

Anti-Bribery and Anti-Corruption Policy

Leading the Fight Against Corruption

Planes Moving & Storage, Inc. (“Planes”) takes a clear stand against bribery and corruption.

Background

This policy covers Planes’ employees (whether permanent, fixed-term or temporary) and any associated third parties providing international household goods services.

What Is Bribery?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal, and it is a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

Planes Will Not Tolerate Bribery

Corruption, bribery or attempted bribery is unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against Planes’ core values of conducting business to the highest legal, moral and ethical standards.

Bribery and corruption are covered by various international laws and statutes. These laws often require companies to have rigorous, pro-active measures in place to detect and prevent corrupt practices.

Planes commit to legal and ethical behavior, and to refrain from doing anything that will harm the interests of clients, or the industry. Planes will take steps to ensure they are fully informed of applicable

regulations and will monitor their employees and business partners to ensure full and continual compliance.

Legal compliance

Planes 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.

Ethical behavior

Planes pledges to take a zero tolerance approach to bribery and corruption. At all times, Planes will act professionally, fairly and with the utmost integrity in all business dealings.

Code of Conduct

Planes undertakes to:

1. Never engage in any form of bribery, either directly or through any third party.
2. 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.
3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
4. 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.
5. 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.
6. Never accept any gift from any business partner if there is any suggestion that a return favor will be expected or implied.
7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
9. Never induce or assist another individual to break any applicable law or regulation.