

Quality Manual

Chapter **4** **Member Coordination**
Subject **4.0.1** **Compliance & The Code**

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A) Introduction: what 'The Code' is about

"Harmony Relocation Network's mission is to provide superior relocation services around the world, using the combined skills and strengths of our independent member companies worldwide.

We strive to do so in harmony with the world we operate in, taking into account health & safety, environmental care, ethical business practices, privacy protection, and the right of workers to earn a decent income; and thus maintain a sustainable business.

We challenge our network partners to continually improve (themselves/their services/their businesses) and facilitate them where we can, to further increase employee excellence and customer satisfaction."

(Harmony Relocation Network Mission Statement, 2016)

Serving international corporate accounts in a network like ours involves more than just doing a good relocation job. Our worldwide customers (accounts, transferees) but also legislators and special interest groups who all play their role in modern society require us to do much more: exercise safe work practices, reduce the imprint of our activities on the environment, obey human rights, be ethical in our business dealings, respect other peoples' privacy, do something back for society... and prove that we do so. In order to make sure we all talk about the same thing when addressing these topics, we have laid down our standards in this document **The Code**. It gives us the standards we as a network abide by, and tells us how to use them, and what to do if the code is breached.

This document explains what The Code is, who must follow it and what to do and what sanctions can be imposed in case of infringement.

Part A explains what the code is about

Part B tells us how to use the Code (for workers, staff and managers)

Part C is the actual Code of Conduct we (managers, workers) must uphold

Part D lays down our commitment to the Network

For more information on The Code you may ask more information at your Company Manager, or contact the Harmony Relocation Head Office at Compliance@Harmonyrelo.com.

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B) How to use The Code

The Code in everyday practice

We are committed to conducting business honestly and ethically. We are committed to complying with all applicable laws and regulations. *The reputation of our Network and our Member Companies* for integrity and honesty is built one decision at a time and the Code of Conduct (our “Code”) was created to help all of us make the right decisions. Our Code, together with our company policies, gives us guidelines we need to do the right thing, each and every day.

We are responsible for acting with integrity, understanding and adhering to The Code and company policies, and following all laws and regulations that apply to our jobs. As representatives of Harmony Relocation Network, we can demonstrate our commitment to The Code and its principles by:

- always choosing to do the right thing
- ask questions about the right course of action when in doubt
- report Code violations

Who must follow The Code

We present ourselves to the world as one global network with the highest standards to quality of work and responsible behaviour. Therefore, all who work for Harmony Relocation Head Office or Member Companies must follow The Code.

Special consideration is to be given to The Code by:

- Managers and supervisors
Managers and supervisors are expected to promote The Code by:
 - leading by example
 - inform employees on The Code and other relevant policies and procedures;
 - making employees feel comfortable and show appreciation when questions are asked
 - appropriately respond to concerns and questions
 - be aware of what is going on in their area and keep an eye out for misconduct
 - avoid any actions or behaviour that could be viewed as retaliation, and
 - never excuse or promote violations of The Code or the law.Sometimes you may need assistance answering a question or handling a problem that comes your way. All managers and supervisors must be able to recognise when they need help from senior management, Harmony management or the Supervisory Board and must take steps to escalate issues when necessary.
- Workers and staff
 - uphold The Code
 - report breach of one or more aspects of The Code if they notice any
- (Sub)contractors
(Sub)contractors performing work directly for the network (that is: for Harmony corporate accounts or as OA/DA for another Harmony member company) must uphold the standards just as we as network partners would:
 - subcontractors must be aware of our standards (all of them) and commit to them
 - (document 4.5.7-A Subcontractor conformity may be helpful for this purpose)
- Suppliers
Suppliers who impact our (social) performance most, are our subcontractors. Other suppliers are usually less visible and their activities are outside our field of view.
If, however, a supplier has a track record of poor social behaviour (i.e. involvement in child labour, dumping of waste etc.) this is to be included in the supplier evaluation and available alternatives considered.

Remember that any malpractice or breach of integrity that would occur by one person in the network could reflect poorly on the entire global network with all its member companies and workers for a long time to follow.

Speak up

We must always choose to do the right thing. This means we must speak up whenever there are suspicions or concerns:

- when:
 - we have a question or concern about the lawful or ethical course of action
 - we believe or suspect that you or someone else has violated or may violate The Code, a Harmony policy or any law or regulation, even inadvertently
- to whom:
Compliance Code related questions and reports can be directed to:
 - your manager or supervisor
 - Harmony management
 - the Supervisory Board
- how:
Serious questions or reports to Harmony management may be addressed as follows:
 - as a rule, you may address your issue to compliance@harmonyrelo.com: your mail will be received by Harmony's Managing Director (MD) and Quality Manager (QM);
 - if you wish to make a report in which you feel the MD or QM should not be involved, you may address your issue to supervisoryboard@harmonyrelo.com: it will be received by the Chairman of Harmony's Supervisory Board who will respond as required.

Your report will always receive serious consideration and attention and will be responded to as swiftly as reasonably possible (please bear in mind that investigating reports may be time consuming).

Anonymity and confidentiality

Your reporting mail to the Harmony management or Supervisory Board will be handled with full confidentiality.

Protection from retaliation

Harmony does not allow any form of retaliation for:

- reporting what the reporter believes is a violation of The Code, Harmony policies or the law;
- raising a concern, asking a question or seeking advice about company practices, decisions or actions; or
- cooperating with an investigation.

Retaliating against someone for making a good faith report is itself a violation of the Code. Anyone engaging in retaliation may be subject to disciplinary action, which could include termination of employment. Individuals self-reporting misconduct are not entitled to protection from the non-retaliation policy for their misconduct.

If you ever suspect that you or someone else is being retaliated against in violation of the Code, you must report it immediately.

Consequences

Consequences of violations of The Code may be serious.

Investigations into Code violations may reveal the (legal) requirement to report illegal actions to authorities which in turn may lead to criminal or civil liability. Harmony will take what action it deems appropriate to parties involved in malpractices.

Investigations

All reports of potential misconduct will be taken seriously and thoroughly investigated to determine whether The Code or any law or regulation has been violated. If you are asked to participate in an investigation, you must cooperate fully and answer all questions accurately and truthfully.

Note that since confidentiality is maintained to the fullest extent possible, you may not know all details of an investigation.

Cognizance

To support our commitment to responsible and ethical behaviour, all Member Company top management (i.e. at least the two most senior executive managers) as well as all head office staff must update their awareness and knowledge annually by following an on-line compliance training provided by Harmony, and passing the test that comes with it. As a minimum the following topics must be trained:

- anti-bribery and corruption
- anti-cartel
- data privacy

Member Companies are required to demonstrably create awareness about The Code to their staff and workers, either by posting The Code, making it part of their own code of conduct, or by communicating the essence of The Code for relevant groups of workers.

Harmony, The Code, and the law

Although we try to be as complete as possible, The Code cannot address all laws, policies and situations that relate to our business.

Applicable legislation, whether national, domestic or regional, must always be met when performing our job. Being familiar with applicable legislation is therefore always a first requirement.

It is important that our staff understand the rules and regulations, policies and procedures that apply to doing their job in a safe, sound and honest manner. We cannot and will not ask of our people to know The Code by heart – but we do require all to know its purpose and to consult The Code when in doubt.

C) The Code

(The actual Compliance Code is part of our Quality Management System - Policies under reference '0.03 The Code')

Working conditions and meaningful work

Our employees are of foremost importance to us. They are in contact with our customers on a daily basis, and a happy employee will better take care of our customers.

The employment conditions which are applied by Harmony can never be adverse on our employees.

Harmony staff and workers must make a decent salary: this means that an employee with a full-time job is able to provide for his/her family with his/her salary, calculated on the national average family size and basic needs of life in the country where the Harmony representative is based. We provide fair contractual terms in employment contracts, because we believe in the benefits of fair, honest and balanced relationships with our employees.

We allow freedom of association. We will not allow pressure to be put on employees or threatening them during negotiations about fair collective working conditions or from seeking representatives. All of our employees have the opportunity to be part of a collective labour agreement.

'An employer strives for open communication, fair and honest contractual obligations towards employees, balanced employer-employee relationship with a safe and clean work environment.'

We provide safe and healthy working conditions. As an employer, we take effort to provide our employees with a safe work environment without risk to their health, even though these work places are not always within our control. We ensure that our employees and their representatives are consulted, informed and trained on all aspects of occupational safety and health, including emergency arrangements, associated with their work. Our employees understand the risks involved in their work and the relevance of the preventive and control measures being taken.

We provide training to our staff and workers to create skills and awareness to better and safer perform their tasks, and, if applicable, to support personal growth and development.

We stand for equal opportunities. We recognise that operational removal work is physical labour that requires a certain fitness of our workers. With this in mind, we endeavour to provide a suitable workspace also for employees with physical challenges, by providing them with suitable work or workplace.

Harmony stands for openness and transparency to its employees. Communication is a key element in motivating staff and workers; people who know what is expected of them, and know their role in delivering excellent service, perform better and safer. Open and honest communication also creates understanding for and involvement in the company's decision-making.

Human Rights

Human rights are based upon moral principles and standards and laid down in international treaties. They are understood as absolute fundamental rights to which a person is inherently entitled simply because she or he is a human being, and which are inherent in all human beings regardless of their nation, location, language, religion, ethnic origin of any status.

Harmony does not accept any breach of human rights within its organisation or as a result of decisions taken by the organisation. This includes, but is not limited to, involvement in or failing to speak up against practices like child labour, slavery or servitude, human trafficking, cruel or degrading treatment, or any acts against the human dignity.

We strive for management and strategies that are compliant with universal human rights. Harmony ensures that every development in our strategy or management will be compliant with human rights.

Harmony strictly prohibits discrimination, in any form.

Discrimination: the practice of treating a person or particular group of people differently (especially in a worse way) from the way other people are treated, because of their skin colour, sex, sexuality or other differences irrelevant to the topic at hand.

There is a distinction between direct and indirect discrimination:

Direct discrimination means treating someone less favourably because of certain attributes of who they are. Examples of direct discrimination include dismissing someone because of a protected characteristic, deciding not to employ them, refusing them training, denying them a promotion, or giving them adverse terms and conditions all because of a protected characteristic. These protected characteristics include: age, disability, gender reassignment, sexual orientation, marriage and civil partnership, pregnancy and maternity, race, religion or belief and sex, and other differences;

Indirect discrimination occurs when an organisation's practices, policies or procedures have the effect of disadvantaging people who share certain protected characteristics.

An example of indirect discrimination may be a policy to not allow part-time workers (which may disadvantage people with children) or only allow physically fit workers (which may be discriminatory to less fit people, but may be a requirement for operating heavy machinery). In cases of suspected indirect discrimination, the employer must demonstrate it has an objective and proportional reason for this perceived discriminatory policy or procedure.

The employees of our members companies have mostly local backgrounds. Nobody knows the local values and traditions better than the local people. As a network, we respect and value the indigenous people and their rights, traditions and cultural values.

Similarly, Harmony encourages diversity with the network organisation and its Member companies:

We recognise that one of the strengths of our network is that of the diversity of our people. The different backgrounds of our Member companies, our staff and workers ensure that a broad view is maintained in preparing for the future, in doing our daily work, solving problems and serving our customers. Major decisions in the network require the approval from Member companies worldwide.

We encourage and will act to promote diversity within the management and operational layers of our organisation. Gender, ethnicity and origin are observed where possible to ensure a mix of people at all levels.

Harmony's Supervisory Board must be composed (as much as is possible) of a diverse mix of Board Members. Harmony HO management and staff are composed as much as possible of a diverse mix of people.

Member companies, within their local legislation and culture, are encouraged to follow the same approach.

Ethical business practices

Ethical business practices are the philosophical core of our business and their outcome is crucial for economic development. Business ethics are more than values and principles that determine our conduct in the business world. Ethical principles will build an honest reputation and ensure smooth running of our organisation. It is very important that these principles are strictly pursued by everyone at Harmony.

We value our customers, members, agents, suppliers, and other business partners. We treat these parties the way we want to be treated: fairly and honestly. It is our duty to represent our organisation accurately and use truthful sales and marketing practices.

We conduct business free of bribery and corruption. Laws around the world prohibit the payment of bribes. We must not and will not offer, pay, authorise, facilitate or promise any form of bribe or kickback in order to further our business interests. We must never accept a gift from any business partner where a return favour may be expected, or accept commissions or kickbacks in procurement processes.

Bribes can include anything of value that might influence a person's judgement or conduct. In addition to cash, bribes may be given as gifts, meals, job offers, contract award or other favours. It is not only gifts to governmental officials that can be considered bribes. Under certain local laws, and under internal policies of many organisations, business gifts or entertainment provided to employees of private organisations may be considered prohibited bribes or kickbacks. Check to make sure any business gift or entertainment complies with local law and the recipient, if an individual, is authorized to accept it on behalf of his or her organisation.

We compete fairly and in compliance with all antitrust laws. We avoid any form of agreements (cartels) with competitors and any activities that may appear to be anti-competitive.

We do not engage in or permit money laundering. We will refrain from doing business with companies or people suspected of being involved in this.

We never ask or induce anyone to act illegally on our behalf or break applicable legislation. These rules apply to our own behaviour, as well as to that of third parties conducting business on our behalf. We must not use consultants, brokers, agents or intermediaries if there is reason to believe that they endorse paying bribes or if some part of the payment we make to them may be used for a bribe.

Each one of us is accountable and responsible to stop unethical business practices.

Consumer affairs

The health and safety of our customers, and of third parties, may be directly affected by the safe performance of our operations. We commit to measures to prevent any action or situation that could pose a danger to either our customers, our workers or third parties. Harmony and our member companies are committed to our Health & Safety policy, which includes the demand to prevent any danger of injury or ill to the health of our customers and to the public health. Member companies may choose to implement the international OHSAS18001 standard using the Harmony HSE program.

Consumer information must always be clear and correct about services offered; it should also clearly outline costs and transferee responsibility.

In general communications like advertisements or internet sites, our organisation (including contact details) and the services provided are clearly defined.

In specific communications, such as quotations, service provision and estimated transit or delivery times, the information provided must give a realistic representation of the expected performance, limiting the possibility of unexpected surprises.

Transparency and honesty should be key in any consumer communications.

COVID-19

In 2020, a COVID-19 Compliance Code has been implemented for the duration of COVID-19 spread the world (0.03-1), which 0.03-1 has the same status as this Code.

Privacy Protection

The privacy of our customers is an increasingly important issue.

Carrying out (international) removals means that we need to collect certain personal data.

Collecting this information is subject to strict rules: we will only ask for information which is necessary to perform the customer's relocation or removal; the information is used only for the purpose of the removal;

information is not shared with third parties unless this is necessary for the purpose for which the information was collected, or when we are legally required to (for instance, for customs handling).

No personal data will be sold or provided to third parties for commercial reasons.

No automated decision making is done based upon personal data.

Stored data must be secured against unauthorised access and data integrity must be ensured by technical and procedural measures.

Customers must receive an information privacy notice at first contact.

Customers may access their personal information by contacting Harmony IT Manager.

We must be in compliance with privacy laws in the countries in which we conduct business. Our workers are expressly instructed not to disclose any information of personal nature they obtain during their work to any outside parties, and sanctions may apply if this instruction is broken.

If there is a need for security personnel, the personnel needs to be aware of the security protocols and respect the human rights of our customers, immediate surrounding and local people.

Environment, materials, energy and emissions

The physical movement of people and goods involves the use of materials, equipment and vehicles, the use of which inevitably has an impact on our environment.

Harmony is committed to safeguarding the environment. We comply with relevant (international, domestic and local) legislation. In our decision making (strategic as well as operational) we take our environmental impact into account to protect the environment from any adverse effects from our activities as much as possible.

We offer various modalities of transport as well as groupage opportunities to our customers in order to find the routing with the least environmental impact.

We promote the reduction of natural resources and water consumption, and the use of renewable resources for our materials and energy needs wherever possible.

Waste management can have a direct impact on people's everyday lives and welfare, as well as their enjoyment of their surroundings. We encourage the re-use of used materials and the recycling of (paper, cardboard, metal, plastic, glass, household) waste. This reduces the demand for virgin materials of all kinds and the emission of greenhouse gases associated with producing new materials. It also reduces emissions incurred when burning waste.

We stimulate environmental awareness of our staff and workers so they can make informed decisions concerning the environment at management and operational levels.

We strive to gain regard from our customers, stakeholders and employees as an organisation that takes measures to have a positive, no or minimal adverse effect on our environment.

Harmony Relocation Network encourages its partners to implement the international ISO14001 standard using Harmony's HSE program.

Community involvement and development

The membership structure of Harmony Relocation Network implicates that earnings generated by our member companies remain with these companies, thus benefiting the area in which they are generated.

D) The Network

Commitment to the Organisation

We must act in Harmony Relocation Network's best interest and avoid conflicts of interest. A conflict of interest may occur when personal interests interfere with the ability to make objective decisions for the network. We must avoid any conflict, or even the appearance of a conflict, between our personal interests and Harmony's interests. If you think there might be (the perception of) a conflict of interests, it is important that you disclose this with your management or Harmony's compliance reporting email address. If relations that bear the potential for a conflict are known, they are easier to prevent or manage.

(Social) media

In a network structure such as ours, it may be easy for the public to confuse the identity of a member company with that of our network. Speaking on Harmony's behalf can only be done by those assigned to this task by Harmony management or the Supervisory Board.

- If you or others at your company are contacted by the media about the network, do not provide any information and refer them to Marketing & Communications at Harmony's Head Office (marcom@harmonyrelo.com);
- In your use of social media, make sure that your expressions and opinions cannot be interpreted as those of Harmony Relocation Network.

Confidential information

In today's society information is of great value to companies and institutions and is often obtained for competitive or (other) purposes. As a network, we are entrusted with personal information about our transferees and often non-public information about our accounts. It is our express duty to safeguard that information and:

- ensure that no non-public account information ends up in the hands of third parties;
- ensure that no personal information about our customers / transferees is spread beyond those directly involved in their removal;
- ensure that no competitive information about our Harmony Relocation Network and its partners is disclosed to third parties;
- report any breach of such information protection.

Worldwide there is strict legislation in place that regulates this confidentiality, including sometimes severe punishment if reprehensible actions can be proven.

Harmony Relocation has implemented a data privacy program into its management system to secure its data security.

The Harmony identity

The Harmony Relocation Network brand is a major asset of our organisation: it is the constant factor in all our communications to our (potential) customers and media outings. Our many member companies and their employees invest a lot of their effort in making it a highly recognised quality label. It is important that each of us:

- keeps up the highest standards of communication, conduct and work while acting under the Harmony label;
- refrains from downgrading or allowing the downgrading of the network or its affiliates;
- reports any illegal use of the brand by parties who are not entitled to it to the Marketing & Communications department.

Likewise, we must respect the intellectual property of others by not distributing, using or displaying it without permission of its owners.

External Codes

Sometimes our (corporate) accounts set specific standards that apply when working for them. This may be as obvious as specific health & safety rules that apply on a jobsite, special licences or qualifications, but also additional operating rules or attention to (operational, legal, cultural) sensitive issues . When not in violation of our own compliance rules, we adhere to these Codes when required of us.