

ANTI-TRUST CHARTER

*Transcontainer is determined to lead the relocation industry by taking a clear stand adopting the **Anti-Trust compliance programs and pledge to abide by the highest ethical standards and to free and fair competition.** By doing so, Transcontainer will protect the best interests of the industry, the Affiliates and their customers.*

The purpose of this agreement is to ensure that all employees/vendors/agents/partners/suppliers are in compliance with all the applicable anti-trust policies.

Transcontainer 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 e to detect and prevent cartels.

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

All FIDI Affiliates commit to legal and ethical behavior, 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 behavior

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.

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 behavior.*
- 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.*

If you want / need to report any act against Anti-Trust Policies please use the following email as your escalation point of contact: ethics@transcontainer-group.com