



A Commitment
to Integrity:

Code of
Business Conduct

2018

A COMMITMENT TO INTEGRITY

SIRVA Worldwide, Inc. 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. This Code of Business Conduct applies to all officers, directors, and associates of SIRVA.

The Company 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.

SIRVA handles all aspects of mobility services, including full global assignment management, home finding and home-sale services, household goods moving, mortgage services, closing and settlement services, expense management, consulting services, corporate housing and property management. SIRVA conducts more than 300,000 mobility events per year, transferring corporate, government employees, and individual consumers.

SIRVA's well-recognized brands include Allied, Allied International, Allied Pickfords, DJK Residential, Global, northAmerican, northAmerican International, SIRVA Mortgage, SIRVA Move Management, SIRVA Relocation and SIRVA Settlement.

With our global reach and local expertise, people trust SIRVA to listen to their unique needs and to deliver seamless relocations every day.

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.

Thus, for all of us at SIRVA, there is no document more important than this Code of Business Conduct. It is our code: a commitment by each of us to keep our promises to our customers, agents, shareholders and associates, and to keep the company and ourselves within the law.

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

- Confront tough issues and use SIRVA values to find the right answers.
- 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 perspectives.
- Ask questions and raise concerns to SIRVA 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.

If we do these things, we will strengthen SIRVA,



Tom Oberdorf, Chairman and Chief Executive Officer

Our Commitment:
Keep our promises.
Keep our company
and ourselves
within the law.

Your Code:

- Confront tough issues
- Master SIRVA's policies
- Communicate
- Ask questions / raise concerns
- Contact SIRVA's Compliance Helpline

Table of Contents

A Commitment to Integrity.....	2
A Message from SIRVA’S Chief Executive Officer	3
1. The SIRVA Standard.....	5
1.1 Trust	5
1.2 Living Our Values	5
1.3 Acting with Integrity	6
1.4 Making Good Decisions	6
1.5 Speaking Up	7
1.6 The SIRVA Compliance Office	8
1.7 Accountability.....	9
1.8 Leaders’ Responsibilities	10
2. SIRVA Policies	12
2.1 Improper Payments	13
2.2 Trade Controls	14
2.3 Money Laundering	15
2.4 Privacy	16
2.5 Information Security	16
2.6 Agents and Suppliers	17
2.7 Working With Governments	18
2.8 Competition Laws (Antitrust)	19
2.9 Fair Dealing	20
2.10 Environment, Health and Safety.....	21
2.11 Fair Employment Practices	21
2.12 Conflicts of Interest	22
2.13 Controllership	23
2.14 Insider Trading	24
2.15 Confidentiality and Intellectual Property	24
3. How To Raise An Integrity Concern	26
4. Where To Find Help	27

THE SIRVA STANDARD

TRUST

People trust SIRVA to move them across their countries, or across 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 associates trust each other to meet all of these commitments, and to treat each other with respect.

This Code of Business Conduct - - this Commitment to Integrity - - is about maintaining that trust by practicing our values and respecting the law.

LIVING OUR VALUES

When making a decision, SIRVA's values are your first source of guidance. They begin and end with unyielding integrity in everything we do. Integrity means honesty, incorruptibility, completeness and consistency between actions and words.

Without integrity, nothing we do has meaning: we do not serve customers well unless we communicate openly and meet our contractual promises; financial performance is not meaningful if our records are not accurate and complete. We cannot be the best unless we hold ourselves to high standards.

Dignity and respect are inherent in this Code. SIRVA is confident that its associates will make good choices when they have correct information and resources available.



SIRVA's values:

- unyielding integrity
- customer centric
- associate oriented
- performance based
- leadership driven

In this Code, the term "SIRVA" refers collectively to SIRVA Worldwide, Inc., its parent, SIRVA, Inc., and to its family of companies.

Accountability is inherent in the commitments that we each make to follow this Code. We exercise good judgment, ask advice, and comply with the law. SIRVA associates protect the company - - and themselves - - from legal and ethical risks.

ACTING WITH INTEGRITY

SIRVA's leadership traits remind us that both deeds and words matter. Here are principles that can help you act on our values:

1. Keep your promises. Build trust.
2. Tell the truth. Every statement and document must be accurate.
3. Treat everyone with respect. Never put your colleagues at risk; let them know if they are about to cross the line.
4. Never pretend that a policy does not apply or make excuses for a bad decision. "Everyone does it" is not a reason; it is a red flag.
5. Avoid even the appearance of bad behavior. Protect the company's reputation, and your own.
6. Comply with all laws that govern our business and all policies that apply to your job. Beware of questionable industry practices.
7. Raise concerns about possible integrity violations. Cooperate in investigations.
8. Never retaliate against anyone for raising an integrity concern or helping to resolve one.

MAKING GOOD DECISIONS

No document or policy can answer all potential questions. When you are not sure about the right course of action, review SIRVA's values and policies and then ask yourself:

1. Have I gathered 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 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 it the right thing to do?
7. How would my decision look in the news for the whole world to see?

SPEAKING UP

What if you have an integrity concern - - or you are the victim of a policy violation? There may be a safety issue that must be addressed immediately, or harassment that may only grow worse over time. If you don't confront it, who will?

Unyielding Integrity means open and candid communication. Accountability requires that you follow through on your concern. Otherwise, problems will not get solved.

You have a right and a responsibility to speak up. When you provide your acknowledgement of the SIRVA Code of Conduct, you are acknowledging your obligation to report possible violations of policy.

There are many ways for you to ask a question or to report a concern - - your manager, senior management, human resources, or a member of the legal department. Each business and support function also has a compliance champion available to assist you. For more information on who your compliance champion is, please contact SIRVA Legal. Generally, the most direct approach is best: for example, a concern about discrimination should be addressed to Human Resources and a question about applicable regulations to the SIRVA Legal Department.

Report all suspected violations of this Code.

Compliance Helpline:

- 888-545-0250
(U.S. associates)
- +1 260-429-1111
(Non-U.S. associates)

NAVEX Global hotline

- (888) 875-1168
Non-U.S. associates may call NAVEX Global's hotline collect at +1 (770) 613-6359

You can make a confidential or anonymous report to the Compliance Helpline or to The Network.

SIRVA will not tolerate any retaliation against anyone who reports an integrity concern or who provides information as part of an investigation.

But there are also times when associates will want to communicate confidentially, or even anonymously. For that reason, there is the SIRVA Compliance Helpline. You can reach the SIRVA Compliance Helpline Manager by sending an e-mail to compliance@sirva.com or calling one of the phone numbers at the end of this policy.

You can also use the services of an independent company, The Network, by calling one of the phone numbers at the end of this policy. If you call The Network, they will send a report to the SIRVA Compliance Helpline Manager. If you want, The Network will exclude any information that identifies you.

The SIRVA Compliance Office will receive your report. If you provided feedback, the report will not be confidential and the Compliance Office will consult with you about the best way for you to pursue your concern. If you have raised an issue about a potential violation of policy or law, it will assign an investigation team. It will also provide feedback to you if you have chosen not to remain anonymous.

If you raise an integrity concern to a manager and the issue is not addressed, then you must notify the SIRVA Compliance Helpline. Managers, compliance champions and others who receive integrity concerns must notify the SIRVA Compliance Helpline Manager so that issues are tracked and addressed.

SIRVA prohibits retaliation against anyone for raising an integrity concern or assisting in an investigation.

THE SIRVA COMPLIANCE OFFICE

The Compliance Office oversees SIRVA's program for compliance with law and with this Code. Consisting of the Chief Compliance Officer and the SIRVA Compliance Helpline Manager, it is overseen by a Committee of SIRVA's senior managers, and provides reports to the Audit Committee of SIRVA's Board of Directors. The most important job of the Compliance Office is to be accessible to each of you: answering questions, addressing issues and providing training.

You can contact the Compliance Office for a copy of any SIRVA policy. You can also ask them for advice about any integrity issue. If they cannot help you, they will find someone who can. You can e-mail compliance@sirva.com or call one of the telephone numbers at the end of this policy.

ACCOUNTABILITY

The SIRVA Code of Business Conduct applies to all SIRVA associates, officers and directors throughout the world.

SIRVA has the obligation to enforce this Code of Business Conduct, and thereby maintain compliance with law and ethical business practices. SIRVA therefore periodically requires associates to acknowledge the “Personal Commitment to Integrity.”

I acknowledge that I have received the SIRVA Code of Business Conduct.

I understand that every associate is required to comply with the Code.

When I have a concern about a possible violation of SIRVA policy, I will raise it to a SIRVA manager, compliance champion, the SIRVA Legal or Human Resources Department, or the SIRVA Compliance Helpline.

Violating a SIRVA policy can mean breaking the law. The company - - or you as an individual - - might face criminal penalties (prison or fines) or civil sanctions (damage awards or fines).

Associates who violate the spirit or letter of the Code or SIRVA policies are therefore subject to company discipline up to and including termination of employment



These are examples of conduct that may result in discipline:

Violating the law or a SIRVA policy, or requesting others to do so.

Failing to promptly raise 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.

LEADERSHIP RESPONSIBILITIES

SIRVA's leaders must maintain a culture of unyielding integrity and high performance. They must set the right example through their own behavior, talk directly to associates about SIRVA values and policies, and evaluate associates' commitment to the Code in performance appraisals.

SIRVA leaders are also responsible to ensure that their business units and functions are in compliance with the law and SIRVA policies. They must work with the Legal Department and Chief Compliance Officer to prevent and detect compliance problems, and to respond promptly once they are identified.

Specifically, if a leader receives a report of a possible violation of SIRVA policy, then that leader must raise it to a senior manager, a compliance champion, the Legal or Human Resources Department or the Compliance Office.



Determining Which Laws Apply

You should always comply with the laws of the countries where you operate. But in some cases, the laws of another country might apply because our parent company, SIRVA, is a U.S. corporation and certain U.S. laws extend to the company's activities outside of the United States. Other countries may apply their laws outside of their borders to their own citizens and to SIRVA subsidiaries organized under their laws. If you are in doubt, or if there is a conflict between the applicable laws, contact the SIRVA Legal Department.

Subsidiaries and Affiliates

Companies in which SIRVA has majority ownership or control must adopt a Code that corresponds to this one. Associates serving as directors of joint ventures or companies that SIRVA does not control should encourage them to adopt similar policies.

Agents, Licensees and Representatives

SIRVA relies on independent household goods moving companies, real estate brokers, appraisers and other suppliers to provide its relocation services. We rely on consultants for critical tasks including support of information technology systems. We expect these companies to meet our integrity standards. SIRVA associates must report integrity concerns arising from the actions of these companies to a SIRVA manager, compliance champion, the SIRVA Legal or Human Resources Department, or the SIRVA Compliance Helpline.

Other companies or people might represent SIRVA more directly, for example in the role of an independent sales representative. You should call the Compliance Office to determine when they must comply with SIRVA policies.



This Code and the policies in it are not an employment contract. SIRVA does not create any contractual rights by issuing the Code or the policies.

SIRVA POLICIES

Here is an overview of SIRVA's policies. You will find more information on each policy on the following pages.

Individual SIRVA businesses might issue additional policies.

IMPROPER PAYMENTS *We win through integrity and excellent service, never through bribes or conflicts of interests.*

TRADE CONTROLS *Compliance with customs, visa, licensing and trade control laws is a service our customers expect.*

MONEY LAUNDERING *We don't accept proceeds of criminal activity. We know our customers and watch out for suspicious payments.*

PRIVACY *We move not only households, but also personal information. We protect it from improper disclosure.*

INFORMATION SECURITY *We safeguard our computer systems from attack, and confidential information from accidental disclosure.*

AGENTS AND SUPPLIERS *Every customer's relocation depends on our excellent agents and relocation service suppliers. We choose the best and meet our commitments to them.*

WORKING WITH GOVERNMENTS *We act ethically, respecting the laws that regulate business and the contracts that protect public money.*

COMPETITION LAWS (ANTITRUST) *We compete to win and respect the laws that protect free enterprise. We don't collude, fix prices or rig bids.*

FAIR DEALING *We deal honestly with customers, agents and suppliers, never misrepresenting or manipulating information. We respect competitors' legal rights.*

ENVIRONMENT, HEALTH & SAFETY *Health, safety and environmental protection are part of our services. We protect our associates' well-being.*

FAIR EMPLOYMENT PRACTICES *We act with respect for individuals and make decisions based on merit. Harassment, intimidation, discrimination and employment law violations have no place here.*

CONFLICTS OF INTEREST *We fulfill our obligations to the company, never using influence or information for personal gain.*

CONTROLLERSHIP *We protect company assets and keep accurate records. We escalate problems quickly, to solve them before they grow.*

INSIDER TRADING *We don't trade, or tip anyone to trade, securities of any company on inside information. We follow fair disclosure laws.*

CONFIDENTIALITY AND INTELLECTUAL PROPERTY *We protect our confidential information, trademarks and copyrights. We don't misuse other companies' intellectual property.*

Improper Payments *We win through integrity and excellent service, never through bribes or conflicts of interests. Bribery and kickbacks violate the law. Personal gifts or lavish entertainment can create conflicts of interest. We make no improper payments; neither can anyone acting on SIRVA's behalf.*

Never offer money, goods, services or anything else of value to influence anyone's decision. This includes government officials and people who work for customers, agents and suppliers.

Offer courtesies only to develop business relationships. Reasonable meals and entertainment are acceptable. Any gifts should be nominal (less than U.S. \$25 and not to exceed a total of U.S. \$50 to any person in any calendar year). Make sure you comply with the policies of the other company involved.

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 its associates to make facilitating payments to expedite a routine administrative action unless the payments have been cleared by SIRVA's Legal Department and are clearly and accurately reflected in SIRVA's financial records.

Many countries regulate international trade, such as imports, exports and international financial transactions. Be sure to screen international transactions against all applicable laws and regulations.

Never accept gifts of more than nominal value or excessive entertainment from suppliers, customers, transferees or competitors. Associates who perform packing, transportation and storage services may accept customary tips.

Screen agents, brokers, appraisers, sales representatives and consultants before you do business with them. Make sure they follow our policies against improper payments.

Never tip a government employee (for example, a customs clerk) to expedite a routine action without prior approval from SIRVA's Legal Department for a specific payment or category of payments.

Never give company money or resources for political purposes without prior approval from the SIRVA Legal Department.

Never make a charitable contribution at the request of a customer, supplier, agent or government official without prior approval from SIRVA's Finance Department and the CEO. Never solicit a charitable contribution without prior approval from the Chief Compliance Officer.

Keep accurate records of all payments that are permissible.

Trade Controls *Compliance with customs, visa, licensing and trade control laws is a service our customers 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, services and financial transactions.

Recognize that U.S. trade controls might apply outside the United States.

Screen all transactions against laws that restrict dealings with particular countries and people. The SIRVA Legal Department has this information.

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.

Call the SIRVA Legal Department if a conflict arises between U.S. law and the law of another country.

Money Laundering *We don't accept proceeds of criminal activity. We know our customers, and watch out for suspicious payments.* More than 100 countries prohibit money laundering in order to prevent crime and terrorism.

Make sure that customers, agents and joint venture partners are legitimate businesses and only use money from legitimate sources. Suspect anyone who does not provide complete information.

Comply with laws that require you to report suspicious payments. This includes cash, multiple money orders, or checks from unknown third parties. Don't transfer money to a third party or to an account you don't recognize.

Screen payments that do not come directly from known customers, or that seem unusual for the business being transacted.

Watch out for money laundering centers like Russia, Mexico, Turkey, Panama, Thailand, Brazil, Indonesia, Colombia, the Cayman Islands, and the Dominican Republic. The Legal Department maintains a current list.

Q. A new SIRVA customer wants SIRVA's assistance relocating employees 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 that involve 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 Legal Department before proceeding with this arrangement.

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 SIRVA's Privacy Manager or the SIRVA Compliance Office.

Follow SIRVA's information security rules.

Privacy *We move not only households, but also personal information. We protect it from improper disclosure.* Lax security can lead to identity theft. Lax compliance can violate laws that limit disclosure. Data can be electronic or in hard copy.

Follow the SIRVA Global Privacy Policy when you handle information that can identify any person. This includes transferees, and people who work for customers, agents and service suppliers. It is available by clicking the Privacy tab at www.sirva.com.

Follow the law of the country where you collect data. It may be stricter than our general policy. Do not transfer personal information out of that country unless the law permits.

Do not distribute personal data within the company to people who don't need it. Use only aggregated data for quality or sales analysis.

Never transfer personal information to any company outside of SIRVA that does not comply with our policies.

Follow SIRVA's policies when handling personal data of associates.

Report security breaches and accidental disclosures of information to SIRVA's IT Department.

Information Security *We safeguard our computer systems from attack, and confidential information from accidental disclosure.* Our information technology is the central nervous system of our business; we must protect it from hackers and viruses.

Protect passwords; never share them.

Do not use laptop computers or personal electronic devices to store personal data or confidential information.

Grant access to IT systems only to associates and contractors who need it. Make sure they follow SIRVA's information security rules. Ensure that access is cancelled when people leave the company or is revised when people change jobs.

Use only secure transmission for personal data or company trade secrets outside of SIRVA. E-mail is not secure; encrypted e-mail is.

Ensure that virus protections are up to date; never download suspicious files, or files from senders you do not know. Do not open SPAM e-mails.

Report any security breaches, lost computers or lost data to SIRVA's IT Department.

Do not use company computer systems for any purpose that violates law.

Computers and internet access are for company business. Incidental personal use is permitted, but not if it strains system capacity, and never for illegal purposes or harassing, offensive, obscene, or hateful content. SIRVA has the right to monitor your use of company property, including computers, e-mail and phones, subject to the limits of national and local laws.

Agents and Suppliers *Every customer's relocation depends on our excellent agents and relocation service suppliers. We choose the best, and meet our commitments to them. The agents who make up our van lines and display the brand names of SIRVA companies are special stakeholders.*

Choose agents and suppliers who meet our standards of integrity. Avoid those who follow poor industry practices.

Do not use SIRVA's computers or internet access for illegal purposes or to transmit harassing, offensive, obscene, or hateful information.

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 a friend. Contact SIRVA's Compliance Office if you have a question about this.

SIRVA is committed to conducting its business with government customers with the highest ethical standards and in compliance with applicable laws and regulations.

Build strong relationships and strengthen our networks. Avoid companies who do not respect their obligations to SIRVA or to other agents or suppliers.

Enforce contractual commitments that require proper business practices. Report all integrity concerns arising from the actions of agents and suppliers.

Make sure that agents and suppliers safeguard SIRVA's confidential information. Never misuse their information.

Avoid all conflicts of interest. Accept only nominal gifts and reasonable entertainment that is related to business. Do not direct business to the company of a relative or friend.

Choose suppliers on the merits of their services. Use competitive bidding when it makes sense. Give small businesses and minority-owned businesses an opportunity.

Choose only agents and suppliers who are legally qualified to perform the work. Include all applicable contract clauses in subcontracts.

Working with Governments We act ethically, respecting the laws that regulate business and the contracts that protect public money. SIRVA has many government customers. Various agencies regulate our business for safety and other matters.

Be truthful and accurate in all communications with government officials, whether in writing or not. This includes regulatory filings, audits, investigations and inspections. It also includes customs declarations, certifications and commercial matters.

Make sure that invoices and reports are accurate and complete. Recognize that false or misleading statements can lead to legal penalties. Some documents require signatures under penalty of perjury.

Fully comply with all government contracts. Seek a formal clarification if there is a question about what the contract requires.

Follow government bidding procedures. Never seek or accept confidential information about another bidder's prices or service offerings.

Never offer even a nominal gift or any entertainment to a government employee, or discuss potential employment with SIRVA, unless you follow applicable regulations. They are available from the SIRVA Legal Department.

Competition Laws (Antitrust) *We compete to win, and respect the laws that protect free enterprise. We don't collude, fix prices or rig bids.* These laws also regulate mergers, and limit dominant companies from abusing their power.

Never make an agreement with any company about any aspect of competition between that company and SIRVA. An agreement does not have to be in writing to be illegal. It can be oral. It can be informal, implied or just an "understanding."

Never make cover quotes or false bids. Never agree with a competitor to submit a bid, or not to submit a bid. Never agree on the terms of a bid.

Never agree with anyone to submit a bid for any purpose except to win the business. This includes competitors, agents, suppliers and customers.

Do not discuss sensitive subjects with any competitor. This includes prices, bids, sales territories, allocation of customers, terms of sale, capacity, volume, costs, profits, market share, service offerings and compensation levels.

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 SIRVA's Legal Department or the Compliance Office.

We treat our customers, agents, suppliers and service providers with respect, honesty, dignity and fairness.

Stop the conversation and walk out if a competitor raises one of these subjects or suggests an illegal agreement. Report the incident to the SIRVA Legal Department or Compliance Helpline.

Remember that some agents, customers and relocation service suppliers also compete with us. Limit correspondence and conversations to the Business we do together.

Get approval from the Chief Compliance Officer before you join a trade association.

Get approval from the SIRVA Legal Department before collecting market or price information.

Never make agreements that restrict the price or terms at which customers resell our services. Never make agreements that restrict the price or terms at which SIRVA resells any services.

Get legal advice for any merger, acquisition, joint venture or other business arrangement.

Fair Dealing *We deal honestly with customers, agents and suppliers, never misrepresenting or manipulating information. We respect competitors' legal rights. We do not take unfair advantage of anyone who puts their trust in us.*

Explain terms of service and pricing to customers clearly. Make sure that advertising is accurate.

Make sure that invoices accurately reflect services rendered.

Never use illegal or deceptive means, or any pretext, to gather information about any person or company.

Never ask anyone to give us information that they have received from another company and have a legal obligation to keep confidential.

Never disparage another company.

Environment, Health and Safety *We protect our associates' well-being, as well as the environment. We are committed to being a highly green company, to promoting recycling and renewable energy, and to helping to reduce our carbon footprint and the carbon footprint of our suppliers and agents. We work to conduct our operations in a safe manner that minimizes environmental impact. These concerns are particularly important to our transportation and warehousing activities.*

Comply with the environmental, health and safety laws of the country where you operate. Comply with regulations for transportation and storage of hazardous materials and firearms.

Make sure that only qualified drivers, laborers, real estate brokers, inspectors and appraisers are sent to customer homes and offices. Get drug tests and background checks where appropriate.

Ensure that all vehicles and warehouses meet safety and emission regulations. Provide adequate training and personal protective equipment to all associates.

Maintain safe offices and workplaces. Establish first aid resources for your workplace; know which hospitals are accessible in emergencies.

Report immediately any threat of workplace violence to Human Resources and to management at your facility.

Fair Employment Practices *We act with respect for individuals, and make decisions based on merit. Harassment, intimidation, discrimination, and employment law violations have no place here. We follow laws that protect employee privacy, freedom of association, collective bargaining, wages and hours. We follow laws that prohibit child labor and forced labor.*

Use only merit and job criteria, such as experience and performance, in employment decisions.

Perform your job in a safe and environmentally responsible manner.

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

A. First, tell your coworker that you are uncomfortable and want him or her to stop. If you feel that you cannot talk directly to your coworker, talk to your supervisor, another manager, Human Resources, or the SIRVA Compliance Office. SIRVA does not tolerate harassment or a hostile work environment

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.

Comply with all laws that prohibit employment discrimination. Never make decisions based on race, color, religion, national origin, sex, pregnancy, sexual orientation, age, disability or prior military service.

Never harass, bully or demean anyone. Avoid behavior that can create a hostile environment. Be especially careful of behavior aimed at a person based on age, sex, race, religion or ethnic group.

Never make unwelcome sexual advances.

Take lawful affirmative action in the United States to increase employment opportunities for women, minorities, people with disabilities and veterans. Take lawful affirmative action as required in other countries.

Never violate labor laws, for example, by hiring a child under minimum age, or by ignoring wage and hour regulations, including laws regarding overtime pay and required work breaks.

Call the Legal Department for advice if there is a conflict between this policy and the laws or practices of any country.

Conflicts of Interest *We fulfill our obligations to the company, never using influence or information for personal gain. Even the appearance of a conflict can destroy trust.*

Avoid actions and relationships that conflict with your job or with SIRVA's business. Discontinue any activity that management tells you is a conflict or creates an appearance of a conflict.

Never compete with SIRVA, or do any work for a company that competes with SIRVA.

Never take any opportunities for yourself that you discover through your work at SIRVA. Never help any agent or customer pursue an opportunity that SIRVA can pursue.

Disclose all outside activities, financial interests and relationships that may create a conflict or an appearance of a conflict.

Get approval from the Chief Compliance Officer to hold any position with a company that does business with SIRVA.

Get approval to be an officer or director of any other for-profit company, or of a non-profit organization that gets support from SIRVA.

Do not use SIRVA resources, intellectual property, time or facilities for your own business ventures. This includes computers, office equipment and e-mail.

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.*

Never create a false document.

Maintain complete, accurate and timely records and accounts for all transactions.

Follow SIRVA's Contract Management Policy; make no contracts without thorough risk assessment, legal approval and confirmation of signing authority.

Safeguard all company assets. This includes physical assets, financial assets, legal rights, proprietary products and confidential information.

Maintain sound processes and controls.

Report potential legal issues or problems that can affect your business.

Always cooperate with SIRVA's internal and external auditors.

Follow SIRVA's accounting policies and procedures. This includes generally accepted accounting principles and standards, and local law.

No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Never trade in a company's stock or securities, or suggest that someone else make a trade, if you are aware of material inside information about that company.

Provide full, fair, accurate, timely and understandable reports and disclosures to our lenders and any regulators. SIRVA's senior management is responsible for reports to our lenders and communications to the public.

Provide timely, candid forecasts and assessments to management. Make decisions based on objective criteria, assessing business risks.

Follow SIRVA policies for maintaining documents and electronic records.

Preserve documents and electronic records related to litigation, audits and investigations that have begun, or are foreseeable. Follow directions from the SIRVA Legal Department.

Insider Trading *We don't trade, or tip anyone to trade, securities of any company on inside information.* We follow fair disclosure laws. 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.

Never buy or sell any company's securities on the basis of inside information. Never suggest that anyone else buy, sell, or retain securities of a company while you have inside information about that company. This applies to any company, including our clients and suppliers.

Never disclose inside information to anyone outside SIRVA unless it is necessary for SIRVA's business and you have received approval from SIRVA's Legal Department.

Report accidental disclosures of inside information to SIRVA's Legal Department or the Compliance Helpline immediately.

Confidentiality and Intellectual Property *We protect our confidential information, trademarks and copyrights.* We don't misuse other companies' intellectual property. Our inventions and trade secrets are critical to our success.

Safeguard SIRVA's trade secrets and confidential information, including customer lists, pricing and competitive plans.

Safeguard the trade secrets and confidential information that customers, agents and relocation service providers share with us.

Use confidentiality agreements when entrusting our information to another company, or accepting its information. The SIRVA Legal Department can help you.

Follow company guidelines when using SIRVA's trademarks, service marks and brands. Misuse can undermine their value. Work with SIRVA's Legal Department to make sure other companies use SIRVA's marks properly.

Place a copyright notice on all brochures, advertising and websites to protect our writings and designs.

Notify the SIRVA Legal Department of any unique products, services or processes you develop, before you use them. We may be able to get a patent.

Report to the SIRVA Legal Department any other company's unauthorized use or imitation of our trademarks or copyrights.

Never infringe another company's rights. Contact the SIRVA Legal Department before launching new services or new names.

Never seek or accept the proprietary information of another company without that company's permission.

Do not use unlicensed software, or make unauthorized copies of licensed software.

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

A. No, you may not forward this information to an outside party, even if it is a friend or former coworker. We all have 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. If you need additional guidance, contact SIRVA's Compliance Office.

HOW TO RAISE AN INTEGRITY CONCERN

The company offers you a number of ways to get answers to your questions about integrity issues and to raise any concern about what might be a violation of SIRVA policy:



- **Your supervisor or manager**
- Next level of management
- SIRVA Compliance Helpline Manager c/o Law Department Address: 101 East Washington Blvd. Suite 1100 Fort Wayne, IN 46802 USA Phone: (260) 429-1111 Toll-free: (888) 545-0250 (U.S. associates) E-mail: compliance@sirva.com
- Company legal counsel
- The compliance champion for your business or function

If you prefer to report an integrity concern to someone outside the SIRVA organization, U.S. associates may contact NAVEX Global's hotline service at (888) 875-1168. Non-U.S. associates may call NAVEX Global's hotline collect at +1 (770) 613-6359. You may wish to remain anonymous, although you are always free to leave your name and contact information.

Non-U.S. associates will need to add the applicable international dialing prefix to the numbers shown above.

Generally, your supervisor or manager will be in the best position to resolve the issue quickly. If after raising an integrity concern the issue is not resolved, raise it with one of the other contacts listed above. You can raise your concern orally or in writing, and if you prefer, you can do so anonymously.

The whole idea is to speak up. Ask questions. Get answers. Bring the concern into the open so that any problems can be resolved quickly and more serious harm can be prevented.

WHERE TO FIND HELP

- E-mail address: compliance@sirva.com
- Fort Wayne, IN (260) 429-1111
- Toll-Free (888) 545-0250 (U.S. associates)
- The Network – Hotline Service
Toll Free: (888) 875-1168 (U.S. associates)
Collect +1 (770) 613-6359
(Non-U.S. associates)
- Non-U.S. associates will need to add the applicable international dialing prefix to the numbers shown above.





Copyright 2018, SIRVA, Inc.
All Rights Reserved