

**Transworld International Removals Ltd, New Zealand
Data Privacy & Protection Policy**

Transworld International Removals Ltd will gather and use personal data about customers, suppliers, business contacts, employees and other people Transworld have a relationship with or may need to contact.

1) Why this policy exists

This data protection policy ensures Transworld International Removals Ltd:

- Complies with data protection law Privacy Act 2020 and follows good practice
- Protects the rights of customers, suppliers, business contacts, employees and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

2) Policy scope

This policy applies to:

- The head office of Transworld International Removals Ltd
- All branches of Transworld International Removals Ltd
- All staff of Transworld International Removals Ltd

3) Collection

It applies to all data that the company holds relating to identifiable individuals and companies. This can include but not limited to:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Passport details
- Plus, any other information relevant information required to transport and clear goods through the relevant authorities

4) Notice

All outgoing emails from Transworld to contain the link to Transworlds Data & Privacy Policy

5) Consent

- In providing information to Transworld International Removals Ltd, specifically gives your consent that Transworld International Removals Ltd and its employees can use the information in the normal process of performing our responsibilities in the operation of running the company lawfully.
- The information will not be sold, traded or disclosed to any third party that is not directly related to the normal function of supply the service that we provide in the transportation, storing or insuring goods.
- Information will only be used to fulfil our contracted obligation in transporting the respective goods including but not limited to Customs Clearance, Quarantine Clearance. Data may be disclosed to third parties only to fulfil our obligations per the contract.
- Transworld employees have restricted access to data records relating to their departments role only.
- In compliance with New Zealand Law, specific data will be retained for 7 years then purged from databases and hard files destroyed. All other data, not required to be kept for 7 years, will be destroyed after its purpose has been fulfilled.
- **Consent and Individual Choice** - Where personal information is collected directly from individuals, Transworld obtains consent either explicitly or implicitly through the provision of information for the purpose of delivering contracted services.
- Individuals are informed of the purposes for which their personal information is collected and used, and may withdraw consent or request limitations on use where permitted by law.
- Records demonstrating the basis on which consent was obtained (including contractual agreements, forms, or electronic submissions) are retained as part of Transworld's business records.
- **Use and Disclosure Limitation** - Personal information is used and disclosed strictly in accordance with the purposes outlined in this policy and Transworld's privacy notice. Disclosure to third parties occurs only where necessary to fulfil contractual obligations or legal requirements and only to parties that provide appropriate assurances of data protection.

6) Access and Accuracy

- The information that has been collected on customers, suppliers, business contacts, employees or partners can be reviewed by that respective customers, suppliers, business contacts, employees or partners at Transworld International Removals Ltd office where the data has been collected.
- Information will be updated when we are notified of any changes.
- Access, Review and Correction - Individuals may request access to, or correction of, their personal information held by Transworld. Requests will be handled in a reasonable timeframe and in accordance with the Privacy Act 2020. Transworld may require verification of identity before providing access to personal information.

7) Data protection risks

This policy helps to protect Transworld International Removals Ltd from some very real data security risks, including:

- Breaches of confidentiality – for instance, information being given out inappropriately.
- Reputational damage – for instance, the company could suffer if hackers successfully gained access to sensitive data.

8) Responsibilities

Transworld International Removals Ltd has overall responsibility for the management of personal information in accordance with the Privacy Act 2020 and this policy. Accountability for privacy compliance sits with senior management, supported by the IT Department and relevant business managers.

Privacy Accountability - The Managing Director is the designated owner of this Data Privacy & Protection Policy and has overall accountability for privacy governance and compliance, supported by the IT Department and relevant business managers.

Transworld maintains an internal overview of its personal data processing activities, including the types of personal information processed, the purpose of processing, the source of the information, retention periods, and the categories of third parties with whom personal information may be shared. This overview is reviewed periodically and updated as required.

The IT department is responsible for:

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.
- Evaluating any third-party services, the company is considering using to store or process data – for instance, cloud computing services.

9) Transworld Staff Guidelines

- The only people able to access data covered by this policy should be those members of staff who need it to process individual clients' needs for their removals.
- Transworld International Removals Ltd provides training to all employees so they understand their responsibilities when handling data.
- Employee personnel records are Restricted Access to the HR department and the Company Directors
- Employees will keep all data secure by taking sensible precautions and following the guidelines below:
 - In particular strong passwords are used and are never shared.
 - Personal data is not disclosed to unauthorised people, either within the company or externally.
 - Data is regularly reviewed and updated if it is found to be out of date.
 - Employees will request help from their manager or the data protection officer if they are unsure about any aspect of data protection.

10) Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT Manager.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files are kept in a locked drawer or filing cabinet.
- Employees will make sure paper and printouts are not left where unauthorised people could see them.
- Certain Data and Files are kept for 7 years in accordance with New Zealand law.
- Data printouts are disposed of securely when no longer required.
- End of employment, ex-employees personnel records are disposed of securely.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data is protected by strong passwords and never shared between employees.
- Data is only stored on designated drives and servers, and only uploaded to an approved cloud computing service.
- Servers containing personal data are sited in a secure location, away from general office space.
- Data is backed up frequently. Those backups are tested regularly, in line with the company's standard backup procedures.
- Data is never saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data is protected by approved security software and firewalls.

11) Record of Data Processing Activities

Transworld International Removals Ltd maintains a documented register of personal data processing activities. This register identifies:

- the categories of personal data processed;
- the purpose for which the data is collected and used;
- the source of the personal data;
- the retention period applicable to each category of data; and
- any third parties or service providers with whom personal data may be shared.

This register supports transparency, accountability, and compliance with applicable privacy legislation. For guidance on breach notification actions and response procedures, see Section 12: Data Breach & Data Breach Management.

12) Data Breach & Data Breach Management

Transworld maintains a documented data breach response procedure to manage incidents involving the destruction, loss, alteration, unauthorised disclosure of, or access to personal information.

The procedure includes identification and containment of the breach, assessment of potential harm, notification of affected individuals and relevant authorities where required, remediation actions, and a review to prevent recurrence

- All affected customers, suppliers, business contacts, employees and partners will be notified of a data breach as soon as practicable.
- All Passwords changed, locks changed where relevant.
- Audit of systems and procedures to mitigate any future breach.

13) Privacy Complaints

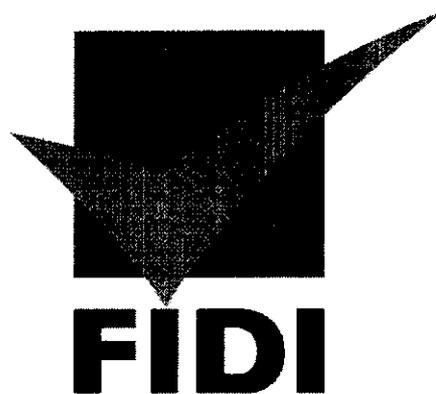
If you have any privacy issues or complaints, these need to be submitted in writing and addressed to the Managing Director, Transworld International Removals Ltd, PO Box 305137, Triton Plaza, Auckland, NZ.

14) Monitoring and Review

This policy and associated privacy procedures is reviewed annually or when required, to ensure continued compliance with applicable privacy legislation, business practices, and operational requirements. Reviews may include assessment of data handling practices, incident trends, and changes to regulatory obligations. Review amendments communicated to all staff.

THE FIDI ANTI-TRUST CHARTER

2023



Leading the Fight Against Cartels

FIDI supports the adoption of Anti-Trust compliance programs by its Affiliates. In this connection, FIDI is determined to support the fight against cartels, which restrict competition among suppliers to the detriment of customers.

Background

Membership in FIDI is highly valued by its Affiliates, and to ensure that value continues, all FIDI Affiliates pledge to abide by the highest ethical standards and to free and fair competition.

The Anti-Trust Charter is a declaration of commitment. It will strengthen the FIDI organisation, the FAIM programme, and all Affiliates by making it clear what distinguishes FIDI Affiliates from non-FIDI companies.

All FIDI Affiliates agree to sign and be guided by the provisions of the Anti-Trust Charter. The Anti-Trust Charter covers their employees (whether permanent, fixed-term or temporary) and any associated third parties providing services to or on behalf of the FIDI Affiliates.

The Anti-Trust Charter is integrated into FAIM. The procedural and audit requirements form part of the FAIM Implementation Manual and the Pre-Audit assessment.

What Is a Cartel?

A cartel is an agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition.

A cartel is regarded as the most egregious violation of Anti-Trust laws in most jurisdictions, which may lead to the imposition of significant fines as well as, in certain jurisdictions, criminal penalties.

FIDI Will Not Tolerate Cartel Conduct

FIDI respects the Anti-Trust laws and regulations in the countries in which it operates and requires that its Affiliates do the same. Involvement in a cartel is unacceptable. It is against FIDI's core values of competing freely and fairly, based on the added value of its products and services.

The laws and regulations that sanction cartel conduct are in place in most jurisdictions. These laws and regulations are designed to promote free and fair competition and to protect consumers. Anti-Trust compliance programs are in place to detect and prevent cartels.

Charter Statement

Undertaking by all FIDI Affiliates with immediate effect

All FIDI Affiliates commit to legal and ethical behaviour, and to refrain from engaging in any business that will harm the interests of FIDI, other affiliates, clients, or the industry. FIDI and its Affiliates will take steps to ensure they are fully informed of applicable Anti-Trust laws and regulations in connection with cartel conduct and other Anti-Trust violations, and will monitor their employees and business partners to ensure full and continual compliance.

Legal compliance

FIDI Affiliates will ensure that they are aware of all applicable laws and regulations covering anticompetitive practices in all the jurisdictions in which they operate, and that they will obey and uphold those laws and regulations.

FIDI affiliated companies will ensure that they are aware of, and are complying with, applicable laws and regulations in connection with cartels.

Ethical behaviour

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zero-tolerance approach to cartel conduct. At all times, FIDI and its Affiliates will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

Commitment to the values of FIDI

This Charter will be formally integrated into the FAIM quality standard.

Code of Conduct

By agreeing and committing to this Charter, each FIDI Affiliate undertakes to:

1. Never make direct or indirect (via third parties including agents, suppliers or customers) contact with an actual or potential competitor or other third party, the object of which is to engage in cartel behaviour.
2. Never propose or reach an agreement, whether directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issues, including:
 - Fixing prices
 - Dividing or sharing markets, customers or territories
 - Rigging a competitive bidding process
3. Report any indication or initiative of improper anticompetitive business conduct by an actual or potential competitor in accordance to your internal reporting procedure, including but not limited to, reporting to your legal department and/or to the relevant Anti-Trust authorities.
4. Not to participate in a meeting of a trade association in which sensitive competition-related issues are discussed. If such subjects are raised during a meeting, employees of FIDI Affiliates must immediately ask for the discussion to end. If not, they must leave the meeting and ask for that to be noted in the minutes of the meeting.
5. Ensure that all internal and external correspondence, including e-mails and texts, and documents, discussions and public statements do not contain any statements that might be misinterpreted by third parties or Anti-Trust authorities and courts in the context of a potential Anti-Trust investigation.
6. Maintain independent judgment in pricing or selling of any products and/or services.
7. Limit any information discussed during commercial negotiations, with or disclosed to competitors or other third parties, to that which is strictly necessary for completing or assessing the transaction.

Agreement

I confirm that I have read and understood the FIDI Anti-Trust Charter. I accept and agree to abide by this Charter and the Code of Conduct, which is included in the FAIM Implementation Manual and is available on the FIDI website.

I understand and accept that participating in a cartel, as described in this Charter, in a final decision of a competent authority, is considered as non-compliance with this Anti-Trust Charter.

I understand and accept that non-compliance with this Charter signifies non-compliance with FAIM pre-requirements, which will result in expulsion from the FIDI organization.

Date:

11 / March / 2026

Individual:

Graham Bell

Title:

Managing Director

For and on behalf of (Affiliate company)

Transworld International Removals Ltd

THE FIDI ANTI-BRIBERY AND ANTI-CORRUPTION CHARTER

2023



Leading The Fight against Corruption

FIDI is determined to lead the relocation industry by taking a clear stand against bribery and corruption. By doing so, FIDI will protect the best interests of the industry, the Affiliates and their customers.

Background

Membership in FIDI is highly valued by its Affiliates, and to ensure that value continues, all FIDI Affiliates pledge to abide by the highest ethical standards.

This Charter is a declaration of commitment. It will strengthen the FIDI organisation, the FAIM programme, and all Affiliates by making it clear what distinguishes FIDI Affiliates from non-FIDI companies.

All FIDI Affiliates agree to sign and be guided by the Charter's provisions. The Charter covers their employees (whether permanent, fixed-term or temporary) and any associated third parties providing services to or on behalf of the FIDI Affiliates.

The Charter is integrated into FAIM. The procedural and audit requirements form part of the FAIM Implementation Manual and the Pre-Audit assessment.

What Is Bribery?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal, and it is a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

FIDI Will Not Tolerate Bribery

Corruption, bribery or attempted bribery is unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against FIDI's core values of conducting business to the highest legal, moral and ethical standards.

Bribery and corruption are covered by various international laws and statutes. These laws often require companies, including FIDI Affiliates, to have rigorous, pro-active measures in place to detect and prevent corrupt practices.

Charter Statement

Undertaking by all FIDI Affiliates with immediate effect

All FIDI Affiliates commit to legal and ethical behaviour, and to refrain from doing anything that will harm the interests of FIDI, other affiliates, clients, or the industry. FIDI and its Affiliates will take steps to ensure they are fully informed of applicable regulations and will monitor their employees and business partners to ensure full and continual compliance.

Legal compliance

FIDI Affiliates will ensure that they are aware of all applicable laws countering bribery and corruption in all the jurisdictions in which they operate, and that they will obey and uphold those laws.

The laws that apply to particular international business activities include those of the countries in which the activities occur as well as others that - like the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010 - govern the international operations of national companies and citizens in respect of their conduct both at home and abroad.

We, as a FIDI affiliated company, have to ensure that we are aware of, and are complying with, applicable laws.

Ethical behaviour

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zero-tolerance approach to bribery and corruption. At all times, FIDI and its Affiliates will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

Commitment to the values of FIDI

This Charter will be formally integrated into the FAIM quality standard.

Code of Conduct

By agreeing and committing to this Charter, each FIDI Affiliate undertakes 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 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.

Agreement

I confirm that I have read and understood the FIDI Anti-Bribery and Corruption Charter.

I accept and agree to abide by this Charter and the Code of Conduct, which is included in the FAIM Implementation Manual and is available on the FIDI website.

I understand and accept that non-compliance with this Charter signifies non-compliance with FAIM pre-requirements. Non-compliance with FAIM pre-requirements will result in expulsion from the FIDI organization.

Date:

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Individual:

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