



Fukuoka Soko Co., Ltd.

## **ANTI-BRIBERY & CORRUPTION MANAGEMENT**

Fukuoka Soko Co., Ltd. makes its employees and affiliates obligatory to operate with constant sincerity and attitude not to give in to things, does not accept any form of corruption, and strive to comply and support the Anti-Corruption laws in force in all of the countries in which it operates.

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

Principles and Requirements:

Fukuoka Soko Co., Ltd. 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.

### **Anti-Bribery & Anti-Corruption**

We expect all of our employees, business partner (agents, vendors, suppliers and third parties) will conduct themselves in accordance with our values, policies, procedure and laws relating to bribery and corruption.

- Never engage in any form of bribery, either directly or through any third party.
- Never offer or make an improper payment, or authorize 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 legally 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.



WORLD WIDE MOVERS

Fukuoka Soko Co., Ltd.

## ANTI-TRUST MANAGEMENT

Understanding global antitrust and competition rules is a necessary and prudent part of our international moving business strategy. It's our basic policy to comply with all laws and regulations regarding Anti-Trust, fair competition and trade applied in all countries.

- 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.
- 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 agent of Fukuoka Soko Co., 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.
- 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.