



INTERNATIONAL REMOVALS, RELOCATIONS & STORAGE

**DELAHAYEMOVING**

DEMENAGEMENTS INTERNATIONAUX & GARDE-MEUBLES



# Code of Conduct

**Version : 2020 05**

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## **1. Introduction**

The Delahaye Moving Code of Conduct complements the staff handbook and describes the types of behaviour that are expected from all employees working for Delahaye Moving, whether at work or outside of office hours. The Delahaye Moving code of conduct intends to incorporate the various elements of the BAR code of practice as well as the FIDI code of conduct that relate to its employees conduct.

## **2. Mission Statement**

Delahaye Moving is committed to provide a working environment to its employees that is safe, free from any form of harassment and where everyone has equal opportunities. Delahaye Moving expects its employees to respect its values when dealing with each other, with our customers, our suppliers, and other associates

## **3. Roles and responsibilities**

Everyone who works directly or indirectly for Delahaye Moving is responsible for the compliance of all employees and people otherwise employed by Delahaye Moving with the Delahaye Moving Code of Conduct.

Any concern regarding compliance with the Delahaye Moving Code of Conduct should be raised first with the Branch Manager and, if required, can be escalated to the CEO. Concerns and complaints will be dealt with in an appropriate way.

## **4. General Employee Conduct**

Delahaye Moving expects its employees to conduct themselves in a business-like manner. Drinking, gambling, fighting, swearing and similar unprofessional activities are strictly prohibited when on the job.

Employees must not engage in any form of harassment, or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials on their computer.

Employees must strive to be fair and objective in their advice and actions.

Delahaye Moving will not tolerate any form of harassment being by age, gender, race, religion, personal disability, or colour.

## **5. Confidentiality**

Delahaye Moving and its employees are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past clients, both in terms of normal commercial confidentiality, and the protection of all personal information received during the provision of the business services concerned. We extend the same standards to all our customers, suppliers, and associates. Delahaye Moving

has a data protection policy that must be adhered to during and upon completion of employment by Delahaye Moving.

## **6. Ethics**

Delahaye Moving and its employees always conduct our own services honestly and honourably and expect our clients and suppliers to do the same. The provision of our services takes proper account of ethical considerations, and business is conducted with honesty, integrity, and transparency. We respect the law in all our dealings.

Delahaye Moving does not knowingly misrepresent facts concerning any aspect of a transaction; all communication (including any marketing material) is clear, legal, truthful, and transparent.

## **7. Payments**

Delahaye Moving respects its suppliers' need for timely payment. For smaller suppliers Delahaye Moving wants to be supportive and responsive to their cash flow needs.

## **8. Intellectual Property & Moral Rights.**

We will respect the intellectual property and moral rights (such as copyright) of others and pay for all licences and permissions that are required by law.

## **9. Conflict of interest**

Delahaye Moving expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of Delahaye Moving.

Employees must not use their positions, or the knowledge gained because of their positions for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with Delahaye Moving or its customers, they should immediately communicate all the facts to their Branch manager.

## **10. Outside Activities, Employment, and Directorships:**

All employees share a serious responsibility for Delahaye Moving's good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to Delahaye Moving and is encouraged.

Employees must, however, avoid acquiring any business interest or participating in any other activity outside Delahaye Moving that would, or would appear to:

- Create an excessive demand upon their time and attention, thus depriving Delahaye Moving of their best efforts on the job.

- Create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in the Delahaye Moving's best interest.

## **11. Quotes**

Our quotes will usually be in the form of a detailed proposal, including aims, activities, costs, timescales, and deliverables. The quality of our service and the value of our support provide the only true basis for continuity. We do not hide surpluses in our quotes and our quotes are always competitive for what we provide, which is a high quality, tailored, specialised service. As such we do not generally offer arbitrary discounts; generally, a reduction in price is only enabled by reducing the level or extent of services to be delivered. That said, we always try to propose solutions which accommodate our clients' available budgets and timescales.

## **12. Professional conduct**

We conduct all our activities professionally and with integrity. We take great care to be completely objective in our judgement and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our clients.

We use language our customers understand. We identify and highlight the circumstances under which any additional charges may arise and any clauses that may impact our customer as limits of liability and the procedures for making claims.

Providing service which exceeds the expectations of our customers is central to our aspirations and culture. We cannot know whether we are succeeding without measuring our performance.

We cannot improve our performance without feedback into training and methodology.

We will therefore maintain the quality of what we do through constant and ongoing training and appraisal and incentivisation programmes, which in turn will enable and encourage employees to perform their roles safely and competently and to develop their full potential.

We will consult our customers to understand whether our performance has fulfilled their expectations and how we may improve it. When we get things wrong, whether through loss or damage to property or through failure to please, we will carefully review and identify the reasons and either modify our operating procedures or re-train our operators. If we made a mistake resulting in a loss for our customers, we will fairly and promptly compensate our customers.

We will comply with worldwide rules and regulations regarding anti-bribery and corruption, and in particular will not do anything that would constitute an offence under the US Bribery act 2010 or the US Foreign Corrupt Practices Act or any other applicable laws, regulation and codes relating to anti-bribery, anti-corruption and anti-money laundering.

### 13. Equality and discrimination

We always strive to be fair and objective in our advice and actions, and we are never influenced in our decisions, actions, or recommendations by issues of gender, race, creed, colour, age or personal disability.

### 14. Gifts an Entertainment

Delahaye Moving and its staff do not use gifts and entertainment to gain a customer's business or to give a supplier a benefit over another supplier. While it is Delahaye Moving's policy not to engage in customer or supplier entertaining the following gifts and entertainment are acceptable:

#### Customers

**Meals** - Sometimes a Customer can be treated to a drink or a meal to discuss business in a more relaxed environment, in a bid to secure or retain a deal. This should be at an appropriate expense level. If you are unclear what appropriate is, ask yourself if you would pay the bill yourself if entertaining a friend.

**Champagne** - As part of Delahaye "Welcome home pack" a bottle of champagne is given to the Customer once the move is completed.

**Flowers** – Can be an alternative for the Champagne, as part of the "Welcome home pack" or when the move has not been "perfect" .....to say "sorry".....

**Christmas** - Some customers may receive Champagne or Chocolates for Christmas or similar occasions. All such gifts are to be approved by the Branch Manager and / or CEO.

#### Suppliers

Suppliers and subcontractors do not receive any gifts of any kind from the Company.

It is not the company's policy to encourage gifts from suppliers, however some suppliers and agents may show their appreciation by bringing small gifts to the office (such as calendars, bottles of wines or champagne, chocolates .....). Members of staff receiving those gifts are required to:

- Thank the supplier in writing; suppliers and agents must be sent a "Thank you" mail or card to acknowledge the present.
- Handover the gift; all gifts are for sharing among staff. We are a team and all contribute, not just those who deal directly with suppliers

Similarly, as Delahaye Moving does not encourage gifts from suppliers and agents it does not encourage entertainment from them. If, for any reason you would be invited for a drink or a meal by a supplier or an agent it is to be under the same guidelines that apply for Delahaye Moving to entertain its customers and at no point in time should this result in some kind of benefit for the supplier or agent above those that can be expected from a good relationship.

## **Exceptions**

Exceptions to these gifts and entertainment may be agreed by the CEO if presented in writing (e-mail, memo...). In the absence of any approval for out of policy expenditure, the cost will be bore entirely by the employee making the decision.

## **15. BAR code of practice**

Delahaye Moving is a member of the BAR and the BAR overseas group. As such our conduct needs to be compliant with the BAR code of practice. This code of practice is integrated in our staff handbook and company policies which are reviewed regularly to ensure compliance with changes in guidance from BAR.

## **16. FIDI Anti-Trust, Anti-Bribery and Anti-Corruption Charters**

Delahaye Moving is a member of the FIDI association of international movers and operates in compliance with all FIDI quality standards.

The FIDI Anti-Trust, Anti-Bribery and Anti-Corruption Charters, annexed to the present Code of Conduct is to be adhered to be by all Delahaye Moving employees during the time of their employment with Delahaye Moving.

## **17. Attachments**

- a. FIDI Anti-Trust charter
- b. FIDI Anti-Bribery and Anti-Corruption Charter

## 18. Attachment: The FIDI Anti-Trust charter

### FIDI Anti-Trust Charter

Compliance with the FIDI Anti-Trust Charter (ATC) is a mandatory requirement for all FIDI Affiliates.

FIDI Delegates from all FIDI Associations unanimously approved the ATC document during the FIDI Extra-Ordinary General Assembly in Long Beach on 8 October 2017. To download the full Charter, please click on the link at the end of this page.

#### Leading the Fight Against Cartels

FIDI supports the adoption of Anti-Trust compliance programs by its Affiliates. In this connection, FIDI is determined to support the fight against cartels, which restrict competition among suppliers to the detriment of customers.

#### Background

Membership in FIDI is highly valued by its Affiliates, and to ensure that value continues, all FIDI Affiliates pledge to abide by the highest ethical standards and to free and fair competition.

The Anti-Trust Charter is a declaration of commitment. It will strengthen the FIDI organisation, the FAIM programme, and all Affiliates by making it clear what distinguishes FIDI Affiliates from non-FIDI companies.

All FIDI Affiliates agree to sign and be guided by the provisions of the Anti-Trust Charter. The Anti-Trust Charter covers their employees (whether permanent, fixed-term or temporary) and any associated third parties providing services to or on behalf of the FIDI Affiliates. The Anti-Trust Charter will be integrated into FAIM. The procedural and audit requirements will form part of the FAIM Implementation Manual and the Pre-Audit assessment.

#### What Is a Cartel?

A cartel is an agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition.

A cartel is regarded as the most egregious violation of Anti-Trust laws in most jurisdictions, which may lead to the imposition of significant fines as well as, in certain jurisdictions, criminal penalties.

#### FIDI Will Not Tolerate Cartel Conduct

FIDI respects the Anti-Trust laws and regulations in the countries in which it operates and requires that its Affiliates do the same. Involvement in a cartel is unacceptable. It is against FIDI's core values of competing freely and fairly, based on the added value of its products and services.

The laws and regulations that sanction cartel conduct are in place in most jurisdictions. These laws and regulations are designed to promote free and fair competition and to protect consumers. Anti-Trust compliance programs are in place to detect and prevent cartels.

#### Charter Statement

##### 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. FIDI and its Affiliates 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

FIDI Affiliates 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.

FIDI affiliated companies 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**

**By agreeing and committing to this Charter, each FIDI Affiliate undertakes to:**

- 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.
- 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:
  - o Fixing prices
  - o Dividing or sharing markets, customers or territories
  - o Rigging a competitive bidding process.
- 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.
- 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.
- 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.
- Maintain independent judgment in pricing or selling of any products and/or services.
- 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.

## 19. Attachment: The FIDI Anti-Bribery and Anti-Corruption Charter

### Leading The Fight against Corruption

FIDI is determined to lead the relocation industry by taking a clear stand against bribery and corruption. By doing so, FIDI will protect the best interests of the industry, the Affiliates and their customers.

### Background

Membership in FIDI is highly valued by its Affiliates, and to ensure that value continues, all FIDI Affiliates pledge to abide by the highest ethical standards.

This Charter is a declaration of commitment. It will strengthen the FIDI organisation, the FAIM programme, and all Affiliates by making it clear what distinguishes FIDI Affiliates from non-FIDI companies.

All FIDI Affiliates agree to sign and be guided by the Charter's provisions. The Charter covers their employees (whether permanent, fixed-term or temporary) and any associated third parties providing services to or on behalf of the FIDI Affiliates.

The Charter will be integrated into FAIM. The procedural and audit requirements will form part of the FAIM Implementation Manual and the Pre-Audit assessment.

### What Is Bribery?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal, and it is a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

### FIDI Will Not Tolerate Bribery

Corruption, bribery or attempted bribery is unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against FIDI's core values of conducting business to the highest legal, moral and ethical standards.

Bribery and corruption are covered by various international laws and statutes. These laws often require companies, including FIDI Affiliates, to have rigorous, pro-active measures in place to detect and prevent corrupt practices.

### Charter Statement

#### Undertaking by all FIDI Affiliates with immediate effect

All FIDI Affiliates commit to legal and ethical behaviour, and to refrain from doing anything that will harm the interests of FIDI, other affiliates, clients, or the industry. FIDI and its Affiliates will take steps to ensure they are fully informed of applicable regulations and will monitor their employees and business partners to ensure full and continual compliance.

#### Legal compliance

FIDI Affiliates will ensure that they are aware of all applicable laws countering bribery and corruption in all the jurisdictions in which they operate, and that they will obey and uphold those laws.

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 US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010 - 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.

#### **Ethical behaviour**

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zero- tolerance approach to bribery and corruption. 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**

By agreeing and committing to this Charter, each FIDI Affiliate undertakes to:

1. Never engage in any form of bribery, either directly or through any third party.
2. Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
4. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
5. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour
6. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
9. Never induce or assist another individual to break any applicable law or regulation.

## 20. Document Control

The present policy will be reviewed and updated at least annually. Below table will help Delahaye Moving to keep track of changes made.

Version Control			
Version	Author	Date	Changes made
2017 02	J-C Maerten	16 February 2017	New policy
2018 06	J-C Maerten	12 June 2018	Update 11 to include US legislation and extent 14 to include anti-trust
2019 05	J-C Maerten	14 <sup>th</sup> May 2019	No changes
2020 05	J-C Maerten	6 May 2020	General update and review of compliance with BAR code of conduct.