



## **FOREIGN CORRUPT PRACTICES ACT, ANTI-BRIBERY, AND ANTI-CORRUPTION POLICY**

National Van Lines Inc. is committed to conducting business in accordance with all applicable laws, rules and regulations and the highest ethical standards. This policy is intended to reiterate the Company's commitment to full compliance with the U.S. Foreign Corrupt Practices Act and any local anti-bribery or anti-corruption laws that may be applicable.

### **Definitions**

Corruption: The misuse of public power for private profit, or the misuse of entrusted power for private gain.

Bribery: The offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage.

Bribery and corruption can take many forms, including the provision or acceptance of:

- Cash payments.
- Phony jobs or "consulting" relationships.
- Kickbacks.
- Political contributions.
- Charitable contributions.
- Social benefits.
- Gifts, travel, hospitality, and reimbursement of expenses.

### **Policy**

Company personnel are strictly prohibited from offering, paying, promising, or authorizing:

- any payment or other thing of value to any person, directly or indirectly through or to a third party; for the purpose of (i.e., in exchange for):
  - causing the person to act or fail to act in violation of a legal duty;
  - causing the person to abuse or misuse their position;
  - securing an improper advantage, contract or concession;

for the Company or any other party.

No Company personnel shall undertake any improper payment activity in respect of:

- a foreign official;
- a domestic official;
- a person doing business in the private sector.

### **Records**

Company books and records must correctly record both the amount and a written description of any transaction.

Company personnel must ensure that there is a reasonable relationship between the substance of a transaction and how it is described in the Company's books and records.

### **Prohibition on Retaliation**

There will be no retaliation or discrimination against any employee who:

- Submits a good faith complaint;
- Reports an incident witnessed;
- Participates in any way with the investigation of a violation of this Policy.