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www.glensremovals.com

GLENS REMOVALS & STORAGE

ANTI TRUST CHARTER

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.

GLENS REMOVALS & STORAGE WILL NOT TOLERATE CARTEL CONDUCT

Glens Removals & Storage respects the Anti-Trust laws and regulations in the countries in which it operates and requires that its Affiliates do the same. Involvement in a cartel is unacceptable. It is against Glens Removals & Storage core values of competing freely and fairly, based on the added value of its products and services.

The laws and regulations that sanction cartel conduct are in place in most jurisdictions. These laws and regulations are designed to promote free and fair competition and to protect consumers. Anti-Trust compliance programs are there to detect and prevent cartels.

LEGAL COMPLIENCE

Glens Removals & Storage respects the Anti-Trust laws and regulations in the countries in which it operates and requires that all its Affiliates do the same. Glens Removals & Storage and all Affiliates commit to legal and ethical behaviour, and to refrain from engaging in any business that will harm the interests of FIDI, other affiliates, clients, or the industry at large. Glens Removals & Storage 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 complete and unreserved compliance.



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In Zimbabwe the Competition and Tariff Commission whose mandate as highlighted in the Competition Amendment Act, 2001, is to promote and maintain competition in the economy of Zimbabwe; to provide for the prevention and control of restrictive practices, the regulation of mergers, the prevention and control of monopoly situations and the prohibition of unfair trade practices; and to provide for matters connected with or incidental to the foregoing. Antitrust practices are therefore strongly prohibited and monitored. Breach of the act may lead to penalties or prosecution or both

COMMITMENT TO THE VALUES OF FIDI

By agreeing and committing to this Charter, Glens Removals & Storage 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:
 - Fixing prices
 - 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 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



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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.

ETHICAL BEHAVIOUR

Glens Removals & Storage as a complete compliance and demonstration to commitment to this charter will take a zero- tolerance approach to cartel conduct. Glens Removals & Storage and its Affiliates will act professionally, fairly and with the utmost integrity in all its business dealings and relationships.

AGREEMENT

I understand and accept that participating in a cartel, as described in this Policy, in a final decision of a competent authority, is considered illegal which may result in action against individuals or companies and does not comply with Anti- Trust laws and regulations.

ADMINISTRATION, MONITORING & ENFORCEMENT OF THIS CHARTER

The company takes this policy seriously and makes every effort to make sure that preventative and educational training is done every quarter.

To this effect all managers and employees are well informed and trained on this charter and related policies. Communication of the charter has been done to employees and all our supply chain members, and all are required to have read and understood the charter and their responsibilities within it and to commit to completely comply at all times.

Employees and members of the supply chain have a duty to speak up if they have any questions or concerns regarding any suspicions they may have or approaches from any member of staff or competitor which they perceive to be in violation of the charter or supporting policies.



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Reports for any breach, suspicion and, or questions can be directed to line managers, the HR department or the Managing Director on our hot line Telephone. 00263 0732 270270 or on email: helpdesk@glens.co.zw

Glens Removals & Storage take the charter violations very seriously and may carry severe consequences including disciplinary action as well as legal liability.

Service providers who violet this charter will have their services with Glens Removals terminated and blacklisted.

We thank you for acting within the guidelines, question any concerns and do not tolerating behaviour that violates this charter.