



# **SIRVA CODE OF BUSINESS CONDUCT & ETHICS**

## **A COMMITMENT TO INTEGRITY**

March 2025



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## A MESSAGE FROM SIRVA'S CHIEF EXECUTIVE OFFICER

I am proud of the dedication and integrity of Sirva's associates. They shine through every time we counsel a family through the uncertainty of relocation or deliver moving solutions for our customers. We succeed because our efforts are sincere. Our culture of unyielding integrity and high performance is at the core of everything we do.

For all of us at Sirva, there is no document more important than this Code of Business Conduct & Ethics. It expresses the commitment by each of us to keep our promises to our customers, agents, suppliers, shareholders, and Sirva Personnel, and to keep the company and ourselves within the law and comply with good business practice.

I ask everyone to read this Code carefully and take it to heart:

- Address challenging issues and use Sirva values to find the right answers;
- Support Sirva's commitment to fairness, equity, diversity, and inclusion in our workplace;
- Master Sirva's policies: they will help you navigate the laws that apply to our business;
- Communicate openly and candidly; be boundaryless to get other people's understanding and perspectives; and
- Ask questions and raise concerns to Sirva subject matter experts who know how best to handle them.
- Contact the Sirva Compliance Helpline for confidential or anonymous assistance if you have an integrity question or concern

When we do these things, we strengthen Sirva



Carlyn Taylor  
Chief Executive Officer



# 1. INTRODUCTION – A COMMITMENT TO INTEGRITY

Sirva Worldwide, Inc. (“Sirva”) and its family of companies are a leading worldwide provider of mobility solutions (relocation and moving) to a well-established and diverse customer base around the world. Sirva strives to deliver the best mobility experience at the lowest total cost to relocate through complete management of the global supply chain, the world's leading global operations, industry-leading risk management processes, full accountability, and transparency of costs.

This Code of Business Conduct and Ethics (“Code”) applies to all employees, directors and officers of the companies comprising Sirva on a worldwide basis. All of these individuals, including temporary employees, are referred to in this Code as “Sirva Personnel” and are expected to act lawfully, honestly, ethically, and in the best interests of the company. Sirva Personnel who are unsure whether their conduct or the conduct of others complies with this Code should contact their manager, Human Resources, or the Legal Department. This Code is subject to change and may be amended, supplemented, or superseded by one or more separate policies.

You should always comply with the laws of the countries where you operate. But in some cases, the laws of the United States may also apply because our parent company is a U.S. corporation, and certain U.S. laws extend to the company's and its affiliates’ activities outside of the United States. Other countries may also apply their laws outside of their borders to their own citizens and to Sirva subsidiaries organized under their laws.

If any part of this Code conflicts with local laws or regulations, only the sections of this Code permitted by applicable laws and regulations will apply. Any policies that are specifically applicable to your jurisdiction will take precedence to the extent they conflict with this Code. If you are in doubt, or if there is a conflict between the applicable laws, contact the Sirva Legal Department.

All Sirva policies referenced herein can be found on the Sirva Intranet page(s).

# 2. YOUR RESPONSIBILITIES – THE SIRVA STANDARD

## A. FOLLOW THE CODE

All Sirva Personnel are expected to act ethically and follow our Code. Our Code, together with our company policies, provide the framework for each Sirva Personnel to perform their jobs ethically and responsibly. If you have questions on how to interpret the Code, seek guidance from the Sirva Legal Department.

## B. THE SIRVA STANDARD

### *Trust*

- People trust Sirva to move them around the world.
- Families trust Sirva to help them find homes and settle into new communities.
- Customers trust Sirva to keep accurate accounts and to safeguard confidential information.

- Agents and service suppliers trust Sirva to coordinate household moves and relocations efficiently.
- Sirva Personnel trust each other with respect.

### ***Living Our Values***

- Conduct yourself with integrity, respect and dignity in all aspects while representing Sirva.
- Make a commitment to diversity and inclusion by providing a productive, creative and engaging environment that fosters interactive dialogue with fellow associates
- Provide equal opportunities and treatment for all associates, regardless of race, religion, gender, sexual orientation, gender identity, disability, ethnicity, nationality, or any other category protected by applicable law.

### ***Acting With Integrity***

- Keep your promises. Build trust.
- Tell the truth. Every statement and document must be accurate.
- Be Honest. Our statements must not be misleading and not intentionally omit critical information.
- Treat everyone with respect. Never put your colleagues at risk.
- Never pretend that a policy does not apply or make excuses for a bad decision. “Everyone does it” is not a reason; it’s a red flag.
- Avoid even the appearance of impropriety. Always protect the company’s reputation and your own.
- Comply with all laws that govern our business and all policies that apply to your job. Beware of questionable industry practices.
- Raise concerns about possible ethical violations. Cooperate in investigations.
- Never retaliate against anyone for raising an ethical concern or helping to resolve one.

### ***Making Good Decisions***

- No document or policy can answer all potential questions or address all potential issues. When you are unsure about the right course of action, review Sirva values and policies and ask yourself:
  1. Have I gathered all the facts? Have I analyzed them well?
  2. Do I know what our values and policies require in this case?
  3. Have I sought advice from people I trust? Have I consulted Sirva subject matter experts?
  4. Who are the people or companies affected by my decision? What are my obligations to them?
  5. Is my course of action legal?
  6. Is this the right thing to do?
  7. How would my decision look in the news for the entire world to see?

## ***The Sirva Compliance Team***

The Compliance Team oversees Sirva's program for compliance with law and with this Code. The Compliance Team is led by the Chief Compliance Officer who reports to the Audit Committee of Sirva's Board of Directors. The Sirva Compliance Team manages the Compliance Helpline and oversees the company's various compliance committees, including the Privacy Committee, the Third-Party Risk Management Committee, the Enterprise Risk Management Committee, the Technology Risk Management Committee, the Mortgage Compliance Committee and Risk Committee, and the ESG Committee. The Compliance Team is supported by the Sirva Information Security Group, DPO, and Privacy Officer, as well as subject matter experts, investigators, and senior managers. In addition to overseeing the compliance matters of the company, a key responsibility of the Compliance Team is to be accessible to each of you: answering questions, addressing issues, and providing training.

You can contact the Compliance Team for a copy of any Sirva policy or ask for assistance regarding an ethics or compliance issue. You can contact [www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/) or call one of the telephone numbers at the end of this Code.

## ***Accountability***

Sirva is obligated to enforce this Code and maintain compliance with the law. On an annual basis, Sirva requires Sirva Personnel to participate in training on the Code as well as acknowledge the Code and their "Personal Commitment to Integrity."

- I acknowledge that I have received the Sirva Code.
- I understand that all Sirva Personnel are required to comply with the Code.
- When I have a concern about a possible violation of this Code or any Sirva policy, I will Speak Up to a Sirva manager, compliance team member, Sirva Legal department, or the Sirva Compliance Helpline.

Violation of any Sirva Policy or this Code can mean a violation of the law. The company – or you as an individual – may face criminal penalties (prison or fines) or civil sanctions (damage awards or fines). Any Sirva Personnel who violates the spirit or letter of the Code or any other Sirva policy is, therefore, subject to disciplinary action, up to and including termination of employment. Examples of conduct that may result in discipline include, but are not limited to:

- Violating the law, a Sirva policy, or this Code or requesting others to do so.
- Failing to promptly report a suspected policy violation.
- Failing to cooperate in an investigation of a policy violation.
- Retaliating against another associate for reporting a concern or cooperating in an investigation.

## ***Speaking Up***

If you are aware of or suspect violations of the Code, our policies, or the law, you must report it so it can be addressed. This includes violations or suspected violations by Sirva suppliers, such as independent household goods moving companies, real estate brokers, title insurance agents, appraisers, and other relocation and moving suppliers and procurement vendors. You may report violations to your people manager, Human Resources, or the Legal Department. All complaints will be investigated and treated with the necessary and appropriate discretion. Alternatively, you may report

the violation anonymously (if you so choose) to the Sirva Ethics and Compliance Hotline. Refer to Schedule A of this Code for more information about making a compliance complaint.

### ***Leaders' Responsibilities***

Sirva's leaders must maintain a culture of unyielding integrity. They must set the right example through their own behavior, speak directly to associates about Sirva values and policies, and evaluate their team's commitment to the Code. If a leader (or anyone) receives a report of a possible violation of Sirva policies or this Code, the leader must report it to a senior manager, the Legal or Human Resources Department or the Compliance Office.

It is against Sirva policy for any Sirva Personnel to retaliate against any person who (a) in good faith reports what he or she believes is a violation of our Code, our policies or the law; (b) assists other Sirva Personnel to report a violation of this Code, (c) participates in any investigation pursuant to this Code, or (d) raises a compliance question or seeks advice about a particular business practice, decision or action. If you know or suspect that retaliation has occurred or is occurring, you have a duty to report it. Refer to Sirva's *Ethics and Compliance Reporting Policy*.

## **3. RESPECT IN THE WORKPLACE**

All Sirva Personnel are responsible for creating a positive, collaborative, supportive work environment that values integrity and promotes open and honest communication. We believe in developing and maintaining fair and mutually beneficial relationships with our business partners and are committed to treating all our employees, suppliers, and business partners with fairness, dignity, and respect. For more information, please refer to Sirva's *Fair Employment Practices Policy*.

### **A. DIVERSITY, ANTI-DISCRIMINATION, AND ANTI-HARASSMENT**

Sirva supports diversity in our workplace and among our clients and suppliers. Discrimination, harassment or any mistreatment by or of employees, guests, or clients, in the workplace or in a work-related situation on the basis of race, color, religion, gender, national origin, age, medical condition or disability, sexual orientation, veteran status, or any other protected group is strictly prohibited. Refer to Sirva's *Fair Employment Practices Policy*. If you suspect harassment, discrimination, or retaliation has occurred, you are encouraged, and managers are required to promptly report it to Human Resources, the Legal Department, or to our Ethics and Compliance Hotline (in accordance with Sirva's *Ethics and Compliance Reporting Policy*).

### **B. HEALTH AND SAFETY**

Sirva strives to provide its employees with a clean, safe, and healthy place to work. Employees must comply with all occupational, health and safety laws and internal procedures; not engage in illegal or dangerous behavior, including any acts or threats of violence; not possess, distribute or be under the influence of illicit drugs while on Sirva's premises or when conducting company business; and not possess or use weapons or firearms or any type of combustible material at Sirva facilities, or at Sirva-sponsored functions. If you suspect or are aware of any health and safety violations, report it to your supervisor, Human Resources, Legal, or call the Sirva Ethics and Compliance Hotline. See Sirva Environmental, Health and Safety Policies, and workplace policies as set forth in the Employee Handbook.

## 4. ETHICS IN OUR BUSINESS ACTIVITIES

### A. CONFLICTS OF INTEREST

Sirva Personnel are expected to use their judgment to act in the best interests of Sirva while performing their job duties. Sirva Personnel should attempt to avoid actual or apparent conflicts of interest. A “conflict of interest” occurs when a person’s private interest interferes, or even appears to interfere, with the interests of the company. A conflict of interest may arise, for example, from your personal relationship with a customer, supplier, vendor, competitor, business partner, or other Sirva Personnel, if that relationship impairs or may be perceived to impair your objective business judgment. A conflict may also arise if you are retaining, managing, or approving payment to a supplier with whom you have a personal relationship outside of your business relationship such as a family member. Other potential conflicts of interest include serving on boards, using company property, information, or resources for personal benefit, having outside employment, or engaging in activities that compete with, or appear to compete with, Sirva’s interests. If at any time during your employment, you think you may have a potential or actual conflict of interest, you have an obligation to disclose the conflict to the Sirva Legal Department. Having a conflict of interest may not necessarily result in a Code violation, but the failure to disclose the issue is a violation of the Code. See the Sirva *Conflicts of Interest Policy*.

### B. INSIDER TRADING

Sirva Personnel shall not trade, or tip anyone to trade, securities of any company on inside information. Inside information is non-public information that would influence an investor’s decision to buy, sell or hold a company’s stock or other securities. Report all actual or suspected disclosures (even if the disclosure was accidental) to the Sirva Legal Department or the Compliance Helpline.

### C. POLITICAL ACTIVITIES

Sirva Personnel must comply with all applicable lobbying and campaign finance laws (which can vary across jurisdictions). All political donations, no matter how small, made on behalf of the company (directly or indirectly) must be approved in advance. Political donations made by individuals on their own behalf should comply with local laws and regulations. Refer to Sirva’s *Political Donations and Lobbying Policy*.

### D. GIFTS AND BRIBERY

Giving or receiving gifts or entertainment to or from a current or future client or business partner can potentially create a conflict of interest, especially if the value of the items is significant. Gifts are generally acceptable if the gift or entertainment is modest in value, appropriate to the business relationship, and does not create an appearance of impropriety. Generally, gifts should not be cash or a cash equivalent and should not be given to or received from public officials. Refer to Sirva’s *Anti-Bribery and Corruption Policy* and *Travel and Entertainment Policy*.



## **5. PROTECTION AND USE OF SIRVA'S ASSETS**

### **A. USE OF SIRVA'S RESOURCES AND ASSETS**

Sirva provides Sirva Personnel with a wide range of valuable assets to help you perform your work on behalf of Sirva. These assets include but are not limited to computers, software, fax machines, copiers, telephones, mobile devices, office and electronic equipment, and facilities. Sirva Personnel are expected to treat these assets with care and use them only for Sirva business. While we appreciate the need for limited use of these tools for personal purposes, your use should not be excessive or detract from your work. Sirva Personnel are not permitted to email business information to their personal email accounts or maintain a copy of business information on their personal computers or other non-work electronic devices. Use of assets for purposes that are disruptive, offensive, embarrassing, or in violation of Sirva's policies, including Sirva's *Information Security Policy* or Sirva's *Acceptable Use Policy*, is strictly prohibited. Sirva reserves the right to monitor or make records of all use of its systems to verify compliance with Sirva policies. Sirva may have obligations to preserve electronic communications and other information in connection with actual or anticipated legal events, such as litigation, arbitration proceedings, governmental investigations, and subpoenas. Upon direction from the Legal Department (known as a Legal Hold), you must not destroy, delete, or modify electronic communications or information subject to a Legal Hold. Refer to Sirva's *Record Retention Policy*.

### **B. INTELLECTUAL PROPERTY RIGHTS**

While employed at Sirva, you may be involved in the creation, development or invention of intellectual property such as concepts, methods, processes, inventions, confidential information and trade secrets, works of authorship, trademarks, service marks and designs. All such intellectual property and the rights therein, such as copyrights and patents, will be owned by Sirva and your moral rights to such intellectual property will be waived. You are responsible for cooperating with Sirva and providing all necessary assistance to ensure that all intellectual property and related rights become the exclusive property of the company. Refer to the terms of your employment offer letter or contract. See *Intellectual Property Policy*

## **6. ACCURACY OF BOOKS AND RECORDS AND PUBLIC DISCLOSURES**

### **A. ACCURATE BOOKS AND RECORDS**

All Sirva books, records, and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of Sirva shall conform to generally accepted accounting rules and Sirva's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in Sirva's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation. Sirva Personnel must not conceal information from auditors (both external and internal) and shall always honestly and accurately report all business transactions.

## **B. PUBLIC DISCLOSURES**

Sirva is committed to the transparency and integrity of our information, especially to the extent it forms a part of the public disclosures required of our parent organizations. All Sirva Personnel who are responsible for preparing information as part of that process must ensure that such disclosures are full, fair, accurate, timely, and understandable.

## **C. CONTROLLERSHIP**

We protect company assets and keep accurate records. We escalate problems quickly to solve them before they grow. We make wise business decisions and respect internal checks and balances.

# **7. CONFIDENTIAL INFORMATION AND PROTECTION OF PERSONAL DATA**

## **A. CONFIDENTIAL INFORMATION**

Sirva Personnel are required to use confidential information of Sirva for business purposes only and must always keep such confidential information in strict confidence. This obligation also extends to confidential information of third parties that we have received in the course of our business. Confidential information includes, without limitation, proprietary data, trade secrets, customer lists, employee data (other than your own), financial data, tax matters, business plans, contract provisions, marketing, intellectual property, client information, and customer information.

Your obligation to maintain the confidentiality of this information means that you may not share any such information outside of Sirva unless Sirva has appropriate non-disclosure agreements (NDA) in place. Contact the Sirva Legal Department should you need an NDA or if you have questions about whether certain information can be disclosed. Sirva Personnel should also refrain from sharing confidential information internally beyond those persons who legitimately need to know it for the purposes of their job. You should avoid discussing confidential information in public places and should be careful not to leave confidential information unattended in conference rooms or public places. Your obligation to protect confidential information continues after you leave Sirva. If you become aware of confidential information about Sirva or another entity that you know or suspect has been inadvertently disclosed, please contact the Sirva Legal Department. See the *Sirva Controllership Policy*.

## **B. PROTECTION OF PERSONAL DATA**

Sirva collects the personal data of individuals both inside and outside the organization. Personal data includes, among other things, sensitive personal, medical, and financial information. Sirva Personnel shall be responsible for dealing with personal data in accordance with applicable data protection laws, such as the EU General Data Protection Regulation (GDPR). You must take all reasonable steps to ensure that personal data is accessed only by those Sirva Personnel who have a need to know the information in order to carry out their duties. Additionally, personal data will only be held by Sirva for as long as it is necessary to satisfy a legitimate business purpose or to satisfy a legal or regulatory obligation to retain such personal data. For more information about compliance with data protection laws, refer to the applicable Sirva data privacy policies. See the Privacy Policy (both the internal and public *Privacy Policies* and the *Data Policy*.)

## 8. COMMUNICATIONS

### A. SOCIAL MEDIA

Sirva Personnel are strictly prohibited from commenting, posting about, or otherwise discussing Sirva, its customers and clients, and its securities, investments, and other business matters on social networks, chat rooms, wikis, virtual worlds, and blogs (collectively, “social media”). Refer to Sirva’s *Acceptable Use Policy and Controllership Policy*.

### B. OTHER EXTERNAL COMMUNICATIONS

You may not make public statements on Sirva’s behalf unless you have been authorized by the Legal Department and/or the Marketing Department. If a member of the media or other third-party contacts you to request information, even if the request is informal, do not respond to it unless you are authorized to do so. In this event, refer the request to your supervisor or forward the request to the Marketing Department.

## 9. COMPLIANCE WITH LAWS

### A. COMPLIANCE WITH LAWS

If you have questions about the applicability or interpretation of certain laws, rules, regulations, or policies relevant to your duties at Sirva, you should consult with the Legal Department. In the event a local law, custom, or practice conflicts with the Code, you must adhere to whichever is most stringent. We expect you to make every reasonable effort to become familiar with the laws, rules, regulations, and policies affecting your activities and to comply with them. Ignorance of the law is not, in general, a defense to breaking the law. If you have any doubts as to the applicability or interpretation of any of the above, you should obtain advice from the Legal Department.

### B. ANTI-BRIBERY AND CORRUPTION

Sirva Personnel must comply with all anti-corruption laws of the countries in which we do business, including the U.S. Foreign Corrupt Practices Act (FCPA), and the UK Bribery Act, 2010, both of which apply globally. We do not pay bribes in furtherance of our business, either directly or indirectly, and you are not permitted to pay bribes on our behalf or authorize others to pay bribes on our behalf. Facilitation payments are also a form of bribe and are not permitted. Refer to Sirva’s *Anti-Bribery and Corruption Policy*.

### C. ANTI-MONEY LAUNDERING

Sirva complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. “Money laundering” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. You should always ensure you are conducting business with reputable parties, for legitimate business purposes, and with legitimate funds. Be wary of money laundering centers like Russia, Mexico, Turkey, Panama, Thailand, Brazil, Indonesia, Columbia, the Cayman Islands, and the Dominican Republic. If you suspect money laundering activities, report it to the Legal Department or the Ethics/Compliance Hotline. See the Sirva *Anti Money Laundering Policy*.

## D. TRADE CONTROLS

Compliance with customs, visa, licensing, and trade control laws is a service our customers and clients expect. A country's trade controls enforce national security and tax policies.

- Follow all regulations relating to licensing, shipping, import and export, visas, and work permits. This includes filing reports and keeping records.
- Remember that regulations cover goods, technology, software and financial transactions.
- Recognize that U.S. trade controls might apply outside of the United States.
- Screen all transactions against laws that restrict dealings with particular countries and people (i.e., Sanctions). The Sirva Legal Department can assist.
- Do not cooperate with any boycott or trade restriction that violates U.S. law or local law. Report all requests relating to boycotts to the Sirva Legal Department. This includes requests for information about countries or people we do business with.
- See Sirva policy on *International Trade Controls*

## E. COMPETITION

Sirva is committed to competing in a fair and vigorous manner, in compliance with all applicable antitrust and competition laws. Antitrust laws protect consumers by prohibiting anticompetitive conduct that can restrict free competition. In accordance with these laws and regulations, Sirva Personnel must never agree, either directly or indirectly, with competitors: (1) to set prices or other terms related to our products; (2) to allocate customers, advertisers, territories, or product markets; or (3) not to deal with a particular company (called a "group boycott"). If you have questions around competition, please contact the Legal Department. See the Sirva policy on *Complying with Competition Laws*.

## F. REPORTING CONVICTIONS

At Sirva, we expect you to continue to adhere to the principles of openness, honesty and transparency. If at any time while you are associated with Sirva you are convicted of, or plead guilty to, a felony or misdemeanor, you have an obligation to report this information to the Legal Department, the HR Department or your supervisor, unless local supersedes this obligation in whole or in part.

## G. COMPLIANCE WITH ALL APPLICABLE LABOR LAWS AND INTERNATIONAL STANDARDS<sup>1</sup>

Sirva is committed to compliance with all laws related to child labor, forced labor, employee working hours, payment of employees (including minimum wage laws and overtime), and the working environment See the Sirva *Fair Employment Practices Policy and the Modern Slavery Statement*.

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<sup>1</sup> References

- The United Nations Universal Declaration of Human Rights.
- The Conventions of the International Labour Organisation.
- The United Nations Convention on the Rights of the Child and the UK Modern Slavery Act of 2015

# 10. ADMINISTERING OUR CODE

*The Sirva Compliance Team*

Chief Compliance Officer	Jeff Margolis
Privacy Officer	Emily Wolf
Data Protection Officer & CISO	Mike Garza
Manager Risk & Compliance APAC & Europe	Kris Shelton
Other Compliance/Legal Team Members	Assunta Rossi Sara Candioto Jennifer Gregg Courtney Rawlinson Lisa Fedorka

You may contact the Compliance team ([www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/)) with questions at any time.

## A. INVESTIGATING MISCONDUCT

All reports of suspected violations of the Code or the law will be taken seriously and promptly reviewed. You must cooperate fully with an inquiry or investigation. The individual(s) assigned to investigate the violation will (a) act objectively in determining facts through interviews or a review of documents, (b) contact employees who may have knowledge about the alleged incident(s), and (c) recommend corrective actions and/or disciplinary measures where appropriate. In accordance with applicable law, Sirva strives to protect the confidentiality of the individuals involved, to the extent possible, inform an employee of the accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation and, where appropriate, allow employees to review and correct information reported.

## B. THIS CODE IS NOT A CONTRACT

This Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time. If the Code conflicts with a collective bargaining agreement or Works Council rules governing the wages and/or conditions of employment for unionized employees, the collective bargaining agreement or the Works Council rules will prevail; if a collective bargaining agreement or the Works Council rules is silent with respect to an area addressed in the Code, or if the Code supplements a collective bargaining agreement or Works Council rules, applicable employees are expected to abide by the Code.

## C. AMENDMENTS TO THE CODE

This Code is reviewed periodically by our Legal Department to determine whether revisions may be required due to changes in the law or regulations or changes in our business or the business environment. The Code may also be modified at any time at the discretion of Sirva. The General Counsel must approve any changes to the Code.

## **D. APPLICATION OF THE CODE**

The application of the Code to any situation is determined by the General Counsel. The application of the Code for a Director on the board of any Sirva entity must be approved by the CEO.

## **E. ACKNOWLEDGMENT**

Upon joining Sirva, each Sirva Personnel will be provided with a copy of the Code and required to acknowledge that they have read and understand Code and that they agree to abide by its provisions. On an annual basis, each Sirva Personnel will be required to re-certify compliance with the Code and disclose any potential conflict of interest or any other possible exception to compliance with the Code.



## SCHEDULE A: SIRVA'S ETHICS AND COMPLIANCE HOTLINE SAFE CALL

The Reporting Hotline is available tollfree 24 hours a day, 7 days a week.

You may report violations online at [www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/) or call tollfree:

COUNTRY	NUMBER
Australia	800 312 928
Brazil	0 800 892 1750
Canada	877 599 8073
China	1 0 800 744 0605 1 0 800 440 0682
Finland	999 800 7233 2255 990 800 7233 2255
Germany	00 800 7233 2255
India	000 800 4401 256

COUNTRY	NUMBER
Netherlands	00 800 7233 2255
New Zealand	00 800 7233 2255
Singapore	800 448 1773
South Africa	0 800 990 243
UAE	8000 441 3376
UK	0800 915 1571
USA	866 901 3295

For a list of additional toll-free numbers, please visit: [www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone)

If you have any questions about the Ethics and Compliance Hotline, please contact the Compliance Team at [www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/).



## QUESTIONS & ANSWERS

*For additional guidance on any of these Q&A's, contact Sirva's Compliance Team ([www.safecall.co.uk/clients/sirva/](http://www.safecall.co.uk/clients/sirva/))*

### CONFLICTS OF INTEREST

Q: I own a small business that is unrelated to the relocation business. It doesn't take a lot of my time, because I make most of my phone calls and answer most of my e-mails during my lunch break. Is this okay?

A: No, this is a conflict of interest. You may not use Sirva equipment or Sirva time in support of your personal business.

Q: My brother's company could be a good supplier for Sirva. Can I purchase services from him?

A: No. To avoid a conflict of interest, you should not direct business to the company of a relative or friend.

### HARASSMENT

Q: My coworker tells jokes that make me uncomfortable. What should I do?

A: First, tell your co-worker that you are uncomfortable and want him or her to stop. If you feel like you cannot talk directly to your co-worker, talk to your supervisor, another manager, Human Resources, or the Sirva Compliance Team. Sirva does not tolerate harassment or a hostile work environment.

### FACILITATION PAYMENTS

Q: You are having trouble getting an international transferee's shipment cleared through customs. A clerk in the customs office offers to help expedite the process but expects to receive a tip. Should you pay the clerk a tip?

A: Sirva does not allow associates to make facilitating payments to expedite a routine administrative action unless the payment has been cleared by Sirva's Compliance Team and are clearly and accurately reflected in Sirva's financial records.

Q: What if it is customary in the country to provide facilitation payments or kickbacks?

A: No. Even if it is customary in the country, facilitation payments (also known as "grease payments") are prohibited by Sirva.



## **MONEY LAUNDERING**

Q: A new Sirva customer wants Sirva's assistance relocating between its offices in the United States and Singapore. It offers to pay via a wire transfer from an account held in the name of a Cayman Islands company at a bank located in Thailand. It also requests that any overpayments be returned to an account in Russia. Should you be suspicious?

A: Yes, you should be suspicious of payment transactions involving transferring money from or to countries or companies that aren't related to our business dealings or that seem illogical. Because of a potential money laundering concern, you should contact the Compliance Team before proceeding with this arrangement.

## **PROTECTION OF PERSONAL INFORMATION**

Q: A purchasing manager from a potential new customer has given you his business card. Is it OK to add his name and contact details into a database where other Sirva Personnel can access it?

A: Maybe. If you collected this information in a country that has a personal data protection law (like most European countries), you may be prohibited from using or sharing the information if the purchasing manager has not given you express consent to do so. If you aren't sure, contact the Sirva Compliance Team.

## **ANTITRUST**

Q: During the morning break at a trade association meeting, your two largest competitors approach you and propose that Sirva join them in implementing a price increase that will improve margins for all of the companies. Is this acceptable?

A: No, we do not make agreements with respect to pricing with competitors. If you are invited to participate in such a scheme, you should strongly object to the invitation, advise the others involved in the scheme that this behavior is illegal and that Sirva will not participate, and then report the incident to the Sirva Compliance Team.

## **CONFIDENTIAL INFORMATION**

Q: Recently, I received a call from a former co-worker asking how things were going at Sirva. Is it okay to forward an internal announcement to him that describes the reorganization of our department and Sirva's strategic direction?

A: No. You may not forward this information to an outside party, even if it's a friend or a former co-worker. We all have a responsibility to safeguard Sirva's confidential information. Organizational structure and strategic plans are considered confidential and not something you may discuss with a third party.

## ANTI-BRIBERY AND CORRUPTION

Q: What is Sirva’s policy on anti-corruption?

A: Sirva has a “zero tolerance” policy when it comes to matters of corruption.

Q: Can Sirva or an employee within the organization be prosecuted under the FCPA and other anti-bribery statutes if a bribe is made by a third party, such as one of Sirva’s suppliers?

A: Yes, legal liability is not limited to those who actively participate in illegal conduct. A bribe made by a third party is illegal under anti-bribery laws. Sirva and individuals who made the payment to the agent on Sirva’s behalf can be prosecuted under the FCPA and other anti-bribery statutes.

## CHARITABLE CONTRIBUTION

Q: A Sirva Client has requested that Sirva make a charitable contribution to a children’s charity. Is this permitted?

A: You should never make a charitable contribution at the request of a Client, customer, agent, supplier, or government official without prior approval from Sirva’s Finance Department and CEO. You should also never solicit a charitable contribution without prior approval from the Chief Compliance Officer.

## SPEAKING UP

Q: Do I have an obligation to report actual or suspected violations of this Code?

A: Yes, you do. Sirva Personnel have an obligation to ensure the integrity of Sirva operations within their respective areas of responsibility and are specifically required to report any observed or suspected violations of this Code. You also have an obligation to cooperate fully with all investigations. To report allegations, please provide as much information and detail as possible, including who, what, when, where, why, and how. Ask yourself:

- **WHO** do you think committed the corruption, fraud, or improper act? Who else was implicated? Who else might have been involved?
- **WHAT** happened? Describe the events fully and be as detailed as possible.
- **WHEN** did it happen? Provide dates, times, and frequency.
- **WHERE** did it happen? Include not only the city and country but also, if possible, an actual address, the name of the building, and the office number.
- **HOW** does your allegation relate to Sirva business? Was a Sirva employee involved? Was a Sirva supplier or client involved?