

# SOCIAL RESPONSABILITY POLICY CODE OF CONDUCT

REF. RH-049  
V/2021

**HARSCH**  
The Art of Moving Forward

## Our values

Henri Harsch HH SA (Harsch) endeavors to meet high standards as regards quality, performance and behavior, thus respecting the fundamental Company Values in how we run our business.

Our values are set forth in the charter (Mission Statement) and are based on the following key considerations:

- To set the priority on achieving CUSTOMER SATISFACTION, thus building up LONG TERM RELATIONSHIPS.
- ELIMINATE ALL RISKS for our customers, their possessions and for our employees.
- Promote COMPANY SPIRIT, as much for INNOVATION as for CREATIVITY.
- Build up the KNOWLEDGE and SKILLS of our employees.
- Work ETHICALLY, HONESTLY, FAIRLY, RESPONSIBLY while respecting LEGAL AND ENVIRONMENTAL REQUIREMENTS.



## Our responsibilities

Harsch HH SA is committed to achieving long-term relationships with its customers, partners and employees. It recognizes that lasting profitability is essential for continuity.

Our task is to contribute to ensuring excellent service quality for our customers.

For this we need to provide customers with services that give real value in terms of price and quality, while at the same time meeting high security, quality and environmental standards.

We offer a pleasant and healthy working environment to our employees.

This means recruiting and promoting employees only in terms of their suitability for the position, working to ensure their personal and professional development, and providing a healthy and dependable working environment.

It is also our responsibility to ban whatever form of mobbing and child labor. We will handle our business in a socially responsible way.

This means that in the conduct of our activities we respect the laws of the countries in which we work, we defend human rights and show consideration for hygiene, security and environmental concerns, thus reflecting our commitment to contribute to sustainable development.

This « Code of Conduct » aims to provide you with a clear and brief overview of the obligations that all company employees should understand and put into practice in their daily work.

Not only does it refer to the Company Principles, but also to the significant and important Company Rules that help us to fully accomplish our assignments according to the standards set forth in the « Process Charts »: International and local moves, Fine Art, Archives.

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As an employee, you are responsible for knowing and complying with our standards. You should therefore be aware that lapses or voluntary breaches of our Code of Conduct will oblige the Company to consider disciplinary measures, which in cases of serious professional misconduct may take the form of dismissal.

This Code of Conduct represents who we are and how we work.

## Communication

Although subject to confidentiality clauses in special cases, Harsch HH SA endeavors to communicate with all parties concerned in a clear, factual and appropriate manner.



## The environment

Harsch HH SA protects the environment by preventing or minimizing the impact of its activities thanks to the analytical and preventive measures adopted for its operations.

Harsch Management expects its employees to take an active role in protecting the environment.

Should an employee become aware of a case of non-respect of our environmental policy, he should take the matter to his superior.

As far as possible, Harsch intends to cultivate concern for hygiene, security and environmental protection among the employees as well as suppliers, partners and/or customers.

## The environment

Harsch HH SA always complies with the laws and regulations relevant to its activities, keeping up-to-date with regard to the laws, directives and regulations via Legal Monitoring.



## Respect for free enterprise and for the rules of fair trading

Harsch HH SA defends the principles of free enterprise and free trading. The Company intends to meet the requirements and expectations of its customers faster and more competently than its competitors, so as to stand head and shoulders above them.

Harsch HH SA will compete with vigor to achieve this goal, but also in all fairness and in compliance with applicable competition law.

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Harsch HH SA also expects its competitors to play the competitive game properly, respecting the law and ethical considerations.

Harsch HH SA has a strict policy of ensuring that its activities around the world are conducted in the fullest compliance with applicable competition law.



## Business integrity

Harsch HH SA attaches special importance to honesty and fairness in the conduct of all aspects of our operations.

Harsch HH SA expects employees to avoid situations where their personal or financial interests may conflict with those of the Company.

All transactions carried out must be accurately and fully recorded, in line with the Company's accounting rules and with local legislation. They may be subject to internal and/or obligatory external audits and controls.

## Relationships with partners and suppliers

Harsch HH SA intends to do business with partners who subscribe to our ethical values and standards as regards social and environmental considerations, as set forth in our Charter and our Environmental Policy statement.

Respect for our Company Principles is of the greatest importance to Harsch HH SA in our decisions to continue or promote partnerships with suppliers, agents or third parties.

## Corruption

Corruption or any other business practices contrary to our ethics are prohibited. No special circumstances can justify an employee, a manager, an agent or a representative of our Company promising or approving payments or a « present » in order to:

- Achieve a clear business advantage
- Influence government or business group policy
- Obtain any other form of benefit based on deceptive information

In the absence of clear justification, the provision of any transaction, service or product (for example packing materials) for which there is no payment may amount to a breach of the law and of Harsch HH SA policy.

## Payment of commissions

The regulation prohibiting any form of corruption may not be circumvented through paying commissions. All payments of commissions need to be justified as consideration for specific and traceable services provided to the Company.



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## Honest payments

All payments made must be recorded in the appropriate accounting ledgers so that they may be subjected to internal or obligatory external audits.

Secret accounts or registers held outside the Company accounting system are formally prohibited. Apart from transactions using petty cash accounts, payments in cash to third parties are not authorized.

All payments must be made through a bank account designated in writing. All financial transactions are to be properly registered.

All the information of relevance to a transaction should be documented. The bookkeeping entries shall properly reflect the transactions effected in compliance with accounting standards, thus excluding any unregistered transactions such as illicit payments.

Company employees are required to respect the principles, procedures and legal requirements for all bookkeeping entries and financial reporting. No employee may effect an unrecognized or unregistered transaction in the Company's name, whatever the reason may be. Under no circumstances may falsified or artificial entries appear in the accounts.

## Money laundering

Harsch HH SA will neither enter into nor tolerate any arrangement or agreement that facilitates (or that might facilitate or that might be suspected as being used to facilitate) the acquisition, withholding, use or control of goods or money in order to hide ill-gotten gains.

## Business gifts

No gifts or personal favors of material or commercial value to/from third parties may be offered or accepted. By gifts or personal favors of material or commercial value we mean an object of material or commercial value with the potential to influence a purchasing decision and/or to result in a relationship of dependency. Where there is doubt, a hierarchical superior must be consulted. There must be total transparency between subordinates and superiors in all departments of the Company regarding business gifts.



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## Fraud, falsification or inappropriate behavior

Anyone who comes across or suspects a case of fraud, falsification or inappropriate behavior is required to immediately inform the departmental manager's superior.

The superior is then obliged to inform Harsch HH SA management to decide what measures are called for.

Definitions:

- **Fraud:** suppression, falsification, omission or deliberate hiding of information, misappropriation of funds and/or goods resulting in the illegal appropriation of resources or assets belonging or owed to the Company.
- **Falsification or inappropriate behavior:** communication of deliberately incorrect and/or incomplete and/or unclear information, or breach of the employment contract, of Company directives or of other rules which, while not amounting to fraud leave in an unfortunate/ negative impression with regard to the Company's financial reports and/or decisions.

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## Child labor

« Child labor » refers work undertaken by children of a kind and intensity that prevents them from having an education, causes them physical and/or psychological harm, affects their personal development within the family and prevents them from enjoying their lives as children or undermines their self-respect.



Consequently, Harsch HH SA employees are required to follow the following rules:

- Harsch HH SA respects the minimum working age in Switzerland and around the world.
- Furthermore, by respecting the ILO Convention (International Labor Organization) N° 138 regarding « Minimum working age » and the Convention N° 182 on the « Prohibition of the worst forms of child labor », Harsch does not employ children less than 16 years old.
- Where children aged between 16 and 18 years old are employed, the Company takes care that their work neither affects nor limits their schooling, quite to the contrary.
- Management is tasked with informing the main suppliers, agents and third parties regarding the Harsch standards concerning child labor.

## Forced labor

Harsch HH SA will never resort to using forced labor.

Harsch HH SA will only take on employees working of their own volition; this is also true as regards overtime. No employee is asked to put down a deposit or to accept surrendering his identity documents when commencing work in the Company.

It is Management's task to inform the main suppliers, agents and third party contractors regarding the Harsch HH SA standards concerning forced labor.



## Clear internal communications

Openness, honesty and dependability make for open and healthy communication between employees and superiors about all aspects of the work environment.

All employees are encouraged to discuss such questions with their direct hierarchical superior or, if communication with the direct hierarchical superior is limited, then with his/her direct hierarchical superior. In cases where communication via the hierarchy is not the best option, all employees are free to use the Company Procedure for Complaints by filling in the « non-compliance form » in order to bring his situation to the attention of Management. These non-compliance forms go to the Director.

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## Equal opportunity

We undertake to provide a pleasant working climate for our employees. For this, it is our duty to recruit and promote employees on the sole criteria of their suitability for the post to be filled, to encourage their personal and professional development and to create a dependable and healthy working climate. Our employees must be selected, recruited and promoted on objective, non-discriminative criteria. No mobbing or discrimination will be tolerated, whether on racial, gender or religious grounds. Handicapped employees or those suffering from chronic illnesses must be able to work to the extent that their handicap or illness permits, and be given suitable work without suffering any form of discrimination.

## A healthy working environment

Harsch HH SA provides a healthy and dependable working environment in order to avoid any problems and to protect the health of all our employees and other stakeholders.

To achieve this, programs and rules for health and security are established. It is up to each employee to respect the hygiene and security rules. Harsch HH SA does all it can to avoid injuries at the workplace both for its employees and for third party contractors.

The Company furthermore seeks to adapt the work to the physical capacities and level of confidence of all employees.



## Divulgence of medical data

Nothing justifies asking candidates for employment or employees to reveal personal medical information going beyond what is necessary to confirm their suitability for the position to be filled. All personal medical information is treated confidentially.

## Participation in politics

Harsch HH SA encourages employees to play an active role in civil society, and particularly as regards the activities of political parties and standing for elective office.

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## Personal data protection

Harsch HH SA recognizes the importance of protecting personal data; it is committed by its Code of Conduct to protect such data.

Harsch HH SA will use personal data only for defined purposes and exclusively in the context of Company matters.

Personal data includes the name, private address, private telephone number, performance appraisals (HR). HH is committed to respect individual's data by handling all the Personal information collected in accordance with applicable laws and its Data Privacy Protection Policy

## Confidential information

Harsch HH SA employees may find themselves in situations where they acquire information concerning Harsch HH SA or other companies that is unavailable to the general public.

The use of such unpublished information, or « confidential » information, regarding Harsch or any other company is unethical and may represent a breach of law.

Breaches of the law may result in civil and penal sanctions.

Harsch HH SA will not tolerate any abuses in the use of confidential information.

Sensitive information regarding Harsch HH SA or other operations could, if they became public knowledge, affect the market. The following exemplifies (without limitation) such information:

- Information on financial results/turnover/profits
- Mergers and acquisitions
- New services or customers with potential to significantly impact business or financial strategy
- Strategic information or changes provided by Harsch Management
- Bankruptcies
- Disputes, etc.

## Protection of Harsch intellectual property

Harsch HH SA has acquired and developed intellectual property, including non-disclosure agreements (for example covering confidential business information).

Employees are responsible for protecting these assets.

Employees may not release confidential information without being fully aware of the implications, and should take the necessary measures to avoid any unapproved divulgation of Company information, e.g. providing security to protect access to the data. Publishing confidential information to third parties calls for a non-disclosure agreement by Harsch HH SA Management.





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## Usage of the Internet / IT code of conduct

In general, all IT equipment and resources are provided only for company-internal professional usage, and not for private purposes.

The IT equipment provided to employees should never be used for personal gain or profit and should not be used other than for professional purposes during working hours. It remains Harsch HH SA property. Sending confidential information, or information belonging to the Company or its customers, outside official communication channels is strictly prohibited.

The IT equipment and resources may under no circumstances be used for illegal or unethical purposes, nor for libeling the Company or peddling an unfair or negative image of the Harsch HH SA Company, its activities, employees, suppliers, agents, customers, competitors or stakeholders.

IT systems are protected by passwords and/or additional physical authentication systems (door-codes for secure areas, video surveillance of areas at risk); employees are required to use such passwords/codes responsibly, to look after and protect them against any malicious intent.

All installations, modifications, changes or any personal usage of software provided by or made available through Harsch HH SA IT systems, must be authorized and managed by the IT Department Manager.

In order to prevent theft, loss or non-authorized usage of the data and systems, users are required to adopt the measures necessary to ensure the physical security of the equipment provided, such as portable computers, telephones, keys, USB keys, etc.

To ensure the availability of Company data, users will regularly ensure the security of the data associated with their activity by running local or remote back-ups.

All information regarding IT security incidents or violations of security principles are to be reported to the IT Manager and Security Manager.

All employees are required to familiarize themselves with and to respect the security rules and procedures for accessing information set up in their departments by the Security Manager.

Harsch reserves the right to control the procedures adopted by employees for using IT equipment provided by the Company.

## Illegal substances

The usage of illicit substances during working hours is strictly prohibited.

Usage of illicit substances can have disastrous consequences at work and notably in the course of activities at the customer's home and on Harsch premises.

All substances, such as alcohol, drugs, etc., are considered illicit, except for medicines sold with or without a prescription that have been obtained legally and are used for the purpose for which they were prescribed. Management may authorize moderate consumption of alcohol for a special occasion (dinner, « leaving drink», Christmas aperitif, etc.) and for other locally relevant events. Employees in breach of this policy risk disciplinary action.

Harsch HH SA will do everything it can to help employees who have become dependent on illicit substances. The kind of help provided can vary and requires the cooperation of the employee concerned.



## Protection of employees from harassment or intimidation

The Employer has set up a procedure to protect employees from harassment or intimidation at the workplace. Employees who experience a situation detrimental to the company interests or to the personnel are free to contact internal or external reference persons.

- **Reference persons within the company:**

These reference persons are committed to taking no action without the agreement of the employee. No information will be communicated without the express permission of the employee. The reference persons can assure plaintiffs that their complaints will be heard without reprisals. Reference persons may be:

- Direct superior
- Human Resources Manager
- General Management

- **External reference persons:**

- Mediation

1. The Maison genevoise des Médiations (Geneva Mediation Office) and its team of professional mediators offer those finding themselves in a situation of conflict somewhere to meet and discuss their problems. Employees who consider themselves victims of such situations may contact the Geneva Mediation Office by telephone or letter in order to arrange an interview. The company pays the fees of the professional mediators; their invoices particularly do not mention the name of the plaintiff.

Maison Genevoise des Médiations  
Rue de la Synagogue 41 1204 Genève  
+41 22 320 59 94 / info@mgem.ch

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2. Bureaux de l'égalité romands : [www.egalite.ch](http://www.egalite.ch)

3. Prévention et maintien de la santé en entreprise (PMSE)

PMSE SA - GENÈVE

Chemin du château-Bloch 11

1219 Le Lignon

+41 22 970 19 06

PMSE SA - AARAU

Hohlgasse 45

5000 Aarau

+41 62 823 19 21

o Legal :

Inspection du travail

Département de la solidarité et de l'emploi (DSE)

Office cantonal de l'inspection et des relations du travail (OCIRT)

Rue des Noirettes 35, case postale 1255

1211 Genève 26 La Praille

+ 41 22 388 29 29

The Employer commits to taking all necessary steps to avoid and, should it occur, censor any form of harassment or intimidation of employees. It expects directors and managers to demonstrate exemplary behaviour and also to pay close attention to their subordinates' well-being in the company. Should a case arise, an internal or external investigation will take place and where necessary appropriate disciplinary measures applied:

- Warning letter
- Dismissal (with or without notice)