

# ***ANTI-BRIBERY AND ANTI-CORRUPTION CHARTER***

*Transcontainer is determined to lead the relocation industry by taking a clear stand against **Bribery and Corruption**. 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-bribery and anti-corruption policies.*

*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.*

## ***Transcontainer Will NOT Tolerate Bribery***

*Corruption, bribery or attempted bribery is unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against Transcontainer's / 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.*

## ***Legal compliance***

*Transcontainer will ensure the awareness of all applicable laws countering bribery and corruption in all the jurisdictions in which they operate, and we 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. As a FIDI affiliated company, have to ensure that we are aware of, and are complying with, applicable laws.*

## ***Ethical behavior***

*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.*

## ***CODE OF CONDUCT***

- 1. Never engage in any form of bribery, either directly or through any third party.*
- 2. Never offer or make an improper payment, or authorize 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 favor*
- 6. Never accept any gift from any business partner if there is any suggestion that a return favor 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.*

*If you want / need to report any act against Anti-Bribery and Anti-Corruption Policies please use the following email as your escalation point of contact: [ethics@transcontainer-group.com](mailto:ethics@transcontainer-group.com)*