

Movers International – Social Responsibility Policy / Code of Conduct

Purpose

This Code of Business Conduct covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees employed by, or otherwise affiliated with, every company within the Weichert Family of Companies, including Movers International, referred to as the Company.

If a law conflicts with a policy in this code, you must comply with the law. Alternatively, if a local custom or policy conflicts with this code, you must comply with the code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation. Employees and officers are responsible for understanding the legal and policy requirements that apply to their jobs and reporting any suspected violations of law, this code, or Company policy.

Policy Statement and Guidelines

1. Ethics

The Company and its employees, wherever they may be located, must conduct their affairs with uncompromising honesty and integrity. Business ethics are no different than personal ethics. The same high standard applies to both. As a member of the Company you are required to adhere to the highest standard regardless of local custom. Employees will not engage in conduct or activity that may raise questions as to the Company's honesty, impartiality, reputation, or otherwise cause embarrassment to the Company.

2. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built. All employees and officers must respect and obey the laws, rules, and regulations of the cities, states, and countries in which we operate.

3. Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the Company. A conflict situation can arise when an employee or officer takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when an employee or officer (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company. Loans or guarantees of obligations to employees and officers and their family members by the Company may create conflicts of interest and in certain instances are prohibited by law.

Conflicts of interest are prohibited as a matter of Company policy, except as waived in writing by the applicable board of directors. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with senior management. Even the mere appearance of a conflict of interest should be avoided. Any employee or officer who becomes aware of a conflict or

potential conflict should bring it to the attention of a supervisor, manager, or other appropriate personnel.

4. Corporate Opportunities

Employees and officers are prohibited from taking personal advantage of opportunities available to the Company that are discovered through the use of corporate property, information, or position without the consent of the board of directors. No employee or officer may use corporate property, information or position for personal gain and no employee or officer may compete with the Company directly or indirectly. Employees and officers owe a duty to the Company to advance the Company's interests when the opportunity to do so arises.

5. Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee and officer should endeavor to respect the rights of, and deal fairly with, the Company's customers, vendors and suppliers, competitors, and employees. No employee or officer should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

To maintain the Company's valuable reputation, compliance with our quality processes and safety requirements is essential. All inspection and testing documents must be handled in accordance with all applicable specifications and requirements.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. Gifts and entertainment may be specifically prohibited by law when dealing with all applicable government officials.

6. Discrimination and Harassment

The diversity of the Company's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment including that based on:

- i. Race, color, religion, sex, sexual orientation, disability, family status or national origin.
- ii. Age (40 and over) – (Reference: U.S. Federal): Age Discrimination in Employment Act of 1967.
- iii. Disability status - (Reference: U.S. Federal): Vocational Rehabilitation and Other Rehabilitation Services of 1973 & Americans with Disabilities Act of 1990.
- iv. Veteran status - (Reference: U.S. Federal): Vietnam Era Veterans Readjustment Assistance Act of 1974.
- v. Genetic information - (Reference: U.S. Federal): Genetic Information Nondiscrimination Act.
- vi. Sex (Wages) - (Reference: U.S. Federal): Equal Pay Act of 1963.
- vii. Any other protected class based on applicable federal, state, or local law.

7. Health and Safety

The Company strives to provide each employee and officer with a safe and healthy work environment. Each employee and officer have the responsibility for maintaining a safe and healthy workplace for all employees and officers by following environmental, safety, and health rules and practices and by reporting accidents, injuries and unsafe equipment, practices, or conditions.

Violence and threatening behavior are not permitted. Employees and officers are expected to perform their Company-related work in a safe manner, free of the influences of alcohol, illegal drugs, or controlled substances. The use of illegal drugs and alcohol in the workplace will not be tolerated.

8. Confidentiality

Employees and officers must maintain the confidentiality of proprietary information entrusted to them by the Company or its customers or suppliers. Unauthorized disclosure is prohibited. Proprietary information includes all non-public information that might be of use to competitors or harmful to the Company or its customers or suppliers if disclosed. It includes information that suppliers and customers have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

9. Protection and Proper Use of Company Assets

All employees and officers should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All Company assets are to be used for legitimate Company purposes. Any suspected incident of fraud or theft should be immediately reported for investigation.

The obligation of employees and officers to protect the Company's assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing, and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Company policy. It could also be illegal and result in civil or criminal penalties.

10. Reporting Any Illegal or Unethical Behavior

Employees are encouraged to talk to supervisors, managers, or other appropriate personnel about observed behavior that they believe may be illegal or a violation of this Code of Conduct or Company policy or when in doubt about the best course of action in a particular situation. It is the policy of the Company not to allow retaliation for reports made in good faith by employees of misconduct or unethical or illegal behavior by others. Employees are required to cooperate in internal investigations of allegations of misconduct and unethical or illegal behavior.

11. Covering Up Mistakes; Falsifying Records

Mistakes should never be covered up but should be immediately fully disclosed and corrected. Falsification of any of the Company's clients or third-party records is prohibited.

12. Developing Software

Any invention, discovery, or device-like software made by an employee which results from activities carried out at the Company will be the property of the Company, and will be assigned to the Company or an entity designated by the Company. Employees involved in the design, development, testing, modification, or maintenance of the Company software must not tarnish or undermine the legitimacy and “cleanliness” of the Company’s products by copying or using unauthorized third-party software or confidential information. You may not possess, use or discuss proprietary computer code, output, documentation, or trade secrets of a non-Company party unless authorized by such party. Intentional duplication or emulation of the “look and feel” of others’ software is not permissible.

13. Fair Dealing

No employee of the Company should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other fair-dealing practice.

14. Fair Competition and Antitrust Laws

Personnel must comply with all applicable fair competition and antitrust laws. These laws attempt to ensure that businesses compete fairly and honestly and prohibit conduct seeking to reduce or restrain competition.

15. Political Contributions

No Company funds may be given directly to political candidates. You may, however, engage in political activity with your own resources on your own time.

Failure to comply with all of the components of this policy may result in disciplinary action up to and including termination.