



DERKSEN

INTERNATIONAL MOVERS AND PACKERS

Anti-Bribery and Anti-Corruption Charter

At Derksen International Movers & Packers, the way we do things is just as important as what we do, providing International Relocation Services to third parties. We strive to be the best in our industry, but not at any price. The workplace must enable each employee to achieve the highest business standard, at least compliant to FIDI-FAIM 3.1. Besides that everyone must feel proud of our company and the job he or she is doing.

Derksen is a team of professionals with core values: accountability, customer focused and team driven. These values guide how we work every day. We bring these values to life in the way we perform, giving our best effort every day, being accountable for what we do, delivering on our commitments to each other and to our customers, setting objectives, meeting our goals, and working together to achieve business results. A core objective of our company is creating a winning and inclusive culture that drives results.

By working at Derksen, you are representing the company to our customers and everyone else you come into contact with. You are expected to adopt the highest standards of professionalism and personal behavior and demonstrate respect, integrity, good judgement, honesty and trust, the right way, in all your actions, no matter what the circumstances.

One of the guiding principles of Derksen is complying with anti-bribery and -corruptions laws. The anti-bribery and -corruption policy extends on this principle, and is applicable to all employees and everyone we do business with, including agents, representatives, consultants, independent contractors and anyone acting on behalf of Derksen.

If you have any questions regarding these anti-bribery and -corruption policy, please contact Derksen.

Reason and purpose of the anti-bribery and -corruption policy

This policy outlines acceptable and non-acceptable behaviors to ensure compliance with anti-corruption laws. This includes compliance with all laws, domestic and foreign, prohibiting improper payments, gifts or inducements of any kind to and received from any person, including officials in the private or public sector, customers and suppliers.

Definitions:

Bribe: Anything of value given in an attempt to affect a person's actions or decisions in order or to gain or retain a business advantage. Anything of value includes cash, entertainment or other gifts or courtesies.

Corruption: The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

Facilitation payments: Small sums paid to clients, government officials or other suppliers in general, to facilitate or expedite routing. Non-discretionary government actions are considered facilitation payment.

Kickbacks: The return of a sum already paid or due as a reward for awarding of furthering business.

What Does 'Anti-Corruption' Mean to You?

Corruption can take place in many types of activities. It usually is designed to obtain financial benefits or other personal gain. For example, bribes are intended to influence behavior – they could be in the form of money, a privilege, an object of value, an advantage, or merely a promise to influence a person in an official or public capacity. Usually, two people are involved and both will benefit. Examples of a bribe include:

- Offer or receipt of cash in the form of a kickback, loan, fee or reward
- Giving of aid, donations or voting designed to exert improper influence

The areas of business where corruption, including bribery, can most often occur include:

1. Gifts, Entertainment and Hospitality
2. Facilitation Payments
3. Procurement Process
4. Political, Community and Charitable Contributions

1. Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality are acceptable if they are reasonable, proportionate and made in good faith. These activities must be in compliance with Derksen's Code of Conduct.

Examples of gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, invitations to events, functions, or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

How do you know if an offered gift, entertainment or hospitality by Derksen? First, take a step back and ask yourself the following:

- What is the intent – is it to build a relationship or is it something else?
- How would it look if these details were on the front of a magazine or newspaper?
- What if the situation were reversed?

If you find it difficult to provide a comfortable answer to one of the above questions, ask your manager.

What to do when you doubt if you can accept? If you are unsure if you should accept something of value –. Ask your manager.

As a general rule, Derksen employees and business partners should not provide gifts or hospitality to, or receive them from, a government or other public official (or their close families and business associates). You may give a modest gift to these parties when appropriate. Please refer to our Code of Business Conduct.

2. Facilitation Payments

Facilitation payments are not allowed. If you are unsure whether certain payments represent facilitation payments, please contact your manager.

3. Procurement Process

Supplier selection should never be based on receipt of a gift, hospitality or payment. When supplier selection is a formal, structured invitation for the supply of products or services, it is most important we maintain documentation supporting our internal controls.

A procurement process includes an invitation for other parties to make a proposal, no parties having the unfair advantage of separate, prior, closed-door negotiations for the provision of services and products where a bidding process is open to all qualified bidders. We will choose on the basis of price and quality.

4. Political Community and Charitable Contributions

You are not allowed to make political contributions from Company funds without authorization. Political contributions, as permitted by law, must be approved in advance by our management.

Contributions made by Derksen to community projects or charities need to be made in good faith and in compliance with this Anti-Corruption Policy and all relevant Derksen's policies and procedures.

Books, Records and Internal Control Requirements

Expenses must never be hidden or purposefully misclassified. To prevent this, international anti-corruption laws generally require detailed and accurate accounting records for transactions, including cash and bank accounts. We must ensure we maintain accurate books, records and financial reporting.

You Are Responsible

Derksen takes corruption and bribery very seriously. Any violation of this policy will be regarded as a serious matter and is likely to result in disciplinary action, including termination, consistent with the Dutch law.

Bribery is a criminal offense. As an employee you will be accountable whether you pay a bribe yourself or whether you authorize, assist, or conspire with someone else to violate an anti-corruption or anti-bribery law. Punishment for violating the law are against you as an individual and may include imprisonment, probation, mandated community service and significant monetary fines which will not be paid by Derksen.

Questions or How to Raise a Concern

If you are concerned that an anti-corruption violation is occurring or has occurred, report it immediately to your manager. You are required by law to report any suspected violation.