



Galleon International
Shipping Co. Ltd

Galleon International Anti-Trust Charter

Galleon International is fully committed to conducting all of our business in a legal and ethical manner and in compliance with FIDI FAIM requirements, we comply with the Anti-Trust Charter that fights against Cartels and unfair practices. Galleon International pledge to abide by the highest ethical standards and to free and fair competition.

This policy applies to all of our employees, contractors, agents and others acting on our behalf.

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.

Galleon International comply fully with the UK Competition Act 1998 and all other Anti-Trust laws in the countries in which we operate and requires that its Affiliates do the same. Involvement in a cartel is unacceptable.

Galleon International is fully committed 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.

Legal compliance

Galleon International 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.

Ethical behaviour

Galleon International will take a zero-tolerance approach to cartel conduct. At all times we will act professionally, fairly and with the utmost integrity in all business dealings and relationships.

Code of Conduct

By agreeing and committing to this Charter, we will:

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.