



## THE TRANSPARENCY ACT – MARKETS, SERVICES AND ORGANISATION

Sirva AS is part of the US-owned group Sirva Inc. Sirva provides comprehensive global mobility services to corporate clients, the public sector and private individuals. These services are delivered domestically within Norway, to / from Norway, as well as between third countries. In total, we can serve 190 countries through our own offices and network partners. Sirva does not work with, provide services, nor conduct administrative or other support activities for countries, regions, individuals or entities that are currently sanctioned by the FN or the Office of Foreign Assets Control (OFAC).

### Markets

The oil, gas, and energy sector is the largest customer group for the company, and we are able to serve all countries they are operating in (except for sanctioned countries or regions.) For the public sector, we assist mainly diplomats moving to embassies and consulates around the world.

The Norwegian business currently has the highest activity in the following countries:

- Europe – UK, Netherlands, Germany, France, Italy, Austria, Switzerland, Turkey, and Russia
- Asia and Oceania – UAE, India, Singapore, Thailand, Korea, and Australia
- Africa – Angola and Nigeria
- Americas – Entire USA, Canada, and Brazil

### Services

The services we offer the assignees make their relocation happen efficiently and smoothly to their new location, either in Norway or abroad:

- Removal of personal household goods belongings (to include directly providing or arranging for the provision of pack/load, transport, and unpack/unload.)
- Storage of personal and commercial goods
- Visa and immigration services
- Search assistance for with temporary accommodation
- Home search and assistance with lease agreements
- Assistance with finding schools and kindergartens
- Coordination of cultural and language courses

### Organisation

The Sirva group is organized into functional areas within the following main categories, where the Norwegian business encompasses the following functional areas:

- Sales and Account Management
- Moving Operations
- Relocation Services Operations
- Finance and Accounting
- Quality, Environment, Health and Safety (HSSE)

Key functional areas that provide direct support to the Norwegian business within the group are:

- Top Management – Headquarter in the USA
- Board of Directors – Leadership from Norway, the Netherlands, and the USA
- HR – UK
- IT – Netherlands
- Legal – USA and local counsel
- Marketing – USA
- Procurement and Supply Chain – the Netherlands
- Heading 3, Subsection Title – Calibri Bold 14pt HEX 120052

## **Responsibility**

SIRVA AS acknowledges its responsibility to promote and comply with fundamental human rights and decent working conditions in the provision of services, in accordance with the Norwegian Transparency Act. We take responsibility and actively work in a reasonable manner to comply with the law within our own operations and in our supply chain. The leadership team has been dedicated to this work and the human rights topic is addressed in monthly management meetings.

The Transparency Act ensures public access to information on how we work in this regard, and the law is based on the OECD Guidelines for Multinational Enterprises. This includes conducting due diligence assessments. Business ethics, sustainability, and corporate social responsibility are integrated into SIRVA's operations and are outlined in our procedures and policies. SIRVA's Code of Conduct for suppliers describes our commitment and approach to respecting human rights. To follow up on this, all employees at SIRVA must undergo annual e-learning courses covering topics such as anti-bribery, Code of Conduct, GDPR, Data Privacy, OFAC, and Sexual Harassment.

## **Risk assessment and auditing**

SIRVA AS holds regular meetings with our key suppliers. To comply with the Transparency Act we are actively conducting an overarching risk assessment of our supply chain and our own operations. We will continuously work on working with our supply chain to prioritize their efforts to prevent, reduce, and address any negative impact on human rights.

## **Whistleblowing channels**



SIRVA AS has clear rules for whistleblowing in our Corporate Whistleblower Policy. Whistleblowers can be employees, customers, and suppliers who suspect and report illegal, unwanted impact on human rights.

Anonymous whistle-blowers are covered and protected by the internal police. Examples could be violations of national laws, invoicing for services that have not been performed, or other fraudulent financial reporting. All reports will be followed up promptly and any necessary investigation carried out. The whistleblower's name will be confidentially maintained as permitted by law and the circumstances of the matter. SIRVA AS does not retaliate for reporting to a manager, ref. AML §2 A-4 on prohibition of retaliation.

## **Explanation**

SIRVA AS continues to work with risk assessments of our suppliers and own operations, in addition to preparing questionnaires for our suppliers.

We will report annually on the status and measures in accordance with the Transparency Act in a report on our website. We will work systematically with the mapping, evaluation and follow-up of subcontractors and business partners so that we prevent and protect against violations of human rights and decent working conditions.

## **Information**

Anyone who wants information can contact us in writing and ask for more details about how the business handles actual and potential negative consequences for basic human rights and decent working conditions. Feedback will be given within a reasonable time.

For more information, please send an e-mail to Managing Director [Atle.skaarud@sirva.com](mailto:Atle.skaarud@sirva.com)