



Social Responsibility Policy Code of Conduct

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Dear All,

Global Moving Srl is fully committed to its Social Responsibility Policy towards all the company's stakeholders – customers, suppliers, employees and institutions.

Seeking the highest standards in term of ethics, business integrity and sustainability is part of our values and missions, beyond the expected compliance with local legislation and regulations. Therefore, it was natural for Global Moving Srl to become an active member of many Italian and international associations such as IAM, EURA, ATP, IMG.

Our industry is changing and will continue to change, especially after the COVID-19 world pandemic, so we need to continue improving, taking all the challenges as opportunities to make us better.

The implementation of our Quality Management System (QMS), which includes in particular the Social Responsibility Policy / Code of Conduct, the Anti-Bribery & Anti-Corruption Policy and the Anti-Trust Management, allows our company to document and improve our practices in order to better satisfy the needs and expectations of our staff, customers, supply chain and other interested parties.

I am convinced that Global Moving's success cannot be separated from the well-being of our communities and we cannot be successful without being compliant and responsible towards all our stakeholders.

I count on each of us to continue succeeding because Global Moving has, over the years, earned a solid reputation for integrity, which we are committed to maintaining. We will carry on business honestly and fairly, implementing our objectives of excellence and improving our Social Responsibility Policy as it is key for our future success.

Best regards,

Roberta Longhi

Owner & General Manager

About us

Global Moving was founded in 2005 with the collaboration of experts and professionals operating in the transportation and moving industry since 1982.

With offices in 5 different countries and correspondents worldwide, our company can boast of having a valid network operating all over the world.

Thanks to our experience and professionalism, we have obtained the International Shippers qualification.

Each move is managed by a “Moving Manager” that has at least 5 years of experience and that will follow you in all phases of the moving until its conclusion.

Our sustainable growth plan is designed to create longevity and stability for our company and a profitable association with our counterparts and partners.

We are a customer-focused, responsible business that meets the highest standards of ethical and professional behaviour, a great place to work where the safety and welfare of our staff is paramount.

Our company is built on four pillars which embody our values, define who we are and how we want to work:

Proven Excellence

We provide our customers with the best and consolidated solutions, ensured by the expertise of our employees.

Associated values: Quality, Professionalism and Reliability.

Teamwork

We work hand in hand with our customers and encourage teamwork throughout the company. We listen to our customers to understand and meet their needs.

Associated values: Client proximity, Collective performance and Trust.

Responsibility

We respect and trust each other and achieve more by working together across the industry. We care for and protect each other, our business and our environment.

Associated values: Commitment, People development and Personal fulfilment

Visionary

We are always aware of what is happening in the world around us.

We strive to develop new ideas and continuously improve the way we do business.

Associated values: Agility, Openness and Integrity

Our vision

Global Moving Srl strives to deliver comprehensive national and international removal services through continuous improvement, reinvestment, professionalism and the dedication of its employees.

Our mission

Every move is a commitment made towards our customers.

Purpose of this Code: Governing Rules for All

The purpose of this Social Social Responsibility / Code of Conduct (the “Code”) is to establish a set of governing principles applicable to Global Moving Srl (managers and employees) and their different stakeholders i.e. customers, suppliers, contractors, business partners and shareholders (the “Business Partners”).

This Code should be referred to as a decision-making tool. It however only provides a framework and is not intended to set a detailed and exhaustive list of all rules that govern the Company’s activities.

It is the responsibility of each Global Moving Srl employee to comply with the Code and act ethically in their day-to-day activities to sustain the company global reputation.

Business Partners are expected to adhere to the Code and apply standards that are equivalent to Global Moving’s principles.

This Code is available on our website, as well as the corresponding policies.

In addition, all applicable codes, policies and procedures are available to Global Moving Srl employees on internally-shared platforms.

Managers and the Code

Managers are responsible for ensuring that this Code and any applicable supplemental policy or procedure are applied within their own area and thereby demonstrate, in case an incident occurs, their determination to solve any non-compliance issue. Managers however should not take action on their own on sensitive and potentially serious matters; they should advise their own manager of any such non-compliance issue, who will in turn handle the issue, strive to identify the cause and prevent any recurrence.

Global Moving’s Compliance Department

The Chief Compliance Officer (CCO) is responsible for overseeing the promotion, roll-out and proper implementation of the rules arising from this Code. The Chief Compliance Officer is appointed by the Global Moving’s CEO and reports to the same.

The Chief Executive Officer and the CEO are committed to making this mission successful by providing the Chief Compliance Officer and his team with the necessary means to seek continuous improvement and allowing him to perform this mission independently.

Commitments & Policies

1. Compliance & Ethics

Global Moving Srl is fully committed to its Social Responsibility Policy towards all of its Business Partners. Therefore, beyond the expected compliance with local legislation and regulations, Global Moving Srl strongly believes that seeking the highest standards in terms of ethics, business integrity and sustainability is its responsibility.

In this respect, our employees, who in addition may be considered by third parties as representing Global Moving Srl at any time, even in the private sphere (including their personal social network accounts), are expected to comply with these highest standards at any time.

2. Human Rights

Global Moving Srl has a duty to respect and promote internationally recognised human rights, both internally and with its Business Partners.

Global Moving Srl is committed to defending diversity, to prohibiting any kind of discrimination and to promoting health and safety principles. Moreover, Global Moving Srl favours the selection of its Business Partners on the basis of their ability to comply with the Code and in particular with Global Moving Srl 's Human Rights commitments set in the paragraph 2 of this Code and to apply them to their own employees as well as to their subcontractors and next-tier suppliers.

2.1 - Human Rights and Workplace

2.1.1 - Prohibition of Child Labour

The use of child labour in the manufacture of products or the provision of services in ways that are illegal, socially unacceptable or lead to a child losing his or her educational opportunities is not tolerated.

Global Moving Srl works towards the elimination of child labour and believes that societies that permit child labour are jeopardizing their future and that of future generations. In order to contribute to their education, young workers are admitted from the minimum age permitted by law for internship and apprenticeship. Internship and apprenticeship contracts are used only for contributing to the education of young workers which working hours and remuneration comply with local laws.

2.1.2 - Forced and compulsory Labour

Global Moving Srl does not tolerate the use of convict, indentured, slave, bonded, or other Forced Labour, including human trafficking, either directly or indirectly, by its Business Partners, or by any subcontractors utilised by its Business Partners.

This includes transporting, harbouring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

All employees, both foreign and national, must be treated equally, and will not be required to pay fees to agencies or the Company in exchange for employment.

2.1.3 - Working time

Global Moving Srl recognises the right to rest and leisure and therefore complies with local laws, regulation and/or local customs with regards to working overtime hours.

2.1.4 - Fair Wages and Benefits

Global Moving Srl compensates its employees fairly, taking into account the country and industry standards, in compliance with wage and working time applicable laws, in particular, the minimum wage ones.

2.2 - Human Rights and Labour Relations

Global Moving Srl undertakes to contribute to all statutory social security and welfare funds to which employers and/or employees are required by applicable laws to contribute, including industrial injury insurance, pension and unemployment funds.

2.2.1 - Freedom of opinion and expression

Global Moving Srl recognises that by virtue of international Human Rights standards, every individual has the right to freedom of opinion and expression. The right to freedom of expression guarantees that no one should be harassed on account of their opinions. Global Moving Srl recognises the freedom of association for all its employees and does not interfere with employees' rights to form or join any workers' organization to protect their interests in the workplace.

2.2.2 - Promotion of social dialogue

Global Moving Srl encourages Collective Bargaining and is committed to facilitating and maintaining the Collective Bargaining process in good faith.

2.2.3 - Intolerance of discrimination

Global Moving Srl strives to create an environment free of any discrimination in the treatment of individuals, based on criteria other than competencies and aptitudes.

2.3 - Human Rights and Political or Religious Activities

Global Moving Srl recognises the rights individuals have to take part in political or religious activities. Global Moving Srl expects its employees to clearly indicate that they do not represent Global Moving Srl and to inform their manager in the event a conflict of interest may arise from these activities. Global Moving Srl maintains a neutral position with respect to politics and religion and any contributions to political or religious activities on behalf of Global Moving Srl is forbidden. Any Human Rights issue should be disclosed and reported by Global Moving Srl employees to their managers.

3. Data Protection

Global Moving Srl complies with all applicable privacy and data protection laws, wherever it does business.

Employees who have access to Personal Data shall be only those whose function and responsibility specifically include the handling of Personal Data; the right of access is restricted according to the nature and scope of the individual function and responsibility.

Global Moving Srl does not communicate personal information to third parties, except to the extent necessary and permitted by applicable laws or regulations.

Any personal information Global Moving Srl collects is treated with care, protected and used lawfully and properly.

4. Assets, Intellectual Property and Information Security

Global Moving Srl is a world-class removal services provider. In this respect, preserving, protecting and responsibly using company's assets, including intellectual property is essential to remain competitive and serve the interests of the company and its shareholders.

Global Moving Srl expects its employees to strictly comply with the internal policies and take all necessary steps to preserve and protect its intellectual property and more generally any Global Moving Srl know-how and confidential information.

Confidentiality obligations are further detailed in the employment agreements and/or Global Moving's internal rules. In particular, Global Moving Srl provides employees with a non-exhaustive list of measures to protect information and resources and steps to take in case of an incident.

5. Financial and Accounting records

Global Moving's Financial and Accounting records serve as a basis for managing its business and are essential in fulfilling its responsibility to Global Moving's shareholders and other Business Partners.

They also are necessary for preparing the financial statements, accounting and tax filings and financial documents that the company has to make publicly available, when applicable.

Global Moving Srl is committed to maintaining accurate, timely and complete Financial records.

6. Health, Security and Environment

6.1 - Health and Security

Global Moving Srl strives to provide a safe and healthy work environment for its employees.

Every effort is made to ensure that risks of accidents, injury and exposure to health risks are minimized. It recognizes that providing a safe and healthy work environment is fundamental to a productive and competitive work environment.

Global Moving Srl is committed to providing a secure work environment, where employees are not encumbered by concerns for their personal safety or security due to internal or external threats.

6.2 - Environment

Global Moving Srl is committed to minimising the environmental impact of our day-to-day operations and continually improves its energy efficiencies and waste management. We recognise the need to protect the natural environment and believe that keeping our environment clean and unpolluted is a benefit to all.

We'll always follow best practices when disposing of waste and, apart from our legal obligations, Global Moving Srl will proactively protect the environment. We encourage all our employees to consider our environment at all times, we actively promote recycling in all communal areas.

Global Moving Srl is engaged in optimising the use of resources in its products and service processes, reducing the impacts on the environment and reinforcing its environmental management system in order to contribute to a better future for next generations.

Global Moving Srl has established a policy which aims to control and minimise the environmental impacts of its activities and is committed to a social and environmental responsibility shared approach.

Global Moving Srl expects its employees to comply with its environmental management principles.

7. Conflicts of Interests

A conflict of interests is a situation where the personal interest of an employee may be or may appear to be, directly or indirectly, in a potential or actual conflict with his or her job's responsibilities and/or the interests of Global Moving Srl.

Situations where the personal interests of an employee could inappropriately influence or appear to influence their business judgement may hurt the reputation and business of Global Moving Srl and should be avoided.

Global Moving's employees are expected to make business decisions that are based solely on Global Moving's best interest and prohibited from entering into any conflict of interests.

Conflicts or potential conflicts of interests should be disclosed and reported by employees without delay to their manager.

8. Committing to professionalism and quality

Global Moving Srl considers both customers and suppliers as valuable partners and Global Moving's decisions aim at enhancing their satisfaction and long-term relationships with Global Moving Srl.

Global Moving Srl is committed to supplying services to its customers which meet their expectations of quality, integrity and reliability and constantly improving its practices and methods with a high standard of innovation and safety.

The quality of Global Moving's relationships with its customers and suppliers is essential to Global Moving's success.

Global Moving Srl and all employees must look to work with Business Partners who demonstrate strong business values, ethical principles and support Global Moving's commitment to quality.

Professionalism ensures the ability of Global Moving's businesses and relationships to grow and thrive.

9. Antitrust and Competition Laws

Competition and Antitrust laws are intended to ensure free and fair competition between companies on the market.

Their violation may result in important fines and damages both for the individuals and the enterprise involved.

Global Moving Srl is committed to free and fair competition and expects its employees and Business Partners to abide by the same rules.

In particular, Global Moving Srl undertakes not to participate in cartels fixing prices, agreements on quotas, production or sales, or more generally, any unfair practices which impede free competition, in particular those intending to oust a competitor from the market or restrict access by new competitors to markets by unlawful means.

10. Anti-Bribery Laws and Anti-Money Laundering

10.1 - Anti-Bribery Laws

Bribery is a widespread phenomenon in international business transactions, including trade and investment, which raises serious moral and political concerns, undermines good governance and economic development, and distorts fair competitive conditions.

Global Moving Srl fights corruption in any form, including influence-peddling, whether it is active or passive, direct or indirect, or private or public and has decided to define a specific policy on this matter.

All Global Moving Srl employees, as well as any party acting on behalf of Global Moving Srl, are prohibited from making or accepting, offering to make or accept, or promising to make or accept any bribery whether or not any benefit is actually received.

No bribe may be provided, offered to or accepted from any person in exchange for recommending, purchasing, supplying or administering Global Moving's services or for a commitment to continue to do so. Nothing may be offered, provided or accepted in a manner or on conditions that would have an inappropriate influence on a person's action or conduct, or that would create the appearance of doing so.

Employees and any party acting on behalf of Global Moving Srl should not appear as unduly influencing suppliers, customers or government officials in any way.

Employees are not permitted to accept any gift or gratuity/invitation from customers or suppliers in any form whatsoever (in particular, amounts of money, merchandise, services, entertainment, or travel) except where the gift or gratuity/invitation is of a token value.

Global Moving Srl favours the selection of its Business Partners on the basis of their ability and commitments to comply with anti-corruption principles set in this Code and the Global Moving Srl Anti-Bribery Policy.

Global Moving Srl Anti-Bribery Policy provides further details to assist employees in identifying potential corruption issues, recommendations and procedures to comply with applicable internal rules and laws and selection processes for Business Partners.

10.2 - Anti-Money Laundering

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin.

Global Moving Srl is committed to complying with all applicable anti-money laundering laws and to answer to any legitimate request of information on this basis.

In compliance with applicable anti-money laundering laws, Global Moving Srl conducts business with reputable Business Partners and undertakes to conduct due diligence aiming at verifying the origin of funds.

Glossary

Confidential Information shall mean all information of whatever kind or nature, which belongs to Global Moving Srl: information not disclosed to public about technology (including Intellectual property or trade secrets, clients, business plans, promotion and marketing, finance and others activities). Confidential Information may include confidential or proprietary information of third parties.

Collective Bargaining process is a voluntary process that determines terms and conditions of work and establishes the effective working relationship between management, employees and unions.

Financial and Accounting records may be the books of account, budget proposals, economic evaluation for projects and the like.

Forced Labour refers to any kind of work or service (forced and compulsory labour, prison labour, slavery...) exacted from an individual under the threat of any penalty, violence (physical or mental) or punishment and for which the individual did not volunteer.

Personal Data refers to any information that can be used to identify an individual, whether directly or indirectly.

For instance, name, date of birth, social security number, photograph, location data, email address, IP address are personal data.

