



Anti-Trust Charter

Updated 22/02/2023



MOVING AND STORAGE SERVICES

Tel : +352 / 31 09 21

Fax +352 / 31 84 12

international@streff.lu

service@streff.lu

Albert Streff S.à r.l. et Cie SECS
138, route d'Arlon · L-8008 Strassen
R.C. B163766 · TVA LU 25072815

MOVING - STORAGE
RECORD MANAGEMENT
ARCHIVE DESTRUCTION
PACKING MATERIAL



FIDI ACCREDITED
INTERNATIONAL
MOVIES



Delivery beyond standard.
Luxembourg





1. Introduction:

Streff supports the adoption of Anti-Trust compliance programs by all its partners & suppliers. In this connection, Streff is determined to support the fight against cartels, which restrict competition among suppliers to the detriment of customers.

The Anti-Trust Charter is a declaration of commitment by Streff. The Anti-Trust Charter covers our employees (whether permanent, fixed-term or temporary) and any associated third parties providing services to or on behalf of Streff.

2. Our statement

We commit to legal and ethical behaviour, and to refrain from engaging in any business that will harm the interests of Streff, our partners/suppliers, clients, or the industry. We will take steps to ensure they are fully informed of applicable Anti-Trust laws and regulations in connection with cartel conduct and other Anti-Trust violations, and will monitor their employees and business partners to ensure full and continual compliance.

We will ensure that we are aware of all applicable laws and regulations covering anticompetitive practices in all the jurisdictions in which they operate, and that we will obey and uphold those laws and regulations.

We will further ensure that we are aware of, and are complying with, applicable laws and regulations in connection with cartels.

We pledge to 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. This will apply wherever we operate.

3. Code of Conduct

Streff adheres to the following:

1. We never make direct or indirect (via third parties including agents, suppliers or customers) contact with an actual or potential competitor or other third party, with the object of engaging in cartel behaviour.
2. We 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:
 - o Fixing prices
 - o Dividing or sharing markets, customers, or territories
 - o Rigging a competitive bidding process
3. We 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. We do not 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 Streff 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.

4. Governance

Monitoring

Any reports in the context of Anti-Trust are reviewed by the management board immediately to take necessary actions.

Review

This Anti-Trust Charter is reviewed by the management board at least once a year and enhanced if necessary. All Streff employees are invited to constantly challenge this Charter to bring us together forward.

Communication

This Programme is made available to all employees and all employees are reminded at least once a year to familiarize with the Charter. It is planned to have it published constantly via Odo.