



FIDI ACCREDITED INTERNATIONAL MOVER

Version 3.1

**Annex 02: Anti-Bribery and Anti-Corruption Charter
(FIDI ABC Charter)**

FAQ

September 2016

Annex 02 FIDI ABC Charter – FAQ

The purpose of this document is to answer a number of questions that FIDI Affiliates might have regarding the FIDI ABC Charter. It can be amended based on specific questions from Affiliates.

1. *What does ABC Charter stand for and what is it about?*

ABC Charter stands for: Anti-Bribery and Anti-Corruption Charter (a.k.a. FIDI ABC Charter).

By introducing the FIDI ABC Charter both FIDI and FIDI Affiliates want to give a clear signal to the relocation industry and the membership's corporate and private customers how FIDI and FIDI Affiliates position themselves on the topics of bribery and corruption.

2. *Why did FIDI produce this Charter?*

FIDI produced the ABC Charter for two main reasons:

1. The FIDI Affiliates have requested the FIDI Office to develop a solution enabling them to differentiate themselves in a simple, consistent & credible way from non-FIDI movers by demonstrating that FIDI Affiliates conduct business under strict ethical compliance procedures;
2. FIDI wants to give a clear signal to the relocation industry and the Affiliates' corporate and private customers by clearly communicating FIDI's mission statement regarding bribery and corruption.

3. *"Another charter": why did FIDI not simply use, f.i.:*

- *the Foreign Corrupt Practices Act (USA)?*
- *Bribery Act 2010 (UK)?*
- *the OECD Anti-Bribery Convention?*
- *other declarations or charters?*

The above mentioned documents are mainly focussing on residents and companies from the respective countries / regions that developed them. Furthermore, the scope of these documents is not consistent; and neither are the legal implications. Since FIDI is an international organisation with an international membership, we had to take all aspects under consideration. Hence, FIDI developed a more tailor-made and more consistent Charter applicable to our industry.

4. *To what extent does the FIDI ABC Charter differ from the other models?*

The current FIDI ABC Charter is, like FAIM 3.1, is based on minimum requirements and consists of a "declaration of intent" with a limited scope suitable to our industry. The concept of the Charter is based on a continuous improvement philosophy. The current version can therefore be considered as a first step towards a maturity model.

5. What exactly does the FIDI ABC Charter cover?

The FIDI ABC Charter contains a "Declaration of intent" combined with a section "Code of Conduct" resulting in an "Acknowledgement" section.

The FIDI ABC Charter applies to all FIDI Affiliated companies, all their employees (whether permanent, fixed-term or temporary) and all associated third parties who provide services to or on behalf of the FIDI Affiliated company.

6. What is FIDI asking from the Affiliate in this regard?

FIDI is asking Affiliates to demonstrate Top Level commitment, i.e. the FIDI ABC Charter should be acknowledged and signed by the company's CEO. Signing of the FIDI ABC Charter is now a FAIM 3.1 Pre-Requisite.

7. By when should we sign?

The FIDI ABC Charter will be available on the FIDI website as of 01-August-2015. The Charter should be signed by all FIDI Affiliates within 3 months i.e. before 01-November-2015. On-site visit compliance is to be demonstrated by all First Time Applicants & Affiliates with a scheduled audit as from 01 November 2015 (FAIM 3.1 Implementation).

8. We've just passed the FAIM audit. Do we still have to sign the FIDI ABC charter or can we wait for 3 years?

To give the FIDI ABC Charter credibility it should be signed by all FIDI Affiliates irrespective of whether or not they have undergone a (recent) FAIM audit.

9. Do we just have to sign the document?

No. Signing the FIDI ABC Charter is only the first step in the process. The second step consists of the Affiliate demonstrating, during the next scheduled on-site visit, its compliance with the following evidence requirements:

- ✓ Provide evidence that the FIDI ABC Charter has been communicated to your internal personnel (staff) by management, i.e. Demonstrate Top Level Commitment.
- ✓ Demonstrate that your move files are compliant where your company was acting as the booker of the move and you communicated the FIDI ABC Charter to your Supply Chain.
- ✓ Demonstrate that your move files are compliant where your company was acting as the booker of the move and you communicated the FIDI ABC Charter to your private customers and corporate accounts.

10. To what do we commit ourselves by signing?

By acknowledging and signing the document, the Affiliate commits to:

- ✓ Conducting business as described in the FIDI ABC Charter's statement.
- ✓ Abiding by the "Code of Conduct" described in the FIDI ABC Charter.
- ✓ Communicating the FIDI ABC Charter to staff, private customers, corporate accounts and your Supply Chain.

11. *It is well-known that in some countries, bribery is more or less "required" if you want to do business at all. Does the FIDI ABC Charter take this fact or practice into account?*

Not only are bribery and corruption wholly contrary to the FIDI values, they are also considered illegal in all countries in the world. Even if some countries may have a bad reputation in this area and even if there may exist some acceptance by considering bribery and corruption a "normal" practice, both still remain fully illegal. In that sense the FIDI ABC Charter is aligned with local rules and regulations.

12. *What if we don't sign?*

Signing the FIDI ABC Charter has been approved as a pre-requisite for FAIM 3.1. Consequently, not signing it equals to not meeting the FAIM pre-requirements which inevitably results in termination from FIDI.

13. *Is this charter linked to FAIM or FIDI?*

The FIDI ABC Charter is directly linked to the FAIM 3.1 quality Standard and indirectly to FIDI since FAIM compliance is the first requirement to earn FIDI affiliation.

If it is linked to FAIM:

✓ *Why is it linked?*

It is linked to FAIM 3.1 so it will be eligible to be audited by an independent FAIM Auditor. In that way, the FIDI ABC Charter and its content will contribute to provide the necessary credibility in our industry in contrast with Affiliates using their own version of a similar charter.

✓ *What does that imply?*

It implies that signing of the FIDI ABC Charter has been approved as a pre-requirement for FAIM 3.1 and that evidence requirements will be assessed during the on-site visit by an independent FAIM Auditor.

✓ *How will it be audited?*

During the on-site visit the independent Auditor will look for evidence showing that:

- the FIDI ABC Charter has been communicated to your internal personnel (staff) by management, i.e. Demonstrated Top Level Commitment;
- your move files are compliant when your company was acting as the booker of the move and you communicated the FIDI ABC Charter to your Supply Chain;
- your move files are compliant when your company was acting as the booker of the move and you communicated the FIDI ABC Charter to your private customers and corporate accounts.

✓ *As from when it will be audited?*

The FIDI ABC Charter will be available on the FIDI website as of 01-August-2015. The Charter should be signed by all FIDI Affiliates within 3 months after that date, i.e. before 01-November-2015. On-site visit compliance is to be demonstrated by First Time Applicants and Affiliates with a scheduled audit as from 01 November 2015 (FAIM 3.1 Implementation).

If it is not linked to FAIM: why not?

N/A.

14. What does FIDI expect from us, apart from signing the document?

Please refer to question 6 - "What is FIDI asking from the Affiliate in this regard?"

15. We already have our own policy. Can we not just use that?

Affiliates can still use their own policies. However, the strength of the FIDI ABC Charter is that it will be included in the FAIM 3.1 Standard and therefore be mandatory and consistent for all FIDI Affiliates. Furthermore, its credibility will be high because the requirements will be audited by an independent FAIM Auditor. All this will result in a higher value to FIDI Affiliates.

In case your company has its own Anti-Bribery and Anti-Corruption Charter and/or policy you need to indicate where, on your existing documents, the core elements of FIDI's Anti-Bribery and Anti-Corruption Charter are included so the Auditor can check this on the audit day.

16. Will there be a separate certificate (I may need it for an RFP)?

No. FIDI will clearly communicate to the industry that the FIDI ABC Charter is part of the FAIM 3.1 Standard which will automatically give it the necessary credibility.

17. What if we want to do more than just the basics?

The development of the FIDI ABC Charter is a first step in the process of countering Bribery and Corruption issues in our industry. FIDI accepts and appreciates that certain members have already measures in place to mitigate the risks involved in these areas, depending on the Affiliate's individual risk assessment. Therefore, there is no problem if Affiliates feel the need to demonstrate a higher level of compliance than the requested minimum requirements.

18. Are the requirements related to the FIDI ABC Charter the only topics in FAIM 3.1 related to Bribery and Corruption?

No. Under section FD 5.6 Anti-Bribery & Anti-Corruption Management, the following minimum requirements are also requested:

- ✓ The Affiliate needs to demonstrate the process to mitigate the risk of Bribery and Corruption in its Supply Chain.
- ✓ **How will this requirement be audited?**
The auditor will review that the Affiliate can demonstrate there is a documented procedure in place how the Affiliate mitigates the risk of Bribery and Corruption in its Supply Chain. This procedure has to be monitored and reviewed.

19. Are you planning to help us with the implementation?

Yes. As already demonstrated during the FAIM 3.0 implementation, the FCC will be assisting Affiliates and First Time Applicants by explaining the procedure and the audit requirements. A detailed explanation regarding audit requirements is described in the FAIM 3.1 Pre-Audit Assessment Checklist.

✓ **How?**

As the FIDI ABC Charter will be included in FAIM 3.1, the procedure and audit requirements will be an integral part of the FAIM 3.1 Implementation Manual and the Pre-Audit Assessment Checklist.

✓ **And by when?**

All supporting FAIM 3.1 documentation will be available as of 01 August 2015.

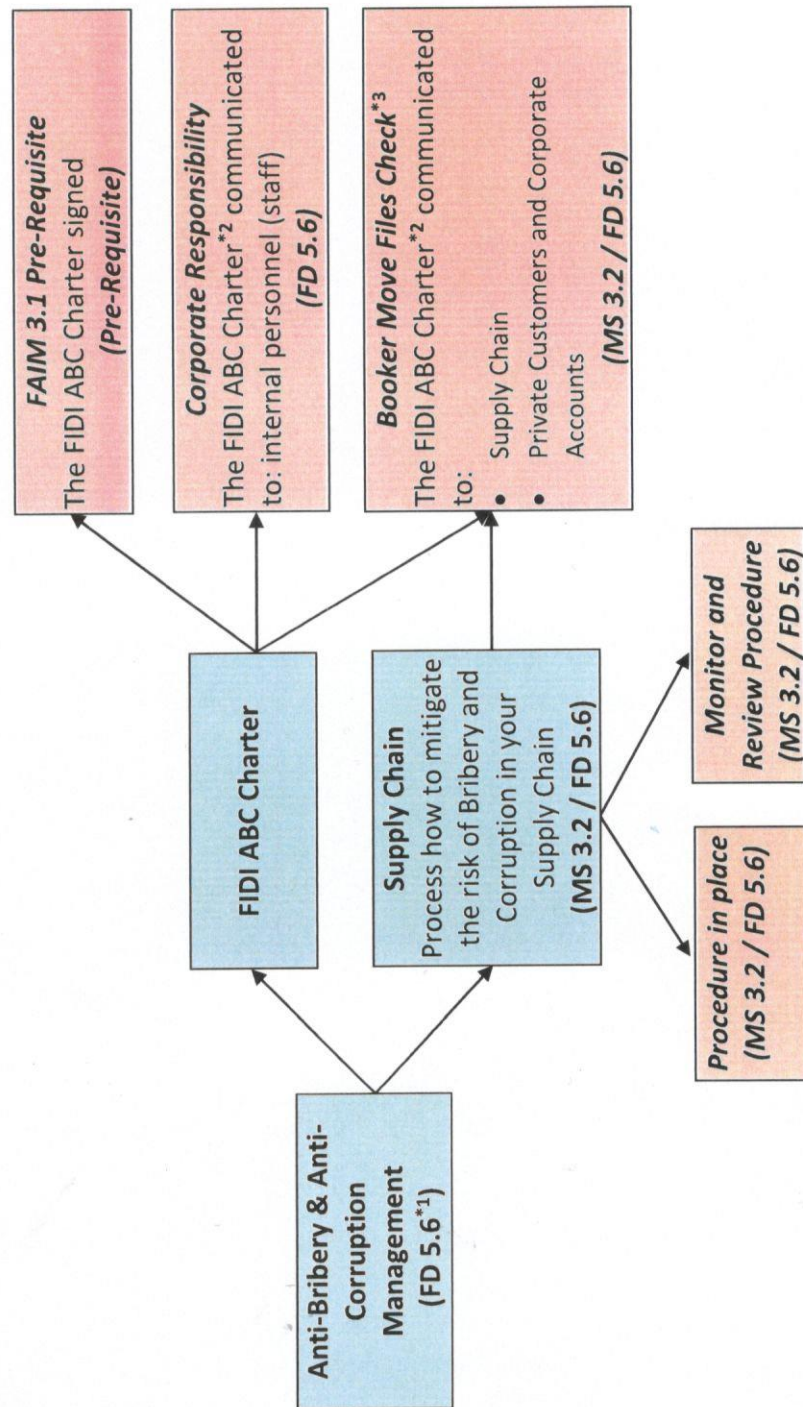
20. When violations against the FIDI ABC Charter have occurred, who is notified and what will be the outcome?

FIDI is looking into the possibility of creating a procedure that makes use of a team of industry experts (like the existing Industry Expert Panels) to assess the reported violations and to determine if any corrective actions are needed.

21. What are the ongoing checks for violations, are we actively checking periodicals, Google, etc., or are we waiting for notification of a violation?

In the first phase, the FIDI Office will not proactively look for possible violations but wait for notifications from the Affiliates and deal with those through the above mentioned procedure (assessment by a team of industry experts). Proactively looking for offenders could be part of a later maturity model (continuous improvement).

22. Graphical overview of Anti-Bribery & Anti-Corruption Management and the related FAIM 3.1 Audit Requirements.



*1 Please find the detailed explanation of the above mentioned topics in the FAIM 3.1 Pre-Audit Assessment Checklist.

*2 In case your company has its own Anti-Bribery and Anti-Corruption Charter and/or Policy you need to indicate where on your existing documents the core elements of FIDI's Anti-Bribery and Anti-Corruption Charter are included.

*3 During the on-site audit the Auditor will focus on core outsourced infrastructure services (operative labour, drivers, vehicles and warehousing) and will check mainly for compliance in move files where you were acting as the booker of the move and you outsourced the origin services and/or the destination services to non-FIDI agents.

Agreement

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

I accept and agree to abide by this Character, and the code of Conduct which is included in the FAIM pre- requirements. Non-compliance with FAIM pre-requirements will result in expulsion from the FIDI organization.

Date: 3rd May, 2017

Individual: Ehsan UI Haq

Title: CEO 

For and on the behalf of (Affiliate Company) Express Movers (Pvt) Ltd.