



Code of Business Conduct

May 2018

The Board of Directors of DT Moving (the Company) has adopted the following Code of Business Conduct (the Code) which sets out our commitment to ethical standards and legal principles, which the Company expects every employee¹ and business Partner² to exhibit and adhere to in all dealings with our clients, the supply chain, the community and with one another.

Scope of activities and our mission

DT Moving is an independent international household goods moving company, providing high quality packing, export, import, domestic and cross-border removals, fine art and antiques packing and shipping, international forwarding (by sea, air and road), storage and associated relocation support services to corporate and business clients, their transferees, and private individual customers. The company strives to maintain and protect its reputation for reliability and integrity through a safe, punctual and properly controlled service.

Our mission is to provide a quality of service which meets or exceeds the demands and expectations of our clients, by:

- Arranging the move or shipment to a plan agreed with the customer;
- Providing value for money – not necessarily at the lowest price;
- Without claim or complaint arising from loss, damage or service failure;
- Ensuring accurate and timely communication with all parties involved;
- Providing the necessary documents and documentation describing all the arrangements and responsibilities of all parties concerned, and;
- Fulfilling our legal, social, environmental and health & safety responsibilities towards both customers and our employees alike.

Our responsibility as an employer

- To act professionally, fairly and with integrity to all employees;
- Provide employees with all information, instruction, training and supervision necessary to best carry out their work, on an ongoing basis;
- Provide a work environment for all employees which is safe and without risk to health and ensure adequate provision is made with regards to the facilities and arrangements assisting employee welfare at work;
- Model ethical behaviour and encourage open communication with employees, providing guidance and feedback in response to questions or concerns;
- Ensure that no employee is retaliated against for reporting suspected or potential violations of the Code or applicable law.

Your responsibility as an employee

- To act honestly and ethically in all business dealings;
- Comply with the law and the Code, as well as Company policies and business procedures;
- Promptly report any suspected or actual violations of the Code to your manager or a director of the Company;
- Seek guidance from your manager or a director of the Company when faced with an ethical or legal challenge; and
- Be accountable for adherence with the law and this Code.

¹ This Code of Business Conduct applies to all DT Moving operations and entities. The term 'employee' should be read to include all officers and employees of DT Moving Limited and DT Moving France SARL including sub-contracted and temporary personnel.

² A business Partner is a supplier, contractor, overseas agent including sub-contractors working with them.

Your responsibility as a business Partner

DT Moving expects all business Partners to:

- Be aware of and uphold the same ethical standards and legal principles set out in this Code;
- Comply with our Partner Service Level Agreement;
- Operate your business professionally and in full compliance with the laws and regulations of the countries in which you are located and in which you do business, and the policies applicable to your business.

Our responsibility to our community

DT Moving is committed to managing and minimising the impact of its operations on the environment and promoting exemplary corporate behaviour in conjunction with our business Partners around the world. To this end we will:

- Comply with or exceed national legislation wherever we work;
- Subscribe to the principles of the United Nations Global Compact;
- Pledge that our employee and environmental policies will not negatively impact the community, wherever we work;
- Pledge honest, courteous and professional dialogue with the wider community;
- Work with business Partners around the world whose commitment to their community matches our own; demonstrated wherever available by their 'FAIM'³ accreditation provided by our world body, FIDI (the international federation of international furniture movers); and
- By participation in voluntary charitable activities and donations.

Our responsibility to the environment

- To remain at all times compliant with the Environmental Protection Act 1990 'EPA' and the Environmental Protection (Duty of Care) Regulations 1991 Controlled Waste Description and Transfer Note;
- Office supplies and marketing material are sourced wherever possible from recycled materials and/or sustainable resources, then wherever possible, recycled after use;
- Our cardboard and paper packing materials are produced wherever possible from sustainable resources; they are recyclable, non-bleached and bio-degradable;
- Timber, where it is used for shipping cases, crates and other applications, is treated and certified to meet International Standards for Phytosanitary Measures (ISPMs) in accordance with the requirements of the International Plant Protection Convention (IPPC) adopted by many countries;
- Our fleet road vehicles are regularly maintained and emission tested; diesel engines are fitted with compliant low CO2 filters; replacement vehicles acquired from 2016 are 'Euro 6' emission regulations compliant;
- We adopt minimum on the road time for all storage consignments. Once goods are stored, they remain in one place until they are needed again.

Our commitment to best practise

- We work to the quality management principles of ISO 9001:2008 including FIDI-FAIM and BS-EN 12522-1-2:1998, documented in our Quality Management manual;
- Our Environmental Management System is incorporated into our Quality Management manual.

³ FAIM means 'FIDI Accredited International Mover' – it is a worldwide quality standard dedicated to the international moving industry; every FIDI affiliated firm is periodically audited for compliance by Ernst & Young.

Our anti-bribery and anti-corruption policy

DT Moving takes a clear stand against bribery and corruption. The Company will not tolerate nor condone any illegal or unethical behaviour or actions by any employee or business Partner with whom DT Moving conducts business.

- *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.*

We will comply at all times with applicable legislation including but not limited to the UK Bribery Act 2010 and the US Foreign and Corrupt Practises Act of 1977 (FCPA) in accordance with the following charter, and expect & require absolute commitment to uphold to the same by our business Partners.

DT Moving including its officer's, employees and business Partners pledge to:

- Never engage in any form of bribery, either directly or through any third party;
- 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;
- Never attempt to induce an individual, or a local or foreign official to act illegally or improperly;
- 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;
- Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is an expectation or implication for a return of favour;
- Never accept any gift from any business Partner if there is a suggestion that a return of favour will be expected or implied;
- Never facilitate payments to obtain a level of service which one would not normally be entitled to receive;
- Never disregard or fail to report any indication of improper payments, to the appropriate authorities;
- Never induce or assist another individual to break any applicable law or regulation.

Our commitment to fair and free competition

We will comply at all times with Competition Law. We commit to healthy free and fair competition and will not enter into any anti-competitive agreement or behaviour with another firm to fix prices or the market, nor otherwise prevent, restrict or distort competition.

Our commitment to the Data Protection Act and protecting personal information

We will comply at all times with the UK Data Protection Act 2018 and/or similar protection of personal information laws in other countries. Personal information will be protected against unauthorised access. We necessarily ask for and retain certain personal information to enable us to process and complete a transaction to deliver our services. We are required to share certain personal information with other parties related to the transaction, such as but not limited to government authorities and agencies including HMRC, international Customs and Border Agency's, business Partners, international Carriers such as shipping lines and airlines, insurance companies and their agents. However, personal information will only be shared for the specific purpose of effecting the transaction. We pledge that personal information processed by us will be:

- Used fairly and lawfully; for specifically stated purposes only;
- Used in a way that is accurate, adequate, relevant and not excessive;
- Kept for no longer than is absolutely necessary;
- Handled according to people's data protection rights, and:
- Kept safe and secure.

Our full Privacy Policy Statement is set out in Addendum 1 of this Code of Business Conduct document and is also available on our public website at <http://www.dtmoving.com/privacy-policy>

Website Cookie Law

We will comply at all times with 'Cookie' law, which requires websites to gain consent from visitors to store or receive any information on a computer or any other web connected device. Our full Cookie and Privacy Policy is set out on our public website at <http://www.dtmoving.com/privacy-and-cookie-policy>

Our Health and Safety Policy

The Health and Safety at Work Act 1974 imposes a statutory duty on employers to ensure, in so far as is reasonably practicable, the health and safety of their employees whilst at work. This duty also extends to others who may be affected by that work.

Employees have a statutory duty of care of themselves and others who may be affected by their acts or omissions.

To enable these duties to be carried out, it is our intention to ensure that responsibilities for health and safety matters are effectively assigned, accepted and fulfilled at all levels within our organisation.

DT Moving will, so far as is reasonably practicable, ensure that:

- Adequate resources are provided to ensure that proper provision can be made for health and safety;
- Risk assessments are carried out and periodically reviewed;
- Systems of work are provided where reasonably practicable, and they are maintained, so that they are safe and without risk to health;
- Arrangements for use, handling, storage and transport of articles and substances for use at work are safe and without risk to health
- Employees are provided with such information, instruction, training and supervision as is necessary to secure their safety and health at work and the safety of others who may be affected by their actions
- The provision and maintenance of all plant, machinery and equipment is safe and without undue risk to health
- The work environment for all employees is safe and without risk to health and that adequate provision is made with regards to the facilities and arrangements for their welfare at work
- The place of work is safe and that there is safe access to and egress from the work place

It is the duty of all employees at work:

- To take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work, and cooperate with us in fulfilling our statutory duties, and;
- Not to interfere with, or misuse anything provided in the interest of health and safety

This Health and Safety Policy is reviewed at least annually, amended and updated as and when necessary. Communication of this Policy and any changes is available via the Company's intranet (shared drive).

Monitoring and enforcement

Employees are expected to promptly report any suspected breach of the Code of Business Conduct to an appropriate authority, which may include but is not limited to:

- The Company Secretary, at m.garner@dtmoving.com / Phone 020 3764 5699
- The Managing Director, at n.kerr@dtmoving.com / Phone 020 3764 5681
- The employee's line manager

In addition, employees may exercise their legal right or duty to report possible violations of law to the appropriate government authorities or the police at any time, without reporting the matter to, or seeking prior approval from the Company.

The Company sets clear guidelines for ethical and professional behaviour through its policies and procedures set out in its ISO 9001-2008 Quality Management System and its Employee Handbook.

Communication and awareness of this Code of Business Conduct

Our Code of Business Conduct is communicated to all employees via the Company's intranet (shared drive). Awareness is promoted by means of internal distribution and an induction programme. It is also available on our public website at <http://www.dtmoving.com/about-us/corporate-social-responsibility> . We proactively communicate our Code of Business Conduct to our partner supply-chain in conjunction with Partner Service Level Agreements.

Nick Kerr
CEO & Managing Director
DT Moving Limited

25 May 2018



About DT Moving

Founded as Davies Turner in 1870 to ship the belongings of Victorian adventurers to the farthest corners of the globe, DT Moving is one of the longest standing international moving companies in the world. We have established ourselves as a market leader in relocating corporate employees all over the world.

DT Moving Limited

49 Wates Way, Mitcham
Greater London, CR4 4HR
United Kingdom

Tel: +44 20 7622 4393
Fax: +44 20 7720 3897
Email: london@dtmoving.com

DT Moving France

12 rue de Fourqueux,
78100 Saint Germain en Laye,
Paris, France

Tel: +33 1 39 04 16 16
Fax: +33 1 39 73 03 78
Email: paris@dtmoving.com

Addendum 1

DT MOVING PRIVACY POLICY STATEMENT

DT Moving Limited including DT Moving France SARL is a Gosselin Mobility group company. This privacy policy explains how we manage and use personal data that we collect from you.

1. Your data controller

This privacy policy statement relates solely to information supplied by you to us either directly or indirectly. DT Moving Limited is registered in England and Wales under company number 1165167 and whose registered address is at 49 Wates Way, Mitcham, Surrey, CR4 4HR, United Kingdom (“DT Moving”). Any reference to DT Moving shall also include reference to or any of the DT Moving associated companies including its holding companies, subsidiaries, and affiliates. The data controller in respect of any Personal Data provided is DT Moving Limited and other controllers identified in section 15. We shall respect the privacy of your personal data, treat it as confidential and keep it secure subject to the provision of the UK Data Protection Act 2018 and/or the EU General Data Protection Regulations (May 2018).

2. Processing your Personal Data

This privacy policy covers the information about you (“Personal Data”) that you provide to us either directly or indirectly via third parties that authorise our services on your behalf, including but not limited to your employer, agent or relocation service provider.

Collection of Personal Data: We collect Personal Data about you, subject to applicable law, from a variety of sources as follows:

- We obtain your Personal Data when you provide it to us (e.g. by phone or via e-mail (or by any other means)).
- We collect your Personal Data in the ordinary course of our relationship with you (e.g. whilst managing your relocation and/or storage).
- We collect Personal Data that you manifestly choose to make public, including via social media (e.g. we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We receive your Personal Data from third parties who provide it to us, e.g. entities who authorise our services on your behalf, such as your employer, agent, relocation service provider, and/or insurers, previous landlords, credit reference agencies, etc.

Creation of Personal Data: We may also create Personal Data about you that we may Process, subject to applicable law, as follows:

- Personal details: given name(s); preferred name; nickname(s), gender, date of birth / age; marital status; social security number; Passport number(s), other Government(s) issued numbers (tax identification number, Green Card(s) number(s) including Driving Licence number; nationality; images of Passports, images of Visas (Work / Residence permits); images of Driving Licences, images of Gun Licences, images of Signatures,
- Family member details: similar information for family members assisting you with your relocation and/or moving with you (e.g. your spouse, partner, children)
- Contact details: address, telephone number(s); fax number; e-mail address; and social media profile details.

- Financial details: billing address, bank account numbers; credit or debit card numbers; cardholder or accountholder name and details, for the purpose of making authorised payment deductions or transfers; instruction records and transaction details.
- Views and opinions: any views and opinions, such as customer satisfaction questionnaires, that you choose to send to us, or publish about us (including on social media platforms).
- Details about your relocation, move or storage requirement: including lists and photographs e.g. for the purpose of assessment, pick-up or delivery vehicular access and condition (of goods). Where photographs of goods or the location are required we will not take photographs of people in your home.
- Valuation of goods details: Bills, receipts, lists or other valuations (of your goods) e.g. for insurance and/or customs declaration purposes
- Electronic Identifying Data: IP address cookies, logs, online identifiers, device ID's geolocation.
- References: reference information from banks, previous and current employers, previous landlords
- Guarantor information: details relating to any guarantors including name and proof of employment or other evidence to guarantee payments on behalf of the tenant.

3. Processing activity and lawful basis for Processing

DT Moving collects and processes your Personal Data in connection with any contract you may enter into with us, for one or more of the following purposes:

- Creation and management of your account (*lawful basis: consent / contract*)
- Administering relationship and related services (*lawful basis: consent / contract*)
- Performance of tasks necessary for the provision of the requested services (*basis: consent / contract*)
- Communicating with you in relation to those services (*lawful basis: consent / contract*)
- Improving the performance of DT Moving and our Website (*lawful basis: consent / legitimate interest*)
- Managing complaints and claims (*lawful basis: contract / legitimate interest*)
- Managing our communications systems; operation of IT security (*lawful basis: legitimate interest*)
- Health and Safety assessments and record keeping, and compliance with legal obligations (*lawful basis: legitimate interest*)
- Physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems) (*lawful basis: legal obligation / legitimate interest*)
- Regulatory and Statutory compliance under applicable law (*lawful basis: legal obligation*)

Processing your Special Category Data: We do not seek to collect or otherwise Process your Special Category Data, except where:

- The Processing is necessary for compliance with a legal obligation;
- The Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law;
- You have manifestly made your Special Category Data public;
- The Processing is necessary to protect the vital interests of any individual; or
- We have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Special Category Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); or
- Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.

We only process Criminal Offences Data, and national identification numbers to the extent required or permitted by applicable law.

4. Sharing your Personal Data

The Personal Data provided by you may also be shared with other organisations in order for us to perform tasks necessary for the provision of the requested services and for us to comply with any legal or regulatory requirements. For the purposes detailed above, your information may be disclosed to:

- Any other branches or companies within our group of companies;
- Any regulatory, supervisory, governmental or quasi-governmental authority with authority and jurisdiction over us;
- Any applicable Customs and/or Border Agency and/or equivalent border control agency from and to which removal goods either originate, transit or are destined;
- Any agent, contractor, third-party service provider, international or domestic carrier (such as shipping lines, road and rail transport operators, airlines and freight forwarders), professional advisor or any other person under a duty of confidentiality to DT Moving;
- Any Insurance company and/or their appointed agent with a lawful interest
- Any financial institution with which we have or propose to have dealings

5. Overseas transfers

We may transfer your Personal Data to countries located outside of the European Economic Area (EEA), e.g. overseas. This may happen in circumstances where your goods or you are destined to or based in an overseas location or because your relocation service provider is based in an overseas location. We may transfer your personal data under certain circumstances (e.g. where it is necessary to perform our contract with you). The data protection laws of these countries may not be as comprehensive as those that apply within the EEA – in these circumstances we will take steps to ensure your privacy and confidentiality rights are respected.

Where we transfer your Personal Data to other countries we do so on the basis of:

- European Commission's adequacy provisions;
- Suitable Standard Contractual Clauses; or
- Other valid transfer mechanisms.

6. Personal Data on vessel manifests / USA shipments

If you are **moving your personal belongings to or from the United States of America**, certain of your Personal Data are declared on the vessel manifest, as required by US law. We draw your attention to the applicable US privacy legislation.

According to United States Code of Federal Regulations *Privacy statute 19 CFR 103.31(d) 'Information on vessel manifests and summary statistical report'*, the public is allowed to collect manifest data at every port of entry. Reporters collect and publish names of importers/shippers from vessel manifest data unless an importer/shipper requests confidentiality.

If you wish to prevent your Personal Data which is declared on the vessel manifest from being collected and published (e.g. on reports, public websites etc), you must contact the Privacy Branch of US Customs and Border Protection in writing (see below):

Request confidential treatment of my personal data and that it may not be copied or published from the vessel manifest'

E-Mail: vesselmanifestconfidentiality@cbp.dhs.gov or Fax: +1 202 325-0154

Send to:
 CBP Privacy Officer
 U.S. Customs and Border Protection
 90 K Street, N.E.
 10th Floor
 Washington D.C. 20229-1177

What information should I include in my request?

- Identify what type of confidentiality you are requesting (e.g. import or export shipment, or both);
- Which party you are (e.g. the importer/consignee (for shipment arriving in USA) or the exporter / shipper (for shipment leaving the USA), or both);
- Your Name and US address (as given for the vessel manifest)
- Your E.I.N. (Employer Identification Number) if available;
- Shipping information including: Vessel Name, Voyage Number, Bill of Lading Number, Date of Sailing, Port of Departure; Port of Arrival/Discharge (you may obtain this information or a copy of the Bill of Lading) from us or the applicable freight forwarder, mover or relocation service provider who is arranging your shipment of personal belongings)

Expiration and Renewal?

Renewal requests must be sent to arrive 90 days prior to the expiration of the two year confidentiality period. There is no fee associated with the request for confidentiality.

7. Third Party information

If you provide us with information about another person, you confirm you already have explicit confirmation that such other person has appointed you to act for them to consent to the processing of their Personal Data by us. This means that you have informed them of our identity and the purpose for which their Personal Data will be processed, namely to verify their name and address and otherwise only in connection with you. You agree to keep us, and any Gosselin Mobility Group company or relevant third party fully indemnified for your not having complied with this requirement.

8. Data Security

We maintain reasonable security measures to safeguard Personal Data from loss, interference, misuse, unauthorised access, disclosure, alteration or destruction. You are responsible for ensuring that any Personal Data that you send us are securely sent.

We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

9. Data Accuracy

We take reasonable steps designed to ensure that:

- Your Personal Data that we process are accurate and, where necessary, kept up to date; and
- Any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay. From time to time we may ask you to confirm the accuracy of your Personal Data that we hold.

10. Data Minimisation

We take reasonable steps designed to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this policy statement.

11. Data Retention

We take every reasonable step to ensure your Personal Data are only processed for the minimum period necessary for the purposes set out in this statement. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- (1) We will retain copies of your Personal Data in a form that permits identification only for as long as:
 - o We maintain an ongoing relationship with you (e.g. where you are the recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or
 - o Your Personal Data is necessary in connection with the lawful purposes set out in this statement, for which we have a valid legal basis (e.g. where your personal data are included in a contract between us and you or your employer, agent or relocation service provider, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data.

Plus

- (2) The duration of:
 - a. Any applicable limitation period under applicable law (i.e. any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant); and
 - b. An additional twelve (12) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

And

- (3) In addition, if any relevant legal claims are brought, we may continue to Process your Personal Data for such additional periods as are necessary with that claim.

During the periods noted above in paragraphs (2)a and (2)b, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any legal obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data;
- archive your Personal Data so that it is beyond use; or
- anonymize the relevant Personal Data

12. Business changes

If DT Moving or the Gosselin Mobility Group undergoes a group reorganisation or is sold to a third party, the Personal Data provided to us may be transferred to that reorganised entity or third party for the purposes set out above.

13. Your rights

With limited exceptions, you are entitled, in accordance with applicable law, to object to or request restriction of processing of your Personal Data, and to request access to, rectification, erasure and portability of your Personal Data. This service is provided free of charge unless requests are manifestly unfounded or excessive. In these circumstances, we reserve the right to charge a reasonable fee, or, refuse to act on the request. You can write to us, please see Contact Information in section 14 below.

If any of the information that we hold about you is wrong, please tell us and we will put it right.

Subject to any applicable local laws or regulations, if you prefer not to be kept informed of our services, please let us know.

You may lodge a complaint with a Data Protection Authority* if you consider our processing of your Personal Data may infringe applicable law.

*DT Moving Limited is registered with the Information Commissioner's Office, registration reference: Z6597751. You can find out more about your personal data rights or make a complaint at: www.ico.org.uk

14. Contact Information

You can raise any issues regarding the processing of your Personal Data by contacting the Data Protection Officer at anytime:

By E-Mail to:

London@dtmoving.com

By post to:

DT Moving Limited, 49 Wates Way, Mitcham, Surrey, CR4 4HR, UK

15. Controllers

DT Moving Limited

49 Wates Way, Mitcham, Surrey, CR4 4HR, UK

DT Moving France SARL

12 Rue de Fourqueux, 78100 St Germain en Laye, France

Gosselin Mobility UK Limited

49 Wates Way, Mitcham, Surrey, CR4 4HR, UK

Glossary of Terms

Controller	The entity that decides how and why Personal Data is Processed, In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
Data Protection Authority	An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
Personal Data	Information that is about any individual, or from which any individual is identifiable.
Process or Processed or Processing	Anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Personnel	Any current, former or prospective director, officer, consultant, employee, temporary staff, individual contractor, intern, seconded person and other personnel.
Processor	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller)
Criminal Offences Data	Personal Data about any actual or alleged criminal offences or penalties.