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CODE OF ETHICS AND CONDUCT

1) INTRODUCTION

Glens Removals & Storage is committed to operating ethically and legally and to preserving integrity in all our business relations with customers, employees, suppliers, and subcontractors. This Code of Conduct represents the ethical, social, and environmental behaviour that Glens Removals & Storage commits to, and wish to promote the same to our employees and throughout our supply chain. This Code of conduct also supports the FIDI anti-bribery and anti-corruption charter, and as a FIDI Affiliate Glens Removals & Storage supports the FIDI's position against Anti -Trust, Anti-Bribery, and Anti-Corruption in the relocation industry.

2) VISION, MISSION, AND VALUES

Our Vision

- To be Zimbabwe's leading and most preferred regional and international relocation company.

Our Mission

- Total commitment to providing a quality and environmentally friendly worldwide relocation service.

Values

- Quality service
- Honesty, dedication and Integrity
- Health and Safety
- Equal Opportunity Employer
- Environmental friendliness
- Innovation service(s)



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3) LEGAL COMPLIANCE

The Code is also a clear statement that Glens Removals & Storage is committed to conducting our business honestly and ethically, and in line with internationally recognized ethical guidelines and conventions such as the Universal Declaration of Human Rights, FN Global Compacts ten Principles and the International Labour Organisation (ILO) conventions.

4) HARASSMENT, EQUALITY, AND DIVERSITY

Glens Removals & Storage does not tolerate bullying or harassment, including (without limitation) SEXUAL HARASSMENT. We recognize that our employees and our global marketplace include a diverse group of people. Sexual harassment is an unwelcome behavior of a sexual nature such as an unwelcome sexual advance, unwelcome request for sexual favors, or other unwelcome conduct of a sexual nature that makes a person feel offended, humiliated, or intimidated, and where a reasonable person in the circumstances would anticipate the possibility the person harassed would be offended, humiliated or intimidated.

Bullying is another type of Harassment. It is the physical or psychological behaviour or conduct where strength (including the strength of personality) and/or a position of power is misused by a person in a position of authority or by a person who perceives that they are in a position of power or authority. While bullying is normally associated with unequal power relationships, peer-to-peer bullying is not uncommon and is an equally unacceptable behaviour. Bullying can affect people at all levels.

Glens Removals & Storage believes in Equality and Diversity policy and has set out its commitment to equal opportunities. **Glens Removals & Storage believes** that the diverse experiences, viewpoints and styles of the company's employees not only give the company an important competitive advantage in the marketplace but also contribute to a unique workplace environment where we can all learn from one another.

Harassment can take many forms, but can generally be defined as any unwelcome conduct that creates an intimidating, hostile, or offensive work environment, or that has the purpose or



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effect of unreasonably interfering with an individual's work performance. It also includes unwanted physical activity including touching or staring.

Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or a compliment can contribute to harassment.

Harassment can include offensive language, jokes, pictures, videos, derogatory comments or remarks, intimidating or threatening behaviour against other employees as a result of their ethnic background

This policy is developed and reviewed in line with local and International conventions such as the Universal Declaration of Human Rights, FN Global Compacts' ten principles, and the International Labour Organisation (ILO) conventions which protect people from discrimination (both direct and indirect) on the grounds of:

- ❖ **RACE,**
- ❖ **AGE,**
- ❖ **GENDER REASSIGNMENT,**
- ❖ **MARITAL STATUS,**
- ❖ **PREGNANCY OR MATERNITY,**
- ❖ **DISABILITY,**
- ❖ **RELIGION OR BELIEF,**
- ❖ **GENDER OR SEXUAL ORIENTATION.**

We are all responsible for understanding our actions and how they may be perceived, regardless of intent.

This code not only applies to our behaviour in the workplace but also outside of the workplace when interacting with our colleagues and includes the use of social media and work-related social events.

5) PROCEDURE FOR HARASSMENT COMPLAINTS



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Glens Removals & Storage has an open-door policy. Harassment complaints are a serious matter to the company and we will be sure to:

- Take every complaint seriously regardless of the employee's position in the organization.
- Investigate every complaint.
- Don't assume that the person making the complaint is being oversensitive.
- Don't leave it to the parties involved to work it out.

If you are the complainant, or are concerned that someone else is being bullied or harassed, you should immediately report it to your immediate line manager. If you prefer not to raise it with your immediate manager, or your immediate manager is the perpetrator, you should contact the Group Human Resources Director, and or the Managing Director.

Glens Removals & Storage operates all cases of Harassment, Bullying, and Discrimination confidentially, and can rest assured that they will treat all complaints and procedures with respect and that employees can freely report harassment of any form freely and from risk of retaliation.

6) WORK ENVIRONMENT, HEALTH & SAFETY

Glens Removals & Storage prides itself on providing a safe, healthy working environment. Safety is our top priority, and all our employees and supply chain partners are expected to maintain a safe and healthy working environment.

1. Glens Removals & Storage appreciates that its employees are the main asset and guarantee for further success. We are therefore committed to providing a safe and healthy work place and protecting the wellbeing of our employees. We ensure consultation and training on all aspects of occupational health and safety associated with our work and its impact on our associates, clients and the general public.
2. We ensure our employees and supply chain understand the risks involved in their work and commit to assisting them in preventing and controlling these risks in line with the relevant local regulations and Health & Safety & Welfare legislation.

Our Responsibility under the code:

1. Responsibilities of employees

- Ensure you are always aware of and in compliance with this code and related policies.
- Raise any concerns or issues which are in breach of (or potentially in breach of) the code
- Always choose to do the right thing.

2. Responsibilities of managers

- The board of directors is responsible for approving the code and related policies.
- Managers are responsible for managing the policy and ensuring it is complied with and enforced.

This includes:

Leading by example in:-

- a. Informing employees on the code and related policies and procedures and making sure they are fully trained on its application
- b. Ensuring matters under the policy are dealt with promptly and that responses are clearly communicated. Ensure employees feel comfortable to raise concerns and avoid any actions or behaviour that could be viewed as retaliation.
- c. Be vigilant and take action for any violation.
- d. Seek guidance and escalate where appropriate.

3. Responsibilities of supply chain



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Glens Removals & Storage will work to build and maintain trust with any of its suppliers, subcontractors, and other chain associates by undertaking that its partners are:

- Aware of and uphold Glens Removals & Storage standards under both this code of conduct and our service level agreement.
- Operate their business in a competent manner and in full compliance with the laws, policies and procedures applicable to your own company and jurisdiction.

7) DRIVER SAFETY

It is of paramount importance that the areas of our business concerned with transportation have a responsibility towards other road users. To this effect, Glens Removals & Storage's commitment to safety in transportation includes:

- Adherence to the local Road Traffic Act [Chapter 13:11and The Protocol on Transport, Communication, and Meteorology] that encourages member states to adopt a harmonized policy on road transport that supports commercial transport enterprises through equal treatment, non-discrimination, reciprocity, and fair competition.
- A zero-tolerance approach to compliance with local, regional, and international transportation regulations.
- Accurate recording of mileage and reporting of driving hours.
- Drivers are responsible for reporting any concerns including any suspicious mechanical signs and also their own ability to drive safely and report to their superiors should they fall seek or feel fatigue during their course of duty
- Ensuring the regular maintenance of our fleet and transportation equipment.
- Compliance with driving regulations in the countries in which we operate including (but not limited to) speed limits and ensuring loads are properly secured.
- Reporting any concerns or unsafe conditions so that action can be taken as soon as possible

8) HUMAN RIGHTS POLICY



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Glens Removals & Storage has confirmed its commitment to advancing fundamental human rights and responsible labour practices throughout our services by adopting a global Policy on Human Rights. The policy, which applies to all Glens Removals & Storage employees, underpins the company's:

- Respect for diversity and inclusion
- Prohibition of discrimination and harassment
- Focus on workplace safety and health
- Commitment to responsible labour practices
- Protection of free speech and association

9) WORKPLACE VIOLENCE

Glens Removals & Storage prohibits violence, threats of violence, intimidation, and disruptive conduct on company premises and even off company premises if the employee is on company business or the behaviour is an extension of the workplace, such as online bullying directed at a co-worker. This prohibition applies to all Bridgestone employees, whether full-time, part-time, or temporary—as well as to customers, suppliers, contractors, and visitors. For the safety of all employees, customers, and visitors, Bridgestone prohibits the possession of firearms or other weapons on company property, in company vehicles, in rental vehicles, while on company business, or at company-sponsored events (even if held off company premises). Very limited exceptions, such as those necessary to comply with local laws, may apply, but only with proper approval in accordance with your local policy.

If you are concerned that you or someone else is being bullied or harassed, you should report it to the HR department and can rest assured that they will treat your concerns with respect and that you can do so free from the risk of retaliation. Employees should consult the Company Procedure Manual for further guidance.

10) DATA PROTECTION (PRIVACY) MANAGEMENT

It is the nature of our business that we need to collect, process, use and retain non-public personal information and we know that privacy is important to everyone. It is important to us



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that our customers, employees, and other individuals with whom we work can trust us in taking care of their non-public information.

The Glens Removals & Storage **Data Protection policy** refers to the company's commitment to treating information of employees, customers, stakeholders, or other interested parties with the utmost care and confidentiality.

We are committed to respecting those individuals whose personal information we handle in conducting our business and delivering our services in accordance with applicable law, our own policies, and those of professional standards such as FIDI.

Glens Removals & Storage operate a strict Data Security and Information Assurance policy which sets out our commitment to maintaining and protecting the information we hold in compliance with the local and International Data Protection Act and the FIDI FAIM Privacy charter

- We collect, process, store, and disclose information only for the purpose intended and always with the consent of the customers.
- We ensure that non-public data is protected by appropriate security procedures with significant access controls to safeguard from loss, damage or unauthorized access at all times.
- We do not keep information for longer than necessary in order to fulfill required services and comply with legal regulations. We ensure that after this date information is securely disposed of or deleted.
- We strive to ensure the data we hold is accurate and up to date and provide reasonable access to individuals to view and update their information

11) ANTI-BRIBERY, ANTI-TRUST AND ANTI-CORRUPTION MANAGEMENT

Glens Removals & Storage does not accept any involvement in corruption, extortion, bribery, attempted bribery, or fraud. This applies whether offering a bribe, accepting a bribe, or engaging in bribery either directly or through any third party.

Glens Removals & Storage, therefore, undertakes that it will always be in compliance with all applicable laws countering bribery and corruption in the jurisdictions in which we operate. This means not only local laws for the countries in which we provide services but those covering



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international operations such as the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010 and other International anti-bribery laws.

As a FIDI FAIM certified company we commit to the FIDI Anti Bribery, Anti Trust and Corruption Charter and undertake to:

1. Never engage in any form of bribery, either directly or through any third party.
2. Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
4. 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.
5. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
6. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
7. Never facilitate payments to obtain a level of service to which one would not normally be entitled to.
8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
9. Never induce or assist another individual to break any applicable law or regulation.

12) COMPLIANCE WITH OPERATING LAWS

Our business is required to comply with a number of laws in the different markets in which we operate, including transportation laws and regulations within Zimbabwe and the SADC region, and other countries in which we conduct our business.

Non-compliance with these regulations by any of us puts us at risk of legal penalties for both the company and/or the individuals involved. The company may also be at risk and jeopardize our ability to be permitted to continue to provide our services in the future and therefore the sustainability of our company.

It is therefore important that we are all aware of and in compliance with the regulations applicable to our company and in particular those applicable to our individual job roles.



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13) CONFLICT OF INTEREST

A **conflict of interest** is a situation in which an individual has competing interests or loyalties. Conflicts of interest involve a person who has two relationships that might compete with each other for the person's loyalties. For example, the person might have loyalty to an employer and also loyalty to a family business. Each of these businesses expects the person to have their best interest first. Thus, the conflict.

A conflict of interest is a situation that could benefit you or someone you know, this includes:

- Competing with Glens Removals & Storage's interest
- Personnel activities including hiring, direct management, and workplace relationships
- Appointment or utilization of supply chain
- Use of company resources (including information, equipment, and time)
- Outside employment
- Business decisions

It is important that should you become aware of a conflict or potential conflict you inform the appropriate manager immediately to ensure it can be effectively managed or resolved without it becoming a violation of the code of practice.

Glens Removals & Storage limits business gifts and entertainment to ensure they are only used in an appropriate manner. Gifts and business entertainment are strictly prohibited and could be construed as a bribe, violates any law or company policy, or creates a conflict of interest. Gifts or business entertainment should NEVER be requested, this includes tips.

14) Reporting – Perceived Violations and Reporting Obligations

Any employee who reasonably suspects violations of this Code of Business Ethics and Conduct related to Conflict of Interest such as Bribery, Corruption, and Anti -Trust should bring the matter to the attention of his or her supervisor, the next level of management, Group Human Resources counsel or the Any senior Executive they feel comfortable talking to. The employee should inform the case to their superior immediately. Such reporting to senior management or Human Resources personnel may be at the employee's option is anonymous. The report(s) shall be maintained in the strictest confidence and the employee making the report(s) shall not be subject to any retribution whatever.



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It is an affirmative part of Glens Removals & Storage's business ethics policy to encourage employees to report any suspected violation of this Code.

Employees should refer to the Company's Procedure Manual Guidelines for further guidance

15) ENVIRONMENTAL RESPONSIBILITY

Glens Removals & Storage is **committed to continuous improvement in the environmental impact of our business**. We acknowledge that our activities have an impact on the environment, and accept our responsibility for this effect. We recognize that effective environmental management is one of the most important priorities of modern times for business, and we are determined to be responsible corporate citizens. This includes:

- **Reducing energy consumption:** We are working at both local and network levels to reduce or eliminate wastes of all types including water and energy, at the source or by practices such as modifying production, maintenance, and facility processes, materials substitution, conservation, recycling, and re-using materials.
- **Reducing fuel consumption and emissions:** As a company heavily involved in transportation we recognize that the environmental impact of the emissions from those vehicles operating under our network is material and we encourage a number of initiatives to reduce our impact including efficient transport planning, utilization of intermodal transport and investing in cleaner more environmentally friendly vehicles as part of our replacement policy.
- **Recycling and reuse:** As a service provider involved in the extensive use of packing materials we recognise our activities have a direct, measurable impact on the environment and strive to recycle or reuse wherever possible.
- **Reducing input materials:** We aim to reduce our environmental impacts through the materials used in delivering our services, including encouraging reduced use of paper for printing and the use of recycled or reusable packing material where appropriate.

Please refer to our Environmental Policy in the Company Procedure Manual for further details

16) DISCIPLINARY ACTIONS ON VIOLATIONS OF POLICY AREAS

Glens Removals & Storage will enforce its policies and legal compliance standards on a consistent basis; strict disciplinary action will be taken for violations, as appropriate. In response to a



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violation of the Code of Business Ethics and Conduct, applicable domestic or foreign law, or Glens Removals & Storage Company Procedure Manual or Local Industry Labour laws will take precedence and be used for disciplinary action, which may range from a verbal or written warning to termination of employment and referral of the matter to local criminal prosecution authorities, or other appropriate disciplinary action, regardless of the level of responsibility within the organization.

The severity of the disciplinary action will be determined by members of senior management (in consultation with worker's Council representatives, and or the company legal counsel.

NOTE THAT: - All employees who do not receive this policy are strictly requested to visit the HR office immediately.

The Revisions to the Ethics & Code of Conduct will next be revised on 05 December 2023 and will be reviewed on a yearly basis, changes may be done earlier where necessary, and will be communicated to all Employees