

Code of Conduct for Service Partners



A General Statement

Please read this document carefully as we are asking for your signed acknowledgement of your commitment to comply with its content. If you are unable to make such a commitment, this will mean that we are unlikely to engage with you as a service partner.

“We have a set of Business Values that are founded upon our intent to act with honesty and integrity in all our business dealings. It is important to us that you share our commitment to treat everyone in a manner that creates a favourable and lasting perception of Crown Worldwide Group.

Remember, your conduct is our reputation. Please uphold it by conducting business in a legally compliant, ethical and courteous manner.”

Stuart Lawson
Global Alliance Manager

A commitment to service excellence is fundamental to the philosophy of Crown Worldwide Group. This commitment requires us to share our objectives, and those of our customers, with those organisations who work with us in the provision of service.

One essential objective is to uphold the highest ethical standards in all our business relationships. These standards apply to every marketplace where Crown is engaged in service delivery.

Our Code of Conduct serves to strengthen Crown’s ethical climate and provides basic guidelines for situations that challenge our adherence to it.

It is the policy of Crown Worldwide Group to:

- comply with all applicable legislation in all territories including, without limitation, employment discrimination, health, safety, securities and environmental laws
- take a zero-tolerance approach to bribery and corruption and adhere to the most stringent legislation relating to it
- conduct all our business with honesty, truthfulness, transparency and integrity

No director, officer, executive, or manager of Crown has the authority to violate any law or direct an employee or any other person to violate any law on behalf of Crown.

Our partners will be held responsible for observance of our Code of Conduct. If any partner has questions about any section of our Code of Conduct, they should be directed to Crown local, regional or group management. If a partner becomes aware that either they, or another partner, or a Crown employee, has violated the Code, they are obligated to report it in accordance with procedures contained within these guidelines. No one has the authority to retaliate against a partner who reports a possible violation.

Our partners are expected to behave in accordance with the guidance expressed in the following pages of this document. Failure to comply with our Code of Conduct will leave a partner liable to suspension and possible termination of our business relationship.

Guidance to Crown Partners

- **No Bribes**

You must not offer, request, promise, provide, or accept bribes, kickbacks, or other payments of anything of value which could improperly influence anyone's performance of their duties, whether in government or the private sector. "Anything of value" could include, but is not limited to, cash, gifts, loans, services, entertainment, meals, travel, favors, and intangible benefits, like hiring someone's relative or donating to his or her favorite charity. Prohibited payments may not be made or received directly or indirectly, including through third parties.

- **No Facilitation or "Grease" Payments**

These are payments of cash or anything else of value to a government official to secure or speed routine, nondiscretionary actions, like issuing permits or releasing goods in customs. Crown Worldwide Group prohibits them, even when small or customary, and despite the potential business consequences of not paying.

- **Providing Gifts, Entertainment, Meals and Hosting to Third Parties**

Most Service Partners will have no reason, in their work for Crown, to provide gifts, entertainment or meals to third parties (including government officials), or to pay these parties' travel, lodging or other hosting expenses. When legitimately required (in rare cases), these expenditures must be modest in value, infrequent, appropriately timed and compliant with the law and any agreement you have with Crown. They must never affect or appear to affect impartial decision-making.

- **Offering Things of Value to Crown Employees**

The same principles apply to things of value that you may provide to Crown personnel. Crown limits the value and frequency of things its employees (including their families) may accept from Service Partners, and often requires them to disclose such offers or their acceptance. Crown prohibits its personnel from requesting or using their position at Crown to obtain things of value from Service Partners, or otherwise allowing their personal interests to conflict with duties to Crown. Things of value provided to Crown employees also may not be charged or invoiced to Crown unless expressly permitted by your agreement or contract (if any) with Crown.

- **Donations and Political Contributions**

Donations or sponsorships, even well-intentioned ones, can present anti-bribery and corruption risks. You must not make them in connection with work for Crown unless expressly allowed in your agreement/contract with Crown. Under no circumstances may you make political contributions in your work for Crown.

- **Money Laundering and Illicit Finance**

Crown does not tolerate money-laundering or illicit finance, and complies with all relevant laws and regulations in every jurisdiction where Crown does business. Failure to report or detect money laundering or illicit finance can result in severe criminal, civil and reputational penalties to both you and Crown.

- **Records, Controls and Audits**

You must keep records which, in reasonable detail, accurately reflect payments and other transactions that you make on behalf of Crown. We may ask you to substantiate any payment made to a third party in the provision of service to Crown and our customers. As part of your agreement with Crown, we reserve the right to carry out audits.

- **Crown Employee Interests in Partners**

Crown's employees are expressly forbidden from having any financial interest in a partner or supplier where that employee or his/her subordinates have direct or indirect dealings with that partner. Any partner found to be offering such financial interest to Crown employees will be suspended and if, following investigation, evidence is found to substantiate such an offer, their service will be terminated.

- **Crown Employees doing work for Service Partners**

Crown's employees are forbidden from participating in "freelance" or "moonlighting" activities that will materially encroach upon their work for Crown. Accordingly, partners must not offer such opportunities to Crown staff.

- **Using Crown Property and Information**

In certain instances, partners may be given access to Crown physical property or resources, as well as its proprietary and other confidential information. Our expectations of partners in those circumstances are identical to those of our employees. All Crown-owned resources (including vehicles) must be properly taken care of and utilized diligently and as approved by Crown.

- **Company Name**

As a partner to Crown, you will identify yourself to customers in accordance with the brand name used by the division you partner (e.g. Crown World Mobility, Crown Relocations, Crown Fine Art, Crown Records Management or Crown Logistics). If you are in any doubt as to which name to use, please check with your Crown contact.

- **Crown Property and Facilities**

Crown property, facilities or physical resources may not be used for solicitation or distribution activities which are not related to a partner's services to Crown and its customers, except for charitable activities that have been given Crown written approval. Partners must not solicit Crown employees for any purposes on Crown facilities. This prohibition includes chain and solicitation e-mails.

Any partner found to be engaging in, or attempting, theft of any property of Crown including documents, equipment, personal property of Crown employees and/or Crown customers' possessions, intellectual property or any items of monetary value will be liable to summary dismissal and possible criminal proceedings.

It is the responsibility of all partners to report any theft or attempted theft of Crown property by anyone to Crown management.

- **Data Privacy**

Crown is fully aware of the dangers of identity theft. Therefore, Crown believes in the absolute preservation and safety of customer data. It is a partner's responsibility to ensure that data given to them by

Crown is secured and that any breach or loss of such data is reported to Crown immediately. A partner that violates Crown Data Privacy or any related legislation will be forbidden to carry out any work for Crown and/or will face legal liability.

- **Crown Proprietary and Other Confidential Information**

In working with Crown, a partner will sign an agreement that requires business confidentiality to be maintained at all times. Failure to adhere to our partner agreement on this basis will mean that we cannot work with you again.

- **Trademarks, Service Marks and Copyrights**

Trademarks or service marks are words, slogans, symbols, logos or other devices used to identify a particular type of goods or services. They are important business tools and valuable assets which require care in their use and treatment. Partners are not permitted to amend or enter into any agreement respecting Crown's trademarks, service marks or logos. Crown respects the trademark rights of others and will not use, or make any amendment to, a partner's mark.

Partners must avoid the unauthorized use of copyrighted material belonging to others in the provision of information to Crown or our customers. All copies of work that is authorized for distribution to the public (including machine-readable works such as computer software), must bear the prescribed form of copyright notice.

- **Social Media Activities**

We respect a partner's membership of social media such as Facebook, MySpace and LinkedIn. Partners are cautioned that once they list Crown as a client or customer on a public website, they become ambassadors for Crown on the internet. To that extent, partners must engage only in appropriate activities and communication on the internet. No partner is authorised to make any public statement on behalf of Crown. Any activity deemed to be harmful to Crown's reputation by association may result in the termination of our partner agreement.

Relationships with Public Officials

Some Crown partners do business with federal, state or local government agencies. All partners engaged in business with a governmental body or agency must know and abide by the specific rules and regulations covering relations with public agencies. Employees of partners must conduct themselves in such a manner that avoids any dealings that might be perceived as attempts to influence public officials in the performance of their official duties.



Legislation

Anti-Bribery and Corruption

Laws and customs vary throughout the world but all partners must uphold the integrity of Crown in every nation as diligently as they do in their home territories. When conducting business, it is imperative that every partner be sensitive to both foreign and local operations and laws that apply to foreign operations, including the UK Bribery Act, the Foreign Corrupt Practices Act and the equivalent laws in various countries.

The UK Bribery Act and the Foreign Corrupt Practices Act make it generally unlawful to give anything of value to foreign government officials, foreign political parties, party officials or candidates for public office for the purpose of obtaining or retaining business on behalf of Crown.

All Crown partners must abide by the various import and export laws imposed in the countries where Crown is doing business through its partner population, as well as by international law. Crown is a law-abiding company – if ever in doubt, please contact us or seek legal counsel before doing anything that may break the law.

In order to support the understanding of our Partners on this issue, Crown provides an e-learning course that can be accessed through its partner website: www.workingwithcrown.com. Taking this course is a mandatory requirement for partners in certain locations or where risk of non-compliance is heightened due to the type of service being provided.

Securities Laws

“Insider Trading” is the purchase or sale of a publicly-quoted security whilst in possession of important, non-public information about the issuer of the security. It is forbidden by Securities laws. As a result, Crown forbids its employees from using such information or from practising in ‘tipping’ such information to third parties that they might gain through their involvement with our clients. Whilst it would be unusual for any of our partners to come across such information about our clients, the rules apply equally to those who work with us in providing services.

Employment

We expect our partners to support our commitment to fostering working environments that:

- treat individuals with dignity and respect
- permit employees to work in a business-like atmosphere that prohibits discriminatory practices, including harassment and prejudice on the basis of race, gender, religion, color, national origin, sex, age, disability, or any other status protected by law
- prevent the employment of children and under-age labourers in the performance of any working activity
- comply with all applicable wage and hour laws and other statutes regulating the employee-employer relationship and the working environment
- provide a safe workplace for all employees. Any partner working at a Crown location must adhere to all safety instructions and procedures that Crown adopts

Security and Safety

Crown expects Partners to share its commitment to providing a safe workplace for employees. In addition, several laws and regulations impose responsibility upon Crown to safeguard against safety and health hazards. For that reason, and to protect themselves and others, Service Partners who are present at Crown facilities are required to follow carefully all safety instructions and procedures that Crown adopts. Questions about any possible health and safety hazards at a Crown site must be directed immediately to Crown management.

Mindful of the harmful effects of smoking and second hand smoke, all Crown offices and warehouses are designated “smoke free facilities” 24 hours a day. Partners visiting Crown locations must adhere to this policy.



Environmental Protection

Crown is committed to the preservation of our natural environment. We expect our partners to share our commitment by conducting business activities that:

- conserve and improve efficient use of energy and fuel;
- reduce waste and pollution; use recyclable materials and limit the use of non-biodegradables.
- re-use and recycle paper, plastic, glass, printer cartridges and other recyclables;
- safely dispose of batteries, IT equipment and other hazardous materials;
- continuously improve performance in the above and any other material impacts;
- communicate the importance of the above to partners' own employees.

Crown will provide guidance on best practices, where appropriate.



Compliance with the Code

We expect all our partners to understand the guidance under our Code of Conduct. If a partner has any doubts or concerns about the Code, they should, in the first instance, address the matter with their Crown contact.

In addition, we expect every partner to perform their work on behalf of Crown with honesty and integrity in any areas not specifically covered by our guidance. A violation of the Code may result in the partner being removed from service provision. We expect our Code to be communicated to all employees of partners who provide services to our customers.

If you are in any doubt about a course of action you intend to take, objectively ask yourself the following questions:

1. Is it against Crown's Code or Values?
2. Is it against the law?
3. Would you be embarrassed if others knew what you did?
4. Is there a less controversial course of action?
5. Have you discussed it with Crown?

General Policy

To assist in the administration of the Code of Conduct, the company has empowered the Group Risk Officer to enforce this code. Crown expects partners to bring to the attention of the Group Risk Officer (or any of the people he/she designates), information about suspected violations of the Code of Conduct or any law in the performance of work on behalf of Crown or by an employee of Crown.



Reporting – Let Us Know!

We understand that speaking up about unethical behavior takes courage, but it also protects you, Crown, our clients and communities. No matter how you decide to raise a concern, the following principles will always apply:

- Let us know as soon as possible. Waiting to report can often make a situation worse
- Stay anonymous. You have the right to protect your identity.
- Respect confidentiality. Your identity and any information learned from you will remain confidential – but that means you musn't share that information with anyone else.

To enable partners to anonymously report such suspected violations, Crown has established a reporting mechanism through its partner website: www.workingwithcrown.com. Crown will treat any information provided in a confidential manner and will ensure that no acts of retribution or retaliation shall be perpetrated against the reporting partner.

Because failure to report suspected criminal activity can be considered as condoning a crime, we emphasize the importance of reporting. Failure to report knowledge of wrong-doing may result in the termination of our partner agreement.

Conclusion

By complying with this Code of Conduct, you are helping to provide a uniform and consistently excellent standard of service whilst upholding high standards of integrity. Your relationship with Crown is based upon the highest mutual regard and a partnership that embodies honesty, fair dealings and ethical conduct. If you should ever have an ethical question or concern, please do not hesitate to Let Us Know using the available Crown resources.

Please indicate that you have received, read and will abide by the Code of Conduct for Service Partners by signing your name and dating the acknowledgement below and returning it promptly to your Crown contact.

Acknowledgement:

I certify that I have received, read and will abide by the Code of Conduct for Service Partners provided to me on ____ 201__

Signature:

Print your name



