



## United Nations Global Compact Communication on Progress 2014

### About the United Nations Global Compact

The United Nations (UN) Global Compact is a call to companies everywhere to voluntarily align their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption, and to take action in support of UN goals, including the Millennium Development Goals.

The UN Global Compact is a leadership platform for the development, implementation, and disclosure of responsible corporate policies and practices. Launched in 2000, it is the largest corporate responsibility initiative in the world, with over 10,000 signatories based in 140 countries. Team Relocations has been following these principles since 2007 and, in 2013, formally affirmed its commitment to, and integration of, the principles.

### The Commitment

- Make the UN Global Compact and its principles an integral part of business strategy, day-to-day operations, and organisational culture;
- Incorporate the UN Global Compact and its principles in the decision-making processes of the highest-level governance body (e.g., Board);
- Take actions in support of UN goals and issues, including the Millennium Development Goals;
- Communicate annually with its stakeholders on progress made to implement the principles, ideally integrated into the annual report or similar public document (known as the Communication on Progress – COP); and
- Advance the UN Global Compact and the case for responsible business practices through advocacy and active outreach to peers, partners, clients, consumers, and the public at large.

## Contents

10 Principles of the UN Global Compact .....	3
Chairman's Statement .....	4
Team's Core Values: Excalibur .....	5
About Team Relocations .....	6
<b>UN Human Rights Principles .....</b>	<b>7</b>
<b>UN Labour Principles .....</b>	<b>13</b>
<b>UN Environment Principles .....</b>	<b>19</b>
<b>UN Anti-Corruption Principles .....</b>	<b>25</b>
Supplementary Reading & Compliance Team .....	29

By participating in the Global Compact, Team Relocations makes a public commitment to the implementation, disclosure and promotion of the ten universal principles

## 10 Principles of the UN Global Compact



### Human Rights



1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.



### Labour



3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labour;
5. the effective abolition of child labour; and
6. the elimination of discrimination in respect of employment and occupation.



### Environment



7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.



### Anti-Corruption



10. Businesses should work against corruption in all its forms, including extortion and bribery.



## A Statement from the Chairman and Founder

To All Stakeholders,

For some 40 years, our growth and success has been based upon a strongly held set of core business values. From the early days, as a path-finding corporate moving company, to our present day position as one of Europe's leading global mobility services providers, we have empowered our people to deliver the highest professional and ethical services possible.

Much has changed over four decades, but the six core values, upon which our business is based, have not: Excellence, Responsibility, Integrity, Security, Synergy and Resourcefulness. They have developed, of course, to keep pace with the demands of 21st century business and, more recently, we have uniquely brought all these elements together under our Excalibur 'core values' programme.

Excalibur unites our values into one clear integrated strategy by which we might drive the pursuit of our goal to provide our clients with excellence in global relocation and move management services. The success of this mission is further supported by our commitment to, and support of, the United Nations Global Compact which we formally subscribed to in August 2013.

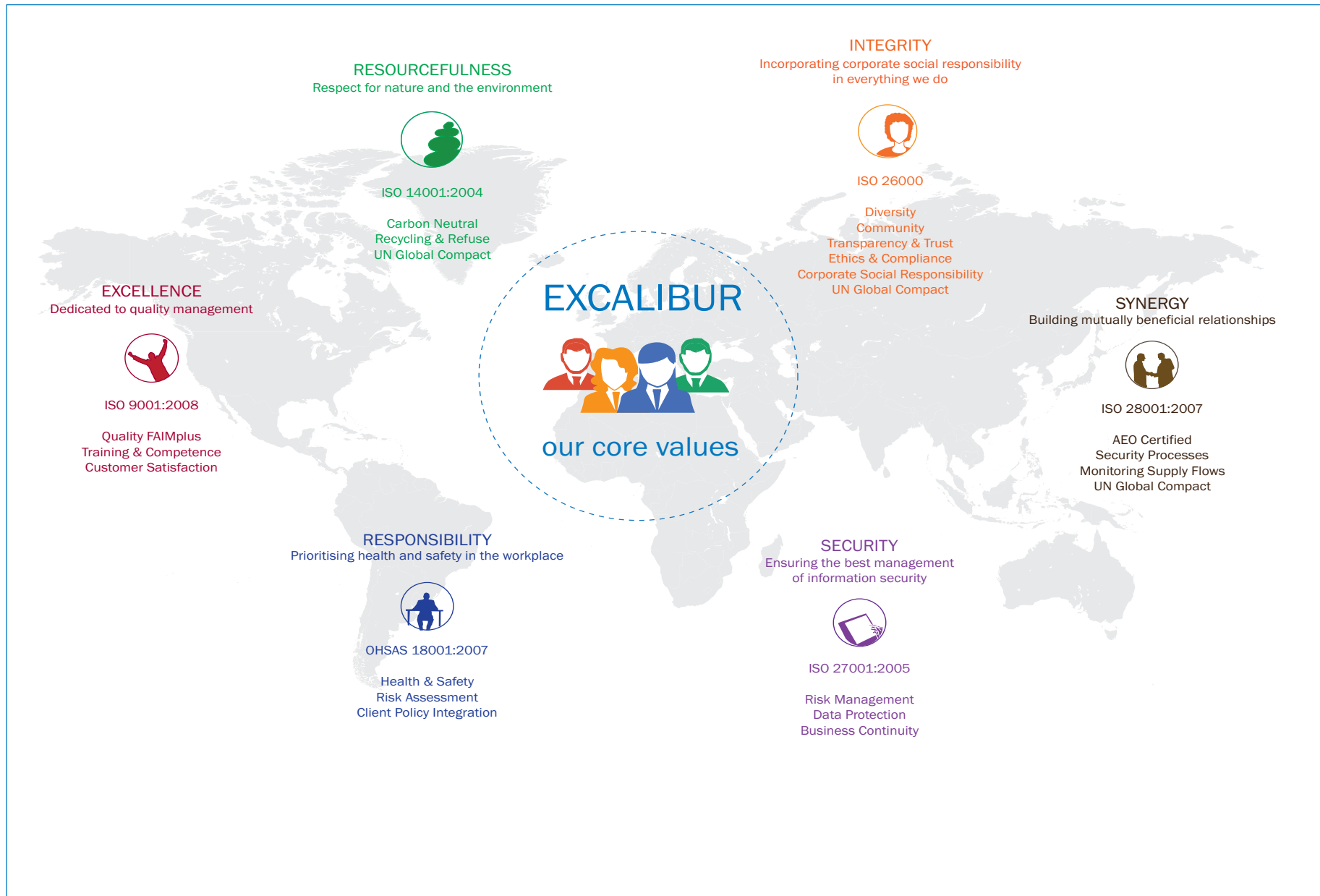
I am pleased to confirm that Team Relocations enthusiastically reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this first annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations, which Excalibur and its associated policies exemplifies also.

We also commit to share this information with our stakeholders using our primary channels of communication, including Team Extranet, web, blog and social media platforms.

**Yogesh B. Mehta**  
Chairman





## About Team Relocations

Team Relocations is a leading independent company specialising in the delivery of fully integrated global relocation services within the corporate market place, supporting in the region of 48,000 cases per annum.

We deliver end-to-end services that span policy consultation, predeparture counselling, destination and moving services, assignment management, expense reporting, repatriation, and transition.

Our partner network is central to our goal of delivering excellence in mobility solutions and supports our ability to maintain consistently high service standards from home to host location, even in the most remote and inhospitable regions.

Team remains privately owned and our portfolio of clients includes some of the industry's largest contracts currently in operation within the marketplace. A substantial percentage of our major corporate relationships have come about due to numerous contract extensions over many decades, as these companies have recognised our unique ability to handle their most challenging mobility requirements, whilst remaining small enough as a company to really care about what we do.

## OUR MISSION

To provide our clients with excellence in global relocation management through:



# Human Rights

**Principle 1**

Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2**

make sure that they are not complicit in human rights abuses.





## Assessment, Policy and Goals

Although already enshrined within our core values declaration policy document, Excalibur, Team has effected several changes throughout 2013/14 to further embody the two essential human rights principles within the fabric of its everyday operational working.

Furthermore, we have comprehensively broadened our approach to Human Rights to include not only our own working environment but also wherever our business activities touch other communities. This has been achieved in our approach to the supply chain as detailed in our Synergy Policy and with regards to Ethics and Compliance as covered in the Integrity Policy. These actions are best shown by clauses 1.2, 2.1, 3.8 and 3.9 of the Integrity Policy.

Excalibur and our individual Integrity Policy have been significantly amended to firmly establish our total commitment to:

- The Universal Declaration of Human Rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work

Our Mission Statement has also been adjusted to include a final principle that states:

- Being excellent corporate citizens

Team recognises its responsibility under the Universal Declaration of Human Rights to promote and protect human rights throughout its business operations





## clause 1.2

### 1.2 Managing Equality and Diversity

In addition to complying with all legal requirements and the UN Global Compact initiatives, Team employs a Diversity and Equality management strategy that is a more effective way of dealing with these issues, by emphasising the business and personal benefits that accrue from valuing the differences between people.

## clause 2.1

### 2.1 Corporate Governance

Good Corporate Governance is at the core of our Integrity Policy and is best encapsulated by our approach to transparency and trust. As a result of recent well publicised corporate scandals, public opinion in the honesty of 'business' has taken a knock. Within Team we have a clear framework, supported by Excalibur, for a code of business ethics which we believe will demonstrate greater transparency and accountability, not only in our financial reporting, but in all areas of activity touched by our business.

We support the ten principles of the United Nations Global Compact as a public commitment to leadership in social and environmental responsibility. A part of this is to address the impact of our business on our communities, on society and the environment more widely. This responsibility extends beyond our own operations, to those of our suppliers. Our desire is to perform ourselves and to engage with our suppliers of goods and services to ensure:

- The maintenance of human rights
- An ethical basis to business practice
- Environmental impact management
- Anti-corruption

Team recognises its responsibility under the Universal Declaration of Human Rights to promote and protect human rights throughout our business operations. We do this by having our own human rights principles. We recognise international labour standards as set out by the seven core International Labour Organisation (ILO) conventions and recommendations. We encourage all our suppliers to adopt a similar approach.

## clause 3.8

### 3.8 Mutual Respect and Dignity at Work

Team aims to create a working environment that allows the full potential of employees to be realised, in a happy and positive atmosphere. It is our wish to develop and maintain a working environment that is free from harassment or bullying and where all employees feel able to speak freely.

## clause 3.9

### 3.9 Implementation of Excalibur

This Integrity Policy sits as one part of Team's overall Core Values program, Excalibur. The implementation of this policy should be viewed together with the other five policies: Excellence, Responsibility, Security, Synergy, Resourcefulness and the 10 UN Global Compact Principles.

Excalibur and its associated policies form and integral part of the life-blood of Team Relocations and as such the exposure of these Core Values principles to all new staff is vital. Exposure and familiarisation should be undertaken during initial induction with HR and further expanded upon at annual management review. On-going update and refresher activity will be carried out via means of the Team Extranet communications site, regular review meetings and staff appraisal sessions.



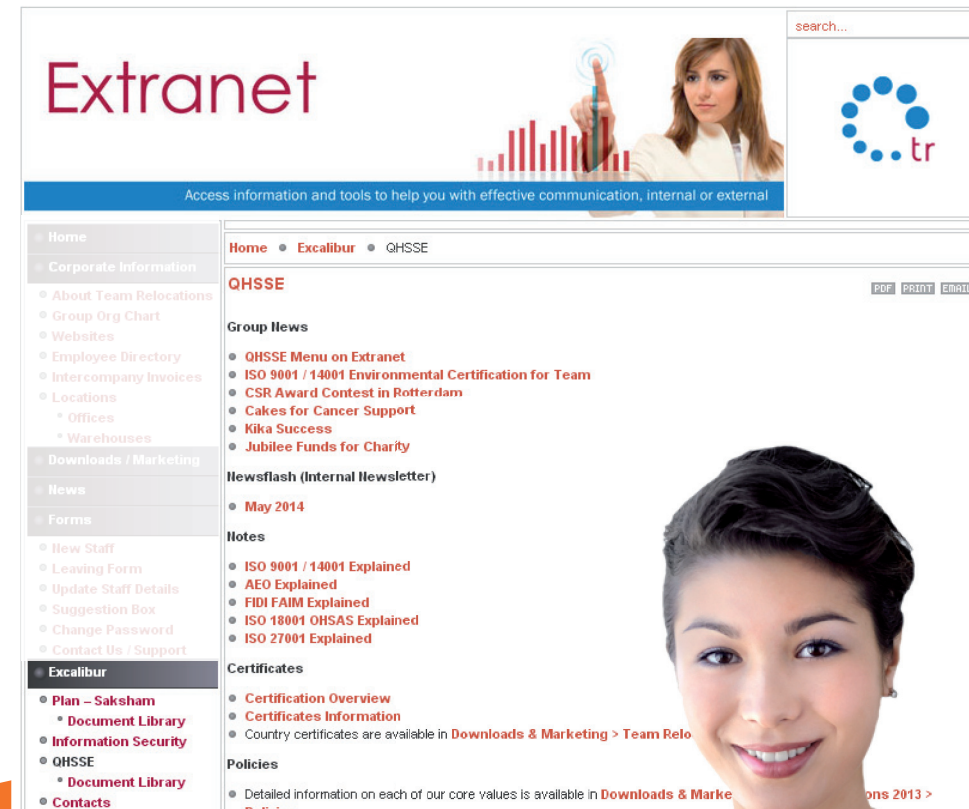
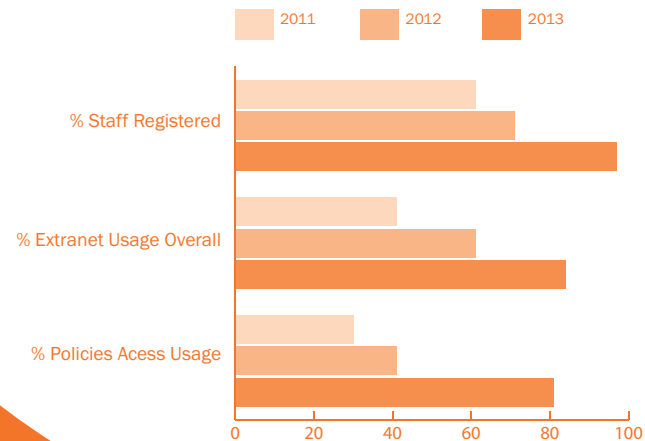
INTEGRITY  
EXCALIBUR | CORE VALUES

## Implementation and Outcomes

Implementation	Measurement of Outcomes
<b>Policy Changes</b>	
In addition to those policy changes noted, an additional clause, Clause 3.9, was introduced into the Integrity Policy, covering the implementation of Excalibur as a whole, the six core values policies and specifically the 10 UN principles.	Throughout the period under review, Team has continued to ensure the implementation of its Human Rights policies as embraced within the Integrity Policy. We have extended our web-based internal communication tool, the Extranet, to now include a dedicated Excalibur section covering the entire Group policies with notification of any policy changes.
<b>HR</b>	
HR has effected several changes to both employment Terms & Conditions and the Team Relocations Induction Programme to reflect specifically our commitment to the UN Global Compact. As an accredited Investor in People Company, we have now included within the staff annual assessment review, specific re-appraisal of staff's understanding and knowledge of the Company's core value policies.	We have seen a greater awareness within our employees of the subject and have not recorded any significant breaches or non-conformances.
<b>Whistle Blowing</b>	
A new 'Whistle Blowing' procedure has been introduced to allow any member of staff to raise an issue or concern without fear of recrimination.	Our 'Whistle Blowing' procedure has not had any issues raised by members of staff concerning breaches of Human Rights during the reporting period.
<b>Group Compliance Team</b>	
A compliance team was formed with nominated members from each of the 13 Team operating countries.	A significant strengthening of the Team Relocations Group Compliance team has taken place over the past 5 months, including a Quality & Compliance meeting in March 2014 where knowledge and lessons learned were exchanged among the team.
<b>Supply Chain</b>	
An integral role of our dedicated Supply Chain Manager is the responsibility for ensuring that all network partners within the Team Relocations supply chain have a clear understanding of our approach to human rights. The Supply Chain Manager reviews and audits the performance of all suppliers in respect of Human Rights.	Operationally, we have continued to select partners who share our core values and have not engaged in work in areas, or with organisations, who abuse the two Human Rights principles.



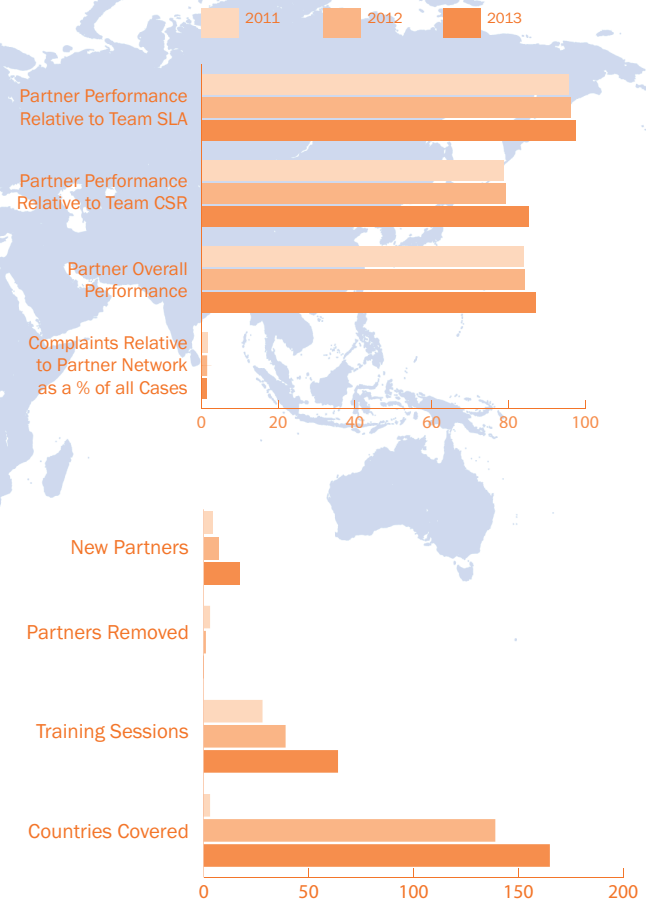
The Team staff Extranet is a user-friendly and comprehensive online tool providing employees with a wealth of useful up-to-date information including access to key business information and all company policies.



Our web-based internal communication tool, the Extranet, includes a dedicated Excalibur section covering all Team group policies, commitments and initiatives



Our global partner network, SUREFAST®, is central to our goal of delivering excellence in mobility solutions. Our ability to maintain consistently high service standards from home to host location, without the need for multiple agencies, provides many positive benefits for both relocating employees and clients alike.





# Labour

**Principle 3**

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4**

the elimination of all forms of forced and compulsory labour;

**Principle 5**

the effective abolition of child labour; and

**Principle 6**

the elimination of discrimination in respect of employment and occupation.





## Assessment, Policy and Goals

Although already enshrined within our core values declaration policy document, Excalibur, Team has effected several changes throughout 2013 to further embody the four essential labour principles within the fabric of its everyday operational working.

Both the summary policy document Excalibur and our individual Integrity Policy have been significantly amended to firmly establish our total commitment to:

- Equal employment opportunities
- Removal of discrimination within and outwith its activities

In addition, we have widened our approach to Labour Rights to include not only Team's working environment but also wherever our business activities interface with other communities. We have achieved this through our approach to the supply chain as detailed in our Synergy Policy and with regards to Ethics and Compliance as covered within the Integrity Policy. These actions are clearly identified in clauses 3.1 and 3.2 of the Integrity Policy and clause 1.0 of the Synergy Policy.

Whilst complying with all legal requirements and the UN Global Compact initiatives, Team also utilises a Diversity and Equality management approach that can be a more effective way of dealing with these issues, by highlighting both business and personal benefits that accrue from valuing the differences between people. Companies that grasp the additional business opportunities generated by managing diversity effectively are far more likely to enjoy sustained competitive advantage than those who do not.

Team aims to create a working environment that allows the full potential of employees to be realised



## clause 3.1

### 3.1 Accountability – Individual and Group

To comply fully with all aspects of this policy

To embrace diversity as a whole and specifically in our business as a means of broadening the Team skill and talent pool, achieving the highest levels of performance, and enabling all employees to maximise their potential

To be aware of discrimination, and understand the negative effect this can have on Team, its employees, suppliers and corporate clients

To stand guardians over this policy and its application and to work towards removing any discriminatory practices which may be preventing the company from achieving its overall CSR and business objectives.

To ensure that the reputation of Team Relocations as a fair and responsible employer in the eyes of the employees, clients, suppliers and the public

To be sensitive to the potential impact of one's behaviour on colleagues, customer and suppliers

To work together in the elimination of discriminatory practices

## clause 3.2

### 3.2 Recruitment and Selection

Every effort will be made to attract employees from all sections of society and to ensure fair treatment throughout the recruitment process and are in line with this Diversity Policy as a whole. This will include:

Ensuring that the vacant position and candidate specifications are accurate and non-discriminatory

Ensure any vacancy advertisement reflects and appeal to all sections of society

Provide a clear outline of our policy to any and all third party suppliers such as recruitment and employment agencies

Asking fair and consistent questions at interview

Maintain full records of the recruitment and selection process, including interviews notes

## clause 1.0

### 1. Intent

We expect our suppliers to do the same. Behaving professionally, responsibly and transparently means that we:

Comply with all applicable legislation

Maintain at all times our commitment to the UN Global Compact and its 10 abiding principles and wherever possible encourage a similar commitment throughout our supply chain

Have accessible and documented processes for supplier selection

Avoid conflicts of interest in our sourcing and supplier selection processes

Conduct our business without the payment or receipt of unlawful incentives

Avoid applying pressure to engage in reciprocal trading

Recognise the risks for suppliers who are dependent on their business with Team Relocations companies, and not abuse our corporate position

Ensure smaller suppliers are given fair consideration in our award of contracts, and when they are awarded business, they are supported to meet our exacting performance standards



INTEGRITY

EXCALIBUR | CORE VALUES

teamrelocations  
empowering relocation



SYNERGY

EXCALIBUR | CORE VALUES



## Implementation and Outcomes

Implementation	Measurement of Outcomes
<b>Policy Changes</b>	
In addition to those policy changes noted, an additional clause, Clause 3.9, was introduced into the Integrity Policy covering the implementation of Excalibur as a whole, the six core values policies and specifically the 10 UN principles.	<p>We are pleased to report that our support for the four labour principles was strong during the reporting period and there were no violations within Team Relocations or its partner network.</p> <p>Team is pleased to report that it has not been involved in any legal cases, rulings or other events related to labour issues.</p>
<b>Staff Suggestion Box</b>	
Allied to the Whistle Blowing procedure, we introduced a Staff Suggestion Box process within the Team Extranet, available to all staff and covering any and every aspect of employment with Team.	<p>Our 'Whistle Blowing' procedure has not had any issues raised by members of staff concerning labour principles during the reporting period.</p> <p>We received seven Suggestions through the electronic staff Suggestion Box but none were related to any of the 10 Global Compact principles.</p>
<b>HR</b>	
HR has effected several changes to both employment Terms & Conditions and the Team Relocations Induction Programme to reflect specifically our commitment to the UN Global Compact.	Team expanded its employed personnel throughout the reporting period (totalling 678) and continued to enjoy a very diverse employee demographic. This included a comprehensive range of ethnicity (18%), a strong split between genders (68%-32%, women to men), sexual orientation and disability.
<b>Project Saksham</b>	
In late 2013, we embarked on a 3 year commitment to a major fundraising initiative in support of Plan, the global children's charity. Spearheaded by Team's Group Compliance Officer, the commitment to the project encompasses all 35 locations across the 13 countries in which we are based, and includes all staff in developing and executing significant fundraising initiatives aimed at contributing €50k to the project annually.	Regular communications specifically concerning the Plan Saksham labour initiative are distributed across the organisation and throughout social media platforms aimed at reporting on progress on the great work completed to date, whilst also continuing to encourage even greater efforts in this worthwhile endeavour.





Founded more than 75 years ago, Plan is one of the oldest and largest children's development organisations in the world. Plan's vision is of a world in which all children realise their full potential in societies that respect people's rights and dignity.

**Project Saksham**, operated by Plan in India, aims to achieve decent employment for young people living in poor urban and rural areas ensuring that all entering the workforce are equipped with the knowledge and life skills required for quality jobs and work their way out of poverty.

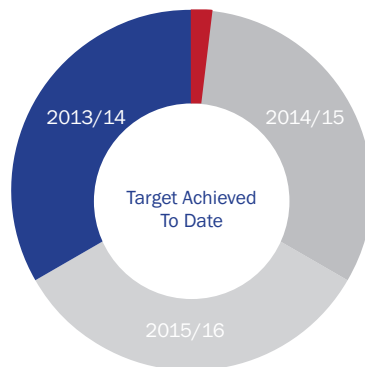
During Team's first year of commitment, our fundraising activities have assisted in the region of some 500 young people in realising their employment goals.



Cees Zeevenhooven  
(Group Director, Team  
Relocations) and Davina  
Feeleus (Account  
Manager, Corporate  
Partnerships) signing the  
agreement with Plan



\* €50,000 per year



■ Excess achievement

“We want to strengthen our core business values by demonstrating our commitment to helping shape society and economy in underprivileged locations in a positive and sustainable way.”

Leonie Kerkelaan, Team Group Compliance Officer



1,2,4: Team fundraising events (Valentines gifts, Bake off, Yoga class)

3: Youth at Saksham centre

5: Classroom in progress at Saksham centre



# Environment

**Principle 7**

Businesses should support a precautionary approach to environmental challenges;

**Principle 8**

undertake initiatives to promote greater environmental responsibility; and

**Principle 9**

encourage the development and diffusion of environmentally friendly technologies



## Assessment, Policy and Goals

We recognise the world is changing and our approach to business and its impact upon that world has to change too. We recognise that organisations of all kinds are, increasingly, determined to achieve and demonstrate sound environmental performance by controlling the impact on the environment by their activities, products and services. This is in the context of growing environmental awareness, increasingly stringent legislation and other factors promoting environmental protection and best practice.

The basis upon which we approach an environmental management system (EMS) is that of the international standard ISO 14001:2004, to which Team has gained certification. The intention of this standard is to provide a framework for a holistic, strategic approach to our organisation's environmental policy, plans and actions. ISO 14001 gives the generic requirements for an environmental management system. The underlying philosophy is that whatever the organisation's activity, the requirements of an effective EMS are the same.

Although already enshrined within our core values declaration policy document, Excalibur, Team has effected some changes to further embody the three essential environmental principles within the fabric of its everyday operational working.

Both the summary policy document, Excalibur, and our individual Resourcefulness Policy (Environment) have been subtly amended to firmly reaffirm our total commitment to the environment and the effect our operations may have on it directly or indirectly. This is best shown by clauses 1.0, 7.0 and 8.0 of the Resourcefulness Policy.

**Our activities are designed  
to reduce our harmful impact  
on the environment and  
everyone working for Team**





## clause 1.0

### 1. Intent

As one of our six core elements within our Excalibur programme, the environment is taken extremely seriously. Within the past five years, Team has embarked on a meaningful drive to proactively do all we can to reduce the impact that our business activities have on the environment, under the leadership of our dedicated Compliance Team.

This policy statement sets out our environmental commitments. It has been confirmed by the Board of Directors and is consistent with our corporate policy and the 3 environmental principles within the UN Global Compact. Our activities are designed to reduce our harmful impact on the environment and everyone working for Team or on Team's behalf is asked to support this statement.

## clause 7.0

### 7. Carbon Neutral

As concerns about climate change grow, the concept of 'carbon neutrality' has captured the corporate imagination, being embraced by a diverse range of organisations. This apparently simple concept however; that a company, or one of its products or services, can have no net impact on climate; is surrounded by controversy, and a wide range of assumptions and actions lie behind many of the claims that have been made.

The ambition to have zero net impact on climate is a powerful one, and a goal of neutrality has the potential to drive ongoing change within an organisation, whilst also promoting a shared responsibility with suppliers and customers, for emissions beyond the organisation's immediate control

In addition to implementing ISO 14001 standards across Team Relocations, we have introduced local regional programmes to reduce our carbon footprint in a meaningful and measurable way.

## clause 8.0

### 8. Reduce, Recycle & Re-use

A vital part of any environmental policy is the whole area of reduction, reuse and recycling. Some of our services by their very nature have the capacity to produce large amounts of waste. We have engaged in a concerted drive through procurement to purchase, wherever possible, materials manufactured from recycled materials, or indeed to purchase materials that in themselves are recyclable.

This programme is also directed at waste production and aims to reduce waste but also ensures that all materials, both office and commercial, are capable of being recycled are suitably collected and distributed to the appropriate authorities.

Changes to legislation will affect the way every business manages its waste products including the disposal of unwanted assets. Following a review of recent legislation, we took the decision to develop a new approach to our environmental policy and to change the way we looked at the challenges both in our daily business and the services provided to our clients.

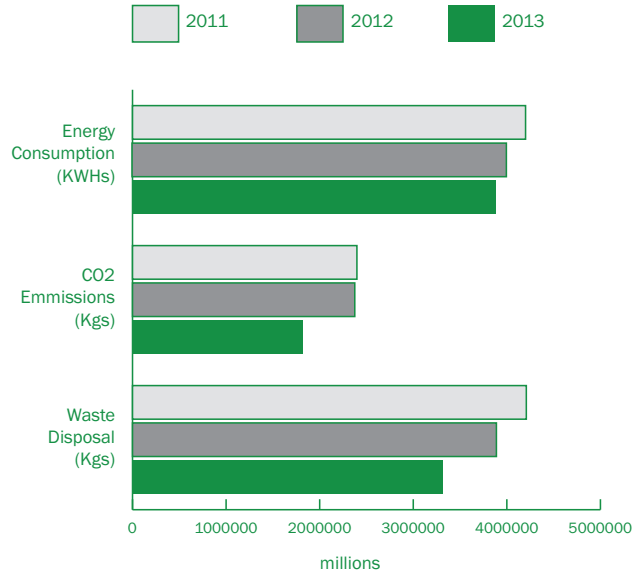


## Implementation and Outcomes

### Implementation

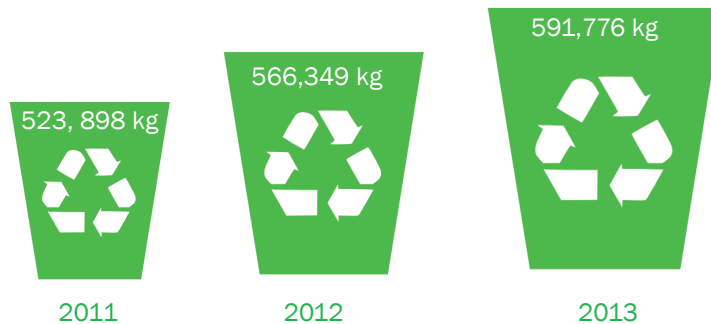
### Measurement of Outcomes

Policy Changes	
In addition to those policy changes noted, an additional clause, Clause 3.9, was introduced into the Integrity Policy covering the implementation of Excalibur as a whole, the six core values policies and specifically the 10 UN principles.	Team is pleased to report that it has not been involved in any legal cases, rulings or other events related to environmental issues.
HR	
HR has effected several changes to both employment Terms & Conditions and the Team Relocations Induction Programme to reflect specifically our commitment to the UN Global Compact.	A new initiative has been developed and introduced across the Group in terms of QHSSE by the means of a monthly newsletter, Newsflash, which is electronically produced and distributed to all staff.
Paradigm Project	
We supported The Paradigm Project which delivers improved efficient cooking stoves in Africa. This targeted regional environmental project in Africa not only assists in reducing the harmful effects of emissions on the environment, but also work towards protecting the environment (see page 24).	<p>With our contribution, we are supporting the people in Kenya where about 90% of rural households cook on open fires, the charcoal or wood for which produces toxic fumes harmful to the environment. In the project, Improved Cooking Stoves (ICS) are produced and sold through a participatory approach with local communities across Kenya.</p> <p>In 2013, we achieved a carbon neutral position by offset through the Carbon Neutral Company, utilising Gold Standard verified carbon credits.</p>
Environment-friendly Initiatives	
<p>We produced significant improvements year-on-year on emissions, waste disposal and recycling.</p> <ul style="list-style-type: none"> <li>• Purchasing vehicles conforming to the Euro 6 standard</li> <li>• Promoting the use of public transport amongst our employees</li> <li>• Promoting a national bicycle plan for employees, Where appropriate</li> <li>• Safe disposal of batteries and toners</li> <li>• Installation of catalytic converters</li> </ul>	During 2013, we renewed our environmental certification and achieved a multi-site certification under ISO 14001:2004 for all Team global operations.



In addition to implementing ISO14001 standards across Team Relocations, we have introduced local regional programmes to reduce our carbon footprint in a meaningful and measurable way.

### Paper and Card Recycling





### The Paradigm Project: Clean and Sustainable Wood Stoves in Kenya

Nearly 3 billion people in the world cook each day on open fires or rudimentary cookstoves. The charcoal or wood that is burnt releases toxic fumes and smoke as well as carbon dioxide and methane, two major greenhouse gases. Alarming, each year nearly 2 million people die prematurely from illness attributable to indoor air pollution.

In Africa, about 90% of rural households cook on open fires. The situation is especially acute in Kenya, which suffers from very high deforestation rates. As a result, many women in rural areas have to travel great distances to collect firewood, often more than 15km in a day!

The Paradigm Project aims to improve health and incomes throughout Kenya by reducing time and money spent buying fuel for household cooking.





# Anti-Corruption

## **Principle 10**

Businesses should work against corruption in all its forms, including extortion and bribery.





## Assessment, Policy and Goals

Good corporate governance is at the core of our Integrity Policy and is best encapsulated by our approach to transparency and trust. As a result of recent well publicised corporate scandals, public opinion in the honesty of 'business' has taken a knock. Within Team, we have a clear framework for a code of business ethics which we believe will demonstrate greater transparency and accountability, not only in our financial reporting, but in all areas of activity touched by our business.

With legislation as the backdrop, Team is committed to conducting itself in an atmosphere that is open, fair and transparent with the aim of enhancing trust in all its business activities. Unless there are compelling reasons to the contrary, Team will provide clients, directors and staff, external bodies and the general public, relevant information affecting them and the actions of Team, speedily and in a manner consistent with our overall Corporate Social Responsibility statements as defined within our ethical values programme.

Although already enshrined within our core values declaration policy document, Excalibur, Team has effected some changes to further embody the essential anti-corruption principle within the fabric of its everyday operational working.

Both the summary policy document, Excalibur, and our individual Integrity Policy have been subtly amended to confirm our commitment both legal and otherwise to a corruption-free business environment. This is best shown by clauses 6.1 and 7.0 of the Integrity Policy.

“ Integrity is what we do,  
what we say,  
and what we say we do ”

Don Galer



## clause 6.1

### 6.1. Bribery, Money Laundering and Fraud

Team staff must never offer, promise, give, receive or demand a bribe or any other undue advantage to obtain or retain business. Team is equally committed to the prevention of bribery by any contractor, supplier or agent acting on Team's behalf. Remuneration to consultants, agents or representatives will be appropriate if provided for legitimate services performed only.

Team staff should at all times use their good judgment to also avoid giving the appearance of improper payments. Particular care should be taken in all relationships with government officials or employees. Facilitation payments are illegal under the UK's Bribery Act.

Team staff should not participate in any type of fraud or fraudulent activity, such as taking action to conceal or convert profit from specific sources to others for personal gain or to the personal advantage of others. Should suspicion of fraud arise the employee should contact their immediate Manager or the Team Personnel/HR Manager.

Team is committed to complying with applicable anti-money laundering laws which exist in such parts of the world where Team is active. We also recognise principle 10 of the UN Global Compact in relation to anti-corruption. We are also therefore committed to only work with Suppliers who are reputable, legitimate business operators and whose funds come from legitimate sources. If you should find yourself in a compromising position you are required to report it immediately to your supervisor, manager, HR or a director. Failure to do so is a disciplinary offence.

## clause 7.0

### 7. Gross Misconduct

Any breach of our code of conduct may lead to termination of employment through reason of gross misconduct.

The following (non-exhaustive) list provides examples of offences which are normally regarded as gross misconduct:

Smuggling of any nature and any costs incurred to Team as a result of any smuggling activity

Serious or persistent breach of safety rules  
Theft, fraud, deliberate falsification of records

Disorderly or indecent conduct or threatening physical violence

Deliberate damage to Company property or that of other employees or clients or suppliers or others associated with Team

Serious incapability through alcohol or being under the influence of illegal drugs

Serious negligence which causes unacceptable loss, damage or injury

Serious acts of insubordination

Flagrant failure to follow company documentary procedures and regulations

Acts of incitement or actual acts of direct discrimination on the grounds of sex, race, religion, colour or ethnic origin

Misuse of electronic media, equipment or company vehicles

Any false verbal or written statements in employment application

Any criminal conviction which has an adverse affect on the ability to perform a job, where no other repositioning is available

Failure to inform Team of any unspent criminal convictions

If driving a company vehicle - failure to operate a company vehicle safely and within the law e.g. failure to report an accident, suspension or endorsement of a driving licence or failure to report to Team a medical condition which could result in the driving licence being withdrawn or prevent the employee's duties from being carried out safely.



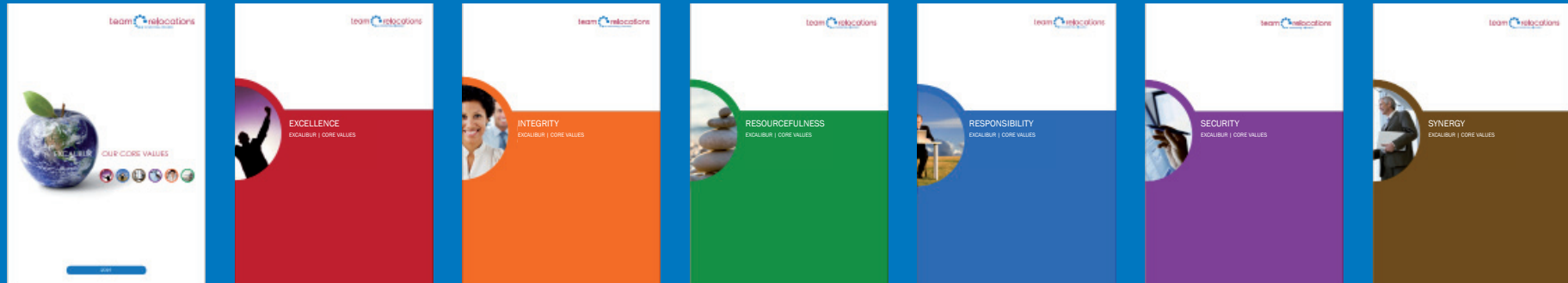


## Implementation and Outcomes

Implementation	Measurement of Outcomes
<b>Policy Changes</b>	
In addition to those policy changes noted, an additional clause, Clause 3.9, was introduced into the Integrity Policy covering the implementation of Excalibur as a whole, the six core values policies and specifically the 10 UN principles.	Team is pleased to report that it has not been involved in any legal cases, rulings or other events related to bribery or corruption.
<b>Whistle Blowing</b>	
A new 'Whistle Blowing' procedure has been introduced to allow any member of staff to raise an issue or concern with respect to corruption without fear of recrimination.	Our new 'Whistle Blowing' procedure has not raised any issues by member of staff concerning anti-corruption during the reporting period.
<b>Audit</b>	
Our financial accounts are naturally audited by a leading independent financial specialist annually and audited reports submitted as legally required.	Such financial reports are publicly available and again we are pleased to report that they show a clean bill of health with no signs of impropriety.



# Supplementary Reading



## Compliance Team

### Group Compliance Director

Luc Oostendorp

### Group Compliance Officer

Leonie Kerkelaan

### Global Supply Chain Manager

Shelley Lloyd

### Regional Compliance Officers

Belgium: Catherine Guns  
Denmark: Steffen Scharff

France: Alain Meriguet  
Germany: Heiko Thomas

Luxembourg: Catherine Guns  
Netherlands: Leonie Kerkelaan

Norway: Finn-Petter Haugen  
Sweden: Christina Federspiel

Switzerland: Jean-Sylvain Nicoud  
United Kingdom: David Boreham



[www.teamrelocations.com](http://www.teamrelocations.com)