



CODE OF CONDUCT & BUSINESS ETHICS

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Corporate Social Responsible

Business Ethics- Declaration

Business Ethics- Declaration

Dear customer, partner,

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

GCR is not tolerating any form of illegal- or immoral activity, corruption, bribery or attempted bribery. It is against our core values of conducting business.

GCR 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 and EURA, the major branch organizations for the international relocation industry.

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 favour.
- We never accept any gift from any business partner if there is any suggestion that a return favour 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.

Sincerely,
Board of Directors
Global Corporate Relo

GCR CARES

WHO WE ARE

Who are we ?

We love our work and it shows. With over 20 years of experience in the sector, we know and master all the steps that allow flawless service. Our attention to detail and optimal communication has earned us the trust of many customers in The Netherlands and around the world.

GCR -GLOBAL CORPORATE RELOCATION

We offer Global Mobility Services for corporate organizations. Whether it is a relocation within EU or for another continent, or an Immigration procedure, tax service etc. ,our team of advisers is at your service to accompany you and meet all your needs. Our goal is your complete satisfaction. It's our way of being and we're proud of it.

We love our work and it shows. With over 15 years of experience in the sector, we know and master all the steps that allow a flawless service. Our attention to detail and optimal communication has earned us the trust of many customers in the Netherlands and around the world.

OUR VISION ON DOING BUSINESS THE RIGHT WAY

Our vision: 'Global Mobility Made Easy- Business without Borders'

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

GCR 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.

OUR MISSION – GCR

Our mission statement

We aim to deliver high quality global mobility solutions in social- and environmental sustainable operation.

While living it's mission & vision, GCR 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 GCR provide a broad commitment to support a better society. Arising from this the focus areas of the **GCR 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.

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 requirements, Professional Cooperation Guidelines 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.

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 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

GCR 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;
- 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 Charters on Bribery/Corruption and Anti-Trust.

A Separate Health & Safety, as well as Diversity, Equality & Inclusion Policy has been created and linked to our Quality System.

BUSINESS ETHICS

GCR'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

GCR 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.

Along with our Building owner we are continuously reducing our waste and carbon footprint.

CHARITABLE EFFORTS

We refer to our Corporate Sustainability Policy.

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 GCR 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.

Our latest Risk Assessment is a separate document.

ANTI CORRUPTION POLICY

No GCR 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)

GCRs Commitment:

We have read and understood the rules and conditions specified in the 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, GCR staff will act professionally, fairly and with the utmost integrity in all business dealings and relationships.

GCR formally accepts and agrees to abide by the rules and conditions outlined in the Anti-Bribery and Anti-Corruption Charter (ABC Charter).

<https://www.fidi.org/about-fidi/fidis-vision-mission/anti-bribery-and-anti-corruption-charter>

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

ANTI-TRUST AND COMPETITION LAW POLICY

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

GCR requires that all employees fully comply with the antitrust and competition laws of the countries in which GCR does business. It is illegal in the U.S. and many other countries in which GCR 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 GCR 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 GCR 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 GCR may enter into any illegal price discrimination between competing customers, nor engage in deceptive trade practices proscribed by US or other law.

GCR's Executive Management and managers share GCR'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 (ATC CHARTER)

GCR's Commitment:

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

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

GCR formally accepts and agrees to abide by the rules and conditions outlined in the Anti-Trust Charter (ATC Charter).

See below for more information.

<https://www.fidi.org/about-fidi/fidis-vision-mission/fidi-anti-trust-charter-o>

DATA PROTECTION AND PRIVACY STANDARD

GCR's Commitment:

GCR 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 GCR employees must abide to this Data Protection & Privacy Standard.

GCR 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 GCR requirements regarding data integrity have been implemented in the GCR organization through our data protection policy, which is available on the GCR website.