



CMS Companies Anti-Trust Charter

CMS Companies, including CMS Relocation & Logistics and Sullivan Moving & Storage, support and pledge to abide by the ethical standards mentioned in the FIDI Anti-Trust Charter. The FIDI Anti-Trust Charter has been communicated to our staff, and third-party vendors, and we hold everyone accountable to these expectations and standards.

Introduction

CMS Companies is fully committed to conducting all our business in a legal and ethical manner. In compliance with FIDI FAIM requirements, we comply with the FIDI Anti-Trust Charter that fights against Cartels and unfair practices. We comply fully with 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 and retain a zero-tolerance approach to cartel conduct. We are determined to support the fight against cartels, which restrict competition among suppliers to the detriment of customers.

This policy applies to all our employees, directors, consultants, contractors, agents or other person or body acting on our behalf and extends to all our business dealings and transactions in all countries in which we or our agents operate.

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 jurisdiction, 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 the FIDI ATC Charter, we will:

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 proposes 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 anti-competitive business conduct by an actual or potential competitor in accordance with our internal reporting procedure, including but not limited to, reporting to our 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 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.
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.

This Anti-trust Charter is reviewed twice a year by CMS Companies Management, updated, when necessary, communicated to CMS Companies Staff and available in our IT system as part of internal CMS Companies policies.

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