

## **Anti-Corruption, Anti-Bribery and Anti-Trust Policy**

Invictus Relocation Services obligates its employees and collaborators to operate with constant honesty and integrity, does not accept any form of corruption, and endeavors to obey and uphold the Anti-Corruption laws in force in all of the countries in which it operates. We comply with the rules and conditions set forth in the documents The FIDI AntiBribery and Anti-Corruption Charter (FIDI ABC) and The FIDI Anti-TrXst Charter (FIDI ATC)'. These documents are available on the FIDI website at <https://www.fidi.org/about-fidi/fidi-governance>.

The policy applies to employees as well as to other individuals or companies that carry out activities in the name and on behalf of Invictus Relocation Services, even if they are not directly employed by us.

### **Principles and Requirements**

Invictus Relocation Services is committed to adopting a "zero tolerance" approach to corruption and "cartel" policies aimed at limiting competition by always acting professionally, loyally and with the utmost integrity in all relationships and commercial activities, wherever they operate. In particular with regard to:

#### **Anti-Corruption**

- Never engage in any form of bribery, either directly or through any third party;
- Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world;
- Never attempt to induce an individual, or a local or foreign official to act illegally or improperly;
- 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;
- 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 favour;
- Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied;
- Never facilitate payments to obtain a level of service which one would not normally be entitled to;
- Never disregard or fail to report any indication of improper payments to the appropriate authorities;
- Never induce or assist another individual to break any applicable law or regulation.

#### **Anti-Trust**

- 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;

- Never propose or reach an agreement, whether directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issues, such as fixing prices, dividing or sharing markets, customers or territories, rigging a competitive bidding process.
- 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;
- 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;
- 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;
- Maintain independent judgment in pricing or selling of any products and/or services;
- 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.

Invictus Relocation Services, with reference to its Mission, Vision and Values specified in the Code of Ethics and Behavior and Branding Policy documents, has defined its policy for Quality, Environment and Safety.

The reporting of any violations can be promptly reported to the manager of the Legal Department of Invictus Relocation Services sending an e-mail to the following address:

[info@invictus-relo.com](mailto:info@invictus-relo.com).