

Four Winds Saudi Arabia, Ltd.

" We move those who move the world "

Anti-Trust Charter



FD 5.7 Anti-Trust Management

PROFESSIONAL RELATIONSHIP WITH CLIENTS AND BUSINESS PARTNERS

Four Winds Saudi Arabia, Ltd. is one with FIDI in support to anti-cartel activities between trade partners which restrict competition among suppliers to the disadvantage of customers.

The company commits itself not to engage in cartels as this is a violation to its business core values of innovation, effective communication and growing together. More importantly, the top management does not condone any form of violation to Anti-trust laws applicable not only is Saudi Arabia but in most countries wherein counteracting sanctions are imposed, as per court decision whenever, one is found violating anti-trust statutes.

The following items generally covers the mantra of partnerships with Four Winds Saudi Arabia, Ltd. in support to legally-founded Service Level Agreements (SLA) and contracts restricting any possibilities of anti-trust actions, if not eliminating them, therefore, favoring healthy competition and sustainable market where healthy competition exists.

1. Four Winds Saudi Arabia, Ltd. acknowledges the governing import and export laws of the land as well as good trade practices between business partners from where and to where a shipment is coming or heading, so to mention the ones implemented in both origin and destination countries.
2. Upon receipt of shipment from the customer, Four Winds assumes responsibility of the importation or exportation of the received goods within the bounds of the governing laws at origin and destination that shall be the foundation of the move agreement.
3. With reference to items 1&2, for intercontinental moves where Four Winds acts as booker but neither the destination or origin agent, the appointed agents at origin and destination assume the responsibility for importing and/or exporting the goods and complying such laws and all related but not limited to the agreement laid in the removal contract agreed by Four Winds and its appointed agent.

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4. To the extent the Saudi Arabian laws or regulations applying to import or export of goods wherein the subject matter of the removal agreement is amended, repealed or superseded, Four Winds, at its sole option, shall establish new terms to these provisions according to the parameters not less than the provisions of the newly established government regulation giving importance to legal trade practices and laws which impose sanctions to cartels and anti-trust violations.

Below is the official Anti-trust policy of Four Winds Saudi Arabia, Ltd having some parts as an adaptation and/or verbatim of some parts of the standard FIDI ANTI-TRUST CHARTER v.1 (dated October 2017):

Charter Statement

Undertaking by all FIDI Affiliates with immediate effect

All FIDI Affiliates commit to legal and ethical behavior, and to refrain from engaging in any business that will ham 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 Anti-Trust laws and regulations in connection with cartel conduct and other Anti-Trust violations, and will monitor their employees and business partners to ensure full and continual compliance.

Legal compliance

Four Winds Saudi Arabia, Ltd. top management 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 by cascading the knowledge to all levels of their organization, maintain effective implementation, monitor strict compliance, and impose sanctions to violations.

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Ethical behavior

As a demonstration of its commitment, Four Winds SA., Ltd. pledge to take a zero-tolerance approach to cartel conduct. At all times, Four Winds will act professionally, fairly and with the utmost integrity in all business dealings and relationships in all areas where the company operates.

Commitment to the values of FIDI

This Charter will be formally integrated into the FAIM quality standard to be adopted into the Four Winds Saudi Arabia, Ltd. quality manual.

Top Management Commitment

Four Winds Saudi Arabia, Ltd. observes zero tolerance to cartel and unfair trade practices. It has been, and will continue to be, an advocate of establishing strong partnerships with its co-players in the moving industry especially to FIDI affiliates and most of all its local and global customers. It will continue to take on the challenges brought about by healthy competition by innovation and continuing growth to fit the needs of the local and international market.

Suppliers, vendors, outsourced service providers, employees and agents working for and/or in behalf of Four Winds are guarded against unfair trade practices that a shadow of cartel and/or the intent of engaging into it shall prove sufficient ground for Four Winds Saudi Arabia, Ltd. to nullifying any existing contractual and/or work agreement with violating party(ies) with no liabilities due for Four Winds Saudi Arabia, Ltd. for cancelling the contract.

Code of Conduct

By Agreeing and committing to this Charter, the signatories 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 behavior.
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

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- 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 Four Winds Saudi Arabia, Ltd. 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-mail 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 judgement 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.
 8. Support zero-tolerance on anti-trust violations and continue to uphold fair, honest and legal-based work and trade practices.
 9. Report any violations or indicators of inconsistency to the mandates of this policy.
 10. Escalate reports which are not acted upon by earlier recipients and seek legal assistance if necessary.

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Agreement

I confirm that I have read and understood the Four Winds Saudi Arabia, Ltd.'s adaptation to FIDI Anti-Trust Charter. I accept and agree to abide by this Charter and the code of conduct, which is included in the FAIM Implementation Manual and is available on the FIDI website (<https://www.fidi.org/fidi-anti-trust-charter-0>) .

I understand and accept that participating in a cartel, as described in this charter, in a final decision of a competent authority, is considered as non-compliance with this Anti-trust Charter.

Four Winds SA., Ltd. invoke its rights to terminate its business dealings with any violating partners and service providers.

(for FIDI partner agents)

I understand and accept that non-compliance with this Charter signifies non-compliance with FAIM pre-requirements, which will result in expulsion from the FIDI organization.

Date:	
Individual:	SAUDI ARABIA, LTD.
Title:	
For and on behalf of (Affiliate Company)	

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