

ANTI BRIBERY AND CORRUPTION POLICY

WARD VAN LINES declares that does not accept corrupt practices in any of its operations, especially in third party negotiations and in commercial relations with private and public sectors. Its activities are carried out with the highest degree of professional integrity, by monitoring and ensuring that all corresponding laws and regulations are being met pertinently.

WARD VAN LINES has established core business values such TRUST, HONESTY, EXCELLENCE AND PERSONAL GROWTH, therefore, it has set that it does not tolerate any form of corruption and bribery or attempted bribery committed by WARD VAN LINES' employees or by a third party acting on behalf of the company and/or representing the company. Payments, gifts, promises, offers, or giving or authorizing prohibited payments will not be tolerated by the company.

WARD VAN LINES, adheres and commits to comply specifically with the "FIDI Charter against BRIBERY AND CORRUPTION". Moreover, the UN document related to Anti-Corruption (General Assembly resolution 58/4 of October 2003) has been established as a guide.

Our policy defines:

Bribery is the offering, promising, giving, accepting gifts, accepting or soliciting of an advantage as an inducement for action. It is illegal and it is a breach of trust.

A bribe is an inducement of incentive or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

Third parties are companies or people who act on behalf of WARD VAN LINES, and therefore, it is the company's responsibility to make sure that its business partners recognize and agree to comply with this policy.

Our staff and associated third parties commit to follow legal and ethical behavior. Therefore, they refrain from any practices that infringe upon the interests of Ward Van Lines, agents, customers, or the industry.

We commit to:

- ✓ Never engage in any form of bribery, either directly or through any third party.
- ✓ Never offer or make 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 illegally or improperly.

- ✓ Never offer or accept money or anything in 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 favor.
- ✓ Never accept any gift from any providers or organizations if there is any suggestion that a return favor will be expected or implied.
- ✓ Never facilitate payments to obtain a level of service that 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.

All our operations must respect the principles stated in WARD VAN LINES core values and comply with the highest standards of behavior, mainly with HONESTY in all aspects of our work.

WARD VAN LINES, through its Management, will be responsible for ensuring the compliance of this policy. It will take steps to ensure that its employees and business third parties are fully aware of, understand and adhere to this policy and the need to comply with it.

As an effective way to fight against corruption and bribery WARD VAN LINES is committed to:

- ✓ Raise awareness and train employees on ethical behavior and dissemination of our corporate values, explaining the meaning of corruption and how to fight against it.
- ✓ Report and manage cases of corruption. For this, a confidential and reliable channel will be established in order to receive each complaint of corruption or bribery. These will be treated as non-conformities according to our quality system.
- ✓ Refuse to participate in any illegal activities. Each Manager will be responsible for ensuring that their departments, units and people that are concerned do not participate in any illegal activity of this nature.
- ✓ Foster with the example of intolerance toward corruption. If proven that an employee has engaged in corruption or bribery, this will lead to the application of the labor legislation and internal procedures to dismiss the employee.
- ✓ Ensure that our providers, contractors and third parties, who work on behalf of the company, whether providing services, processes, or any business or operational activity, will be obliged to act consistently with this policy.

Ward Van Lines is a FIDI affiliated company adheres to the FIDI Charter against corruption and bribery.

WARD VAN LINES S.A. joined FIDI ABC in October 2015, formalizing its commitment to mitigate any corruption and bribery risks through the FIDI ANTI-BRIBERY AND ANTI-CORRUPTION CHARTER. This document has been transmitted to all company employees through its publication in the quality management system. In addition, all our business partners have been notified through our web page.



Sebastian Laporta V
Managing Director