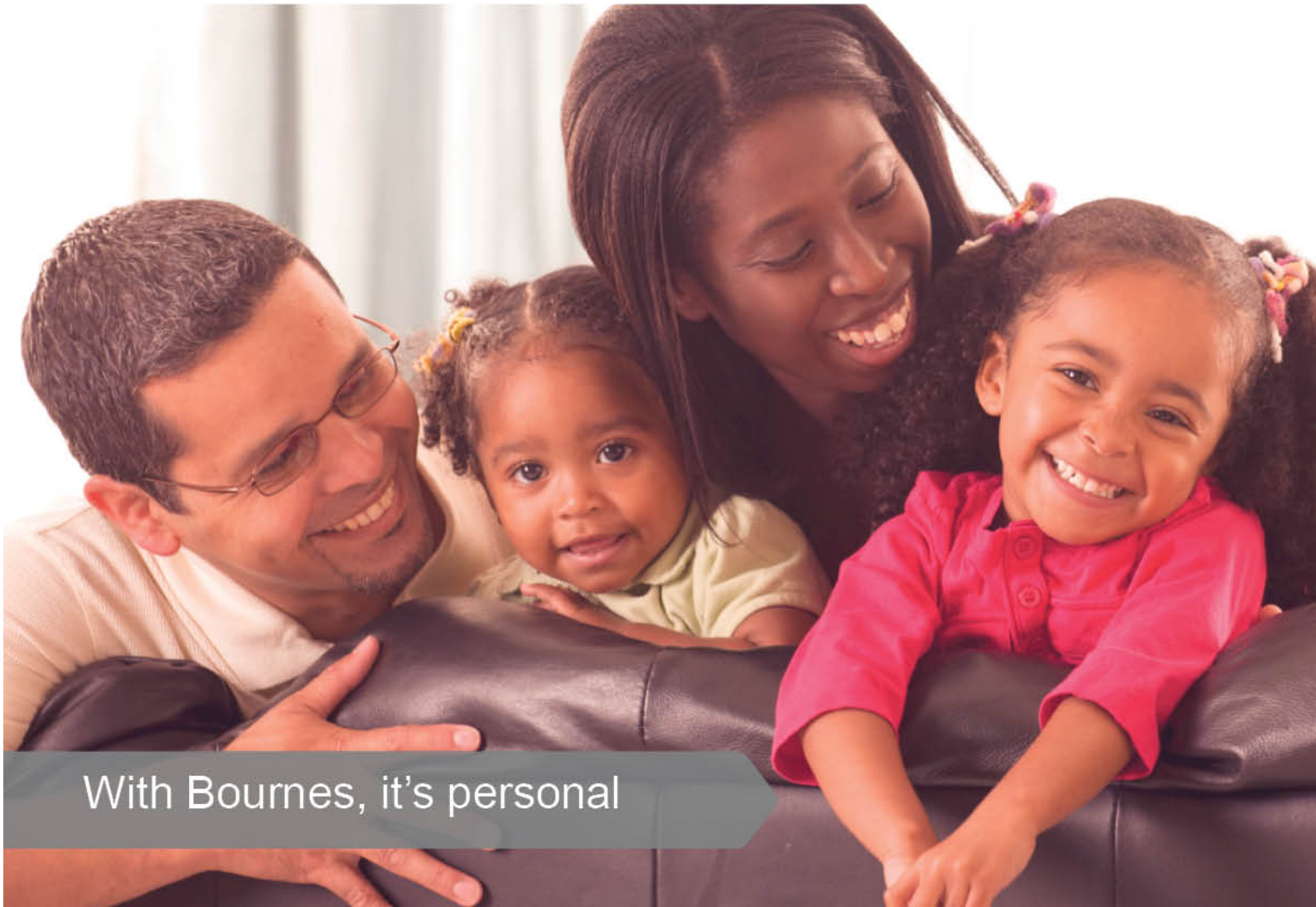




Code of Conduct



With Bournes, it's personal

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1. Scope and introduction

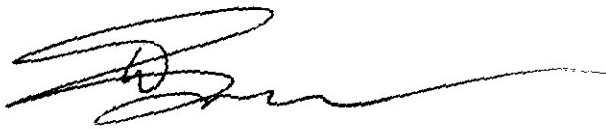
Dear Colleague,

Our company is known for the way it looks after customers. This is reputation built on over 140 years of trust. Trust in providing an excellent standard of service from the smallest move to the largest global contract. Trust in our relationships with our partners, suppliers and customers that we will always act with integrity, honesty and in their best interest as they move through life. Trust as an employer that values its employees as its most important asset. **Our mission is to be the trusted relocation expert of choice.**

This trust is driven by the behaviours of our company, our employees and anyone who represents us and it is essential that we uphold not only our core brand values but also the highest standards of integrity and ethical conduct in everything we do.

This code of conduct together with the policies referred to within the code set out our commitment to ethics and integrity. It provides guidelines on how we expect our employees and anyone representing our company to do business to ensure we always do the right thing. Act within the guidelines, question any concerns and do not tolerate behaviour that violates the code. In a marketplace where trust in businesses is continuously questioned and so valued it is up to every one of us to uphold and protect our reputation.

Thank you for your support.



Wesley Bourne
Managing Director



2. Our Responsibility under the code

2.1. Responsibilities of employees

- Ensure you are aware of and in compliance with this code and related policies at all times.
- Raise any concerns or issues which are in breach of (or potentially in breach of) the code.
- Always choose to do the right thing.

2.2. Responsibilities of managers

- The board of directors are responsible for approving the code and related policies.
- Managers are responsible for managing the policy and ensuring it is complied with and enforced. This includes:
 - Leading by example.
 - Informing employees on the code and related policies and procedures and making sure they are fully trained on its application.
 - Ensuring matters under the policy are dealt with promptly and that responses are clearly communicated. Ensure employees feel comfortable to raise concerns and avoid any actions or behaviour that could be viewed as retaliation.
 - Be vigilant and take action for any violation.
 - Seek guidance and escalate where appropriate.

2.3. Responsibilities of supply chain

It is not only the responsibility of those within Bournes to build and maintain trust. Any supplier, subcontractor, network partner or other party representing or supporting Bournes in undertaking our business plays an important part too.

- Be aware of and uphold our standards under both this code of conduct and our service level agreement.
- Operate your business in a competent manner and in full compliance with the laws, policies and procedures applicable to your own company and jurisdiction.

2.4. The Code, the law and compliance with our regulatory obligations

- Whilst every effort is made to ensure the completeness of the code it cannot cover in detail all laws and policies that apply to our company nor every situation we may encounter. It is important that we understand and comply with legislation applicable to the role we perform. If further guidance is required individuals should seek advice from the appropriate manager or division.
- This code is in full compliance with our obligations under the Harmony Relocation Network code of conduct which as a member Bournes, its employees, subcontractors and suppliers are required to conform with.
- This code is in full compliance with Bournes quality certifications including FIDI FAIM 3.1 and ISO 9001 standards.

3. Commitment to safety



Safety is the most important value in operating our business and we are committed to ensuring the health and safety of our workforce, our customers and the general public.

A serious injury as a result of a lack of safety awareness can change lives forever and without it we cannot operate a sustainable business. Bournes commitment to and performance in the area of safety is demonstrated by our certification to the OHSAS18001 international standard.

We are all responsible for reporting any concerns or instances of noncompliance with these standards and committing to **put safety first**.

3.1. Work environment

Our employees are our most important asset and we are committed to providing a safe and healthy work place and the protecting the wellbeing of our employees.

We ensure consultation and training on all aspects of occupational health and safety associated with our work and its impact on our colleagues, customers and the general public. We ensure our employees and supply chain understand the risks involved in their work and commit to preventing and controlling them.

We are all responsible for:

- Complying with Health and Safety guidelines applicable to our work including (but not limited to):
 - Health and Safety Policy
 - Lone Worker Policy
 - Equality and Diversity Policy
 - Dress Code Policy (including PPE requirements)

Employees should consult the Employee Guidelines for further guidance and other related documents.

- Reporting any concerns or unsafe conditions so that action can be taken as soon as possible. If you feel endangered or threatened at work in any way or if you believe someone else is in immediate danger tell your manager, a member of the HR department or the emergency services (where appropriate) immediately.

3.2. Driver safety

For the areas of our business concerned with transportation we have a responsibility toward other road users. Our specific commitment to safety in transportation includes:

- A zero tolerance approach to compliance with transportation regulations.
- Accurate recording and reporting of driving hours. Drivers are responsible for reporting any concerns including those regarding their own ability to drive safely (for example illness or fatigue).
- Ensuring the regular maintenance of our fleet and transportation equipment.
- Compliance with driving regulations in the countries in which we operate including (but not limited to) speed limits and ensuring loads are properly secured.



We are all responsible
for **putting**
safety first.

4. Commitment to people



Our people are our most valuable asset. Bournes rely on its talented, committed people to drive the business into the future, and in turn they rely on Bournes to enable them to provide for their families, carry out meaningful work and realise their individual potential.

We strive for fair contractual terms because we believe in the benefits of fair, honest and balanced relationships with our employees. We do not allow any pressuring or threatening of employees during discussions about fair working conditions and we ensure compliance with all statutory requirements.

4.1. Equality and diversity

We recognise that our employees and our global marketplace include a diverse group of people and our Equality and Diversity policy sets out our commitment to equal opportunities. This policy is developed and reviewed in line with the UK Equalities Act 2010 which protects people from discrimination (both direct and indirect) on the grounds of age, gender reassignment, marital status, pregnancy or maternity, disability, race, religion or belief, gender or sexual orientation.

Bournes strictly prohibit discrimination in any form and we are all responsible for treating each other with dignity and respect. Employees and those within our supply chain are all responsible for compliance with this policy and for reporting any violations.

Treating each other respectfully also means that we take a **zero tolerance approach to bullying harassment and victimisation**. We are all responsible for understanding our actions and how they may be perceived, regardless of intent (*note: harassment can include offensive language, jokes or pictures, derogatory comments or remarks, intimidating or threatening behaviour, unwanted physical activity including touching or staring*). This code not only applies to our behaviour in the workplace but also outside of the workplace when interacting with our colleagues and includes use of social media and work related social events.

If you are concerned that you or someone else are being bullied or harassed, you should report it to the HR department and can rest assured that they will treat your concerns with respect and that you can do so free from risk of retaliation.

Employees should consult the Employee Guidelines for further guidance.

4.2. Human rights

Human rights are the basic rights and freedoms that belong to every person in the world regardless of nationality, residence, language, religion, ethnic origin or any status. We strive to ensure as a company that we operate in compliance with universal human rights. For example: We do not employ child or forced labour, we do not allow for the physical punishment or abuse of anyone under our employment and we follow international laws regarding employment. It is the responsibility of our employees and supply chain to uphold these standards and to report any violations.

5. Commitment to our market place

Honesty, integrity and transparency are key in building trust in our market place and we expect everyone involved in our business to act with these values at all times.

This means acting fairly and honestly at all times and representing our organisation accurately using truthful sales and marketing practices.

Our commitment to ethical business practices includes:

- Protecting the privacy of non-public information
- Conducting our business free of bribery and corruption
- Complying with applicable laws and regulations
- Competing fairly

5.1. Data Protection (Privacy) Management

It is the nature of our business that we need to collect, process, use and retain non-public personal information and we know that privacy is important to everyone. It is important to us that our customers, employees and other individuals with whom we work can trust us in taking care of their non-public information.

We are committed to respecting those individuals whose personal information we handle in running our business and delivering our services in accordance with applicable law, our own policies and those of the professional standards to which we are certified.

Bournes operate a strict [Data Security and Information Assurance policy](#) which sets out our commitment to maintaining and protecting the information we hold in compliance with the UK Data Protection Act and the FIDI FAIM Privacy Principles.

- We collect, process, store and disclose information only for the purpose intended and always with consent.
- We ensure non-public data is protected by appropriate security procedures with significant access controls to safeguard from loss, damage or unauthorised access at all times.
- We do not keep information for longer than necessary in order to fulfil required services and comply with legal regulations. We ensure that after this date information is securely disposed of or deleted.
- We strive to ensure the data we hold is accurate and up to date and provide reasonable access to individuals to view and update their information.



We are all are responsible for ensuring that we protect the rights and freedoms of individuals in compliance with data protection laws.

Employees and those within Bournes supply chain should familiarise themselves with the [Data Security and Information Assurance policy](#) and their obligations under it, any non-compliance will be treated seriously and may involve disciplinary action.

Should you have additional questions please contact Bournes Quality Manager at the following details:

Hayley Couzens
Quality and Training Manager
customerservice@bournesmoves.com
01797 228000

5.2. Anti-Bribery and Anti-Corruption Management

Bournes are committed to the highest ethical standards including a clear stand against bribery and corruption.

Bournes will not tolerate bribery and corruption in any form involving any of our employees, partners, subcontractors or suppliers who are expected at all times to act professionally, fairly and with integrity in all business dealings and relationships.

It is all of our responsibility to ensure we are aware of and in compliance with all applicable laws countering bribery and corruption in the jurisdictions in which we operate. This means not only local laws for the countries in which we provide services but those covering international operations such as the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010.

As a FIDI FAIM certified company we commit to the FIDI Anti Bribery and Corruption Charter and undertake to:

1. Never engage in any form of bribery, either directly or through any third party.
2. Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
4. 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.
5. 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.
6. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
9. Never induce or assist another individual to break any applicable law or regulation.

Bournes take a zero tolerance approach to noncompliance.

5.3. Compliance with Operating Laws

Our business is required to comply with a number of laws in the different markets in which we operate, including transportation laws and regulations within the UK and other countries in which we conduct our business.

Non-compliance with these regulations by any of us puts us at risk of legal penalties for both the company and/or the individuals involved. It also puts at risk our ability to be permitted to continuing to provide our services in the future and therefore the sustainability of our company.

It is therefore important that we are all aware of and in compliance with the regulations applicable to our company and in particular those applicable to our individual job role.

5.4. Anti-competition

Bournes compete fairly and in compliance with all antitrust laws which exist to protect free trade and ensure a level playing field.

It is all of our responsibility to avoid conversations with competitors or partners (including those with whom we have cooperative relationships) about our actions and avoid any activities which may appear to be anti-competitive this includes:

- Fixing of or discussing pricing or terms
- Dividing markets or allocating customers
- Boycotting suppliers or customers

Due to the nature of our business whereby we may compete with organisations that we may also collaborate with legally (for example for service delivery or shared resources) this can be challenging to understand. If you are not sure if an activity may be anti-competitive you should seek additional guidance from your line manager.

5.5. Compliance with external codes

Sometimes our corporate or trade customers set specific standards that apply when working for them. This may include health and safety regulations, service levels, operating rules or guidance on other issues. Where these are not in violation of our own policies you are required to comply with any additional codes required of us.

6. Commitment to the organisation

To ensure the long term sustainability of Bournes we must always act in the Company's best interest.

6.1. Conflict of Interest

At times there may be a potential conflict of interest between our personal interests and the best interest of Bournes.

It is important that should you become aware of a conflict or potential conflict that you inform the appropriate manager immediately to ensure it can be effectively managed or resolved without it becoming a violation of the code of practice.

A conflict of interest is a situation which could benefit you or someone you know, this includes:

- Competing with a Bournes interest
- Personnel activities including hiring, direct management and workplace relationships
- Appointment or utilisation of supply chain
- Use of company resources (including information, equipment and time)
- Outside employment
- Business decisions

Bournes limit business gifts and entertainment to ensure they are only used in an appropriate manner. Gifts and business entertainment are strictly prohibited where it could be construed as a bribe, violates any law or company policy or creates a conflict of interest. Gifts or business entertainment should NEVER be requested, this includes tips.

Employees should refer to the Employee Guidelines for further guidance including how to report a potential conflict of interest or what to do if you receive a gift that is questionable or prohibited under this code of conduct.

6.2. Professional behaviour and protecting our brand

It is important that we protect the reputation of our company.

It is our responsibility to maintain the highest standards of professional behaviour when representing the company. This also applies to our conduct in our personal lives where there may be a link to or impact on our employment and where our actions could reflect on our employer's reputation. This means conducting ourselves in accordance with Bournes values and in compliance with any instructions given.

We should not speak on behalf of the company or use its intellectual property (including Logo and other branding) without the proper authority or permission. This includes online activity and occasions where you might be approached by the media or other outside party. Should this happen you should not provide any information and should contact the Marketing Department for further guidance. If you are talking about your work (either online or offline) please ensure your expressions and opinions cannot be interpreted as those of the company.

Employees should refer to the Employee Guidelines and Social Media Policy for further guidance.

7. Commitment to the community

7.1. Environmental responsibility

We are committed to continuous improvement in environmental impact of our business.

We acknowledge that our activities have an impact on the environment, and accept our responsibility for this. We recognise that effective environmental management is one of the most important priorities of modern times for business, and we are determined to be a responsible corporate citizen. This includes:

- **Reducing energy consumption:** We are working at both local and network level to reduce or eliminate wastes of all types including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- **Reducing fuel consumption and emissions:** As a company heavily involved in transportation we recognise that the environmental impact of the emissions from those vehicles operating under our network is material and we encourage a number of initiatives to reduce our impact including efficient transport planning, utilisation of intermodal transport and investing in cleaner more environmentally friendly vehicles as part of our replacement policy.
- **Recycling and reuse:** As a service provider involved in extensive use of packing materials we recognise our activities have a direct, measurable impact upon the environment and strive to recycle or reuse wherever possible.
- **Reducing input materials:** We aim to reduce our environmental impacts through the materials used in delivering our services, including encouraging reduced use of paper for printing and use of recycled or reusable packing material where appropriate.

Please refer to our [Environmental Policy](#) for further details.





7.2. Charitable Activity

Giving back to the communities in which we operate is important and Bournes support a number of events and initiatives to benefit community organisations and charities both globally and locally.

We commend our employees' decisions to contribute their own time and resources to good causes, respect their rights to do so and will support them wherever possible. You should seek approval from the Marketing Department before using Bournes name as part of any charitable activity and employees should seek their line manager's permission before conducting any charitable activities during their working hours.

You should never pressure others or feel pressured to support a cause and you should use discretion in soliciting the involvement of others.

[Visit our blog to find out more about recent charitable activities.](#)

8. Administration, monitoring and enforcement of this code

All managers and employees are trained on this code and related policies. We communicate the code to all members of our supply chain and require them to have read and understood the code and their responsibilities within it and to commit to fully complying at all times.

Employees and members of the supply chain have a duty to speak up if they:

- Have a question or concern about the course of action they should take.
- Suspect there may have been a violation of the code or supporting policies, either by themselves or others.

Reports and questions can be directed to line managers, the Quality Department or the HR department.

All questions or reports of non-compliance will be investigated thoroughly and handled with respect and with confidentiality to the fullest extent possible. If you are asked to participate in an investigation you must do so fully and answer all questions truthfully and accurately. Code violations are taken very seriously and may carry severe consequences including disciplinary action as well as legal liability.

Compliance with this code of conduct and related policies by our suppliers and subcontractors form part of our regular approved supplier review process.

Reports made in bad faith, lying, not cooperating or withholding information are considered code violations and could lead to disciplinary action.

8.1. Preventing retaliation

Bournes do not allow any form of retaliation for reporting code violations, asking questions or cooperating in any investigation and anyone engaging in retaliation will be subject to disciplinary action. This includes any form of repercussion or less favourable treatment. Individuals self-reporting mis-conduct are not entitled to protection from the non-retaliation policy for their misconduct.