



**DELIGHT INTERNATIONAL MOVERS
IMS MANUAL
X21: ANTI-TRUST POLICY AND PROCEDURE**

1.0 PURPOSE

We at Delight International Movers LLC. Understand that our customers trust us to be fairly competitive in all our transactions. We also understand that if any organization tries to gain an unfair advantage by collusion with other organizations either explicit or implicit, creating monopolies, fixing prices, setting up limits in tendering process, controlling of productivity etc. to restrict competition or to make it difficult for a new competitor to emerge in the market, it can be very destructive for the overall economic growth and growth of our industry.

Our company has a reputation for honesty and integrity in its management practices and in its business transactions which it values immensely. It is therefore vital for the Company to fight and prevent any form of unfair collusions in all its forms. Hence, we have created this Policy & Procedure on the initiative of FIDI and also in line with FIDI3.2 standards and Federal law Number 4 of 2012 on the Regulation of Competition (Competition law) that governs competition in the UAE for the Company, its subsidiaries and affiliates to comply with, wherever it does business as per the United Arab Emirates Law.

2.0 SCOPE

The Scope of this document is to lay down the Policy and Procedure is to ensure that none of our Employees, affiliates, suppliers and all applicable associates to Monitor and to ensure they do not engage or participate in any form of collusion mentioned above.

3.0 POLICY STATEMENT

Employees, or organizations engage in to obtain financial or personal benefits at the expense of the business, its stakeholders, or the general public. Fraud can take many forms, and it can have serious legal, financial, and reputational consequences for those involved.

It is our policy to conduct all of our business in an honest and ethical manner. We will prohibit any form of unfair collusion with our competing affiliates aimed at obtaining an unfair advantage in the market.



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We will communicate this policy to all our Staff members, Affiliates, Suppliers and all applicable associates and obtain their undertaking to strictly abide by this Policy and will take a zero tolerance approach any such behavior

We continually monitor all respective laws pertaining to Anti-Trust behavior in all countries we operate and update this document in line with our IMS manual.

We will take a proactive approach to the prevention of Anti-Trust behavior by identifying risks and mitigating them to ensure minimal possibilities.

We will take a zero tolerance approach any such behavior

4.0 MONEY LAUNDERING

Money laundering is a criminal process in which the proceeds of illegal activities are disguised as legitimate funds to conceal their illicit origins. This process involves a series of transactions and activities designed to "clean" or "launder" dirty money, making it appear as if it comes from legal sources. Money laundering is a serious financial crime that poses significant risks to economies, financial systems, and society as a whole. It is illegal and subject to criminal prosecution in most countries.

Money laundering can take many forms and adapt to evolving regulations and technologies, making it a persistent challenge for law enforcement and financial institutions. As a result, ongoing efforts are needed to strengthen anti-money laundering measures and ensure compliance with regulations to prevent and combat this illegal practice.

Delight will take zero tolerance approach towards any kind of money laundering practices and ensure ethical business strategies to be followed. In order to find different types of fraudulent activities, Delight will follow below preventive actions.

Financial Statement Fraud: This involves intentionally misrepresenting a company's financial information, such as revenue, expenses, or assets, to deceive investors, creditors, or regulatory



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authorities. Examples include inflating revenue or understating expenses.

Prevention: Implement strong internal controls, conduct regular audits, and encourage whistleblowing to detect and prevent financial statement fraud.

Employee Theft: Employees may steal cash, inventory, or other company assets for personal gain. This can occur through various means, such as embezzlement, theft, or payroll fraud.

Prevention: Establish strict financial controls, segregate duties, conduct background checks on employees, and promote an ethical corporate culture.

Vendor Fraud: Vendor fraud occurs when suppliers or vendors overcharge for goods or services, provide substandard products, or engage in collusion with employees to defraud the company.

Prevention: Implement vendor screening processes, regularly review vendor contracts, and maintain a competitive bidding process.

Customer Fraud: Customers can commit fraud by engaging in activities like chargeback fraud, return fraud, or using counterfeit currency.

Prevention: Establish clear return and refund policies, monitor transactions for suspicious activity, and educate employees about fraud prevention.

Tax Evasion: Businesses or individuals may commit fraud by underreporting income or inflating deductions to evade taxes.

Prevention: Maintain accurate financial records, comply with tax regulations, and seek advice from tax professionals to ensure proper tax compliance.

5.0 WHAT IS ANTI TRUST BEHAVIOR (Cartel Behavior)?

Anti-Trust Behavior or Cartel Behavior is an unfair collusion between a few competitors to restrict other competitors in the market or prevent new competitors from entering the market. This is illegal in UAE and is prohibited vide Federal law Number 4 of 2012 on the Regulation of Competition (Competition law) governs competition in UAE.

The purpose of this policy is to:

- Set out our responsibilities, and of those working for us, in observing and upholding our position on Anti-Trust behavior; and
- Provide information and guidance to those working for us on how to recognize and prevent any Anti-Trust behavior.
- Uphold all respective laws relevant to Anti-trust behavior in UAE and in all the countries we are operating in.

We have identified that certain of our activities create particular risks for our organization, in particular:

- Ensuring Anti-trust behavior in our supply chain.
- Revealing sensitive information unknowingly by participation in estimation activities as a group which are also attended by our competitors.
- Employees unknowingly participating in such behavior by accidentally revealing competitive information.

To address these risks, we have taken the following steps:

- Communicating Our Anti-trust policy to all Staff members and Affiliates
- Training our estimators on what's to be discussed and what should not during such activities to prevent accidental revelation of sensitive information.
- Secure storage of planning & cost working and ensuring access on a need-to-know basis;
- Implement a training program for all individuals operating in areas of the organisation that are perceived as high risk;

6.0 WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, suppliers, subcontractors



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7.0 HOW TO RAISE A CONCERN (WHISTLEBLOWING)

You are encouraged to raise concerns about any issue or suspicion of Anti-trust behavior at the earliest possible stage, in accordance with company's Public Interest Disclosure Policy. If you are unsure whether a particular act constitutes Anti-trust behavior or if you have any other queries regarding this, these should be raised with your line manager and/or the Compliance Manager.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in Anti-trust behavior, or because of reporting in good faith their suspicion that an actual or potential anti-trust behavior offence has taken place, or may take place in the future, in accordance with the COMPANY Public Interest Disclosure Policy. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

8.0 TRAINING AND COMMUNICATION

All staff members will receive regular periodical and legally relevant training on how to implement and adhere to this policy by identifying potential Anti-Trust behavior and preventing it proactively.

Our zero-tolerance approach to Anti-trust behavior must be communicated to all suppliers, contractors, agents and business and other partners at the outset of our relationship with them and as appropriate thereafter.

9.0 MONITORING AND REVIEW

The Compliance Manager will monitor the effectiveness and review the implementation of this policy in line with our IMS manual, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control



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systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected violations.

All Staff members are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Manager.

10.0 REFERENCE



UAE Federal Law No. 4 of 2012 Concerning Regulation of Competition (the “Law”) all businesses with operations in the UAE or supplying goods and services to the UAE market published on 23 October 2012

FIDI Anti-trust Charter: <https://www.fidi.org/about-fidi/fidis-vision-mission/fidi-anti-trust-charter-0#:~:text=The%20Anti%2DTrust%20Charter%20is,of%20the%20Anti%2DTrust%20Charter.>

11.0 Document change history

Doc Number	Revision	Date	Remark
X21	R0	02/03/2013	First Release
X21	R1	15/04/2016	First Revision
X21	R2	09/04/2018	Second Revision
X21	R3	06/03/2021	Third revision
X21	R4	12/03/2024	Fourth revision
X21	R5	05/02/2025	Fifth revision

12.0 Approval

	Name	Designation	Date	Signature
Doc prepared by	Naisal PK	MR	05/02/2025	
Reviewed and approved by	Bosco Paul	HOD	05/02/2025	



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