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# CODE

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# OF CONDUCT

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*“ We incubate your goods by our protective shell ”*





## Introduction

As employees of Segon-Marill International Movers P.L.C., we make decisions that, in one way or another, affect other employees of the Company as well as the customers and suppliers of the Company. The actions that we, as individual employees, take reflect our behaviors and influence how others portray our Company. Hence, each employee of the Company has, through their actions and decisions, the power to improve the workplace, build the trust and image of the Company and enhance its goodwill. This Code of Business Conduct provides an overview of key practices and behaviors that define the conduct that each employee should abide by in order to preserve the reputation of the Company.

This Code of Business Conduct summarizes the policies, rules, procedures and practices of Segon-Marill International Movers P.L.C. with a view to creating harmony between the Company, its employees, customers and suppliers by spelling out the ethical standards expected to that end. However, it is not intended to address specific situations as such details are set forth in the manuals developed by functional areas (e.g., human resource, finance, procurement, etc.). Moreover, the Code is not a substitute for the good judgment of each employee in specific conditions.

It is the responsibility of the employees of the Company to read and understand the specific manuals that apply to their areas of responsibility and to manage the business accordingly. Since the Code is not meant to be a complete code of ethics and business conduct that covers all aspects of the business, an employee confronted with a situation where further guidance is required should discuss the issue with his supervisor or the Human Resource Department Head.

All employees of the Company are expected to comply with this Code, which is essential to maintaining our reputation for honesty, quality, and integrity. It is also each person's responsibility to report to the company any situation that he, in good faith, deems to contravene the ethical standards stated in the Code. Any employee who violates stated ethical responsibilities will be subject to appropriate disciplinary measure, which may include dismissal as well as civil and/or criminal liability.

The ultimate responsibility for leading an effective staff falls on the General Manager of the Company who is accountable for the implementation of this Code of Business Conduct. It is the obligation of all the employees of the Company to report the violation of any Code to his supervisor, the Human Resource Department Head or the General Manager. Failure to report violations might result in disciplinary measures.

## 1. Objective of the Code

The objective of this Code of Business Conduct is to:

- 1.2 Communicate the desired standard of higher ethical conduct of the employees of the Company on the job,
- 1.3 Stipulate the business conduct that govern the activities of the Company,
- 1.4 Specify a summary of key Company policies, rules, procedures and practices that control and guide the business of the Company,
- 1.5 Provide guidance on how to handle difficult situations with regard to business conduct, and,
- 1.6 Provide guidance on how to relate to co-workers, customers, suppliers and competitors of the Company.



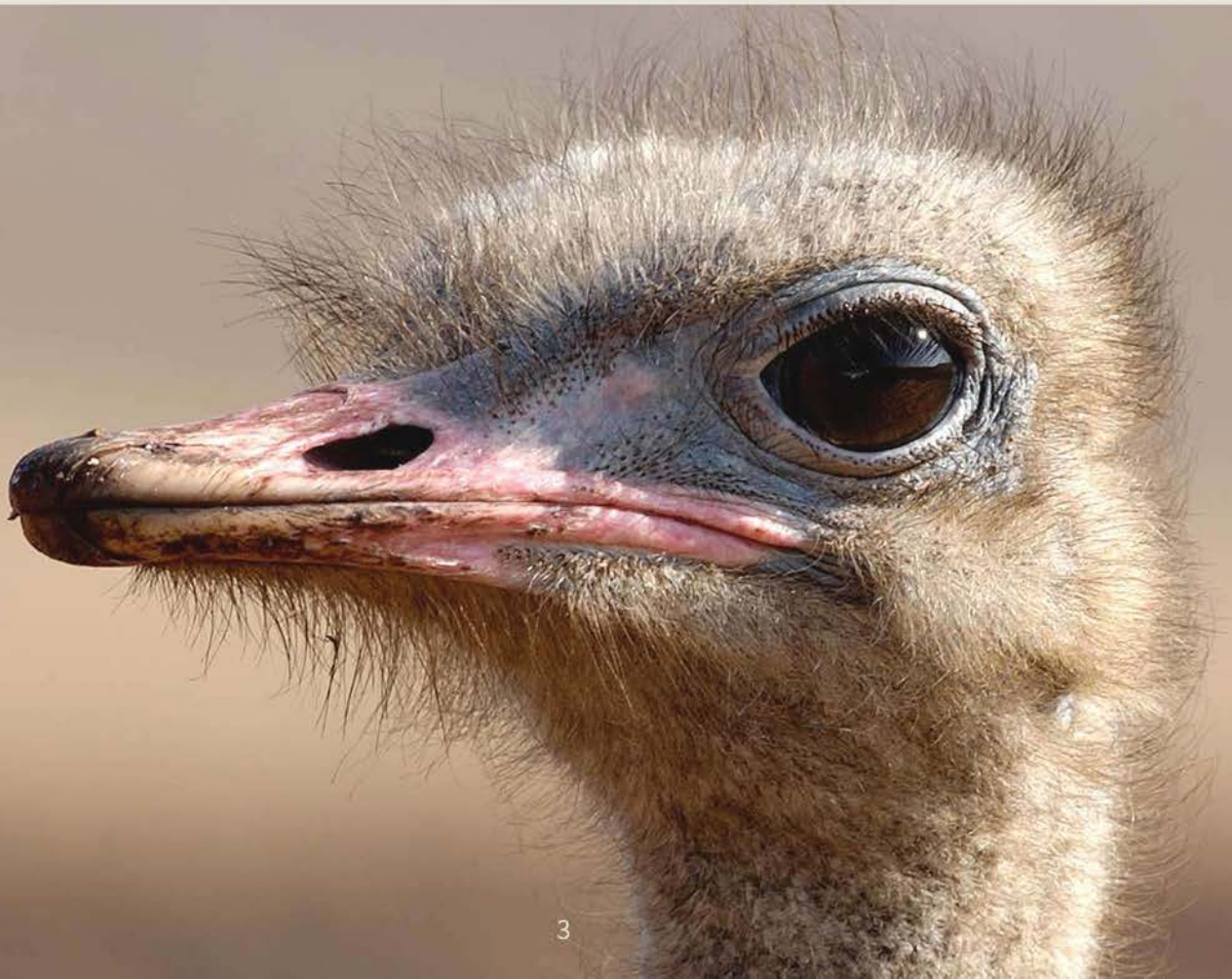
## 2. Definitions

In this Code, unless the context otherwise requires:

- 2.1 “Company” means Segon-Marill International Movers P.L.C.
- 2.2 “Employee” or “Employees” means any natural person who has entered into an employment contract with the Company and includes the General Manager, Senior Management staff and other full-time or part-time employees of the Company.
- 2.3 “Immediate family” means parent, step parent, foster parent, sibling, grandparent, spouse, child, step child or ward of the employee, father-in-law or mother-in-law.
- 2.4 “Code” means this Code of Business Conduct.
- 2.5 Any expression in the masculine gender includes the feminine.

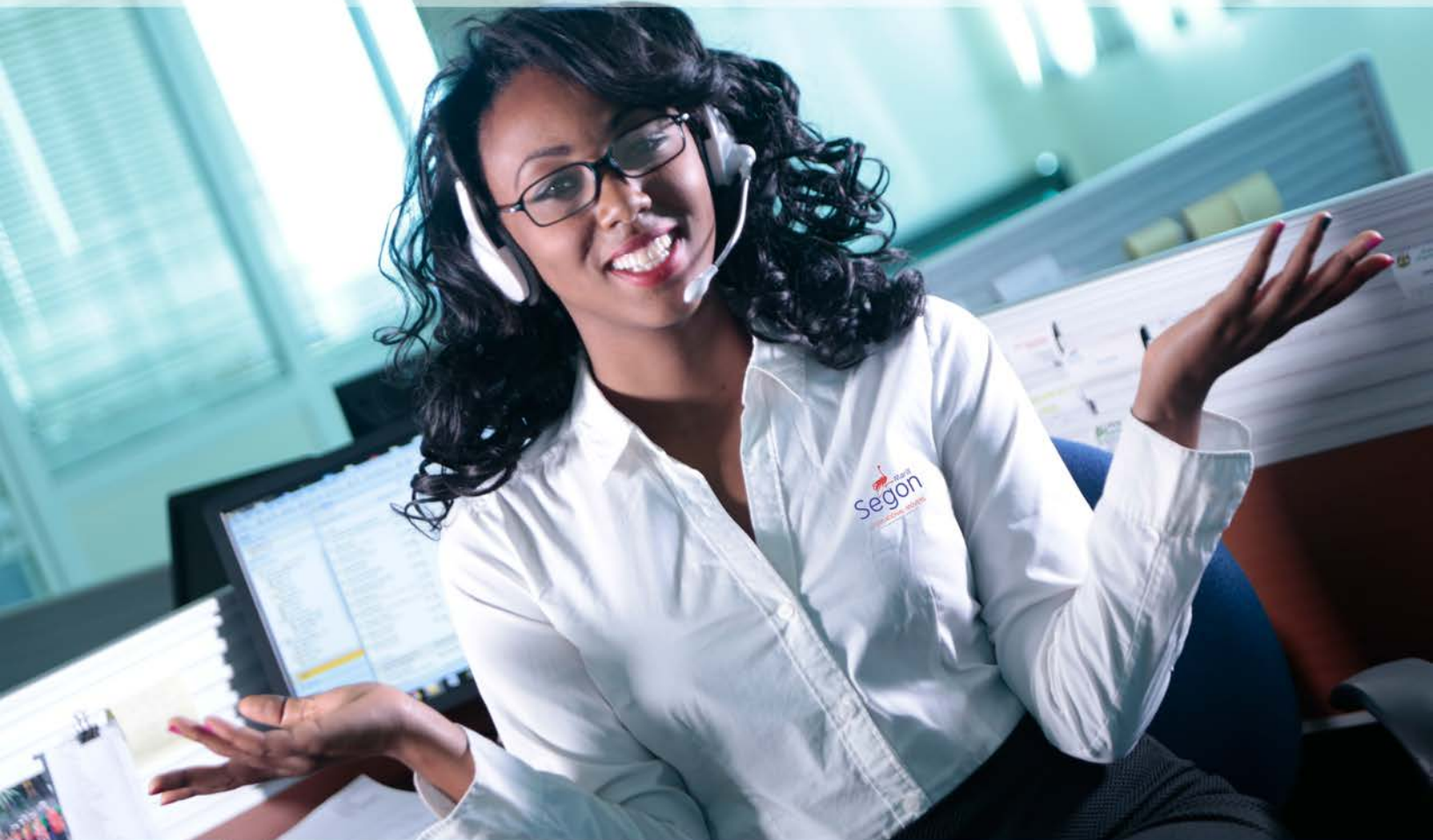
## 3. Scope of Application

This Code of Business Conduct applies to all employees of the Company while doing work for the Company.




## 4. Quality Customer Services

The reason why any business entity is created and exists is because of customers. Consequently, the core task of a business should always be to ensure that its customers are satisfied so that they might come back for more transactions. The quality of customer service is the key differentiator between good, bad and indifferent companies. Good quality customer service keeps customers coming back; bad customer service drives customers away, taking their friends and family with them. On the other hand, customers come back if they are provided excellent service quality.



We, as employees of Segon-Marill International Movers, should be committed to rendering services of the highest quality standard to meet and exceed the expectations of our customers. We must demonstrate to our customers that we really care about them by doing everything we can to meet their needs and solve their problems. The management of the Company is responsible for and committed to the delivery of quality service to the customers of the Company.

Therefore, as an employee of the Company you are expected to comply with the following rules relating to the provision of quality service to our customers:



4.1 Treat all your internal and external customers with high respect. Put yourself in their shoes.

4.2 Listen to the customers carefully and understand their needs.

4.3 Respond to the inquiries of the customers quickly and efficiently. Don't make them wait or keep them in the dark.

4.4 Keep your promises but always under-promise and over-deliver.

4.5 Offer a solution for the customer's problems as much as possible but without violating the policy of the Company.

4.6 Don't neglect your customers. Keep them updated regarding the transaction underway.

4.7 Train your subordinates to provide quality service to customers and ensure that they are friendly, helpful and happy to serve the customers of the Company.

4.8 Ensure that the services the Company provided to its customers are consistent.

4.9 Always be accessible to the Customers of the Company.



## 5. Integrity in Business Relationships

In order to further its business objectives, Segon-Marill International Movers enters into various business relationships with customers, suppliers and individuals. In these relationships it is possible that the reputation of the Company may be adversely impacted if we do not conduct our business with integrity, honesty and in a professional manner.



Therefore, in the course of discharging your job obligations, you should conduct the business of the Company in an efficient and transparent manner. As an employees of the Company you should not indulge in any activity that would have an adverse effect on the goodwill and competitive edge of the Company.

- 5.1. Keep your promises even if it takes extra effort. Be responsible and do what you say you will do.
- 5.2. Don't hide an important information that might adversely impact the Company.
- 5.3. Never indulge in a dishonest act even if it benefits the Company.
- 5.4. Take responsibility for your acts; do not let someone else take the blame for something you did.
- 5.5. If you make a mistake and the work gets messed up or you miss a deadline, admit your mistake. Don't let your coworkers or subordinates take the blame.
- 5.6. Refrain from divulging the confidential information of the Company or that of any third party.
- 5.7. Show sincere respect to coworkers, customers, suppliers and individuals with which you interact in the name of the Company.

5.8 If you are in management, keep your employees informed so they will know what is coming and what needs to be done.

5.9 Adhere to company policies and procedures in all your interactions with the employees of the Company as well as the customers and suppliers of the Company.

5.10 Use Company property solely for work and not for personal use.

5.11 If you find yourself in a conflict of interest, disclose the problem to your supervisor or the General Manager and get out of it as soon as possible.

5.12 When making a business deal, make sure that you have a complete and sufficient information to reach a sound decision regarding the issue under way.

## 6. Integrity of Records and Accounting Procedures

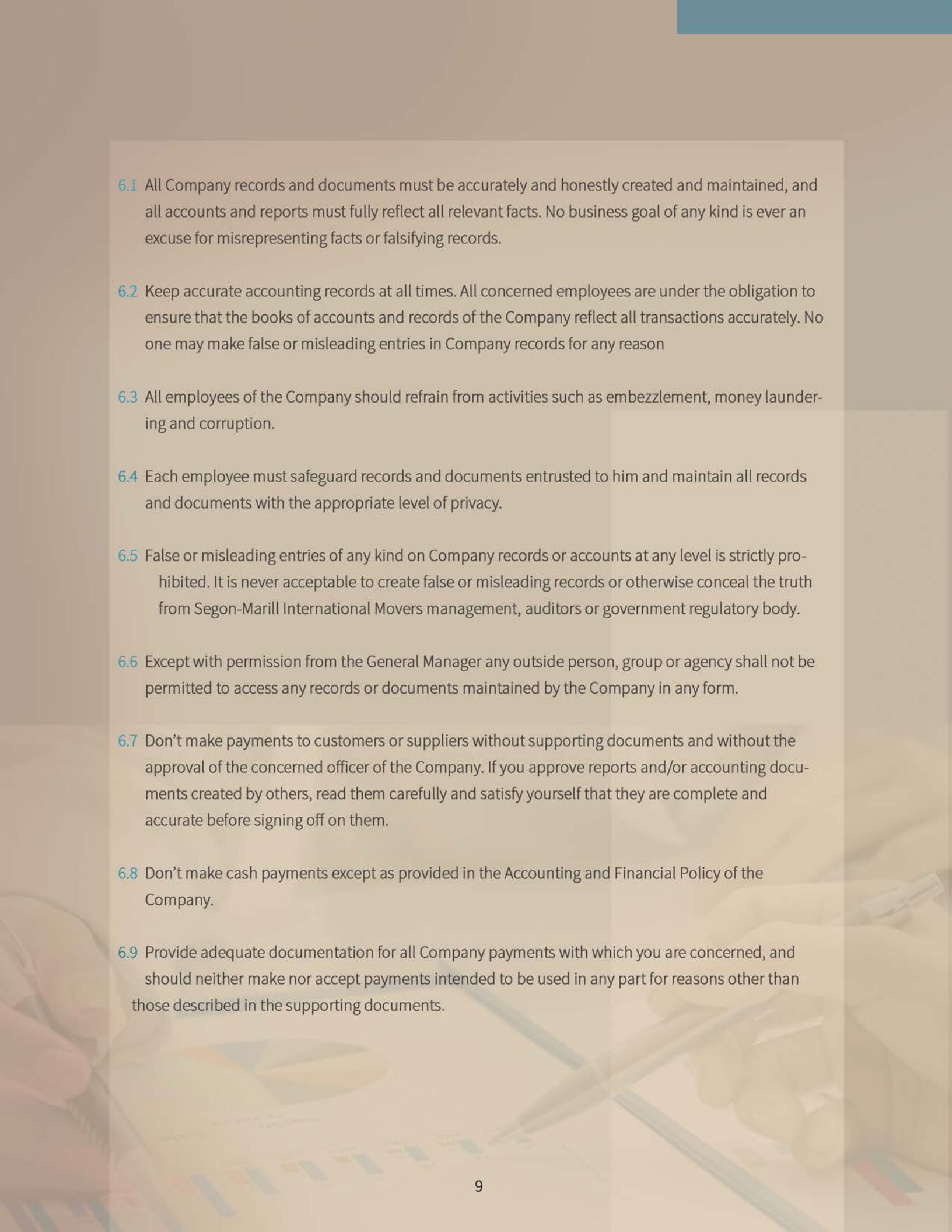
In the normal course of business, documents and records are created to assist in decision-making process and to meet certain obligations under the law of the country. Consequently, entries made in the books, records and accounts of the company are to be complete and correct. Anyone who approves reports or accounting documents created by others should read them carefully and satisfy himself that they are complete and accurate before signing off on them.

Payments that raise legal questions should not be effectuated and all expense accounts must accurately reflect the facts. All the assets of the Company must be recorded in accordance with the guidelines set forth in the Accounting and Finance Policy and payments in cash are not allowed except for normal and common expenses that are paid out of petty cash funds.



Documents that are essential for reporting, auditing, and other critical purposes must be kept in a secure place and easily accessed when needed. With regard to the records and accounting procedures it is mandatory to adhere to the spirit of the relevant laws.

As an employee of the Company you are required to abide by the following rules in order to assure the integrity of records and accounting procedure of the Company:

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- 6.1 All Company records and documents must be accurately and honestly created and maintained, and all accounts and reports must fully reflect all relevant facts. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.
- 6.2 Keep accurate accounting records at all times. All concerned employees are under the obligation to ensure that the books of accounts and records of the Company reflect all transactions accurately. No one may make false or misleading entries in Company records for any reason
- 6.3 All employees of the Company should refrain from activities such as embezzlement, money laundering and corruption.
- 6.4 Each employee must safeguard records and documents entrusted to him and maintain all records and documents with the appropriate level of privacy.
- 6.5 False or misleading entries of any kind on Company records or accounts at any level is strictly prohibited. It is never acceptable to create false or misleading records or otherwise conceal the truth from Segon-Marill International Movers management, auditors or government regulatory body.
- 6.6 Except with permission from the General Manager any outside person, group or agency shall not be permitted to access any records or documents maintained by the Company in any form.
- 6.7 Don't make payments to customers or suppliers without supporting documents and without the approval of the concerned officer of the Company. If you approve reports and/or accounting documents created by others, read them carefully and satisfy yourself that they are complete and accurate before signing off on them.
- 6.8 Don't make cash payments except as provided in the Accounting and Financial Policy of the Company.
- 6.9 Provide adequate documentation for all Company payments with which you are concerned, and should neither make nor accept payments intended to be used in any part for reasons other than those described in the supporting documents.

## 7. Anti-Corruption Measures

The Company understands that employees are commonly requested to make payments or provide other forms of consideration or benefit for privileges or other benefits that would not have a cost at all. However, the Company will not entertain such requests as it will not condone bribery and corruption. It is the policy of the Company to conduct all of its business activities in an honest and ethical manner. The employees of the Company are expected to counter bribery and corruption in all forms, whether direct or indirect and carry out their responsibilities professionally. All business dealings and relationships should be carried out fairly and with integrity.

Therefore, as an employee of Segon-Marill International Movers, you are required to observe the following rules in order to counter bribery and corruption:

- 7.1 Refrain from making payments of any kind or giving or offering anything of value to any person to influence business in any way or obtain an improper advantage for the Company or yourself.
- 7.2 You must abide by the laws of the country regarding unethical behavior and corruption.
- 7.3 You must conduct the businesses of the Company in an honest and ethical manner. The Company would like you to act professionally, fairly and with integrity in all its business dealings.
- 7.4 Report any incident of corruption to the General Manager.

## 8. Non-abuse of Official Position

The Company delegates authority to its employees to enable them carry out their responsibilities successfully. Delegated authority empowers the holders of positions to settle issues or disputes on behalf of the Company, commit resources, give orders and expect them to be obeyed. An employee who is delegated authority is expected to use it solely to expedite the business of the Company. However, if such employee dishonestly and illegally appropriates, uses or traffics the funds and goods he has been entrusted with for personal enrichment or other activities he is said to have abused his power or official position.

Employees who are vested with authority are in a position of trust. As such, each one of them has a responsibility to make decisions on merits and with due care. They should not abuse their official position to obtain any undue benefit for themselves, close relatives or for someone else. In their personal and professional life, the employees of the company should ensure high level of ethical standards and should not be involved in any incident of corruption.

Hence, as an employee of the Company, you should never abuse the authority you are vested with and should adhere to the following rules:



- 8.1 Never use your subordinates for non-organizational work to further your personal gain or that of others.
- 8.2 Don't use your position to involve into an act that can create conflict of interest with the Company. Conflict of interest weakens your ability to discharge your responsibilities efficiently.
- 8.3 Refrain from embezzling the funds of the Company or tolerating those who steal the funds or other properties of the Company.
- 8.4 Never exploit your official position to provide a job or favor to a family member or a friend. The Company does not accept nepotism as a means of filling vacancies.
- 8.5 Ensure that the procurement of goods and services are carried out on the basis of the needs of the Company, in line with the procurement policy of the Company and for the benefit of the Company.
- 8.6 Never use the confidential information of the Company to further private gains. As an official of the Company you should guard Company confidential information that may affect competitive standing.
- 8.7 Refrain from giving bribe, kickback, gift or entertainment to anyone under pretext of benefiting the Company.

## 9. Conflict of Interest



Segon-Marill International Movers expects all its employees to perform their duties carefully, honestly, and in accordance with the best interests of the Company. It doesn't expect its employees to use their positions or the knowledge gained as a result of their positions for private or personal advantage that result in conflict of interest.

Thus, the Company requires all its employees to make sound and impartial decisions in the course of dealing with its customers, suppliers and other stakeholders. Direct or indirect conflict of interest is counterproductive to the success of the Company as it may affect independent judgment in the course of making a decision. The increased scrutiny and criticism that arise as a result of conflict of interest can undermine the credibility and trust that others place in the Company.

As an employee of the Company you are required to avoid the following situations, which are considered to be potential sources of conflicts of interest:



- 9.1 You are not to take outside employment with other employers or engage in outside business including self-employment that adversely impacts your performance in the Company.
- 9.2 You are not to participate in any outside investment which affects or appears to affect your ability to exercise impartial judgment on the job or adversely affect the Company's interests.
- 9.3 You should not enter into any pecuniary relationship with the customers or suppliers of the Company since such relationships are likely to elicit conflict of interest and weaken your ability to transact business on a professional, impartial and competitive basis.
- 9.4 If your immediate family member is a supplier of goods or services or a customer of the Company you must:
  - a. Excuse yourself from making any decisions about the issue underway.
  - b. Disclose the relevant facts in writing, and explain the possible conflict to your supervisor.
  - c. Obtain required approvals before making any decisions or taking any actions that may appear to be a conflict of interest.

## 10. Gifts and Entertainments

Gifts and Entertainments include material gifts, money, trips, services or any other thing that can benefit the employee. The possibility of gifts and entertainments to influence the independence of judgment on the part of the employee of the Company, its customers and suppliers is considered to be high. Therefore, the employees of the Company should avoid giving or receiving gifts and entertainments which include but not limited to gifts of value, favors, entertainment, trips, services or other gratuities as a token of favorable treatment in connection with business activities. It is acceptable to offer or receive gifts and entertainment commonly accepted as business courtesies, provided they are of nominal value and will not inspire favoritism or a sense of obligation. Meals and entertainments that are connected with business must be reasonable but should not be frequent. The definition of “nominal” or “reasonable” or “commonly accepted business courtesies” depends up on the bona fide judgment of the employee himself.

Generally, in dealings with customers, suppliers or competitors you must adhere to the following rules with regard to gifts and entertainments:



- 10.1 If you feel that a gift or entertainment that you are offered contradicts the spirit of this Code of Conduct, you are required to seek approval from your supervisor before accepting such a gift or entertainment. However, if you have already accepted such a gift, you should return it with a note explaining the policy of the Company. However, if you think that it would be considered discourteous to return a gift, you may accept it on behalf of the Company and then turn it over to your supervisor for decision. In case of doubt, you should consult your supervisor.
- 10.2 Don't offer, give or receive anything of value under circumstances that could be viewed as an inducement or a bribe to improperly influence a recipient's decisions affecting the Company.
- 10.3 Exercise caution and good judgment in the giving and receiving of gifts and entertainment and don't cross the line into commercial bribery via frequency or extravagance.
- 10.4 Never accept cash or gift certificates in any amount from persons with whom the Company does business or may do business, and never give cash or cash equivalents to such persons.
- 10.5 Never make or offer gifts or entertainment if acceptance would violate the standards of the recipient's organization.
- 10.6 Document and report to your supervisor all entertainment and gifts you give or receive.
- 10.7 Seek the approval of the General Manager prior to giving gifts or entertainment to any person on behalf of the Company.
- 10.8 Consult the provisions of the Company Gifts and Entertainment Policy regarding the limits established for the commercial business environment.

## 11. Procurement Activity

The desire of the Company is to purchase products and services on the basis of quality, price and reliability. This enables the Company to achieve its goal of providing high quality, efficient and competitive services to its customers. As a result, it is mandatory that the Company procure all the necessary equipment, supplies and services on the basis of merit treating its suppliers fairly and without discrimination. On the other hand, the Company expects its customers to obtain its products and services on the same basis. Hence, the employees of the Company are required to stick to the highest ethical standards in choosing sources of supplies and services, negotiations, determining awards and in administering all procurement activities. In this respect they are required to strictly apply the procurement policies and procedures of the Company.





## 12. Protecting the Assets of the Company

The tangible and intangible assets of Segon-Marill International Movers P.L.C. entrusted to each of its employees in order to do their jobs are highly valuable. These assets are intended for use to advance the business purposes of the Company. It is by deploying its assets that the Company strives to enhance the net wealth to the shareholders. These assets include equipment, vehicles, buildings, tools, funds, supplies, computers, computer programs, documents, data, files, manuals, confidential information, reports, trademarks and any other resources or property of the Company. The employees of the Company are duty bound to protect these assets from the risk of waste, theft, misuse, damage or loss. Moreover, all employees must refrain from indulging in or encouraging activities that would result in misappropriation or abuse of such assets.



Basically, Company assets are meant to be used only for legitimate Company business at all times. However, the Company may allow the personal use of its communication and information systems provided that the use of such assets is not excessive and does not:

- i. Represent a conflict of interest,
- ii. Include immoral or defamatory material,
- iii. Interfere with work priorities.

As an employee of the Company you are expected to observe the following rules in order to protect the tangible and intangible assets of the Company:

- 12.1 Avoid committing Company assets for personal use unless authorized by the appropriate department head or the General Manager.
- 12.2 Take care to prevent waste, loss, damage, misuse, theft, or misappropriation of Company assets.
- 12.3 Report to your supervisor or the General Manager any third party activity that is harmful to the assets of the Company.
- 12.4 Upon termination of the contract of employment for any reason, surrender the properties of the Company in your custody to the General Service Head. The properties should be in good condition and you should surrender them promptly and without being requested to do so.
- 12.5 Use the assets of the Company appropriately and responsibly and in compliance with specific restrictions placed on their use.
- 12.6 Be vigilant regarding access to the assets of the Company by others. Access to Company assets (including offices, plants and equipment) by any third party (e.g. customers, suppliers, etc.) must be limited to and directly associated with services provided by the third party to the Company.
- 12.7 Respect the physical and intellectual assets of others. You should refrain from knowingly damaging or misappropriating the assets of others.  
of interest can result in termination of employment.



### 13. Company Confidential Information

Company confidential or proprietary information is information or knowledge which is not generally available to the public about the Company's operations and which the Company has determined must not be disclosed to others, except as required by law or under circumstances permitted by Company policy. During the course of work the employees of the Company may come into contact with such confidential information as suppliers, customers, financial information, sales figures, product designs, information regarding contracts, employee related information, strategic plan, business plans, software, trade secrets and other similar information.

The disclosure of confidential information about the operation of the Company can be harmful as it can put the Company at a competitive disadvantage. Therefore, the employees of the Company are duty bound to refrain from divulging information that are considered confidential.

In order to protect the confidential information of the Company you, as an employee of the Company, are required to adhere to the following confidentiality rules:



Top Secret!



- 13.1 Do not disclose or use any Company confidential information without proper authorization. Furthermore, avoid the unauthorized receipt of confidential information from others.
- 13.2 Know what constitutes confidential information where your responsibilities are concerned. If you are responsible for Company confidential information, it is your duty to take the appropriate precautions to ensure the security of such information.
- 13.3 Protect the Company's confidential information and never seek to obtain or disclose the confidential information of others. The personal information of our co-workers such as addresses, home phone numbers, salary, medical information, or performance appraisals should be protected.
- 13.4 Respect the confidential information of third parties; do not engage in unethical or illegal means to obtain confidential information belonging to others.
- 13.5 Do not disclose to Company personnel or use for the Company's business any confidential information in your possession as a result of prior employment with another company.
- 13.6 Prevent others from illegally obtaining Company Confidential information. Follow established guidelines and procedures before publishing Company information.
- 13.7 Ensure that access to any Company office or facility by third parties such as suppliers and customers is directly associated with services provided to the Company.
- 13.8 Unless required by the applicable laws, refrain from divulging confidential Company information to anyone outside the Company or to persons within the Company who do not have a "need to know."
- 13.9 Refrain from using confidential information for personal gain or to further the gain of an outside body.
- 13.10 Do not post confidential Company information on internet message boards or social networking sites.
- 13.11 Never send confidential information to unattended fax machines or printers.
- 13.12 Never discuss confidential information loudly or openly when others might be able to hear.
- 13.13 Report any instance of spying, hacking, or other illegal activity aimed at obtaining confidential information whether for or against the Company.

## 14. Fair Employment Practices

Segon-Marill International Movers P.L.C. is committed to maintaining a workforce where employees are hired, retained, compensated, disciplined and promoted based on their contribution to the Company through their performance. Thus, the Company endeavors to provide equal employment and advancement opportunities to all individuals. In order to realize this aspiration employment and advancement decisions shall be based on merit, qualifications and abilities without having regard to race, color, religion, sex, age, disability, marital or other status or any other legally prohibited criteria.

The Company strictly conforms to all laws governing the terms and conditions of employment and will not tolerate unlawful discrimination of any kind in connection with employment. All employee relation activities such as compensation, benefits, transfers, layoffs, training, promotion, etc., shall be administered without regard to any kind of discrimination.

The Company is aware that nepotism is counterproductive to its success as it is sure to raise issues of conflict of interest. Hence, no candidate shall be hired for a position where he may report to or supervise a member of his immediate family. The existence of a personal relationship with an employee of the Company should be disclosed to the Human Resource Department Head prior to accepting any offer of employment or advancement. Failure to do so would be considered as a violation of this Code.

Employees with questions or concerns about discrimination in the workplace are encouraged to bring the issue to the attention of their supervisor, the Human Resource Department Head or the General Manager. Employment and advancement shall be made in accordance with the Human Resource policy of the Company.

As an employee of the Company you are expected to share the Company's commitments by adhering to the following rules with regard to fair employment practices:

- 14.1 If you are hiring an employee, choose from individuals based on their qualifications to perform the job. Observe the hiring policy of the Company.
- 14.2 Avoid discriminatory practices based on race, color, religion, sex, age, disability, marital or other status or any other legally prohibited criteria in relation to employment.
- 14.3 You should disclose to the Human Resource Department Head the existence of a personal relationship with an employee of the Company prior to accepting any offer of employment or advancement.
- 14.4 Assess employees under your control solely on their job performance; avoid introducing unrelated considerations into your decisions.
- 14.5 Document instances of unsatisfactory performance by the employee as they occur and inform the individual of his shortcoming.
- 14.6 Always base your decisions on the law governing employment and the policy of the Company.
- 14.7 Encourage a professional atmosphere that promotes productivity, creativity and innovation.
- 14.8 Treat all individuals in the work environment with respect and dignity.

## 15. Health, Safety and the Environment

Segon-Marill International Movers P.L.C. believes that a safe workplace allows greater productivity, and reduces human and business losses. Consequently, it gives primary importance to the health and safety of its employees and works to create an accident-free workplace. It is committed to preventing incidents that are hazardous to the health and safety of its employees. The Company believes that all occupational and environmental incidents can be prevented. To that end, it will take all the necessary measures in its power to ensure that all operations are performed safely and with minimal environmental impact.

Therefore, as an employee of the Company you are expected to abide by the following rules with regard to health, safety and the environment:

- 15.1 If you are a line supervisor you are accountable for the actions of your subordinates. You shall always reinforce safe working behaviors.
- 15.2 You are responsible for stopping unsafe acts, alerting management of unsafe work areas and potential environmental concerns.
- 15.3 You must take responsibility for your own safety. You should know and follow the safety precautions in relation to the facility or asset you are using.
- 15.4 Report any unsafe or hazardous conditions immediately to your supervisor or the Human Resource Department Head.
- 15.5 You have the responsibility to adhere to the health and safety policy of the Company and the laws and regulations of the country governing occupational safety and health.
- 15.6 Avoid activities that may pollute the environment.
- 15.7 Conduct all tasks in a safe and efficient manner.



## 16. Alcohol and Substance Abuse

Segon-Marill International Movers believes that its success depends on the productivity of its employees. Thus, in order to achieve the business goals of the Company, its employees are expected to be fit on duty and capable of performing their assigned responsibilities in a safe and productive manner. However, the use of alcohol or controlled substances in the workplace is an obstacle to achieving the goal of the Company. The use of alcohol or drug on the job results in impairment that can endanger people or property. In order to avert any drug or alcohol related undesirable consequences the Company shall commit to maintaining a work environment that is safe for all employees by creating a drug and alcohol free environment.

Possession of legally prescribed drugs is permitted. Except for legal medical prescriptions, employees are not allowed to bring controlled substances into the workplace. If an employee is taking a legally prescribed drug that affects his judgment or reaction time, he must discuss the situation with his supervisor or Human Resources Department Head to determine if he should report for work. However, under no circumstance is it permitted to bring alcohol into the workplace.

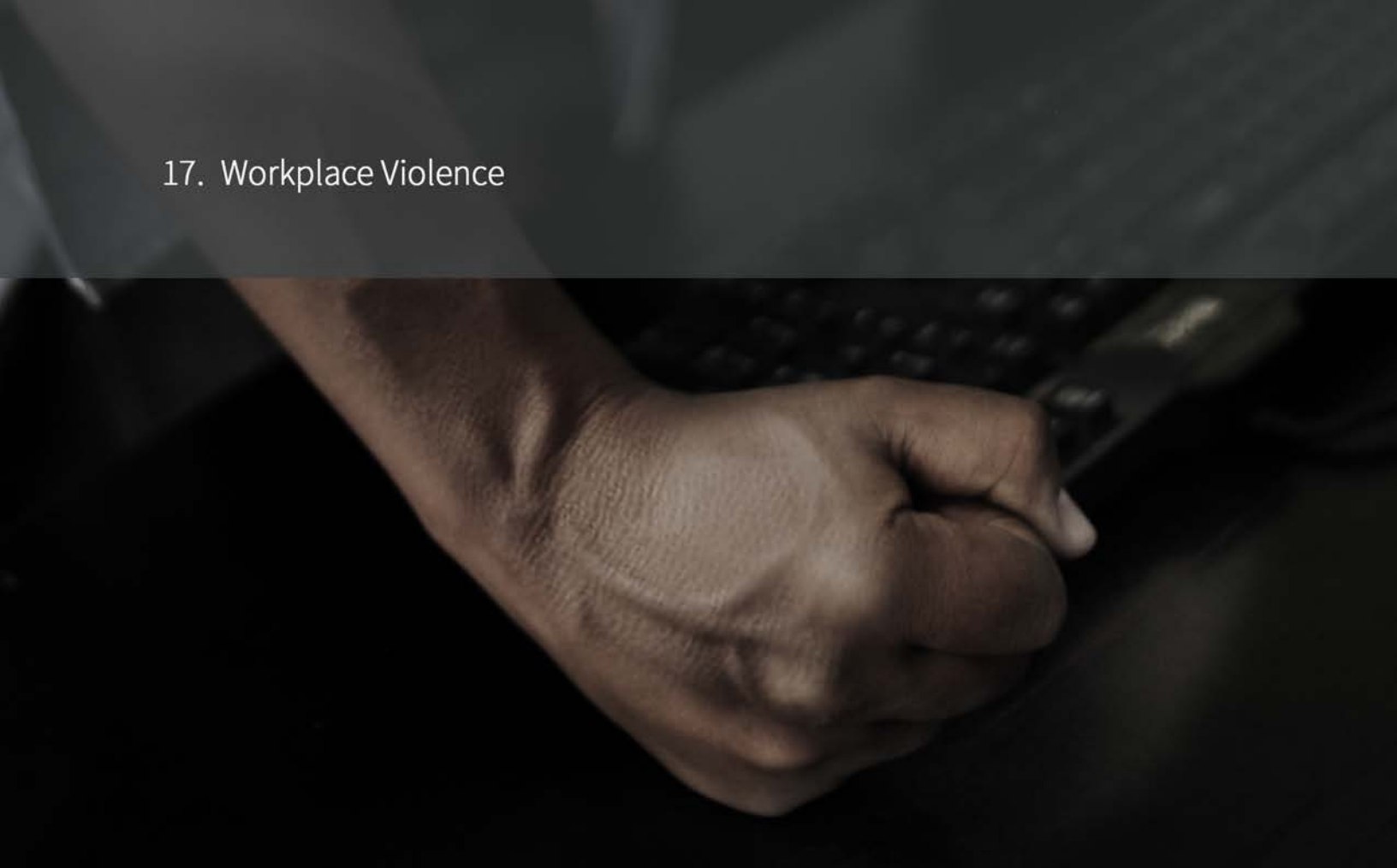
Therefore, as an employee of the Company you are obliged to adhere to the following rules in order to assist the Company in its endeavors to maintain an environment that is safe from alcohol and drugs:





- 16.1 It is forbidden to be under the influence of any alcoholic beverage, narcotics or any other form of intoxicating drugs during the course of your duty. You shall ensure that the performance of your duties at any time is not affected in any way by the influence of alcoholic beverages or drugs.
- 16.2 Alcoholic beverages are not to be consumed on Company premises at any time unless sanctioned by the General Manager of the Company to celebrate an event. In particular, neither regular drivers nor persons authorized to operate or use the vehicles of the Company are to consume alcoholic beverages or use illegal drugs while driving the vehicles.
- 16.3 It is prohibited to use, sale, distribute, transfer, purchase, manufacture or possess alcohol or controlled substances illegally on Company premises unless specifically authorized by the Company.
- 16.4 Legally prescribed drugs are permitted. However, you must ensure that while in the workplace the use of the legally prescribed drugs will not affect your productivity or the safety of the workplace.
- 16.5 Intoxication in the workplace is prohibited. Moreover, you are not to appear in a public place in a state of intoxication or impaired state due to drug. Never use or be under the influence of any impairing substance on the job as your impairment could endanger people or property.

## 17. Workplace Violence



Segon-Marill International Movers wishes to maintain a peaceful work environment that fosters personal and professional growth for all employees. Maintaining such an environment is the responsibility of every employee of the Company. As such the Company does not tolerate workplace violence including threats, threatening behavior, harassment, intimidation, assaults or similar conduct.

Mutual respect, along with cooperation and understanding, must be the basis of interaction between the employees of the Company. Because of their role, senior management staff and supervisors have the additional responsibility to lead in a manner which fosters an environment of respect for each person. The Company demands and promotes respectful behavior with all employees at all levels. It shall neither tolerate nor condone behaviour that is likely to undermine the dignity or self-esteem of an individual, or create an intimidating, hostile or offensive environment or an act of aggression resulting in physical or psychological damage, pain or injury to a worker. Employees who engage in violent conduct will be disciplined up to and including termination of employment.

For safety reasons the Company prohibits bringing weapons of any kind onto Company premises or to company work. Any employee who is suspected of possessing a weapon will be subject to a search at the Company's discretion. Such searches may include, but are not limited to the employee's personal effects, desk, handbags, backpacks, etc. Refusal to comply shall result in immediate dismissal from work.

Therefore, as an employee of the Company you are required to adhere to the following rules to maintain a peaceful work environment that is free of any kind of violence:

- 17.1 Never carry firearms or other weapons of assault on Company facilities without prior knowledge and permission of the Company management.
- 17.2 Avoid violent behavior in the workplace including, but not limited to, physical assaults, fighting, threatening comments, demeaning others, intimidation or threats by any means.
- 17.3 Drinking, gambling, fighting, swearing, and similar unprofessional activities are strictly prohibited while on the job.
- 17.4 Never come to work intoxicated or under the influence of drugs.
- 17.5 Foster cooperation and communication among the employees of the Company.
- 17.6 Treat co-workers in a fair manner with dignity and respect; promote harmony and teamwork in all relationships.
- 17.7 Seek to avoid workplace conflict, and if it occurs, respond fairly and quickly to provide the means to resolve it.
- 17.8 Encourage and consider the opinions of other employees and invite their participation in decisions that affect their work and their careers.
- 17.9 Administer all policies equitably and fairly, recognizing that jobs are different but each is important; that individual performance should be recognized and measured against predetermined standards; and that each employee has the right to fair treatment.
- 17.10 If you believe that you may be the target of violence in work place you must report to your supervisor or the Human Resource Department Head immediately.



## 18. Dispute Settlement

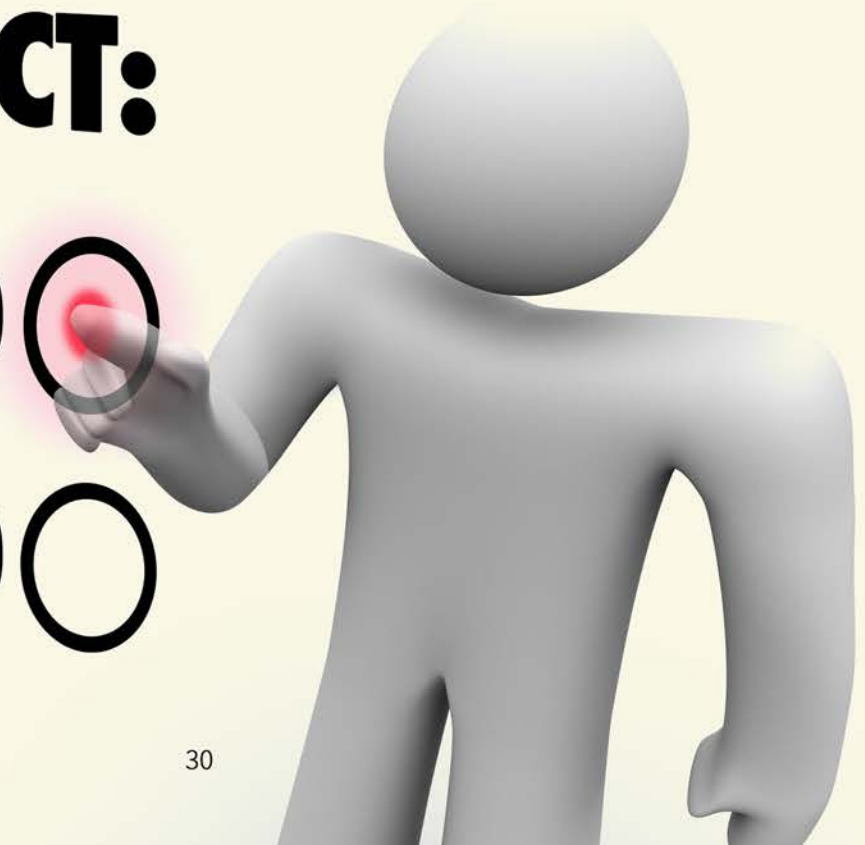
Although undesirable, conflicts can happen in any working environment. Usually, disputes result from misunderstandings and communication barriers. In such circumstances the Company recommends the following process for dispute solution with a view to resolving the conflict in a manner beneficial and fair to all parties concerned.

18.1 First and foremost, speak to the person you are having the dispute with.

18.2 If speaking to the individual does not work, speak to the General Manager in case of senior staff members and to the department head in case of other employees.

If the concerned department is unable to resolve a workplace dispute he should refer the case to the General Manager. The decision of the General Manager shall be final with regard to disputes arising in work place and in connection with the work of the Company.

**CONFLICT:**  
**RESOLVED** ○  
**CONTINUED** ○



## 19. Dressing Manners

The way you dress in the workplace is important because it influences the perception of other people about you. If an employee's clothes are clean, neat and professional, it shows that he takes pride in himself, his position and the Company. When such employees meet with a superior, customers, suppliers or other stakeholders, their professional dress instills confidence in them about their abilities.



Therefore, the employees of Segon-Marill International Movers should choose to dress in a manner which presents a professional image to the public and behave appropriately when representing the Company or during working hours. However, such dresses should not require excessive use of ornaments and unconventional dressing since such scenes are neither professional nor respectful to co-workers. The Company shall not tolerate improper dressing in the workplace. Those who are provided with uniforms or overalls should keep them clean and use them during working hours. Failure to comply with this policy might result in counseling the employee or in severe cases the employee may be sent home to change clothes. Continued disregard of this policy may be cause for disciplinary action, which may result in termination of employment. The Company reserves the right to determine the appropriateness of a dressing manner.



## 20. Amendment of the Code

The Code shall be reviewed from time to time for updating and any amendment in the Code shall be approved by the General Assembly of the Company and shall be disclosed to the employees of the Company through the appropriate media.

## 21. Violation of the Code

Infringement of this Code of Business Conduct may entail serious disciplinary measures including termination of employment and the General Manager of the Company shall have the powers to take such measures against violators.

## 22. Adoption and Effective Date

This Code of Business Conduct was adopted by the General Assembly of the Company by its resolution dated January 1 in the year 2017 and shall come into force as of February 1 in the year 2017.

