

## CODE OF ETHICS

### **FIDI'S ANTI-CORRUPTION AND ANTI-BRIBERY CHARTER**

FIDI is committed to leading the relocation industry by taking a clear stance against bribery and corruption. In doing so, FIDI will protect the best interests of the industry, its Affiliates, and their clients.

#### **Background**

Membership in FIDI is highly valued by its Affiliates, and to ensure that value continues, all FIDI Affiliates commit to upholding the highest ethical standards. This Charter is a statement of commitment. It will strengthen the FIDI organization, the FAIM program, and all Affiliates by making clear what distinguishes FIDI Affiliates from non-FIDI-affiliated companies. All FIDI Affiliates agree to sign and be guided by the provisions of the Charter. The Charter covers their employees (whether permanent, fixed-term, or temporary) and associated third parties providing services on behalf of FIDI Affiliates. The Charter will be integrated into FAIM. Procedural and audit requirements will form part of the FAIM Implementation Manual and pre-audit assessment.

#### **What is bribery?**

Bribery is offering, promising, giving, accepting, or soliciting an advantage as an incentive for action. It is illegal and constitutes a breach of trust. Bribery is an incentive or reward offered, promised, or provided to obtain a commercial, contractual, regulatory, or personal advantage.

#### **FIDI will not tolerate bribery**

Corruption, bribery, or attempted bribery are unacceptable. This applies both to offering a bribe and accepting one. It contradicts 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 implement rigorous and proactive measures to detect and prevent corrupt practices.

### **CHARTER STATEMENT**

#### **Commitment of all FIDI Affiliates with immediate effect**

All FIDI Affiliates commit to behaving legally and ethically and to refrain from doing anything that harms the interests of FIDI, other affiliates, clients, or the industry. FIDI and its Affiliates will take steps to ensure they are fully informed about applicable regulations and will monitor their employees and business partners to ensure ongoing full compliance.

#### **Legal compliance**

FIDI Affiliates will ensure they are aware of all applicable laws combating bribery and corruption in all jurisdictions in which they operate, and that they will obey and comply with those laws. Laws that apply to particular international business activities include those of the countries in which activities are carried out, as well as other laws such as the United States Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010, which regulate the international operations of national companies and citizens concerning their conduct both domestically and abroad. As an FIDI-affiliated company, we must ensure we are aware of and comply with applicable laws.

### Ethical behavior

As a demonstration of their commitment, FIDI and its Affiliates commit to adopting 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 transactions and relationships. This will apply wherever they operate.

Commitment to FIDI's values

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

### BY ACCEPTING AND COMMITTING TO THIS CHARTER, EACH FIDI AFFILIATE AGREES TO:

- 01 Never engage in any form of bribery, whether directly or indirectly through any third party.
- 02 Never offer or make an undue payment, nor authorize an undue payment (in cash or otherwise) to any person, including local or foreign officials anywhere in the world.
- 03 Never attempt to induce a person or a local or foreign official to act illegally or improperly.
- 04 Never offer or accept money or anything of value, such as gifts, bribes, or commissions, in connection with obtaining business or awarding a contract.
- 05 Never offer or give any gift or hospitality to any public official, government official, or representative if there is any expectation or implication of a favor in return.
- 06 Never accept any gift from any business partner if there is any suggestion that a favor is expected or implied in return.
- 07 Never facilitate payments to obtain a level of service to which one would not normally be entitled.
- 08 Never ignore or fail to report any indications of undue payments to the appropriate authorities.
- 09 Never induce or assist another person to breach any applicable law or regulation.