process to be followed in an emergency situation:

1. Identify and mitigate problems before a crisis.
2. If an emergency happens, follow emergency preparedness protocol.
3. Anticipate the consequences of the emergency.
4. React to the emergency appropriately and quickly.
5. Recover from the emergency.

Role of Suppliers

Where possible, Suppliers are expected to notify SIRVA of any anticipated emergency before it happens. Suppliers must also work with SIRVA to anticipate any effects the emergency may have and work during and after an emergency to ensure that SIRVA's shippers, transferees, assignees, and their property are both safe and secure.

Before a crisis

Be proactive. If you anticipate that an emergency may be taking place, contact your SIRVA Supply Chain Manager as soon as possible. Suppliers should also have an emergency preparedness process in place to protect the safety and security of your own employees and any customers to whom you are providing services. In confronting the emergency, SIRVA asks that Suppliers be the "eyes and ears" of SIRVA and our clients. This means that Suppliers must remain aware of any actual or potential danger that confronts SIRVA shippers, transferees, assignees or their property.

When a crisis/emergency happens

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 Director of Supply Chain

If a SIRVA shipper, transferee or assignee is in any type of danger, contact SIRVA immediately.

Your role will be to work with SIRVA Supply Chain managers and service delivery teams to ensure the safety and security of all SIRVA shippers, transferees and assignees.

ADDITIONAL SUPPLIER RESPONSIBILITIES

As a SIRVA Supplier, any product or services offered must be delivered in accordance with applicable quality and safety standards.

Included in this mission is an obligation to follow all applicable laws and regulations in the country (or countries) where you and your organization operate.

Support compliance with this Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by SIRVA.

As a supplement to this policy, suppliers are required to comply with the Responsible Business Alliance Code of Conduct. The Responsible Business Alliance Code of Conduct can be found here: <http://www.responsiblebusiness.org/code-of-conduct/>