

WHR Global Supplier Partner Code of Conduct



WHR Group, Inc., doing business as WHR Global (“WHR”) through its relocation management activities touch many people’s lives across the globe. Maintaining the trust and confidence of these stakeholders requires WHR to ensure that its values are translated into consistent and appropriate behavior worldwide.

WHR promotes innovation and strives for economic, social, and environmental sustainability to ensure the long-term success of our company and its stakeholders. WHR is committed to sustainability in all business activities and aims to apply the highest ethical standards. In support of this goal, our company demands strict adherence to our principles for labor, environment, health, and safety as outlined in this Code of Conduct. WHR’s suppliers play an important role as enablers of our company’s sustainable growth and overall success.

WHR is committed to conducting its business considering these principles. In this document WHR has set forth principles that are instrumental for dealings with suppliers as well as specifying applicable standards. WHR expects its suppliers to strictly observe and comply with all the principles expressed herein, in all their activities and sites worldwide. Violation of the WHR Supplier Code of Conduct may result up to and including an immediate termination of the relationship with WHR.

1. Principles

a. All dealings by WHR with its business partners are executed based on competitive prices, highest suitability and required quality. Suppliers with certifications such as [EcoVadis](#), [Science-Based Target](#), [ISO 14000](#), or similar and with a comparable sustainability commitment to WHR shall be preferred.

b. WHR’s suppliers’ business behavior must comply with all applicable international, national, and local laws and contractual terms, as well as with generally accepted standards in relation to child labor, safety, and anti-bribery. WHR requires its suppliers to act in a socially responsible and ethical way. Supplier shall have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, or embezzlement.



c. The principles of the WHR Suppliers' Code of Conduct shall also apply to third parties (subcontractors) if the supplier has outsourced parts of their contractual obligations.

d. Suppliers will obtain, and maintain during the term of each supplier's appointment, insurance that provides coverage in accordance with the service they are providing.

2. Ethics

Suppliers will conduct their business in an ethical manner and act with integrity:

a. Fair Competition

Suppliers shall be committed to working against corruption, including extortion and bribery. Suppliers shall conduct their business using fair business practices, consistent with fair competition and in compliance with all applicable laws, rules, and regulations.

b. Business Integrity

Through all business activities, suppliers shall refrain from proposing any sum of money, gifts, loans, or valuable objects except for presents or promotional gifts of a nominal value which are in accordance with local customs and all applicable laws, rules, and regulations.

c. Identification of Concerns

Suppliers should encourage their workers to report concerns or illegal activities within their workplace without threat of reprisal, intimidation, or harassment. They shall investigate and take corrective action where needed. All reported cases will be officially recorded by suppliers.

d. Privacy

Suppliers shall secure and use properly any confidential information made available by WHR, its clients, and its clients' employees to ensure that the privacy rights of WHR, its clients, and its client's employees are protected. Supplier shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared; this includes the European Union's General Data Protection Regulation (GDPR), China's Personal Information Protection Law (PIPL), and the California Consumer Privacy Act of 2018 (CCPA).

e. Business Records

Suppliers shall maintain, and shall cause its subcontractors to maintain, contract records in accordance with generally accepted accounting principles for the applicable jurisdiction applied on a consistent basis. Suppliers and its subcontractors shall keep all pertinent books, documents, papers, and records as to readily disclose the basis for any charges, ordinary or extraordinary, billed for services (collectively, "Contract Records") and shall make them available for examination and audit by WHR and their agents prior to and for a period of three years after receipt of final payment for any services, or for so long as required by law, whichever is longer.

3. Labor



a. Forced Labor

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. All suppliers must follow the labor and employment laws as defined by their location (i.e., local, state, federal, or other jurisdiction).

b. Child Labor and Young Workers

Suppliers shall not use child labor below the age of 15. The employment of young workers between the age of 15 and 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

c. Fair Treatment

There is to be no harsh or inhumane treatment of workers, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment.

d. Non-discrimination

Suppliers shall be committed to a workplace free of harassment and unlawful discrimination. Any discrimination in hiring, training, promotion, compensation, etc., on the basis of race (including race-based hair), color, religion, sex (including pregnancy and gender identity), national origin, political affiliation, sexual orientation, marital status, disability, genetic information, age, membership in an employee organization, retaliation, parental status, military service, or other non-merit factor.

e. Wages and Fringe Benefits

Work hours, minimum wages and overtime hours paid to employees as well as the fringe benefits must comply with the local regulations. Suppliers must notify their employees of the method used to calculate wages. Wages should be paid at regular intervals and with reasonable frequency in cash, by check or bank transfer, except in specific cases provided for by national regulations. Deductions from wages for disciplinary reasons are prohibited. Supplier shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations.

f. Freedom of Association

Suppliers should encourage their employees to communicate freely with their superiors concerning their working conditions, compensation etc. without fear of reprisals, intimidation, or harassment. Employees should be free to join any trade union of their choice, to seek representation and join workers' councils.

g. Background Checks

Supplier partners, to the extent permissible in the applicable jurisdiction: (i) shall conduct background checks, for all workers providing services; (ii) such background checks will include, but will not be limited to, verification of identity, employment history, and criminal history; (iii)



shall evaluate the results of such background checks to determine whether each worker is appropriate for the services; (iv) such background checks will be conducted by an outside investigative service; and (v) shall comply with, and such background checks will be conducted and evaluated in accordance with, all applicable federal, state and local laws, regulations, executive orders, and enforcement guidance, including but not limited to the fair credit reporting act, anti-discrimination laws and all other laws governing the use of background checks and/or information related to criminal history in employment.

4. Health and Safety

Suppliers must provide a safe and healthy working environment, including any company-provided living quarters.

a. Workers' Health and Protection

Suppliers shall protect workers from over-exposure to chemical, biological and physical hazards in the workplace as well as from risks associated with any infrastructure used by their employees.

b. Maintenance, Emergency Preparedness and Response

Suppliers shall have programs in place to operate and maintain all their operations in a safe manner. Suppliers shall identify and assess possible emergency situations in the workplace and minimize their impact by implementing suitable emergency response plans and procedures.

c. Hazard Information and Training

Safety information shall be available to educate, train and protect workers from hazards. This includes safety information about hazardous substances, machinery, equipment, and more.

5. Environment

Suppliers shall ensure that their activities have a minimal impact on the environment. The suppliers shall operate as environmentally responsible and efficiently as possible. Suppliers are encouraged to use their best efforts to reduce or eliminate emissions generated by their activities, to preserve natural resources, to avoid or minimize the use of hazardous substances and, when possible, to promote waste recycling or re-use.

a. Environmental Authorizations & Policies

Suppliers shall ensure compliance with all applicable regulations and recommendations relating to environmental protection in force within the countries where they carry out their activities. All required environmental permits, licenses, registrations etc. shall be obtained and their operational/reporting requirements followed. Suppliers will have or create a documented environmental policy. The environmental policy shall state the supplier's own intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets.

b. Sustainable Procurement



Suppliers shall ensure they are taking proactive steps to sustainably service their business needs within their own framework. Proactive measures towards reductions in waste, emissions, prevent spills and releases into the environment. Policy and procedures in reactive measures as well to minimize any environmental impact.

6. Internal Measuring Procedures

The supplier shall possess the internal measuring procedures, tools and indicators required to guarantee adherence to the principles mentioned in this policy.

