

THE FIDI ANTI TRUST CHARTER - FIDI FAIM 3.2

Freight International LLC is part of a very strong initiative to ensure free and fair competition in our business.

We strongly comply with and incorporate **Anti-Bribery Anti-Corruption Policies*** in our professional attitude and show zero tolerance to **Anti-Competitive Practices & Cartel Conduct*** that restrict terms of fair competition in all our supply chain, customers, agents and collaborators in general.

In alignment with all this, our company has signed on 07-01-2018 and incorporated in its code of conduct & quality standards the **FIDI Anti –Trust Charter*** declaring its absolute commitment against cartel and anti-competitive practices.

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.

Charter Statement

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 and regulations covering anticompetitive practices in all the jurisdictions in which they operate, and that they will obey and uphold those laws and regulations.

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 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.

*** This policy is communicated to all employees, customers, suppliers, contractors and the community/public.**

Date of 1st Issue	07/01/2018	Rev No.	01	Rev Date	12-04-2019	Effective Date	14/04/2019
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