

THE FIDI ANTI-BRIBERY AND ANTI-CORRUPTION CHARTER

Leading the Fight against Corruption

FIDI is determined to lead relocation industry by taking a clear stand against bribery and corruption. By doing so, FIDI will protect the best interests of the industry, the Affiliates and their customers.

Background

Membership in FIDI is highly valued by its Affiliates, and to ensure that value continues, all FIFI Affiliates pledge to abide by the highest ethical standards.

This Charter is a declaration of commitment. It will strengthen the FIDI organization, the FAIM programme, and all Affiliates by making it clear what distinguishes FIDI Affiliates from non-FIDI companies.

All FIDI Affiliates agree to sign and be guided by the Charter's provisions. The Charter covers their employees (whether permanent, fixed-term or temporary) and any associated third parties providing services to or on behalf of the FIDI Affiliates.

The Charter will be integrated into FAIM. The procedural and audit requirements will form part of the FAIM Implementation Manual and the Pre-Audit assessment.

What is Bribery?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal, and it is a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

FIDI Will Not Tolerate Bribery

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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CHARTER STATEMENT

Undertaking by all FIDI Affiliates with immediate effect

All FIDI Affiliates commit to legal and ethical behavior, and to refrain from doing anything that will harm the interests of FIDI, other affiliates, clients or the industry. FIDI and its Affiliates will take steps to ensure they are fully informed of applicable regulations and will monitor their employees and business partners to ensure full and continual compliance.

Legal compliance

FIDI Affiliates will ensure that they are aware of all applicable laws countering bribery and corruption in all the jurisdictions in which they operate, and that they will obey and uphold those laws.

The laws that apply to particular international business activities include those of the countries in which the activities occur as well as others that – like the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010 – govern the international operations of national companies and citizens in respect of their conduct both at home and abroad.

We, as a FIDI affiliated company, have to ensure that we are aware of, and are complying with, applicable laws.

Ethical behavior

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zero tolerance approach to bribery and corruption. At all times, FIDI and its Affiliates will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

Commitment to the values of FIDI

This Charter will be formally integrated into the FAIM quality standard.

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CODE OF CONDUCT

By agreeing and committing to this Charter, each FIDI Affiliate undertakes to:

- ❖ 1. Never engage in any form of bribery, either directly or through any third party.
- ❖ 2. Never offer or make an improper payment, or authorize an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
- ❖ 3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
- ❖ 4. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
- ❖ 5. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication of a return favour.
- ❖ 6. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
- ❖ 7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
- ❖ 8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
- ❖ 9. Never induce or assist another individual to break any applicable law or regulation.

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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, and the Code of Conduct which is included in the FAIM Implementation Manual, and is available on the FIDI website.

I understand and accept that non-compliance with this Charter signifies non-compliance with FAIM pre-requirements. Non-compliance with FAIM pre-requirements will result in expulsion from the FIDI organization.

Date: 11 / 16 / 2015

Individual: Mr. Arturo Bejarano



Title: Planning & International HHGS Manager

For and on behalf of (Affiliate company): Clover International LLC (USA Houston)