

ANTI-TRUST POLICY (2021)

Alghanim Freight is a quality focused company committed to conduct the business in an honest and ethical manner, by fully comply with the Kuwait Anti-Trust law.

As member of the FIDI organization, we don't seek a competitive advantage through unethical, illegal, or unfair practice. We are determined to support fight against cartels, which restrict competition among suppliers to the detriment of customers.

The current policy applies to all employees, agents, suppliers, consultants, subcontractors. To achieve our commitment and to provide unmatched moving and relocation service to our customers, we expect compliance of the following code of conduct:

- Never propose or accept an agreement, whether directly or indirectly, formally or informally with competitors regarding: 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 the internal reporting procedure, including but not limited to, reporting to the legal department and/or to the relevant Anti-Trust local authorities.
- Not to participate in meetings in which sensitive competition-related issues are discussed. If such subjects are raised during a meeting, they must ask for the discussion to end or they must leave the meeting.
- Ensure that all internal and external correspondence, including e-mails and texts, documents, discussions, etc. 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.
- Limit any information discussed during commercial negotiations, that might be disclosed to competitors or other third parties.
- Employees shall immediately ask for guidance from or to notify the Managing Director if



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they receive any inquiry from any governmental agency or from any private lawyer regarding any alleged antitrust violation.

Alghanim Freight is strongly committed to compliance with the anti-trust policy. Upon violation of this Anti-trust Policy, The Management team may / can take any or all of the following actions: provide a warning or terminate the employment contract of said employee.

Social Responsibility Policy:

Alghanim Freight had made a priority in offering a healthy and safe environment for the employees. In the same time, offers protection against harassment and discrimination based on race, religion, disability or sexual orientation, and takes immediate action against them.

Alghanim Freight has ZERO TOLERANCE to any form of non-compliance.

All above is integrated in the internal Code of Conduct.

If you have questions, please contact our compliance department, on below email address:

Hotline Phone – Call (965) 24963777

Hotline Email: - compliance@alghanim.com

Walk in reporting: Walk into compliance department to report fraud.

Supervisor notification: Notify fraud to your line manager or supervisor and report it to compliance department.

Renewal Date (if the case): Oct 2022

Reviewed Date: Oct 2021



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