



FAIM 3.4

FAQ 02

**Anti-Bribery and Anti-Corruption
Charter (FIDI ABC Charter)**

FIDI ACCREDITED INTERNATIONAL MOVER



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INDEX OF QUESTIONS

1.	What does ABC Charter stand for and what is it about?.....	3
2.	Why did FIDI produce this Charter?.....	3
3.	“Another charter”: why did FIDI not simply use others?.....	3
4.	To what extent does the FIDI ABC Charter differ from the other models?	3
5.	What exactly does the FIDI ABC Charter cover?.....	4
6.	What is FIDI asking from the Affiliate in this regard?	4
7.	By when should we sign?	4
8.	We have already signed the ABC Charter as part of our previous FAIM Compliance Procedure. Do we still have to sign it again?	4
9.	Do we just have to sign the document?.....	4
10.	To what do we commit ourselves by signing?.....	5
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?.....	5
12.	What if we don’t sign?.....	5
13.	Is this charter linked to FAIM or FIDI?	5
14.	What does FIDI expect from us, apart from signing the document?.....	5
15.	We already have our own policy. Can we not just use that?	5
16.	Will there be a separate certificate (I may need it for an RFP)?	6
17.	What if we want to do more than just the basics?	6
18.	Are the requirements related to the FIDI ABC Charter the only topics in FAIM related to bribery and corruption?	6
19.	Graphical overview of Anti-Bribery & Anti-Corruption Management and the related FAIM Audit Requirements.	7

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 on 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, clearly communicating FIDI's mission statement regarding bribery and corruption.

3. “Another charter”: why did FIDI not simply use others?

E.g.: the Foreign Corrupt Practices Act (USA), Bribery Act 2010 (UK), the OECD Anti-Bribery Convention, other declarations or charters?

The above-mentioned documents mainly focus on residents and companies from specific countries/regions where those were developed. Furthermore, the scope of these documents is not consistent; 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 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, like FAIM, 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 your company’s CEO. Signing of the FIDI ABC Charter was already introduced in FAIM 3.1 as a pre-requisite and it continues to be a FAIM pre-requisite in FAIM 3.4.

7. By when should we sign?

The FIDI ABC Charter has been available on the FIDI website since 01 August 2015. With the implementation of FAIM 3.1, the Charter was signed by all FIDI Affiliates and on-site visit compliance was demonstrated by all First Time Applicants & Affiliates with a scheduled audit as from 01 November 2015.

You will be asked to provide an up-to-date signed FIDI ABC Charter as part of your FAIM 3.4 pre-audit documentation.

8. We have already signed the ABC Charter as part of our previous FAIM Compliance Procedure. Do we still have to sign it again?

Yes, it is imperative that top-level commitment is demonstrated on an ongoing basis in all compliance matters. Therefore, you will need to sign an updated Charter. The FIDI ABC Charter is aligned with the FAIM 3-year audit cycle, i.e. you will be asked to provide an up-to-date signed Charter to the FCC before the third-party audit takes place.

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 you demonstrating your compliance with the following evidence requirements, during your next scheduled third-party audit:

- Provide evidence that the FIDI ABC Charter has been communicated to your internal staff by management, i.e. demonstrate top level commitment.
- Demonstrate that your move files are compliant in cases where your company was acting as the booker and/or Origin Agent/Destination Agent of the move, and that you communicated the FIDI ABC Charter to your supply chain.
- Demonstrate that your move files are compliant in cases where your company was acting as the booker and/or Origin Agent/Destination Agent 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, you actively commit to:

- conduct business as described in the FIDI ABC Charter's statement;
- Abide by the "Code of Conduct" described in the FIDI ABC Charter;
- communicate the FIDI ABC Charter to your staff, private customers, corporate accounts and 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 a pre-requisite since FAIM 3.1. The FIDI ABC Charter continues to be a FAIM 3.4 pre-requisite. Consequently, not signing it equals to not meeting the FAIM pre-requirements which inevitably results in termination of your FIDI membership.

13. Is this charter linked to FAIM or FIDI?

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

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?

You can still use your own policies. However, the strength of the FIDI ABC Charter is that it has been included in the FAIM Standard and therefore is mandatory and consistent for all FIDI Affiliates. Furthermore, its credibility is high because the requirements are audited by an independent FAIM Auditor. All this results in a higher value to you and your fellow FIDI Affiliates.

In the case that 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 has clearly communicated to the industry that the FIDI ABC Charter is part of the FAIM Standard, which will automatically give it the necessary credibility.

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

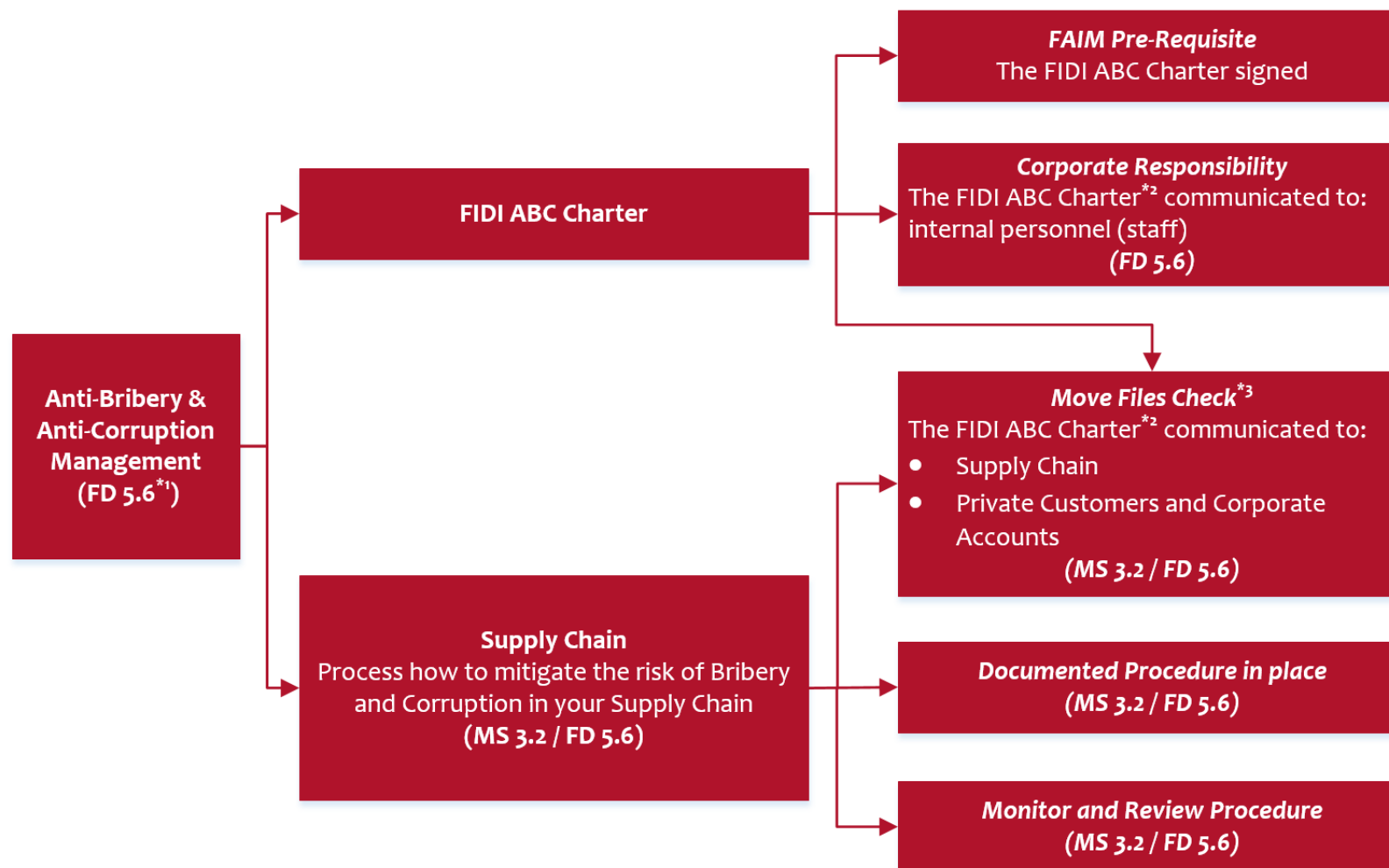
The development of the FIDI ABC Charter is a first step in the process of countering bribery and corruption issues in our industry. FIDI accepts and appreciates that certain Affiliates have already measures in place to mitigate the risks involved in these areas, depending on the Affiliate's individual risk assessment. Therefore, there is no problem if you 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 related to bribery and corruption?

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

- You need to demonstrate that you have a process in place to mitigate the risk of bribery and corruption in your supply chain.
- The auditor will review that you can demonstrate that you have a documented procedure in place, explaining how you mitigate the risk of bribery and corruption in your supply chain. This procedure has to be monitored and reviewed on a regular basis.

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



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

**2 If 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 third party audit, the Auditor will focus on requirement “MS 3.2 Supply Chain; Quality Management” on demonstrating compliance in move files mainly depending on your business set-up. Furthermore, the emphasis will be on third-parties in your supply chain, that are likely to be in direct contact with the end-customer.*

Examples of moves files for assessment could be:

- 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 (I.e. booker moves & third-country moves).*
- Where you were acting as the booker or Origin/ Destination Agent on behalf of an RMC or move management company.*
- Where you were acting as the booker and you outsourced core infrastructure services. +*
- Where you were acting as the Origin/ Destination Agent and you outsourced core infrastructure services. +*

+ Core infrastructure services are operative labour, drivers, vehicles and warehousing.

The Auditor will randomly select files among your active or complete files. At least 80% of selected files must meet the Standard.