

CODE OF CONDUCT & BUSINESS ETHICS

1. Introduction

Intermark Relocation is committed to conducting its business ethically, responsibly, and in full compliance with applicable laws and internal policies.

This Code applies to all employees, managers, directors, temporary staff, contractors, consultants and any third parties acting on behalf of Intermark.

All staff must maintain the highest standards of honesty, integrity, transparency, and professionalism. Managers carry additional responsibility to model ethical behaviour, promote compliance, and address concerns promptly.

Violations of this Code will result in disciplinary actions as outlined below.

2. Core Values

Our work reflects our organisational values:

- Teamwork
- Passion
- Innovation & Creativity
- Entrepreneurial, Sales-Driven Approach
- Excellence

These values guide our behaviour, decisions, and interactions with colleagues, clients, partners, and communities.

3. Ethical Business Conduct

Employees must act honestly, responsibly and in the best interests of Intermark.

Prohibited behaviours include:

- dishonest or misleading conduct;
- manipulation of information;
- hiding material facts;

- abuse of authority;
- any action that damages Intermark's reputation.

Intermark strictly prohibits any form of corruption, bribery, facilitation payments, collusion, deception, or unethical conduct.

(Detailed anti-bribery rules are covered separately in the Anti-Bribery & Anti-Corruption Policy.)

4. Human Rights, Equality & Non-Discrimination

Intermark ensures equal treatment and a respectful workplace for everyone.

The following are strictly prohibited:

- discrimination based on any protected characteristic;
- harassment, bullying or offensive conduct;
- intimidation, retaliation, victimisation;
- forced, child or slave labour.

Employees must treat every person with dignity and respect.

5. Health, Safety & Environment

Intermark provides safe and healthy working conditions.

Employees must comply with all safety procedures and immediately report hazardous conditions.

We promote environmental responsibility through efficient use of resources and minimising waste.

6. Conflicts of Interest

Employees must avoid any situation where personal, financial or professional interests could affect decision-making.

Examples include:

- personal relationships influencing work decisions;
- financial interests in suppliers or competitors;
- outside employment affecting impartiality.

All conflicts must be disclosed immediately.

7. Protection of Company Assets & Confidential Information

Employees must protect:

- company property, equipment and resources;
- confidential and proprietary information;
- personal data of clients, employees and partners;
- IT systems, digital assets, and intellectual property.

Information may only be used for authorised business purposes and handled according to Intermark's security and data protection policies.

8. Gifts, Hospitality & Advantages

Intermark prohibits giving or receiving anything that may improperly influence business decisions.

Not allowed:

- cash or cash equivalents;
- excessive or frequent gifts;
- gifts to public officials;
- any benefit creating obligation or expectation.

Allowed:

- small, symbolic gifts that are infrequent and compliant with normal business customs.

Uncertain situations must be escalated to management or Compliance.

9. Anti-Fraud Requirements

Fraud is a serious violation.

Fraud includes:

- falsifying documents or records;
- misusing or stealing company funds or assets;
- submitting false expense claims;

- unauthorised modification of systems or data;
- intentional misrepresentation to clients or partners.

Employees must immediately report suspected fraud.

10. Ethical Behaviour in the Supply Chain

Suppliers, subcontractors and partners must uphold:

- ethical business conduct;
- human rights and labour standards;
- anti-bribery and anti-corruption rules;
- fair competition practices;
- confidentiality and data protection requirements.

Intermark may suspend or terminate collaboration with partners who breach these standards.

11. Reporting Concerns (“Speak Up”)

Employees are required to report:

- violations of the Code;
- fraud, corruption or unethical conduct;
- safety or security breaches;
- conflicts of interest;
- supply-chain concerns.

Reports may be made to:

- direct manager,
- HR,
- Compliance / Quality & Risk,
- anonymously (where available).

Intermark prohibits retaliation against good-faith reporting.

12. Escalation & Corrective Actions

Corrective actions depend on the severity, intent and impact of the misconduct.

Managers must escalate:

- repeated violations,
- violations involving clients or partners,
- breaches of law,
- health/safety threats,
- fraud or corruption indicators.

13. Penalties & Disciplinary Measures

Violations of this Code may result in disciplinary action, including:

- verbal warning;
- written warning;
- mandatory retraining;
- restriction or suspension of duties;
- reassignment or demotion;
- loss of access rights;
- termination of employment;
- notification of relevant authorities when legally required;
- termination of contracts with third parties.

The company may also seek civil or criminal remedies where applicable.

Disciplinary measures apply to:

- direct violations of the Code;
- failure to report a known violation;
- retaliation against employees who report concerns;
- refusal to cooperate in an internal investigation;
- negligence leading to business damage.

All disciplinary actions are applied consistently, transparently and in line with local labour law.

14. Communication of Code Updates

Intermark ensures effective communication of Code updates through:

- internal email announcements;
- scheduled training sessions;
- mandatory employee acknowledgements;
- availability in internal systems.

15. Review & Amendments

This Code is reviewed periodically and updated based on:

- legal or regulatory changes;
- operational or organisational requirements;
- audit results;
- FIDI FAIM compliance obligations.

16. Change Log

Version	Date	Description of Changes	Reason	Approved by
1.0	Nov 2024	Original issue	Corporate adoption	Managing Partners
1.1	Dec 2025	Added escalation & penalties	FAIM requirement	Managing Partners
1.1	Dec 2025	Added anti-fraud & supply-chain ethics	Restore content from legacy document	Managing Partners
1.1	Dec 2025	Consolidated Code structure	Compliance alignment	Managing Partners