



NFB International Relocations AS is a leading Norwegian provider of global moving, storage and DSP services. With over 600 quality certified partners, covering over 100 countries and all continents, NFB is independent and free from commercial oriented partner alliances. We carefully select our trading partners solely based on quality to best protect the interest of our customers and ensure a smooth and trouble free international move, every time!

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## ANTI- BRIBERY AND ANTI- CORRUPTION

### 1. SCOPE

NFB International Relocations AS as a FIDI member has taken a clear stance against bribery and corruption within the industry of International removals. Through this position, as a member of FIDI, NFB International Relocations AS protects its affiliates, its customers and the same interests of the industry.

### 2. CONTROL AND SECURITY POLICY

In order to guarantee security within its supply chain; NFB International Relocations AS is committed with safe and correct procedures and with law compliance. This guarantee is achieved through the identification, assessment and treatment of risks; also by engaging with business partners, compliance with applicable legal requirements, continuous improvement of management systems and FIDI. Our policy has no tolerance for criminal activities such as: drug dealing, smuggling, terrorism, piracy, money laundering, theft, use of drugs and alcohol by cargo services helpers, drivers, shippers, and others that may affect the integrity of the company.

### 3. SAFETY OBJECTIVES

Guarantee our customers 100% reliability during its merchandise handling, administration of legal documentation and application of customs regulations, by meeting requirements of international regulatory standards, in order to provide safe and reliable service to all our customers. Decrease the risks and threats focused on the operations of each process, in order to provide safe and reliable service to all our customers

Improve the level of skills and awareness of our staff on risky operations; considering quality, while maintaining a complete security plan to ensure physical security, access control, personnel and information security.

### 4. BRIBE

Bribing is the offering, acceptance or solicitation of an incentive for certain specific actions, taking advantage illegally. It constitutes a gap in terms of trust. Bribery is the incentive, offer or reward someone promises in order to gain a commercial, legal, personal or contractual advantage over the competition.

### 5. SECURITY

How to react against Drug Dealing and Drug Detection:

**The procedure is activated by**

- Suspicious goods reports
- Staff findings
- National authorities' findings

**How our personnel shall proceed if there is any suspicious finding**

1. Do not touch the content
2. Separate the goods or suspicious transportation unit to an isolated area.
3. Secure and prohibit access to the isolated area.
4. Record in the corresponding log the situation

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**Members of:**

FIDI | FAIM Certified | PAIMA | LACMA | IAM

5. Prepare a list of all persons who were present
6. Give notice to the appropriate authorities: Police Drug Control 227-6352 or 176 / 227-6938 257-2625 Judicial Investigation Agency. If the goods belong to a third party person, check first with the authorities before notifying the owner.
7. Witness the authorities' arrival and the goods confiscation
8. Record in the corresponding law the situation detected by the authorities
9. Wait for authorities recommendations.
10. Give a report of what happened

**How national authorities shall proceed if there is any suspicious finding**

1. Notify the Security Manager or Operations Manager
2. If the goods belong to a third party, check first with the authorities before notifying the owner.
3. Wait for corresponding recommendations.

**Action against assault Robbery**

1. Do not attempt to control the situation
2. Do not put up resistance
3. Follow assailant instructions slowly and calmly
4. Pay special attention to the criminals' traits and listen to their Parliament.
5. Warn others as soon as you can without risking your life or others

**Action against bombing**

1. When detecting a suspicious object immediately inform the Supervisor.
2. Stop the operation immediately.
3. Do not handle the suspicious object.
4. Evacuate the area.
5. Prohibit access to the danger zone.
6. Give notice to the competent authority using communication equipment away from the source.
7. Wait for the authorities' arrival and follow their instructions.
8. Return to the workplace only when authorization is given.
9. Give a report of what happened.

**International Anti-Corruption Laws.**

**A. Improper Payments.**

Under the anti - bribery provisions of International Anticorruption Law, this global policy prohibits paying, offering to pay or authorize payments, directly or indirectly, anything of value to any governmental official, political party or candidate, or anyone acting on behalf of a public international organization in order to obtain or secure a business, give business to any person or to obtain an improper business advantage. It is not necessary that a thing of value changes hands in order to violate the International Anticorruption Law. An offer, a scheme or a promise to pay or give anything of value may constitute a violation. Specifically, the components of incorrect payments under this Policy are:

1. Offer, promise or authorize a payment, money or anything of value, directly or indirectly to any governmental official, corruptly for the purpose of:
  - a) to obtain or retain business,
  - b) send business to a person, or
  - c) obtain an incorrect business advantage.

The term "anything of value" is very broad and includes (but not limited to illustrative):

- a. Money, gifts or personal favors;
- b. Meals and entertainment;

- c. Actions;
- d. Discounts on products and services that are not readily available to the public;
- e. Jobs for governmental officials or their relatives;
- f. Political contributions;
- g. Payments to third parties;
- h. Payment of travel expenses; and
- i. Assume or forgive debt.

**The term "government official" or "foreign official" (interchangeably) includes:**

- a) Officials and employees of the government;
- b) Officials of public international organizations (e.g. the World Bank, the United Nations, the International Monetary Fund, etc.);
- c) Officials and political candidates;
- d) Persons acting with public capacities for governmental institutions;
- e) Official who work without compensation, whose duties are primarily ceremonial; and
- f) F. Royalty

**Books and Records**

This global policy prohibits the falsification of books and records and requires compliance with certain accounting provisions in accordance with International Anti-Corruption Laws. The purpose of the provisions on accounting books and records of the International Anti-Corruption Law is to prevent companies conceal improper payments or bribes or engage in fraudulent accounting practices. The provisions on accounting books and records require the following:

- a) Keep books, accounts and records that accurately reflect all operations and cash available in the company.
- b) Maintain an accounting internal control system that can detect and prevent illegal payments to government officials.
- c) That Operations are done in conformity to generally accepted accounting principles or international financial reporting standards, as applicable, and
- d) Conduct periodically comparative analysis against existing assets in order to identify and address disparities assets.

**6. COMMITMENTS**

All FIDI members without exception, including NFB International Relocations AS, must commit to ethical and legal behavior, which should refuse to participate in any action that will harm the interests of FIDI, other affiliates, customers or industry. Effective compliance will be verified by the policy and regulatory framework and action will be taken in case of non-compliance.

**LEGAL COMPLIANCE**

FIDI Affiliates will ensure that they are aware of all applicable laws countering bribery and corruption in all the jurisdictions in which they operate, and that they will obey and uphold those laws.

The laws that apply to particular international business activities include those of the countries in which the activities occur as well as others that - like the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010 - govern the international operations of national companies and citizens in respect of their conduct both at home and abroad. We, as a FIDI affiliated company, have to ensure that we are aware of, and are complying with, applicable laws.

## **ETHICAL BEHAVIOUR**

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zero-tolerance approach to bribery and corruption. 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.

## **7. CODE OF CONDUCT**

All NFB International Relocations AS personnel undertakes to:

- 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 illegally 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 favor
- Never accept any gift from any business partner if there is any suggestion that a return favor 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.

The latest version of this policy is kept at: <h/NFBIR Admin/NFB Int/Maler>.

Updated June 27, 2016