



Anti-Trust and Competition Compliance Policy

1. Policy Statement and Commitment

Master Moving is committed to the principle of **free and fair competition** and a **zero-tolerance** approach to cartel conduct and all forms of anti-competitive behavior.

It is the strict policy of FIDI to comply fully with all applicable national, regional, and international **Anti-Trust and Competition Laws** in all jurisdictions where they operate. Non-compliance is considered a serious breach of FIDI Affiliation requirements, the FAIM Quality Standard, and may result in legal penalties for the company and individuals, including substantial fines and imprisonment.

2. Prohibited Conduct (The "Cartel Conduct" Focus)

Master Moving and their personnel **must never** engage in, propose, or discuss the following "hardcore" anti-competitive activities with actual or potential **competitors**. This includes direct, indirect, formal, or informal agreements or understandings:

- **Price Fixing:** Agreeing on current or future prices, price ranges, price components (e.g., fuel surcharges, agency fees, net rates, rebates, discounts), or terms and conditions of sale/purchase of moving and relocation services.
- **Market Allocation:** Dividing or sharing markets, territories, customers, or classes of customers or suppliers.
- **Bid Rigging/Collusive Tendering:** Coordinating on bids submitted for a competitive bidding process, including agreeing not to bid, agreeing to bid a losing price, or agreeing on a rotation of bids.
- **Limitation of Output:** Agreeing to restrict the volume or scope of services provided or the number of moves undertaken.



3. Guidelines for Interaction with Competitors (Meetings and Information Exchange)

Master Moving must exercise extreme caution when interacting with competitors, especially at trade association meetings (like FIDI's own General Assembly or Conference) or any other professional gathering.

Prohibited Discussions

Master Moving must **immediately avoid** and **never** discuss the following topics with competitors:

- Current, future, or planned **prices, costs, profit margins, revenues, or pricing methodologies**.
- Current or future **terms of sale** (e.g., credit terms, warranties, delivery schedules).
- Plans concerning **market shares, sales volumes, production capacity**, or new service offerings.
- Specific **individual customer or supplier** contracts, strategies, or bidding intentions.
- Specific commercial terms related to **agency cooperation** that are not already public (unless absolutely necessary for a single, legitimate transaction and limited to only that transaction).



Mandatory Actions at Meetings

If any prohibited subject is raised at a meeting involving competitors:

1. The employee must **immediately object** to the discussion.
2. The employee must insist that the subject be **dropped and noted in the minutes**.
3. If the discussion continues, the employee **must leave the meeting** immediately and ensure their departure and the reason is recorded.

4. Independent Business Judgment

Master Moving must always act with **independent judgment**.

- All business decisions, particularly those related to **pricing, service offerings, and contracting** with customers and suppliers, must be made independently and without any agreement, consultation, or understanding with a competitor.
- Master Moving must ensure that internal and external communications (including emails, texts, and documentation) are clear and **cannot be misinterpreted** by third parties or Anti-Trust authorities as evidence of anti-competitive conduct.



5. Compliance, Reporting, and Disciplinary Action

Compliance & Training

- Master Moving must maintain their own internal Anti-Trust compliance programs and provide **regular training** to employees, agents, and relevant third parties, particularly those in sales, marketing, and management roles.
- Compliance with this Charter is a **mandatory FAIM requirement**.

Reporting Violations

- Any employee who suspects or witnesses a violation of this Policy or applicable Anti-Trust laws must immediately **report the concern** to their company's legal department or a designated compliance officer.
- Affiliates should have a clear, confidential reporting procedure for all personnel.

Consequences of Non-Compliance

- A proven failure to comply with this Anti-Trust Policy will be considered a **breach of the FAIM Quality Standard** and the FIDI Affiliation requirements.
- Such a breach can result in the **expulsion** of the company from the FIDI Global Alliance. This action is separate from, and in addition to, any legal sanctions imposed by governmental Anti-Trust authorities.