

# Anti-Trust Charter

The information contained in this document is intended for general distribution. Whether you are a customer, employee, vendor, agent, partner or supplier interacting with, working for, or appointed by us; you agree and accept to comply with the standards and guidelines contained in this document.

As a FIDI Affiliate, HELUTRANS is committed to conduct our business in the highest legal and ethical standards. We shall refrain ourselves from doing anything that will harm the interest of FIDI, our fellow affiliate members, our customers, employees, supply chain partners, as well as other stakeholders in the industry.

The Anti-Trust Charter is a declaration of commitment.

HELUTRANS pledge to abide by the FIDI Anti-Trust Charter v. 1. (also called the ATC). This ATC also extends to you and all those who act on your behalf, in the course of providing services to HELUTRANS.

## 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

By agreeing and committing to this Charter, HELUTRANS 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:
  - a) Fixing prices
  - b) Dividing or sharing markets, customers or territories
  - c) 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.

## **Agreement**

HELUTRANS confirm acceptance and compliance with FIDI Anti-Trust Charter and the Code of Conduct.

The ATC is also extended to you, our Supply Chain partner and all those who act on your behalf. In addition to the compliance with the ATC, you will also uphold the Anti-Trust laws governing in your location.

**Randy Chiu**  
**General Manager**  
**Relocation**  
**Helu-Trans (S) Pte Ltd**