THE FIDI ANTI-TRUST CHARTER

2023



Leading the Fight Against Cartels

FIDI supports the adoption of Anti-Trust compliance programs by its Affiliates. In this connection, FIDI is determined to support the fight against cartels, which restrict competition among suppliers to the detriment of customers.

Background

Membership in FIDI is highly valued by its Affiliates, and to ensure that value continues, all FIDI Affiliates pledge to abide by the highest ethical standards and to free and fair competition.

The Anti-Trust Charter is a declaration of commitment. It will strengthen the FIDI organisation, the FAIM programme, and all Affiliates by making it clear what distinguishes FIDI Affiliates from non-FIDI companies.

All FIDI Affiliates agree to sign and be guided by the provisions of the Anti-Trust Charter. The Anti-Trust Charter covers their employees (whether permanent, fixedterm or temporary) and any associated third parties providing services to or on behalf of the FIDI Affiliates.

The Anti-Trust Charter is integrated into FAIM. The procedural and audit requirements form part of the FAIM Implementation Manual and the Pre-Audit assessment.

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.

FIDI Will Not Tolerate Cartel Conduct

FIDI 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 FIDI's 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 e to detect and prevent cartels.

Charter Statement

Undertaking by all FIDI Affiliates with immediate effect

All FIDI 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. FIDI and its Affiliates will take steps to ensure they are fully informed of applicable AntiTrust 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

FIDI Affiliates 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.

FIDI affiliated companies will ensure that they are aware of, and are complying with, applicable laws and regulations in connection with cartels.

Ethical behaviour

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zerotolerance approach to cartel conduct. At all times, FIDI and its Affiliates will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

Commitment to the values of FIDI

This Charter will be formally integrated into the FAIM quality standard.

Code of Conduct

By agreeing and committing to this Charter, each FIDI Affiliate 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 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.

Agreement

I confirm that I have read and understood the 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.

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 AntiTrust Charter.

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: 26 / 12 /2023

Individual: PATRICIA CLARA FLUCK

Title: MANAGING DIRECTOR