

# **CODE OF CONDUCT & BUSINESS ETHICS**

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**Corporate Social Responsible**

November 2024

## Business Ethics- Declaration

Dear customer, partner, colleague or relative,

It is important to know how we keep out illegal activities from our business.

**INTERMARK RELOCATION** is not tolerating any form of illegal- or immoral activity, corruption, bribery or attempted bribery. It is against our core values of conducting business. **INTERMARK RELOCATION** has pro-active measures in place to detect and prevent not-ethical practices/ conduct.

For our customers, we offer full compliance to laws and legislations, set by Government agencies as well as FIDI, the major branch organization for the international moving industry.

***With the respective Charters we support a healthy business.***

- We never engage in any form of bribery, either directly or indirect (like our partners).
- We never offer or make and improper payment, or authorize an improper payment to any individual, including any local or foreign official anywhere in the world.
- We never attempt to induce an individual, or a local or foreign official to behave illegally or improperly.
- We never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
- We never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favor.
- We never accept any gift from any business partner if there is any suggestion that a return favor will be expected or implied.
- We never facilitate payments to obtain a level of service which one would normally be entitled to.
- We never disregard or fail to report any indication of improper payments to the appropriate authorities.
- We never induce or assist another individual to break any applicable law or legislation.

Enclosed you will find links to two chapters that we have signed to support Anti-Trust (ATC) as well as Anti- Bribery and corruption (ABC). The signed versions are also accessible at the bottom of our homepage.

Click here for information on our:

[FIDI Ant-Trust Charter and General Compliance Requirements](#)

[FIDI Anti Bribery & Corruption Charter](#)

November 2024

## INTERMARK CARES

### WHO WE ARE

#### Experience

- Established in 1993
- One of the first professional relocation consultancies in CIS Countries
- More than 30 years of experience in relocation
- We relocate over 200 families per month
- We handled “group move” relocations

#### Expertise

- Regular Intermark residential market reviews
- Tracking and updating on immigration legislation
- In-depth Practical Relocation guides
- Comprehensive range of services

### OUR VISION ON DOING BUSINESS THE RIGHT WAY

Corporate Social Responsibility is as a key element in ensuring long term employee and consumer trust. INTERMARK RELOCATION embraces long term relationships with our employees, our customers and our partnerships around the world.

INTERMARK RELOCATION is an open and transparent provider and employer. We believe in equality in all its forms, whether gender, race or religion.

Wherever possible, we do all we can to take care of the environment during our work.

*“Take care of your employees and they will take care of your customers” (Richard Branson)*

We believe in people. We are in a truly people business. So it’s important that we hire the best team to look after our customers.

### OUR VISION – INTERMARK RELOCATION

Our philosophy is simple: “Be brilliant at the basics”. We live by this philosophy because we know it is the foundation of success for our clients and our business.

Understanding and delivering on the basics, means that we try harder, work faster, work smarter, be kinder, more understanding, better listeners, be more effective, more pride in our work and exceed your expectations.

Combined together, it’s our recipe for success

While living it's vision, INTERMARK RELOCATION takes responsibility for the impact on their activities on customers, suppliers, employees, communities and others, as well as the environment. This commitment extends beyond the statutory obligation to comply with laws and legislation. It means that INTERMARK RELOCATION provide a broad commitment to support a better society. Arising from this the focus areas of the **INTERMARK RELOCATION People Planet Profit** program are:

- Include social responsibility in our business and all we do or don't do;
- Documented policies on health, security and safety, communicated and understood within the organization and supply chain;
- Compliance with laws and legislation regarding rules and regulations applicable to our business;
- Making the entire organization conscious of being alerted on prevention
- Minimizing the risk of accidents, personal injuries, materialistic, environmental and/or reputational damage;
- Ensuring business ethics as per our statement;
- Actively avoidance of any conflicts of interest;
- A corporate duty to respect human rights;
- Promote diversity and inclusiveness in our workforce.

## OUR STAFF

As we love what we do, we also love an inclusive and diversified workforce and this is always top of kind when recruiting and developing our staff.

We will never tolerate discrimination against any employee or job applicant because of race, color, religion, sexual preferences, national origin, gender, physical or mental disability, or age.

Our staff is fully involved in the development of our corporate social initiatives. We care for our staff first, as we believe they are making the very difference while delivering our services to our customers.

Note that as of 1<sup>st</sup> of January 2025 we also will release our Corporate Sustainability Policy, which will include goals for the Year 2025.

## OUR CUSTOMERS

By ensuring to receive continuous feedback, and to pro-actively taking opportunities out of our professional networks, we continue to learn how to best interact with our customers.

Rules, regulations (like also EURA QUALITY SEAL, and FIDI FAIM requirements, Professional Cooperation Guidelines- PCG etc. are only a starting point). We ensure we adapt what we learn by our 'soft skill' training sessions, held at least twice a year.

## **OUR PARTNER NETWORK**

Our vision and corporate values are always leading, also in our interactions with the supply chain.

Our supply chain partners are required to fully comply with our business ethics, to include FIDI FAIM's ATC and ABC Charters.

Our supplier chain/ partner selection criteria are compliance to our requirements, price, delivery reliability and historic performance data. Areas of potential conflict with regard to our policies are being addressed and discussed. We have a procedure on how we select our partners which is reviewed and updated at least once a year.

Our business partners should for all their work comply to the PCG- Professional Cooperation Guidelines, which are created by FIDI and accepted throughout our Industry (also recognized by EURA, IAM, LACMA and PAIMA branch-organizations).

## **OUR COMMUNITY**

We lead by example. We are actively participating in our professional communities and encourage to 'give and give back'.

The Impact of doing our business is being calculated where possible. Being a major employer in our area we have an open eye for any particular environmental or social issues, such as waste disposal and traffic conduct etc. Moreover we endeavor to support the local market where we can and are interested in supporting local social activities and charitable efforts.

## **WORKING CONDITIONS**

INTERMARK RELOCATION working conditions do cover, as a minimum:

### **Health and Safety**

- Workplace safety and health; we provide a safe and healthy work environment, take steps to prevent injuries, provide regular health and safety worker training, deploy systems to detect threats to health and safety;
- We require from our operational partners adequate provision and maintenance of warehousing, equipment, systems of work.
- Consistent training and providing of information in order to stimulate an increased consciousness of staff with respect to safety and environmental circumstances; For our operational partners this is part of our Service Level Agreements.
- Investments and maintenance: there is an increased attention for environmental and safety criteria in the event of product selection. Social accountability

- Discrimination; we allow no discrimination or harassment based on race, caste, origin, religion, disability, age, gender, sexual orientation, union or political affiliation.
- Discipline; no corporal punishment, mental or physical coercion or verbal abuse;
- Working hours; we comply with the applicable laws;
- Aim for reduced absenteeism and staff turnover;
- Remuneration; wages paid for a standard working week are meeting legal

and industry standards; disciplinary deductions are excluded;

- A clear communicated business ethics, to include the major FIDI Charters on Bribery/Corruption and Anti-Trust.

## **BUSINESS ETHICS**

INTERMARK RELOCATION 's business ethics policy is based on adequate structures and systems that provide for authority, responsibility, accountability and sustainability and is driven by four major motives:

1. Compliance with the law;
2. Risk management;
3. Reputation enhancement;
4. Value added to the community.

Our policy is developed and implemented appropriate to the purpose of the organization and is documented, communicated and understood within the organization. The policy outlines our approach for dealing with the threat of fraud and corruption, internally as well as externally. The key objectives are prevention, detection and investigation. We respect our customers and develop a reputation for meeting their reasonable expectations. We respect our competitors in the market place and are competing intensely, but fairly, without any use of anti-trust or anti-competitive activities.

## **IN GENERAL**

We refer to our special introduction publication which covers the main business ethics also shared with our customers and published on our website, signed by our Board of Directors.,

## COMPLIANCE WITH LEGISLATION

INTERMARK RELOCATION is committed to conducting its business responsibly in accordance with all relevant legislation. Our policy is to ensure that our employees are aware of and take steps to comply with relevant laws and regulations. We conduct our business without the payment or receipt of unlawful incentives.

## ENVIRONMENTAL MANAGEMENT

Our **health & safety policy** focuses on prevention of personal as well as materialistic accidents and injuries, either or not with environmental impact.

**Carrier selection** for intra-European, overseas or air transportation of our cargo is also being based on similarity of vision with respect to CSR policy.

Our **packing materials** are based on ecologically sound materials. We set environmental aims with respect to reducing waste and use of materials, energy and water. Materials to be recycled are brought to a collection center to be sorted with the intention to be reprocessed into new materials bound for manufacturing.

## CHARITABLE EFFORTS

INTERMARK RELOCATION is striving to fulfill its responsibility as a corporate citizen by engaging in a variety of activities that contribute to the creation of a better society. In addition to taking a Group-wide approach to global issues through our day-to-day business activities, INTERMARK RELOCATION is actively developing ways to meet various challenges in the field of supporting specific good causes, charitable donations and sponsorship. We encourage and support our employees to be involved in volunteering work or other social contribution activities that are of value to society at large. A specific budget is allocated for CSR activities. This budget is project driven.

## RISK MANAGEMENT

In order to arrange for effective and constructive realization of our policies we apply a system of continuous critical evaluation. A proactive approach with an open eye for preventive measures are being considered as critical conditions. The Management of INTERMARK RELOCATION has final responsibility for our policies with respect to the company's social, environmental and economic activities. The feasibility of achieving targets is subject to the efforts in this field of each individual in the organization, whereas business continuity results are being tested regularly.

For our workforce, a specific safety instruction is being made, trained and enforced to ensure maximum safety.

## **ANTI CORRUPTION POLICY**

No INTERMARK RELOCATION employee, manager, director or independent third party acting on behalf of the company may pay, offer or promise to pay, or authorize payment to any party, public or private, in any country, in order to secure an improper benefit for the company and/or for him- or herself. Nor may they accept or solicit such payment. "Payment" includes making or receiving bribes or kickbacks, as well as conferring or receiving anything of value, whether tangible or intangible (e.g., gifts, entertainment, travel expenses, charitable donations, political contributions, hiring an individual or relative).

### **ANTI BRIBERY & CORRUPTION (ABC CHARTER)**

#### **INTERMARKs Commitment:**

We have read and understood the FIDI rules and conditions specified in the FIDI Anti-Bribery and Anti- Corruption Charter (FIDI-ABC Charter).

We demonstrate this commitment by pledging to take a zero-tolerance approach to bribery and corruption. At all times, INTERMARK RELOCATION staff will act professionally, fairly and with the utmost integrity in all business dealings and relationships.

INTERMARK RELOCATION formally accepts and agrees to abide by the rules and conditions outlined in the FIDI Anti-Bribery and Anti-Corruption Charter (FIDI ABC Charter) as these appear in the latest edition of the FAIM Implementation Manual and is also available on the FIDI website:

[https://www.fidi.org/abc\\_atc\\_anti-trustcharter](https://www.fidi.org/abc_atc_anti-trustcharter)

The FIDI requirements regarding anti-bribery and corruption have been fully implemented in the INTERMARK organization and through their supply chain/ business partners.

## **ANTI-TRUST AND COMPETITION LAW POLICY**

INTERMARK RELOCATION competes vigorously, fairly and independently for business in every ethical way in every area of every market for INTERMARK RELOCATION products and services. The antitrust and competition laws of the countries in which INTERMARK RELOCATION does business are the foundation of competitive free enterprise.

INTERMARK RELOCATION requires that all employees fully comply with the antitrust and competition laws of the countries in which INTERMARK RELOCATION does business. It is illegal in the U.S. and many other countries in which INTERMARK RELOCATION does business to enter into agreements, understandings or discussions with any of our competitors concerning: prices or discounts; terms of conditions of sale, including credit terms; profits, profit margins or costs; shares of the market; distribution practices or channels; bids or the intent to bid; capacity expansion or entering new markets; selection, classification, rejection or termination of customers or classes of customers; sales territories or markets; exchange of competitive information; or any other matter inconsistent with complete freedom of action and independence of the company in the conduct of its business. In addition, no officer or employee of INTERMARK RELOCATION may enter into any exclusive dealing arrangement in which the sale or lease of goods or services is conditioned on the customer's refusal to deal in the goods or services of a competing seller. Also, no officer or employee of INTERMARK RELOCATION may enter into a tying arrangement in which the sale or lease of the goods or services is conditioned on the sale or lease to the sale or lease of a separate product or service. In addition, no



officer or employee of INTERMARK RELOCATION may enter into any illegal price discrimination between competing customers, nor engage in deceptive trade practices proscribed by US or other law.

INTERMARK RELOCATION's Executive Management and managers share INTERMARK RELOCATION's commitment to compliance with the antitrust and competition laws. Please consult them before extending different discounts, rebates, allowances or other price adjustments or different terms or conditions of sale to different customers for the same product or if you have any questions or concerns and any time you need assistance in understanding or complying with this policy.

### **ANTI TRUST (FIDI ATC CHARTER)**

#### **INTERMARK RELOCATION's Commitment:**

We have read and understood the FIDI rules and conditions specified in the FIDI Anti-Trust Charter (FIDI-ATC Charter).

As we have elaborated above, INTERMARK RELOCATION requires all employees to fully comply with the antitrust and competition laws of all countries in which INTERMARK RELOCATION Global Relocations does business.

INTERMARK RELOCATION formally accepts and agrees to abide by the rules and conditions outlined in the FIDI Anti-Trust Charter (FIDI ATC Charter) as these appear in the latest edition of the FAIM Implementation Manual and is also available on the FIDI website:

[https://www.fidi.org/abc\\_atc\\_anti-trustcharter](https://www.fidi.org/abc_atc_anti-trustcharter)

### **DATA PROTECTION AND PRIVACY STANDARD**

#### **INTERMARK RELOCATION's Commitment:**

INTERMARK RELOCATION is committed to respect its customers by handling all the personal information collected in connection with their operational assignment in accordance with applicable local law as well as our own Data Protection & Privacy Standard.

All INTERMARK RELOCATION employees must abide to this Data Protection & Privacy Standard.

INTERMARK RELOCATION adopts a comprehensive risk management process taking into account risks, threats, vulnerabilities and impacts, designed to meet international standards for Information Security throughout its business on an ongoing basis.

The INTERMARK RELOCATION requirements regarding data integrity have been implemented in the INTERMARK RELOCATION organization through our data protection policy, which is available on the INTERMARK RELOCATION website, click [here](#)

## **IN CASE OF DEFECTS OR ESCALATIONS TOWARDS OUR POLICIES**

**INTERMARK RELOCATION is committed ensure the correctness and right functioning of the Corporate Policies and Statements.**

**Should you encounter any defect or escalations we are committed to follow up and correct, where necessary.**

**Kindly contact our Company Quality & Compliance Management by using the following email address: [QualityControl@intermarkrelocation.com](mailto:QualityControl@intermarkrelocation.com)**