

ROYAL RELOCATION MALAYSIA

Code of Business Conduct

Contents

1. Introduction.....	3
2. Scope and our mission	3
3. Compliance with Laws, Rules and Regulations.....	3
4. Our responsibility as an employer	3
5. Your responsibility as an employee	4
6. Your responsibility as a business Partner.....	4
7. Our responsibility to our community.....	4
8. Our responsibility to the environment.....	4
9. Our commitment to best practice.....	5
10. Our anti-bribery and anti-corruption policy	5
11. Our commitment to fair and free competition	5
12. Our commitment to the Data Protection Act and protecting personal information	6
13. Our Health and Safety Policy	6
14. Monitoring and enforcement.....	7
15. Communication and awareness of this Code of Business Conduct	7

1. Introduction

The Board of Directors of Royal Relocation Malaysia (the Company) has adopted the following Code of Business Conduct (the Code) which sets out our commitment to ethical standards and legal principles, which the Company expects every employees and business Partners to exhibit and adhere to in all dealings with our clients, the supply chain, the community and with one another.

2. Scope and our mission

Royal Relocation Malaysia provide a wide range of relocation services to aid our client is every need. Our services ranges from relocating large offices to small homes. We even relocate fine arts, factory/industrial units, machineries and your beloved pets. Working with our clients over the years has provided us with a wealth of experience in many different types of relocations. Our experienced team will provide a solution to all your relocation needs. The company strives to maintain and protect its reputation for reliability and integrity through a safe, punctual and properly controlled service.

Our mission is to provide a quality of service which meets or exceeds the demands and expectations of our clients, by:

1. Professionalism

- We understand leaving your old space behind is difficult enough. We aim to ease the transition.

2. Reliability

- We understand your belongings are precious to you, so we do our best to make sure everything makes it across safely

3. Responsibility

- We constantly improve and optimize our processes so that you get the best quality relocation service

3. Compliance with Laws, Rules and Regulations

In conducting day to day business activities, all employees are to follow and observe the local laws, rules and regulations of the country they operate in. Needless to say, this is mandatory.

4. Our responsibility as an employer

- To act professionally, fairly and with integrity to all employees;
- Provide employees with all information, instruction, training and supervision necessary to best carry out their work, on an ongoing basis;
- Provide a work environment for all employees which is safe and without risk to health and ensure adequate provision is made with regards to the facilities and arrangements assisting employee welfare at work;
- Model ethical behavior and encourage open communication with employees, providing guidance and feedback in response to questions or concerns;
- Ensure that no employee is retaliated against for reporting suspected or potential violations of the Code or applicable law.

5. Your responsibility as an employee

- To act honestly and ethically in all business dealings;
- Comply with the law and the Code, as well as Company policies and business procedures;
- Promptly report any suspected or actual violations of the Code to your manager or a director of the Company;
- Seek guidance from your manager or a director of the Company when faced with an ethical or legal challenge; and
- Be accountable for adherence with the law and this Code.

6. Your responsibility as a business Partner

Royal Relocation Malaysia expects all business Partners to:

- Be aware of and uphold the same ethical standards and legal principles set out in this Code;
- Comply with our Partner Service Level Agreement;
- Operate your business professionally and in full compliance with the laws and regulations of the countries in which you are located and in which you do business, and the policies applicable to your business.

7. Our responsibility to our community

- Royal Relocation Malaysia is committed to managing and minimizing the impact of its operations on the environment and promoting exemplary corporate behavior in conjunction with our business Partners around the world. To this end we will:
- Comply with or exceed national legislation wherever we work;
- Pledge that our employee and environmental policies will not negatively impact the community, wherever we work;
- Pledge honest, courteous and professional dialogue with the wider community;
- Work with business Partners around the world whose commitment to their community matches our own; demonstrated wherever available by their 'FAIM' accreditation provided by our world body, FIDI (the international federation of international furniture movers); and
- By participation in voluntary charitable activities and donations.

8. Our responsibility to the environment

- Office supplies and marketing material are sourced wherever possible from recycled materials and/or sustainable resources, then wherever possible, recycled after use;
- Our cardboard and paper packing materials are produced wherever possible from sustainable resources; they are recyclable, non-bleached and bio-degradable;
- Making sure that all our vehicles are in perfect condition to minimize emissions and impact to the environment.
- We adopt minimum on the road time for all storage consignments. Once goods are stored, they remain in one place until they are needed again.

9. Our commitment to best practice

- We work to the quality management principles of ISO 9001:2015 including FIDI documented in our Quality Management documents;

10. Our anti-bribery and anti-corruption policy

Royal Relocation Malaysia takes a clear stand against bribery and corruption. The Company will not tolerate nor condone any illegal or unethical behavior or actions by any employee or business Partner with whom Royal Relocation Malaysia conducts business.

- *Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal and it is a breach of trust.*
- *A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.*

We will comply at all times with applicable legislation including but not limited to the **Malaysian** Anti-Corruption Commission Act 2009 in accordance with the following charter, and expect & require absolute commitment to uphold to the same by our business Partners.

Royal Relocation Malaysia including its officers, employees and business Partners pledge to:

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

11. Our commitment to fair and free competition

We will comply at all times with Competition Law (Malaysian Competition Act 2010.) We commit to healthy free and fair competition and will not enter into any anti-competitive agreement or behavior with another firm to fix prices or the market, nor otherwise prevent, restrict or distort competition.

12. Our commitment to the Data Protection Act and protecting personal information

We will comply at all times with The **Personal Data Protection Act 2010** and/or similar protection of personal information laws in other countries. Personal information will be protected against unauthorized access. We necessarily ask for and retain certain personal information to enable us to process and complete a transaction to deliver our services. We are required to share certain personal information with other parties related to the transaction, such as but not limited to government authorities and agencies including Royal Malaysian Customs Department (RMC), international Customs and Border Agency's, business Partners, international Carriers such as shipping lines and airlines, insurance companies and their agents. However, personal information will only be shared for the specific purpose of effecting the transaction. We pledge that personal information processed by us will be:

- Used fairly and lawfully; for specifically stated purposes only;
- Used in a way that is accurate, adequate, relevant and not excessive;
- Kept for no longer than is absolutely necessary;
- Handled according to people's data protection rights, and:
- Kept safe and secure.

13. Our Health and Safety Policy

The Occupational Safety and Health Act 1994 or act 514 imposes a statutory duty on employers to ensure, in so far as is reasonably practicable, the health and safety of their employees whilst at work. This duty also extends to others who may be affected by that work.

Employees have a statutory duty of care of themselves and others who may be affected by their acts or omissions.

To enable these duties to be carried out, it is our intention to ensure that responsibilities for health and safety matters are effectively assigned, accepted and fulfilled at all levels within our organization.

Royal Relocation Malaysia will, so far as is reasonably practicable, ensure that:

- Adequate resources are provided to ensure that proper provision can be made for health and safety;
- Risk assessments are carried out and periodically reviewed;
- Systems of work are provided where reasonably practicable, and they are maintained, so that they are safe and without risk to health;
- Arrangements for use, handling, storage and transport of articles and substances for use at work are safe and without risk to health
- Employees are provided with such information, instruction, training and supervision as is necessary to secure their safety and health at work and the safety of others who may be affected by their actions
- The provision and maintenance of all plant, machinery and equipment is safe and without undue risk to health
- The work environment for all employees is safe and without risk to health and that adequate provision is made with regards to the facilities and arrangements for their welfare at work

- The place of work is safe and that there is safe access to and egress from the work place

It is the duty of all employees at work:

- To take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work, and cooperate with us in fulfilling our statutory duties, and;
- Not to interfere with, or misuse anything provided in the interest of health and safety

14. Monitoring and enforcement

Employees are expected to promptly report any suspected breach of the Code of Business Conduct to an appropriate authority, which may include but is not limited to:

- The Company Secretary, at royalrelocations.com/contact / Phone 603 6157 6777
- The Managing Director, at Phone 60 12 201 9945

In addition, employees may exercise their legal right or duty to report possible violations of law to the appropriate government authorities or the police at any time, without reporting the matter to, or seeking prior approval from the Company.

The Company sets clear guidelines for ethical and professional behavior through its policies and procedures set out in its ISO 9001-2015 Quality Management System.

15. Communication and awareness of this Code of Business Conduct

Our Code of Business Conduct is communicated to all employees via the Company's intranet (shared drive). Awareness is promoted by means of internal distribution and an induction programme. It is also available on our website.

We proactively communicate our Code of Business Conduct to our partner supply-chain in conjunction with Partner Service Level Agreements.

Nick Lee
Managing Director
ROYAL RELOCATION MALAYSIA

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