



NOBLECARE

NOBLE MOBILITY CHARTER OF CORPORATE SOCIAL RESPONSIBILITY

WHO WE ARE

NOBLE MOBILITY

is a leading provider of moving and relocation services in the corporate market. The company's core values; quality, flexibility, innovation, transparency and our responsibility towards the environment and society are embedded in the company's culture and its staff.

OUR VISION

In March 2010 the European Commission made a commitment to "renew the EU strategy to promote Corporate Social Responsibility as a key element in ensuring long term employee and consumer trust".

Noble Mobility has adopted this commitment as a guideline towards its management philosophy. Our commitment refers not only to the values of a product's convenient function or usability, but also to the fact that our company seeks to identify and realize the values needed by the times in which we live, based on the three dimensions of the economy, the environment, and society. Based on this management philosophy, the Noble Mobility Charter of Corporate Social Responsibility (**NobleCare**) was established to provide guidelines by which we would transform ourselves while interacting with society and work to make more contributions to society.

OUR MISSION



Noble Mobility considers the interests of society by taking responsibility for the impact of our activities on customers, suppliers, employees, communities and others, as well as the environment. This commitment extends beyond the statutory obligation to comply with legislation. It means that our company has moved beyond profit maximization and that our management and staff provide a wider commitment to helping to build a better society in general. Arising from this the focus areas of the **NobleCare** program that have emerged are:

- Find the right balance between CSR and business aims;
- A documented Health and Safety policy, which is communicated and understood within the organization;
- Compliance with legislation regarding relevant rules and regulations and in anticipation of new national and/or European legislation;
- Making the entire organization conscious of being alerted on prevention of possible harmful consequences of company policy on the environment;
- Minimizing the risk of accidents, personal injuries, materialistic and environmental damage;
- Ensuring best business ethics, enforce honesty, values and policies;
- Actively avoidance of conflicts of interest, kickbacks, extortion, any improper payments etc. embedded in our internal control system AO-IB
- A corporate duty to respect human rights;
- Company scheme for charitable efforts.

Each and every person that works for Noble Mobility is developing NobleCare orientated efforts through various aspects of the company's business activities in accordance with the Charter of Corporate Social Responsibility.

NOBLECARE PROGRAM

The **NobleCare** program is basically a top-down commitment to lead the short and long-term developments to the business culture that is required. It stands for our basic values and CSR aims and have the support of everyone connected with the company. The program reflects our general interaction with different groups of people - employees, customers, suppliers and the community - and is based on full management commitment.

OUR STAFF

Our employees are the face of our business and believe in what we are trying to achieve. We build on them in a way that makes sense for the business and respect and encourage their initiatives for continuous improvement of the CSR policy. This policy is communicated to and well understood by all employees and includes plans for regular briefings and ongoing consultation.

OUR CUSTOMERS

An important aspect of how we run our business is the ability to deal with our customers. We consistently acquire to know what is important to them on a wider scale, such as environmental concerns. We aim for sharing the same values with the ultimate objective to jointly build on a better society.

OUR SUPPLIERS

We aim to identify possible issues with our suppliers , bearing in mind our own business values. Our supplier selection system is based on a mixture of quality, price, delivery reliability and compliance with our instructions and policies. Areas of potential conflict with regard to (CSR) policy are being addressed and discussed.

OUR COMMUNITY

The impact of our business on the community is being reflected in our CSR policy. 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



Noble Mobility has implemented acceptable working conditions as described in policy that covers e.g.

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;
- Adequate provision and maintenance of plant, 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;
- Upon investment 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 law;
- 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 code of conduct.

BUSINESS ETHICS



The **Noble Mobility** 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.

COMPLIANCE WITH LEGISLATION



The **Noble Mobility** organization 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



Originally being a transport company our environmental policy particularly focuses on prevention of pollution of air and ground and the limitation of noise and other nuisances. The environmental impact of the utilization of raw materials and energy is subject to full attention since packing and transport are the key elements of the moving industry. Our health & safety policy focuses on prevention of personal as well as materialistic accidents and injuries, either or not with environmental impact. Noble Mobility's is deploying a fleet of fuel efficient vehicles and equipment, aiming for reduction of air pollution by CO2 neutral emission.



Carrier selection for 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

Noble Mobility 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, Noble Mobility 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.



We are proud to say that we have committed ourselves with a sponsorship with Planet Urgence.

What does Planet Urgence do?

Planet Urgence aims to strengthen local communities while at the same time protecting nature. By sharing knowledge, educating people and receiving technical support, whole groups of people are given new chances. Planet Urgence offers help to these people by transferring local knowledge. Local partners are provided with support in the long-term. In addition, donations are made for projects in which natural environments can be restored, by planting trees and repairing the ecosystem.

Making the world greener.

Our company wants to make the world a greener, better place. For each home move we provide, Planet Urgence plants a tree. We consider this a crucial way of improving the environment for people living in vulnerable regions.

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 Noble Mobility 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.



ANTI-BRIBARY & CORRUPTION CHAPTER

1. INTRODUCTION

Our mission statement regarding bribery and corruption is clear;

- ✓ Bribery and corruption have been identified as one of the key factors that limit growth and contribute to inequality. By wrongly benefiting certain parties it limits competition, damages innovation and corrupts societies hence it is considered highly unethical and therefore against FIDI values.
- ✓ Not only is bribery and corruption wholly contrary to the FIDI values, it is also illegal. Bribery and corruption laws expect that companies will have pro-active measures in place to prevent and detect corrupt practice.

2. POLICY STATEMENT

Corrupt activity, bribery or attempted bribery is never acceptable, for legal, moral and ethical reasons, and it does not matter if someone is being bribed or doing the bribing.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and ready to implement and enforce effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

The laws that apply to particular international business activities include those of the countries in which the activities occur, as well as others that (like the U.S. FCPA & the UK Bribery Act) govern the international operations of national companies and citizens in respect of their conduct both at home and abroad. We as a FIDI affiliated company have to ensure that we are aware of, and are complying with, applicable laws.

Bribery and corruption are punishable for both companies and individuals and if we found to have taken part in bribery and/or corruption related activities the

company could face a serious fine, be excluded from tendering for contracts and face damages to its reputation. Moreover as a FIDI affiliated company we would damage the reputation of the whole FIDI organization and its members which is unacceptable. We therefore take our legal, moral and ethical responsibilities very seriously.

3. SCOPE

3.1 WHO IS COVERED BY THE CHARTER?

This Charter applies to all FIDI affiliated companies, all their employees (whether permanent, fixed-term or temporary) and all third parties who provide services to or on behalf of the FIDI affiliated company

3.2 BASIC RULES WE MUST ALL FOLLOW

NEVER

- ✓ Engage in any form of bribery, either directly or through any third party.
- ✓ Offer or make an improper payment, or authorize an improper payment (cash or otherwise) to a business contact or a local or foreign official anywhere in the world
- ✓ Attempt to induce a business contact or a local or foreign official to do something improper.
- ✓ Offer or receive money or anything of value, gifts, kickbacks or commission, in connection with the procurement of business or the award of contracts
- ✓ Offer or give any gift or hospitality to any public employee or government official or representatives
- ✓ Accept any gift of hospitality from our business partner if there is any suggestion that a return favour will be expected or implied.
- ✓ Facilitate payments to obtain a level of service which one would normally be entitled to.
- ✓ "Shrug off", disregard or fail to report any indication of improper payments
- ✓ Do anything to induce or assist someone else to break the rules
- ✓ "Look the other way"

4. NOBLE MOBILITY ADDAPTION OF THE POLICY

Noble Mobility and their operating companies has been distributing the policy effective 26 September 2014 among all employees and stakeholders. The manner of distribution will be:

- ✓ Employees have been informed by general e-mail of our updated CSR policy, to include a specific reference made on the update on the Anti Bribery and Corruption policy.
- ✓ Our policy will be repeated on a regular base during in-house trainings and corporate newsletters

- ✓ The policy is implemented in our SLA's for our partner network

ESCALATIONS

In case of an escalation we have to follow our escalation procedure.

CORRECTIVE ACTIONS

We sincerely Care about our employees, our customers and our move partners (& supply chain) world wide. As much as we Care about our business in General. Therefore we take breach or violation of the rules we have agreed upon very seriously.

Employees

All employees are expected to behave appropriately in the workplace. Corrective action is a process of communicating with the employee to improve unacceptable behavior after other methods such as coaching have not been successful.

Written Warning

If the HR officer gave an oral warning and the problem persists, a written warning may be warranted. This action may be used more than once, however if the problem continues to persist repetitive letters may not be the solution.

Suspension without Pay

A suspension may be the next step in progressive corrective action after written warning(s) and typically prevents an employee to work and is without pay for one to ten working days.

Dismissal

This action may be appropriate after performance counseling and progressive corrective action have failed to get the employee to correct the problem(s). Contact your Employee Relations Consultant for more information regarding this action.

If we believe that the conduct of an employee was seriously inappropriate and possibly criminal, we may request to speak to a police supervisor. This could result in the immediate investigation of the employee.

SUPPLY CHAIN

Our company will share any SLA non-conformances with our partners on a timely basis, and formally during review meetings held during the year. Repeating non-conformances may result in a 'plan of improvement'.

Repeated service failures may result in our restricting future work to the partner and deducting from invoices submitted fair compensation.

ANTI-Trust CHAPTER

Undertaking by all FIDI Affiliates with immediate effect All FIDI Affiliates commit to legal and ethical behaviour, and to refrain from engaging in any business that will harm the interests of FIDI, other affiliates, clients, or the industry.

Our company will take steps to ensure they are fully informed of applicable Anti-Trust laws and regulations in connection with cartel conduct and other Anti-Trust violations, and will monitor their employees and business partners to ensure full and continual compliance.

Legal compliance

Our company will ensure that they are aware of all applicable laws and regulations covering anticompetitive practices in all the jurisdictions in which they operate, and that they will obey and uphold those laws and regulations. We will ensure that they are aware of, and are complying with, applicable laws and regulations in connection with cartels.

Ethical behaviour

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zero tolerance approach to cartel conduct. At all times, FIDI and its Affiliates will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

Commitment to the values of FIDI

This Charter will be formally integrated into the FAIM quality standard.

Code of conduct

Our company agrees and committing to the Anti Trust Charter, with the following content:

1. Never make direct or indirect (via third parties including agents, suppliers or customers) contact with an actual or potential competitor or other third party, the object of which is to engage in cartel behaviour.
2. Never propose or reach an agreement, whether directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issues, including:
 - Fixing prices
 - Dividing or sharing markets, customers or territories

□ Rigging a competitive bidding process

3. Report any indication or initiative of improper anticompetitive business conduct by an actual or potential competitor in accordance to your internal reporting procedure, including but not limited to, reporting to your legal department and/or to the relevant Anti-Trust authorities.

4. Not to participate in a meeting of a trade association in which sensitive competition-related issues are discussed. If such subjects are raised during a meeting, employees of FIDI Affiliates must immediately ask for the discussion to end. If not, they must leave the meeting and ask for that to be noted in the minutes of the meeting.

5. Ensure that all internal and external correspondence, including e-mails and texts, and documents, discussions and public statements do not contain any statements that might be misinterpreted by third parties or Anti-Trust authorities and courts in the context of a potential Anti-Trust investigation.

6. Maintain independent judgment in pricing or selling of any products and/or services.

7. Limit any information discussed during commercial negotiations, with or disclosed to competitors or other third parties, to that which is strictly necessary for completing or assessing the transaction.