ANTI-TRUST CHARTER

TFM Global Mobility are fully committed to conduct all of our business in an honest and ethical manner.

In compliance with FIDI FAIM requirements, we are committed to comply with the FIDI Anti-Trust Charter that fights against Cartels and unfair practices. We comply fully with The Singapore Competition Act 2004 and all other Anti-Trust laws in the countries where we do business. As an affiliate of FIDI, we never seek a competitive advantage through unethical, illegal or unfair practices. We are determined to support the fight against cartels, which restrict competition among suppliers to the detriment of customers.

This policy applies to individual employees, agents, suppliers, consultants or any other people or bodies associated with TFM Global Mobility, or any of its subsidiaries and employees.

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.

Code of Conduct

To achieve our commitment and to provide unmatched relocation service to our clients, we expect compliance of the following code of conduct from all our employees, clients, associates, business partners and suppliers:

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, where the object is to engage in cartel behaviours or practices.

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 o 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.