	QUALITY MANAGEMENT SYSTEM		
	QUALITY MANUAL		
	CODE	PROCESS	REVISION
	QLTM	G INTER QUALITY MANAGEMENT	00

ANTI CORRUPTION | ANTI BRIBERY | ANTI TRUST POLICY | G INTER

















This policy has the purpose of establishing practices that should be followed by employees and service providers to ensure compliance with the actions against corruption. Ginter fully supports the Anti-Bribery guidelines based on the FIDI ABC Charter also the Anti-Corruption and Anti-Trust program, in the fight against harmful and highly prejudicial practices.

These programs clearly demonstrate our position in relation to bribery, corruption and trust in the international move industry.

Bribery, corruption and trust are unacceptable and may jeopardize businesses in different manners, thus, it is a fundamental part of our code of conduct to not tolerate any type of action in connection with such practices.



We reiterate our commitment, adopting the measures below that clearly demonstrate our position:

	Never get involved with any form of bribery, whether directly or through third-parties;	
	Never offer or make an undue payment, or authorize an undue payment (in cash or another form) to any person, including any local or foreign authority in any part of the world;	
	Never try to induce an individual or a local or foreign authority to act illegally or unduly;	
	Never offer or accept money or anything of value, such as gifts, bribes or commission, in connection with business acquisition or awarding of a contract;	
	Never offer or give any gift or symbol of hospitality to any civil servant, government officer or representative if there is no expectation or implication of a favor in return;	
	Never accept any gift from any business partner if there is any suggestion that a favor in return is expected or implicit;	
	Never facilitate payments in order to obtain a level of service that would not be normally entitled;	
	Ginter prohibits any discussions, meetings, or agreements with competitors on any matter that may violate antitrust laws (or "antitrust laws"). Violations of competition laws include any type of discussion between competitors, such as discussions involving pricing, market sharing, and bid rigging.	

PREPARED/REVISED	Liliane Carmo	REVIEW	REVISION DATE
APPROVED BY:	Márcio Robalo	00	02/01/2018
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