

ETHICS AND CONDUCTS CODE

August 2018

At ***Clover Systems LLC, Clover Internacional LLC & Clover Internacional, C.A.***, we are committed to offer integrated service in household goods removals. It's our compromise to offer optimal customer service and quality standards that have been implemented to exceed customers and agents expectations. As FIDI member, committed to standards FAIM and ISO 9001, we are oriented to protect our customers and affiliates and agents and others interested parties.

We have a responsibility to make our workplace a community based on ethical principles and values, being our organizational fundamental values:

- ✚ **Responsibility:** Oriented to adequate and reliable compliance with labor commitments, and the effective resolution of the problems faced.
- ✚ **Loyalty:** We are oriented to decision making on value judgments, actions which the interests of the Company and its workers are prioritized over personal ones.
- ✚ **Honesty:** Developing transparent and consistent work behaviors with the principles of the company, working honestly, caring for fair and reasonable manner the resources allocated and acting righteously at all times transcendent value.
- ✚ **Teamwork:** Working together and in collaboration with each other around a common purpose. It is integration and mutual development essential to ensure the success.
- ✚ **Respect:** To our co-workers as the time allotted for the development of a job considering that this belongs to the company. To value and accept group decisions and comply with the agreements raised.
- ✚ **Approach to Customer Service:** Meet the expectations according to the customer requirements, ensuring of satisfaction. In the pursuit of continuous improvement.

At Clover Systems LLC, Clover Internacional LLC & Clover Internacional, C.A., it's our responsibility to combat corruption and bribery and in its duty to comply with the Law. By including an internal policy, this agreement applicable to suppliers and anyone acting on their behalf, so being agents, consultants, employees, business partners and third parties, are subject to comply with this Internal policy Anti-Corruption and Anti-Bribery (Ethics and Conduct Code) and FCPA, Anti-bribery Law UK.

- ✚ **Bribery** is the act of giving money, goods or other forms of recompense to a recipient in exchange for an alteration of their behavior (to the benefit/interest of the giver) that the recipient would otherwise not alter.
- ✚ **Corruption** is a form of dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire personal benefit.

Corruption, bribery or attempted bribery is unacceptable. This applies whether offering a bribe or accepting a bribe. It is against FIDI's 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, including FIDI Affiliates, to have rigorous, pro-active measures in place to detect and prevent corrupt practices.

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August 2018

ANTI-BRIBERY AND ANTI-CORRUPTION

1. In our activities inside and outside the company or on its behalf, we do not participate; we order, authorize, promise, conspire, induce or assist someone in corrupt practices, either directly or through third parties.
2. No grant, accept or promise gifts, advantageous conditions, money, travel, commissions or any other form of compensation to influence a business decision. Similarly, we do not give or get advantages or undue benefits of any kind, nor carry out any other practice of bribery or extortion in the relationship with customers, suppliers, financial institutions, licensees, contractors, companies, authorities or representatives government or other person or entity with whom we conduct operations.
3. We do not accept gifts from customers, suppliers, partners or competitors, except gifts clearly identified with the company or organizational, without significant commercial value. Those of significant value for any reason not they can be returned to be compulsorily incorporated into the assets of the Company.
4. No employee can make a name Clover Systems LLC, Clover Internacional LLC & Clover Internacional, C.A., any contribution using the name, funds, property, equipment or Services Company, to support political parties, initiatives, committees or candidates. This includes any contribution of value.
5. We comply with the provisions applicable to negotiations with government entities, in particular special requirements associated with contracts and transactions with the government. (Procurement Law Public Administration).
6. Clover Systems LLC, Clover Internacional LLC & Clover Internacional, C.A. employees are responsible for knowing the laws which are subjects and verify, in case of doubt, with the respective compliance with them during operations import / export made by the company on behalf of its client legal area.
7. Use or disclose confidential information of customer data, suppliers or third parties, for their own benefit or for the benefit of others.
8. We do not participate in any act of corruption. Accept a bribe or bribing another person.

ETHICS AND CONDUCTS CODE

August 2018

Our Commitments

Is our compromise, treat all confidential information provided when performing services. Only used by the purpose of fulfilling its obligations under this moving services.

Establish policies, procedures, standards, guidelines for confidential and privacy, information protection. In order to protect integrity and reliability of the information to Clover Systems LLC, Clover Internacional LLC & Clover Internacional, C.A., Customers, Providers, Agents and any third parties.

Establish internal controls, relative to combat corruption and bribery and in its duty to comply with the Law.

In the event of any breach of this agreement, please inform by e-mail to:

- Clover Systems LLC, USA- Miami: Marly Mera/Vice-President International HHGS Removal / marly.mera@clovergroup.com
- Clover Internacional, C.A., Venezuela: Mariberth Alvarez / Vice-President HHGS Removal Division / mariberth.alvarez@clovergroup.com.ve
- Clover Internacional LLC (USA Houston) Marly Mera/Vice-President International HHGS Removal / marly.mera@clovergroup.com

Agreement

I confirm that I have read and understood the FIDI Anti-Bribery and Corruption Charter.

I accept and agree to abide by this Charter.

Date: 08 /01/2018

Name: Mr. Arturo Bejarano



Title: Planning & International HHGS Manager

Company: Clover International LLC (USA Houston)