



SUPPLY CHAIN PARTNER CODE OF CONDUCT

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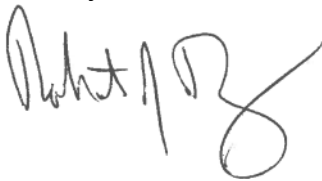
Letter from CEO

Since the very beginning, one of Dwellworks' five core values have been integrity. With that value comes a spirit of compliance as we focus on providing the best relocation services for our clients in the mobility industry. Our compliance focus extends from each and every one of our associates in our service centers around the world to our thousands of local, on-the-ground Supply Chain partners providing Destination Services, Property Management, and Valuation Services.

Our commitment to appropriate conduct hinges upon the efforts of each of you, our Supply Chain partners, to make the right decisions while representing Dwellworks. The focus of this Code of Conduct is to provide you with guidelines as you experience work in the field. We hope that the Code will help guide you to uphold our company's integrity at all times. If you ever have a question about what an ethical commitment is in a particular situation, this Code can help you make the right decision.

As Dwellworks dedicates itself to the future, we continue to focus on promoting integrity and ethical responsibility in the workplace, across all levels of our Supply Chain. Thank you for your continued partnership.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert J. Rosing', with a stylized flourish at the end.

Robert J. Rosing
President and CEO

Core Code of Conduct



Act with honesty and integrity in every interaction with every constituent



Avoid all unethical behavior and take steps to prevent compliance violations



Nurture an employment space that values teamwork, ethical practices, and fair treatment



Create a safe workspace and strive to protect the environment



Strive to do right by our customers and your contractual partners



Acknowledgment and Disclosure

As a Dwellworks Supply Chain Partner, you must acknowledge and certify your awareness to the Supply Chain Partner Code of Conduct (the “Code”). You must also agree to comply with the provisions of the Code and to raise any concerns using the appropriate communication channels. By accepting business from Dwellworks, you certify to act in accordance with the law and to uphold the policies described therein.

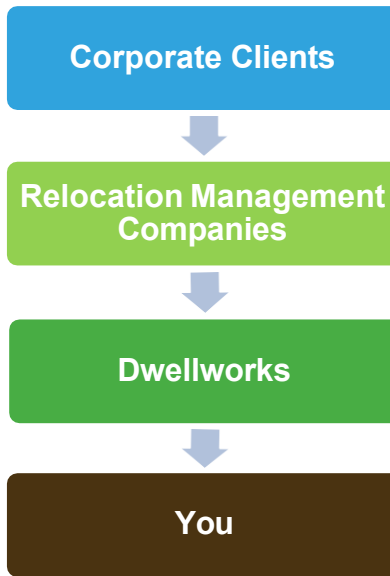
Nothing in the Code should be considered legal advice or guidance. Dwellworks cannot provide you with legal advice, representation, or legal services. If you encounter a situation where legal advice is needed, you are encouraged to contact your own counsel. You also certify that your acceptance and compliance with the policies outlined in the Code do not constitute in any way, shape, or form an employment relationship with Dwellworks. The Code does not in any way amend, alter, or change your status as an independent contractor.

The Code and individual policies or procedures may be changed or edited from time to time. Visit our website for the most up-to-date version of the Code.

Who Must Follow the Code

All Supply Chain partners (including but not limited to destination services providers, vendors, contractors, field agents, and appraisers) and their employees, subcontractors, and other affiliated parties must agree to follow the Code.

The Code serves and benefits *all* constituents, including:



Customers and Clients of Dwellworks require that Dwellworks and its Supply Chain partners abide by the law and contract provisions. These standards “flow down” from Dwellworks Clients to Dwellworks Associates and Dwellworks Supply Chain partners.

What Suppliers Must Do

Since all Dwellworks Supply Chain partners provide key services and products on behalf of Dwellworks and Dwellworks' clients, commitment to the Code and to all constituents should be of utmost priority. Adherence to the Code enables you to provide uniform, desirable, and ethical service each time you conduct business on behalf of Dwellworks. In addition to this general obligation, Supply Chain partners should also:

1. Attain an understanding of the compliance requirements summarized in the Code
2. Learn specific compliance policies as they apply to your job and business
3. Engage and fully participate in all appropriate compliance training modules and programs
4. Provide services within the scope of your service contract/work order with Dwellworks
5. Raise any concerns or violations to the Code immediately
6. Understand and utilize the different communication channels to report compliance violations
7. Cooperate in all Dwellworks audits and investigations



How to Report a Concern or Violation

Your Dwellworks contact is available to discuss concerns or questions about compliance. The following options are also available:

- + Call or email your Dwellworks contact
- + Email the Compliance Office at compliance@dwellworks.com
- + Call anonymously using the applicable Dwellworks Compliance Hotline:
 - **All Countries:** File a report through <http://www.redflagreporting.com>
Code for Ireland, Northern Ireland, Luxembourg and UK: 8455192606
Code for US, Mexico, and Canada: 8003992626
Code for Costa Rica: dwcostarica
Code of China and Hong Kong: dwapac
 - **United States/Canada:** 1 (877) 647-3335
Code: 8003992626
 - **Mexico:** +52 (55) 4170-7583
Code: 8003992626
 - **Ireland, Northern Ireland, Luxembourg, and UK:** +44 800 048-8047
Code: 8455192606
 - **Costa Rica:** +506-4000-3673
Code: dwcostarica

Speak Up! Raising Concerns and Reporting Violations

Speaking up takes a lot of courage – but it also protects you, Dwellworks, and Dwellworks’ clients. If you have a concern or if you need to report a violation, then you have a responsibility to speak up.

No matter how you decide to raise a concern, these two principles will *a/ways* apply:

1. **The Earlier, the Better:** Do not wait to report a concern or violation because the longer you wait, the worse a situation can become.
2. **Right to Remain Anonymous:** You can always choose to use a reporting method that protects your identity.



Interacting with Supply Chain Partners, Customers, and Other Third Parties

Bribery and Other Improper Payments

Bribery and other financial crimes pose serious threats to business, government, and wider civil society, as well as weaken the rule of law. In many countries, these crimes carry severe penalties for persons and corporations that engage in prohibited activity. In accordance with the U.S. Foreign Corrupt Practices Act, Supply Chain partners are prohibited from paying, promising, offering, or authorizing a payment (directly, indirectly, or through a third party) of money or anything of value to a government official or political party for the purpose of influencing an official act or decision in order to obtain or retain business or secure an improper advantage. In addition, in accordance with the U.K. Bribery Act, Supply Chain partners are prohibited from inducing or rewarding improper behavior from government personnel or businesspersons in order to gain a commercial, contractual, regulatory, or personal advantage.

Giving and Receiving Gifts

While gift-giving can be a part of business relationships, Supply Chain partners must exercise caution and good judgment in receiving and giving gifts. All Supply Chain partners must adhere to the following:

- + Ensure that the giving or receiving of gifts is appropriate for the industry and the circumstances
- + Gifts in a business environment must be \$25.00 USD or less in value
- + Remain aware of the local laws that govern the provision of meals, entertainment, and other gratuities when interacting with government or quasi-government officials
- + Regardless of country customs, Supply Chain partners may not accept or condone acts that involve the exchange of gifts or money in return for favorable business outcomes

Example: You receive a vendor invoice from a subcontractor with over \$200 of undisclosed and vague expenses paid to a government official. The vendor hesitates to define what the expenses are. **Should you report this activity?**

Answer: Yes. While these circumstances are often fact-specific, if a payment or other activity seems suspicious, you should report the situation. Dwellworks has a zero-tolerance policy for bribery and other improper payments.

Example: You are trying to complete some government documentation for a relocating employee and her family. The local government official proves to be an obstacle, discussing various undisclosed and vague problems with the forms. He mentions that he can initiate and expedite the process if you pay a sizable “fee” to him. **Can you pay the fee to get the documents finalized?**

***Answer:** No. Any fee paid to induce a person to perform their duties improperly or to improperly expedite a government service is a **bribe** and is strictly prohibited.*

What to Do:

1. **Be familiar** with all applicable laws and legal requirements before you engage in customer entertainment, reimburse expenses, or give a gift to a constituent
2. **Avoid** giving or receiving a gift, gratuity, or other benefit to or from someone when it would appear to be suspicious or unethical
3. **Never offer** or give any benefit to secure improper treatments, kick-backs or other advantages from a governmental, quasi-governmental, business, or regulatory official
4. **Ensure** that your employees/subcontractors and fellow Supply Chain partners abide by and adhere to all anti-bribery and anti-corruption laws
5. **Contact** Dwellworks if there is an ambiguous situation or if you need advice
6. **Report** any and all suspicious activity relating to corrupt conduct or improper behavior

What to Watch For:

1. **Information** that indicates that a third-party or its representatives have a reputation for corrupt activity, allegations of improper business practices, a familial or personal relationship with local government officials, or other suspicious activity
2. **Suggestions** to direct Dwellworks business through a certain company or individual for unknown, vague, or unjustified reasons
3. **Billings** that are disproportionate to the services or goods provided by a subcontractor or fellow Supply Chain partner
4. **Requests** for a payment to be made to a person or company not affiliated with the transaction
5. **Use** of suspicious, fake, or “bogus” identification or business materials
6. **Demands** from government officials for payment to perform normal services or to initiate improper services
7. **Contracts or invoices** where services are poorly defined

Relationships with Supply Chain Partners

Dwellworks' relationship with its Supply Chain partners and vendors is based on ethical, lawful, efficient, and fair business and employment practices. Dwellworks expects that its Supply Chain partners will comply with the law and will act with the highest degree of integrity and performance in the course of their relationship with Dwellworks. Dwellworks expects Supply Chain partners to provide an equal, fair, safe, healthy, and environmentally friendly work environment.

Example: Your low-cost subcontractor delivers a great service at a great price. But you are concerned with reports that this subcontractor abuses her employees and maintains unsafe working conditions. **Should you ignore your concerns or report your misgivings?**

Answer: Report it. Dwellworks' relationship with its clients and customers is dependent on conducting business with Supply Chain partners and additional subcontractors that act responsibly and ethically.

What to Do:

1. **Be familiar** with all applicable laws and regulations relating to supplier relationships
2. **Respect** the independent status of Dwellworks' contractual relationship with you and exercise appropriate judgment
3. **Use** only subcontractors or other Supply Chain partners that follow all applicable local laws and the highest standards in regards to the practices outlined in the Code

What to Watch For:

1. **Unsafe** or unhealthy conditions or practices in supplier or subcontractor facilities and businesses
2. **Behavior** engaged by suppliers that is coercive, harassing, violent, or discriminatory
3. **Disregard** for the environment, community, or the law

Money-Laundering and Illicit Finance

Criminals and terrorists often try to “launder” the proceeds of their illegal activity in order to make their money appear legitimate. Over 100 nations now prosecute money-laundering and other financial crimes, including “reverse money-laundering”, which includes funneling legitimate money to finance and support terrorism.

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

Example: One of your long-time business associates with whom you conduct business has just reorganized his company and now directs you to pay him by sending a check to a company located in the Caribbean, made out to an account with a bank in a small European country. **Should you make the payment?**

Answer: No. You should be suspicious and immediately report the situation. Any situation that involves paying third parties unrelated to the transaction is suspect.

What to Do:

1. **Be familiar** with all applicable laws and regulations relating to the proceeds of crime, money-laundering, terrorist finance, and other illicit monetary practices
2. **Remain vigilant** and know who you are working with
3. **Keep track** of all the necessary documentation and paperwork that accompanies a transaction
4. **Follow** your own good judgment and Dwellworks' rules on acceptable forms of payment and other financial practices
5. **Exercise** caution when interacting with a suspicious party or a suspicious transaction
6. **Report** any and all suspicious activities relating to finances, money, or other monetary transactions because not reporting immediately might prejudice an investigation and could result in criminal penalties

What to Watch For:

1. **Reluctance** to provide identification or other details relating to the transaction or if constituents provide false or suspicious information
2. **Unusually complex** deal structures, trade practices, or business structures, or transactions structured to avoid reporting requirements
3. **Requests** to pay a third party located in another country or a third party unrelated to the transaction
4. **Transactions** involving offshore banks or nations known to facilitate or engage in money-laundering
5. **Attempts** to give or receive payments in cash to avoid taxes or other record-keeping requirements
6. **Suspicious** checks or monetary instruments

Confidentiality, Data Privacy, and Information Security

Many nations have become increasingly aware of data privacy and information security issues. As a result, various jurisdictions and the majority of Dwellworks' clients and corporate customers require Dwellworks and Dwellworks' Supply Chain partners to abide by strict data privacy and information security guidelines.

You may receive confidential, proprietary, or personally identifiable information during the course of your business with Dwellworks. Confidential information is any non-public information containing personal, sensitive, secret, or valuable data. Personally identifiable information is any information that can be used to trace or distinguish an individual's identity, including but not limited to:

- + Social security / insurance numbers or government-issued numbers
- + Passport numbers
- + Taxpayer identification numbers
- + Driver's license numbers
- + Financial account numbers
- + Credit card numbers
- + Addresses
- + Email addresses
- + Phone numbers
- + Names
- + Maiden name
- + Mother's maiden name
- + Age
- + Alias

As a Supply Chain Partner, you must always treat confidential and personally identifiable information that you receive during the course of your business with Dwellworks as you would expect others to treat your confidential and personally identifiable information – with the utmost respect and care.

Dwellworks Supply Chain partners with access to Dwellworks email addresses and accounts should refer to the Dwellworks E-mail Usage Guidelines (the "Guidelines"). The Guidelines cover proper usage of E-mail, securing E-mail and reporting security breaches.

Example: A relocating employee provides you with a copy of their identification and contact information for future reference. **Can you enter their information into a database where your fellow employees or Supply Chain partners can access it?**

***Answer:** No. The collection of personal information and other important data is often subject to various laws and regulations regarding its use. Never use data in a way that is inconsistent with the reason for which the data was given. Contact Dwellworks if you are unsure with how to handle data or confidential information. Supply Chain partners are permitted to enter certain data into a Dwellworks interface such as Servicing for the purpose of providing services.*

Example: The laptop computer that you use for both personal and work tasks has become infected with a virus. **Should you notify Dwellworks?**

***Answer:** Yes. You must notify Dwellworks whenever there is a breach of information security or data privacy. If a security breach occurs at home or your place of work and confidential information, personal information, or other sensitive data is potentially compromised, inform Dwellworks immediately*

Example: You receive a phone call from someone other than your Dwellworks contact who claims to be a Dwellworks associate. The caller is asking you to verify personally identifiable information about the relocating employee. **Should you give the caller the information?**

***Answer:** No. If you receive a phone call, email, or letter from someone other than your Dwellworks contact, do not release any confidential or personally identifiable information to that person. Instead, ask for the person's identity and contact information. Then, contact your Dwellworks contact to verify the caller's identity and the request for the information.*

What to Do:

1. **Be familiar** with all applicable data privacy laws, rules, and regulations in the jurisdictions where you conduct business
2. **Comply** with any additional data privacy, information security, or confidential information policies issued by relevant governments and by Dwellworks
3. **Update** your computer's security and anti-virus software to stay current with security advancements
4. **Change** your passwords frequently
5. **Avoid** discussing or transferring confidential or other sensitive data over unsecured networks or internet connections
6. **Refrain** from discussing confidential information and other sensitive data in public or with unrelated third parties
7. **Abide by** your confidentiality and non-disclosure agreements

8. **Retain or destroy** any and all confidential information, sensitive data, or personal information that you receive in the course of your relationship with Dwellworks in accordance with the terms of your contractual agreement
9. **Secure** objects and environments that contain or hold sensitive data
10. **Return or destroy** any and all confidential material still in your possession upon termination of your contractual relationship with Dwellworks
11. **Obtain** consent from all constituents before gathering their data, using it in a new way, or giving it to a new person
12. **Use** the best practices in the field of information security and data privacy, including complex passwords and data encryption
13. **Report** any potential or actual breach of information security or data privacy, loss of confidential information, or compromised personal or relevant sensitive information
14. **Never** copy confidential or personally identifiable information on to portable media such as flash drives, iPhones, iPods, iPads or cellular devices

What to Watch For:

1. **Inadequate** security controls or computer systems containing confidential information or sensitive data
2. **Outdated or malfunctioning** computer hardware or software, including security software
3. **Simple** or easily guessed passwords or authentication codes
4. **Unauthorized** sharing, distribution, or transfer of confidential information and sensitive data
5. **International** or cross-border transfers of personally identifiable, sensitive, or confidential information
6. **Manipulation** to obtain confidential or personally identifiable information through phone calls or malicious emails that appear to be legitimate

GDPR and Other New Privacy and Security Laws

Suppliers are required to abide by all privacy and security laws in whatever jurisdiction they may be supplying goods or services to Dwellworks.

The European Union recently passed Regulation (EU) 2016/679 (the “General Data Protection Regulation” or “GDPR”), a privacy law that became effective as of May 25, 2018.

The following is a list of the specific GDPR requirements that apply to you as a Supplier of Dwellworks:

- To gather and use Personal Information on instructions from Dwellworks and only as necessary for the transactions and services that you provide to Dwellworks clients;
- To never transfer Personal Information outside the countries to which the parties have agreed without confirming with the Compliance Department whether to do so is compliant with the GDPR;
- To keep confidential all Personal Information;
- To require that any Dwellworks subcontractors also adhere to the same standards as listed here to meet the requirements of the GDPR;
- Report to Dwellworks Compliance at the email address below all requests from transferees/assignees to exercise their rights regarding the handling of their Personal Information relative to notice, access, correction, erasure, objection, and portability;
- To promptly notify Dwellworks Compliance Department of any security breach, phishing incidents or other hacking activities as soon as possible upon becoming aware of them. Notify: Compliance@dwellworks.com or contact Jim Smith, CIO; Hank Roth, Compliance Officer; or the Legal Department or Human Resources.

You are also asked to participate in GDPR Trainings as well as Security Awareness Training on an annual basis and other training on specific privacy and security matters.

Wire fraud: A recent trend involves hackers setting up fraudulent email accounts that mirror the accounts of relocation or real estate service providers including using fraudulent wiring instructions in an effort to collect real estate deposits, first month's rent and/or closing funds.

What to Do:

1. **Implement** two factor identification for wire instructions and revisions:
 - + The most effective way to prevent losses from these schemes is to require verbal or other secondary confirmation of all wire information and especially any revisions to wiring instructions. Make sure to use contact information obtained independent of the wire instructions to ensure you are, in fact, communicating with whom you think you are.
2. **Educate** transferees, assignees, landlords, tenants and staff and suppliers on the risks of wire transfer fraud:
 - + The best defense is for everyone involved in the transaction to understand what to watch out for and how much is at stake. Losses from these frauds can be serious to the relocation industry but devastating to transferees and assignees, landlords and tenants and we as an industry should take every opportunity to educate those involved. Potential options include: wire fraud alerts in email signatures, explanations of wire transfer fraud in initiation packages and cybersecurity due diligence for service providers.
3. **Utilize** secure methods for delivery of sensitive transaction information and documentation:
 - + These frauds almost always begin with a compromised email account. If possible, encourage all involved not to use Gmail, Yahoo, Hotmail or similar services for email relating to these financial transactions.
4. **Inspect** incoming email messages, especially for revised wiring instructions or other direction regarding proceeds:
 - + Impersonators will go to great lengths to hide their identity or provide assurances that all is well. Hyperlinks and return email addresses may appear to go to a trusted source, but upon further inspection (e.g. hovering the cursor over a link) actually redirect to an unknown website or email address.
5. **Avoid** using public Wi-Fi:
 - + Hackers can use these public Wi-Fi connections to distribute malware or intercept your communications. Any information you send (transaction details, financial information, etc.) goes through the hacker before reaching the connection point. If it is essential to connect to a public hotspot, use a virtual private network (VPN) to encrypt the data before it reaches the hacker.

6. **Be cautious** when using real estate search sites:
 - + Similar to the use of public Wi-Fi, hackers can use these public sites to distribute malware and gain the means to access your computer or email. We understand that these sites are valuable when searching for a home but users should use only trusted sites that have a representation of security (like a white hat certification.) In addition, users should be cautious when clicking on ads, links or downloading information from these sites, as they may contain malware.

Phishing: Phishing is a malicious email or website that masquerades as a legitimate email/website in an attempt to get the user to give up information.

What to Do:

1. **Be cautious** with unfamiliar emails and websites. If you are ever unsure about a request for information in an email or website, the safest approach is to refuse the request and delete it. Also, make sure you report the email or website to Dwellworks.
 - + If unsure about an e-mail/website request for information:
 - Refuse it and delete it
 - Report the e-mail/website to Dwellworks
 - Never open an attachment if you are not familiar with the sender
 - Never click on any link within the email if you are not familiar with the sender
2. **Review** the email address following the display name of a sender, as well as the spelling of the display name itself for any irregularities. Note that a familiar name in your inbox may not always be who you think it is so it is important to verify the reply address.
3. **Verify** to whom the email was sent. A seemingly random batch of email addresses or an email address that isn't yours can be a good indicator that the email is suspect.
4. **Inspect** the content of an email. Cybercriminals are known to use branding and language to try and trick you into believing what you're reading is real.
 - + If you did not receive prior notification from Dwellworks regarding future outreach from a third-party, and you are unfamiliar with the sender, please contact your Dwellworks contact before proceeding.
 - + Does the email contain any of the following red flags?
 - Poor grammar and/or spelling
 - A vague salutation ("to whom it may concern" or "Valued Customer")
 - Reference to incorrect account information
 - Urgent or threatening language in the subject line

- Urgent payment requests for orders you did not place
- Notice of your email account being suspended

- + Email attachments are a very common source of malware. If you receive an email with an attachment that appears to be suspicious (ex. a PDF contains a link for you to view/download the PDF), it's best to delete it.
- + Cybercriminals will embed hyperlinks that may appear to be legitimate links. It's best practice to follow the rule "look but don't click" meaning that you should hover over any links in an email to display a pop-up containing the real website link.
- + Always look at the email signature of an email. Business emails typically contain the information of the business and its sender. If the signature is missing or contains information contradictory to the sender, this is a sign that the email may not be legitimate.

Social Engineering: Social engineering is the manipulation of an individual to obtain information that that individual would not normally give out.

What to do: If you ever receive a call from someone you are unfamiliar with trying to gain confidential information about Dwellworks or PII information about an individual you are assisting on behalf of Dwellworks, do not disclose the information requested and follow the steps listed below:

- + Ask for the caller's identity and contact information.
- + If you obtain identity and contact information, try to contact the caller you are suspicious of to verify they are who they say they are.

Complying with Competition Laws

Supply Chain partners must comply with all applicable fair competition and antitrust laws. As a result, Supply Chain partners are strictly prohibited from entering into any agreement that:

- + Limits the competition in the marketplace
- + Fixes prices or other items and conditions
- + Allocates clients or territories
- + Limits availability of services
- + Involves conduct that would result in restraint of trade or unfair business practices

Example: A fellow Dwellworks Supply-Chain partner contacts you, wanting to enter into a price-fixing arrangement so that neither one of you can offer a lower price on the services you provide to Dwellworks. **Should you agree to this arrangement?**

Answer: No. Engaging in anti-competitive activities in a given sector, geographic area, or industry can expose you to severe civil and criminal penalties. While Dwellworks cannot provide you legal advice when encountering these matters, you are encouraged to report these situations to the Dwellworks Compliance Hotline.

What to Do:

1. **Be familiar** with all applicable anti-trust and competition laws and regulations in the jurisdictions where you do business
2. **Avoid** entering into agreements with fellow Supply Chain partners or other unaffiliated competitors to apportion business, territory, pricing, or to conduct any other activity that undermines competition and fair play
3. **Refrain** from agreements or relationships with other Supply Chain partners or unaffiliated competitors that could create the appearance of improper relationships
4. **Report** any suspected or suspicious situations relating to anti-trust or competition law violations

What to Watch For:

1. **Exclusive** arrangements for the purchase or provision of services
2. **Restrictive** agreements that bind a customer's choices in using Dwellworks' services
3. **Selective** price discounting
4. **Distribution** arrangements with competitors

Interacting within the Dwellworks Community

Fair and Honest Dealing

While Dwellworks respects your independence and your status as a Supply Chain provider, we also expect that you conduct yourself with a high degree of honesty, integrity, and equality in your workplace and when you conduct business on behalf of Dwellworks. Supply Chain partners should not misrepresent information or manipulate it. While you are ultimately free to conduct your business and your operations as you see fit, you should also consider the following principles:

Example: A long-time colleague and employee of your business engages in discriminatory behavior when interacting with those of a different ethnicity. You value your colleague's work, but you are uncomfortable with the discrimination. **Should you take disciplinary action?**

Answer: Dwellworks' clients and customers contractually require that Dwellworks provides services using companies and individuals with anti-discrimination policies. If you intend on doing work for Dwellworks, you must conduct yourself and your business with the highest standards of integrity, equal treatment under the law, and fairness.



What to Do:

1. **Avoid** making employment and other similar decisions based on another's race, gender, color, religion, national origin, ethnicity, nationality, sex, pregnancy, sexual orientation, age, disability, veteran status, or any other characteristic protected by the laws of your jurisdiction
2. **Provide** a work environment free of discrimination, violence, and harassment
3. **Comply** with all relevant labor and employment laws and regulations within the jurisdictions where you conduct business

What to Watch For:

1. **Hostile** or inappropriate work environments that engage in crude, rude, discriminatory, or offensive behavior
2. **Unauthorized** disclosure of employment data
3. **Retaliatory** or discriminatory actions taken against people with protected characteristics at any phase in the employment, application, or disciplinary process

Representing the Company

Dwellworks Supply Chain partners occupy a unique place within the relocation services industry. Often, Supply Chain partners are the sole face of Dwellworks to relocating employees, and even though Supply Chain partners are independent contractors, you must nevertheless conduct yourself with integrity and professionalism, no matter who you are or what business you are in.

Example: You list that you are a Supply Chain partner of Dwellworks on your Facebook page, but your friends often post inappropriate pictures of themselves and you on your Facebook page. **Should you be concerned?**

Answer: Yes. While Dwellworks realizes that its Supply Chain partners are free to enjoy their private lives, Dwellworks must also ensure that inappropriate or offensive content is not attributed to Dwellworks' name or reputation. You can keep either the photos or your association to Dwellworks on your Facebook page, but you cannot associate Dwellworks in any way with offensive materials, including photographs, on your Facebook page or any other social media, web-based, public environment.

Example: A local news reporter calls you and asks questions about Dwellworks and the relocation industry. **Should you conduct the interview with the reporter?**

Answer: No. You must not speak with any member of the press in relation to Dwellworks or your relationship with Dwellworks. You should refer all media inquiries to your Dwellworks contact, who will then direct them to the appropriate person.

Example: A relocating employee requests additional services that are not within the scope of your work order. You remember that you should always keep the customer happy. **Should you go ahead and provide the services?**

Answer: No. While satisfactorily providing services is indeed important, it is equally important to avoid "scope creep" by providing services outside of the original order. Contact Dwellworks to determine the next appropriate action.

What to Do:

1. **Be familiar** with any Dwellworks policies relating to media relations, social media, customer service behavior, or any other law or regulation that would govern your conduct on behalf of Dwellworks
2. **Advertise** your services in a fair, factual, and truthful manner. If your marketing materials refer to Dwellworks or to a third-party, you must receive written permission from Dwellworks or that third-party before using those materials
3. **Refrain** from providing services or products that go beyond your original work order or service agreement
4. **Accept** only written contracts, invoices, and communications for any and all business interactions or dealings made on behalf of Dwellworks
5. **Present** yourself in a professional and respectful manner
6. **Avoid** situations where your views, opinions, statements, or actions could be considered representative of Dwellworks
7. **Use** social media in a respectful manner and remove all objectionable material from your social media profile if you intend to acknowledge your relationship with Dwellworks
8. **Avoid** contact with the news media when acting on behalf of Dwellworks and refer any news media inquiries to your Dwellworks contact.
9. **Utilize** your Dwellworks contact if you are unsure about how to appropriately represent Dwellworks

Working with Governments and Their Employees

What may be a minor matter to a corporate client may be extremely important to a government agency. Supply Chain partners must be particularly vigilant when serving government employees. All of Dwellworks' Supply Chain partners should provide support services in a way that does not breach or threaten the government employee's safety and security.

Example: While assisting a government employee you see some envelopes addressed to the employee that state the employee's title and the name of the government agency. **Can you ask the employee about their job in general conversation?**

***Answer:** No. Do not ask about the government employee's job if you come upon some information about it in the course of your duties. Only discuss the government employee's job if the employee chooses to share this information with you. Sensitivity to government employees' positions and work life remains an incredibly important part of delivering key services to our clients and their relocating employees. If you have questions about interactions with government employees, be sure to reach out to your Dwellworks contact.*

What to Do:

1. **Be familiar** with all relevant laws, rules, and regulations pertaining to government affairs and practices
2. **Communicate** truthfully and accurately with government employees
3. **Never** offer a gift or any entertainment to government employees
4. **Never** ask about a government employee's name or agency
5. **Keep** a government employee's name, title, and agency name confidential
6. **Maintain** exceptional diligence in handling personal information relating to government employees
7. **Err** on the side of caution, communicate frequently and reach out for clarification

What to Watch For:

1. **Contracts** or work orders that reference government regulations or laws
2. **Sensitive** or particular needs of government employees and their employers
3. **Specific** instructions that enumerate certain government requirements

Health, Safety, Security, Environment (HSSE)

Dwellworks seeks to provide its services in a healthful, safe, and environmentally friendly manner. As a result, you also need to partake and comply with Dwellworks Health, Safety, Security and Environmental policies in order to protect Dwellworks and all Dwellworks constituents.

Example: You are in a serious automobile accident while conducting work on Dwellworks' behalf. You are unhurt, but your car is severely damaged. **Should you finish your work assignment?**

***Answer:** No. You should contact emergency services immediately if you are injured or in an accident while working on behalf of Dwellworks. Next, you should contact Dwellworks and follow any Dwellworks accident and injury policies, including completing an incident report form.*



What to Do:

1. **Be familiar** with all relevant Dwellworks policies and every applicable law or regulation in the jurisdictions in which you conduct business
2. **Maintain** a safe working environment in every location where you conduct business
3. **Repair** or discard equipment that is unsafe and dangerous
4. **Respect** the environment and act in an environmentally conscious manner
5. **Remain** vigilant and aware of all potential health, safety, or environmental risks or threats that you encounter in the course of your business with Dwellworks
6. **Report** any and all HSSE violations, incidents, injuries, or “near-misses”

What to Watch For:

1. **Unsafe** conditions such as unlabeled or hazardous materials, exposed or faulty wiring, unsafe driving, adverse weather conditions, suspended heavy loads or other potential “fall hazards”, blocked fire or emergency exits, broken or faulty equipment, and hazardous or violent social conditions
2. **Frequent** HSSE complaints in relation to any facet of your work with Dwellworks
3. **Unreported** HSSE concerns
4. **Missed** opportunities to reduce waste, carbon footprint or environmental impact
5. **Inadequate** security procedures to protect the health and safety of others
6. **Undue** risks disproportionate to the rationale or purpose encountered in the course of your contractual relationship with Dwellworks

Destination Services Example

You notice that your car's check engine light keeps flashing while on your way to pick up a relocating employee. **Should you continue with your assignment?**

***Answer:** No. Consultants should maintain their vehicles and ensure they are reliable and safe to drive before accepting an assignment. If there is a mechanical or safety problem with the vehicle, you must provide notice to the relocating employee and reschedule your appointment, and make the necessary repairs.*

What to Do:

1. **Be familiar** with all relevant training material, instructions, guidance, and policies provided to you by your Dwellworks contact
2. **Possess** and make available for inspection a valid driver's license, adequate vehicle insurance, registration certificate, and any other related documents
3. **Refrain** from using any cellular, electronic, or communication devices while driving your vehicle. You may use these devices only when you are stopped in a safe location to conduct business related to services performed for Dwellworks
4. **Obey** all traffic, driving, and other relevant laws
5. **Exercise** caution when encountering slippery roads, precipitation, or other adverse weather conditions
6. **Maintain** your vehicle and keep it in a safe and operable condition
7. **Use** seat belts and car seats and ensure that the relocating employee and his/her family use seat belts and car seats as appropriate and required by law
8. **Have** an emergency roadside kit complete with supplies including flashlights, blankets, first aid kits, fire extinguishers, road flares, etc.
9. **Refrain** from smoking, drinking, drug use, and the possession of tobacco products, alcohol, and other controlled substances while conducting business on behalf of Dwellworks
10. **Avoid** unsafe or hazardous neighborhoods, situations, and areas
11. **Refrain** from possessing firearms, explosives, knives, or other dangerous instruments when conducting business on behalf of Dwellworks
12. **Report** any violations of policies or ask questions by contacting Dwellworks

What to Watch For:

1. **Broken**, frayed, or faulty parts on your automobile
2. **Inclement** weather conditions that can affect safe driving or navigation
3. **Dangerous** or unsafe neighborhoods or areas
4. **Unsafe** driving or traffic conditions
5. **Erratic**, unhealthy, unstable, or violent behavior from third-parties or from the relocating employee and/or his/her family
6. **Environmentally** unsafe conditions that can affect the ecosystem/human health

Residential Services Example

A Dwellworks work order has brought you to a house that has a pervasive mold problem. You hesitate to enter or begin work because of this issue. **Is it appropriate to contact Dwellworks about these issues?**

Answer: Yes. You should contact Dwellworks immediately whenever there is a HSSE concern. In this case, Dwellworks must be alerted of a mold issue as soon as possible, as mold can cause serious health issues and extensive property damage.

What to Do:

1. **Be familiar** with all applicable policies, laws, and regulations in the jurisdictions in which you conduct business
2. **Avoid** unsafe or hazardous conditions on the property including frayed wires, faulty electrical systems, mold, radon, asbestos, lead, crumbling structures, pests or wild animals, and any other risks to health, safety, or the environment
3. **Remain** environmentally conscious and follow all relevant environmental laws and regulations in the jurisdictions in which you conduct business
4. **Dispose** of all waste and hazardous material in a safe and lawful manner
5. **Mediate and report** all serious environmental or health hazards to the relevant local authorities and to Dwellworks
6. **Operate** any equipment and machinery with the applicable safety and protective gear
7. **Avoid** occupational, environmental, and health risks whenever possible by eliminating potentially hazardous situations (e.g., exposed chemicals, dangerous machinery, “fall hazards”, fire hazards, etc.)
8. **Report** any and all HSSE violations, incidents, injuries, or “near-misses”

What to Watch For:

1. **Hazardous** conditions or unreported hazardous conditions that pose a risk to the health and safety of others
2. **Inadequate** safety equipment or procedures
3. **Missed** opportunities to reduce waste, hazardous material production, and/or other environmental impacts
4. **Irresponsible** or hazardous waste disposal procedures

Physical Security Crisis Management

With the wide range of security concerns confronting governments and businesses alike, Dwellworks and Dwellworks Supply Chain partners must remain aware of security threats and the potential for other crises. In a general sense, all Supply Chain partners must take every precaution to prevent a catastrophic occurrence, but some specific guidelines should be used on a daily basis.

Example: Your workplace was broken into, but it doesn't seem like anything related to your work was stolen. However, someone could have seen your computer and email passwords as well as client information because this information was scattered across your desk. **Is this a potential security risk?**

***Answer:** Yes. Supply Chain partners must safeguard their belongings and work product and err on the side of caution. In the event of any security breach, contact Dwellworks immediately. If you cannot reach your Dwellworks contact, or if it is after business hours, then you should report the potential security risk using the Dwellworks Compliance Hotline. Supply Chain partners should refrain from writing down passwords and should safeguard belongings and work product by locking them up or keeping them out of sight.*

What to Do:

1. **Be familiar** with all relevant Dwellworks policies and any relevant laws and regulations relating to employee background checks, identity verification, and immigration/customs laws
2. **Engage** in emergency planning and emergency drills when possible
3. **Screen** employees and subcontractors against appropriate terrorist "watchlists"
4. **Maintain** a safe workplace environment by developing physical security systems and recognizing indicators of criminal activity within the workplace
5. **Ensure** access to your place of work is possible through only authorized personnel
6. **Safeguard** the physical security of your belongings and work product by using safes, locks, barriers, passwords and other physical security tools
7. **Comply** with all relevant immigration and customs rules
8. **Report** potential and actual security threats

What to Watch For:

1. **Unsecured** assets like computers, binders, drawers, computers servers, etc.
2. **Inadequate** protection of hazardous materials
3. **Frequent** or occasional security complaints from constituents
4. **Insufficient** screening for employees, subcontractors, or Supply Chain partners

Respecting Dwellworks Intellectual Property and Assets

Dwellworks' assets, equipment and facilities must be used only for lawful, proper, and authorized purposes. The theft, misuse, or unauthorized tampering or reappropriation of money, property, services, or assets (including intangible assets such as trade secrets, trademarks, company branding, logos, distinctive marks, proprietary information, business, marketing and service plans, designs, databases, records, compensation information, and any unpublished financial data and reports) is strictly prohibited and offending parties may be subject to civil and criminal penalties.



Conflicts of Interest

Dwellworks recognizes that Supply Chain partners may partake in legitimate financial, business, and personal activities beyond their relationship with Dwellworks. These activities must be lawful and free of conflicts with a Supply Chain partner’s responsibilities to Dwellworks. A conflict of interest arises when *any* interest conflicts with the interests of Dwellworks, and could reasonably be determined to harm Dwellworks’ reputation, or make it difficult for a Supply Chain partner to perform his or her work for Dwellworks objectively and effectively.

Example: Your cousin works for Dwellworks and you currently are performing work on behalf of Dwellworks. **Is this a problematic conflict of interest?**

Answer: Not necessarily. While Dwellworks takes any potential conflict of interest seriously, it is important to truly analyze the facts of the situation and make a determination based on the facts. You should always report any potential conflict of interest.

What to Do:

1. **Be familiar** with all of Dwellworks’ conflict of interest policies
2. **Disclose** in writing any and all potential conflicts of interest that may affect your ability to effectively perform services for Dwellworks
3. **Avoid** actions, activities, or relationships that may cause a potential conflict of interest or the appearance of a conflict of interest
4. **Use** good judgment when engaging in economic and personal activity outside of your contractual relationship with Dwellworks
5. **Report** any new or previously undisclosed conflicts of interest
6. **Use Good judgment in selecting a vendor or supplier** especially if you have a previous personal or business relationship with that person.
 - a. Any referral to third parties involving services to be provided to a transferee must follow the guidelines below:
 - i. Provide a list of three providers of the service to the transferee
 - ii. Let the transferee decide which provider to use
 - iii. Disclose any personal relationships that exist with any of the providers ie relatives, friends etc.
 - iv. If there are not three providers in the area then provide those who are available
 - b. If the transferee would like you to make the decision then get an email from the transferee that acknowledges that you have made a disclosure of any relationships with the providers and that the transferee gives you permission to choose the provider



What to Watch For:

1. **Familial** or romantic relationships with Dwellworks associates, clients, or suppliers
2. **Other** work in which you use Dwellworks resources or assets
3. **Sending** business to third parties with whom you have a previous personal or business relationship
4. **Inappropriate** gifts from business associates that may appear to create a conflict
5. **Holding** investments or doing other work that may somehow conflict or compete with Dwellworks and its affiliates

Conclusion

By adhering to the Code, you are helping to provide a uniform and excellent service while upholding high standards of integrity. Your contractual relationship with Dwellworks is based on the highest mutual regard and a partnership that embodies honesty, fair dealings, and ethical conduct. If you should ever have an ethical concern or question, do not hesitate to speak up and use the available communication channels listed below:

- + Call or email your Dwellworks contact
- + Email the Compliance Office at compliance@dwellworks.com
- + Call anonymously using the applicable Dwellworks Compliance Hotline:
 - **United States/Canada:** 1 (877) 647-3335
Code: 8003992626
 - **Costa Rica:** +506 4000-3673
Code: dwcostarica
 - **Luxembourg:** File a report through <http://www.redflagreporting.com>
Code: 8455192606
 - **Mexico:** +52 (55) 4170-7583
Code: 8003992626
 - **United Kingdom:** +44 (800) 048-8047
Code: 8455192606
 - **All Other Countries:** File a report through <http://www.redflagreporting.com>
Code: 8003992626