



<b>ANTI-BRIBERY AND ANTI-CORRUPTION POLICY</b>	<b>CODE:</b> GG-PL-11
	<b>VERSIÓN:</b> 1
	<b>REVIEW DATE:</b> 24-04-2018
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	<b>FECHA REVISIÓN:</b> 03-02-2021

## **We lead the battle against corruption**

FIDI is determined to lead the relocation industry by adopting a clear position against bribery and corruption. By doing so, FIDI protects the best interests of industry, affiliates and their customers.

## **Background**

Belonging to FIDI is highly valued by its affiliates, and to ensure that the value continues, all FIDI affiliates commit to complying with the highest ethical standards.

This policy is a statement of commitment. It will strengthen the FIDI organization, the FAIM program, and all affiliates, highlighting what distinguishes FIDI affiliates from non-FIDI companies.

All FIDI affiliates agree to sign and be guided by the provisions of the policy. The policy covers its employees (whether permanent, fixed or temporary) and any associated third party who offers services to or on behalf of FIDI affiliates.

The policy will be integrated into FAIM. The procedural and audit requirements will be part of the FAIM Implementation Manual and pre-audit evaluation.

## **What is bribery?**

Bribery consists in offering, promising, giving, accepting or soliciting an advantage as an incentive for action. It's illegal, and it's a breach of trust.



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A bribe is an incentive or reward offered, promised or provided for the purpose of obtaining a commercial, contractual, regulatory or personal advantage.

**ABC does not tolerate bribery**

Corruption, bribery or attempted bribery is unacceptable. It applies when offering a bribe, or accepting a bribe. This is against FIDI's core values of doing business with 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 take rigorous proactive measures to detect and prevent corrupt practices.

**POLICY STATEMENT**

**Commitment by affiliates FIDI with immediate effect**

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

**Fulfillment**

FIDI affiliates must ensure that they are aware of all applicable laws in the fight against corruption and bribery in all jurisdictions in which they operate, and that they will respect those laws.



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The laws that apply to certain international business activities, include the regulations of the countries in which the activities are carried out, as well as others that - like the United States Foreign Corrupt Practices Act (FCPA). And the UK Bribery Act 2010 - govern the international operations of national companies and citizens with respect to their conduct. In ABC Cargo, as a FIDI affiliated company, we must ensure that we are aware and in compliance with applicable laws.

**Ethical behavior**

FIDI and its affiliates undertake to adopt a zero tolerance approach to government and corruption. At all times, FIDI and its subsidiaries will act in a professional, fair manner and with the highest integrity in all dealings and commercial relations, this will be applied wherever they operate.

**Commitment to FIDI values**

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

**CODE OF CONDUCT**

By accepting this FIDI policy, we commit to:

1. Never engage in any form of bribery, either directly or through third parties.
2. Never offer or make improper payment or authorize an undue payment (in effect or otherwise) to any official or local in any part of the world



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3. Never attempt to induce an individual, or a local or foreign official to act unlawfully or improperly.
4. Never offer or accept, money or anything of value, such as gifts, bribes or commissions, in connection with the acquisition of business or the award of a contract.
5. Never offer or give any gift or show of hospitality to any public employee or public official or representative if there is any expectation or implication of a favor as a return.
6. Never accept gifts from any business partner if there is any suggestion that you expect or are implied a favor in return.
7. Never facilitate payments to obtain a level of service that one would not usually be entitled to.
8. Never ignore or fail to report any signal of inappropriate payments to the corresponding authorities.
9. Never induce or assist another individual to break any applicable law or regulation.