



COMPLIANCE GUIDELINES

FIDI

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2. Scope and purpose

1. This document provides an overview of the basic compliance responsibilities which FIDI Affiliates¹ are encouraged to implement within their companies.
2. It is to be noted that several requirements outlined in this document are part of the FAIM Standards and consequently have to be complied with by FIDI Affiliates. For FIDI Affiliates, this document is subordinate to the FIDI Statutes and the FAIM Quality Standard.
3. This document will be reviewed annually to reflect new trends in compliance as well as any related updates in the FAIM Standard.
4. As stated in the FAIM Standard, protecting employees and the public, customer's goods and data, as well as the assets of the business against risks and hazards is essential. Companies must demonstrate awareness and detail their security procedures including preventive action that ensure safety, security and minimal disruption to operations and services.
5. Ensuring that services to customers are provided through conditions that respect human rights and that follow an ethical conduct is essential. Companies must demonstrate commitment to ensure their company and service providers deliver services whilst following a social responsibility policy and code of conduct.

3. Privacy & data protection policy

1. Good privacy practices are a key part of corporate governance and accountability. One of today's key business imperatives is maintaining the privacy of personal information. As business systems and processes become increasingly complex and sophisticated, organizations are collecting growing amounts of personal information. As a result, personal information is vulnerable to a variety of risks, including loss, misuse, unauthorized access, and unauthorized disclosure (See FAIM 3.2 - FD 5).
2. The Privacy Principles are essential to the proper protection and management of personal information. They are based on internationally known fair information practices included in many privacy laws and regulations of various jurisdictions around the world and recognized good privacy practices.
3. FIDI Affiliates are striving to strike a balance between the proper collection and use of their customers' personal information as individuals expect their privacy to be respected

¹ For the sake of this document, the term 'FIDI Affiliate' refer to FIDI Affiliates and affiliated branches (FIDI Statutes).

and their personal information to be protected by the organisations with which they do business. Customers are no longer willing to overlook an organisation's failure to protect their privacy (See FAIM 3.2 - FD 5).

4. The FIDI Affiliate must ensure that it provides notice about its privacy policies and procedures and identifies the purposes for which personal information is collected, used, retained, and disclosed (See FAIM 3.2 - FD 5.1).
5. The FIDI Affiliate must ensure that it has a documented process in place ensuring that personal information is collected, used, retained, disclosed, and disposed of in conformity with applicable privacy and data protection legislation in the jurisdictions in which they operate, and that they will obey and uphold those laws (See FAIM 3.2 - FD 5.1).
6. The FIDI Affiliate must ensure that personal data will never be sold, lent or leased to third parties to be used in direct marketing via email, direct mail, telephone and other methods of communication.
7. The FIDI Affiliate must ensure that it has addressed the following generally accepted Privacy Principles as requested by the FAIM Standard (see FAIM 3.2 - FD 5.1):
 - **Management:**

The FIDI Affiliate defines, documents, communicates, and assigns accountability for its privacy policies and procedures.

The FIDI Affiliate creates an overview of all data processing activities and documents which personal data is managed, where it comes from and with whom it has been shared.
 - **Notice:**

The FIDI Affiliate provides notice about its privacy policies and procedures and identifies the purposes for which personal information is collected, used, retained, and disclosed.
 - **Choice and consent:**

The FIDI Affiliate describes the choices available to the individual and obtains implicit or explicit consent with respect to the collection, use, and disclosure of personal information. Consent must be verifiable i.e. the FIDI Affiliate must have a record indicating how and when consent was given.
 - **Collection:**

The FIDI Affiliate collects personal information only for the purposes identified in the notice.

- Use, retention, and disposal:

The FIDI Affiliate limits the use of personal information to the purposes identified in the notice and for which the individual has provided implicit or explicit consent. The FIDI Affiliate retains personal information for only as long as necessary to fulfil the stated purposes or as required by law or regulations and thereafter appropriately disposes of such information.
- Access:

The FIDI Affiliate provides individuals with access to their personal information for review and update.
- Disclosure to third parties:

The FIDI Affiliate discloses personal information to third parties only for the purposes identified in the notice and with the implicit or explicit consent of the individual.
- Security for privacy:

The FIDI Affiliate protects personal information against unauthorized access (both physical and logical).

The FIDI Affiliate must have a documented procedure on how to handle a potential data breach i.e. a breach of security leading to the destruction, loss, alteration or unauthorised disclosure of or access to personal data.
- Quality:

The FIDI Affiliate maintains accurate, complete, and relevant personal information for the purposes identified in the notice.
- Monitoring and enforcement:

The FIDI Affiliate monitors compliance with its privacy policies and procedures and has procedures to address privacy related complaints and disputes.

4. Access control

1. The FIDI Affiliates must demonstrate how they control physical access to warehouse and office facilities and to transportation during transit up to the point within the FIDI Affiliates' control (See FAIM 3.2 - FD 5.2).
2. The FIDI Affiliates must demonstrate how they identify the persons coming into contact with customers' goods whilst in their care and control including during moving, storage and handling processes (See FAIM 3.2 - FD 5.2).

5. Inventory control

1. The FIDI Affiliates must demonstrate their processes to control access to the goods whilst in their care, to account for the packages received into and / or handed out of

their control. This includes signed packing inventories, procedure to record additions and / or withdrawals of packages and / or items from the list during the transit and / or warehousing of the consignment; and warehouse procedure to receive and / or release the consignment (e.g., warehouse control sheet, checklist, case-checklist) (See FAIM 3.2 - FD 5.2).

6. Environmental policy

1. The FIDI Affiliate must ensure that it complies with all relevant local environmental legislation.
2. The FIDI Affiliate must ensure that it has a documented Environmental Policy including as a minimum a mission-statement from management showing a commitment to reduce the impact on the environment (see FAIM 3.2 - FD 3.1 - 5.4).
3. The FIDI Affiliate must ensure that its Environmental Policy is communicated to all staff and applicable contractors (see FAIM 3.2 - FD 5.4).

7. Corporate Social responsibility

1. This document reflects the commitment of the international moving and relocation industry to the highest code of conduct, ethics and integrity in all our relationships, including with our employees, our clients and transferees and our suppliers, as well as the community and environment in which we operate (See FAIM 3.2 - FD 5.5.).
2. FIDI Affiliates must ensure they:
 - 1) Have a documented Code of Conduct which addresses the following minimum FAIM requirements (See FAIM 3.2 - FD 5.5):
 - FIDI Affiliate's commitments and policies for dealing with healthy and safe working environment for employees; protection against harassment; anti-discrimination policy based on race, religion, disability and sexual orientation.
 - Legal, ethical, honest and professional relationships with customers, employees, vendors and suppliers.
 - Anti-trust or anti-competitive activities; especially top level commitment to free and fair competition e.g. Agreements with potential competitors which prevents, restricts or distorts competition; exchange of sensitive commercial data regarding prices or quantities (including sales, market share, territories or customers).
 - Compliance with applicable laws, rules and regulations.
 - Escalation and corrective actions process.

- The company Social Responsibility / Code of conduct policy and procedures are communicated to the company staff.
- 2) Will not engage or participate in any way, in anti-competitive behaviour or infringement of competition laws including but not limited to price-fixing.
- 3) Will maintain the highest level of legal, ethical, honest and professional relationships with clients and transferees, employees, and suppliers.
- 4) Will not discriminate on the basis of race, religion, disability, age, sexual orientation or gender.
- 5) Will remain alert to any incident involving the smuggling of drugs or any other illegal substances, or any incident of human trafficking – and alert the police or other appropriate authorities as soon as such an incident is discovered.
- 6) Will comply with applicable legislation relating to the recruitment and employment of their staff.
- 7) Will ensure that all operative crew personnel assigned to work at or in a transferee’s private residence are known to them and (where legally possible) are vetted by means of an approved Criminal Background Check (police record check); such background check(s) to be retained on record by supplier.
- 8) Will ensure that all applicable personnel, whether direct employees or contractors are legally entitled to work in the country in which they are employed.
- 9) Will ensure that all personnel, whether direct employees or contractors are employed through their own free will with no coercion from other parties.
- 10) Will ensure that all personnel, whether direct employees or contractors are aged at least 15 years or over.
- 11) Will pay at least the national minimum wage.
- 12) Will ensure that all personnel, whether direct employees or contractors are able to work free from harassment of any kind.

8. Supply Chain; Quality Management

3. To provide a quality international move, the FIDI Affiliate acting as the booker must have complete responsibility from beginning to end. FIDI-FAIM places responsibility for all purchased services required to complete the move contract with the booker therefore, the FIDI Affiliate must have not only an appropriate process for the evaluation, selection and monitoring of purchased service providers but also for demonstrating how they control and guarantee a quality performance in their Supply Chain.
4. The FIDI Affiliates must ensure they meet FAIM minimum requirements (see FAIM 3.2 - MS 3.2):
 - 1) Demonstrate the process for selection and approval of Service Providers.
 - 2) Maintain a list of approved Service Providers, which should be readily available to staff.

- 3) Provide written instructions in advance to the service provider and / or contractor, including billing instructions, and / or evidence of an on-going contract.
- 4) Demonstrate the process to control quality performance in their Supply Chain.
- 5) Demonstrate the process to control Data Protection (privacy) in their Supply Chain.
- 6) Demonstrate the process to mitigate the risk of Bribery & Corruption in their Supply Chain.
- 7) Demonstrate the process to mitigate the risk of Anti-Trust non-compliance in their Supply Chain.

9. Background checks (Pre-employment screening)

1. Comprehensive background checks are increasingly becoming a required practice.
2. Background checking (pre-employment screening) is the process of authenticating the information supplied to a potential employer by a job applicant in his or her resume, application, and interviews.
3. The FIDI Affiliates must ensure they meet the FAIM minimum requirements (see FAIM 3.2 FD 5.8):
 - 1) Demonstrate compliance with local rules and regulations
 - 2) Define the type of background checks performed.
 - 3) Demonstrate consistency in procedures i.e. assuring that all background checks are conducted in the same way.
 - 4) Assure adequate protection of any information that is revealed to your company when conducting pre-employment screenings.

10. Anti-bribery and anti-corruption

1. This document reflects the determination of the international moving and relocation industry serving one another, our clients and transferees, our onward supply chain, and our employees, to lead the stand against bribery and corruption, and at all times to act professionally, fairly and with utmost integrity in all business dealings and relationships, wherever you or we operate.
2. All stakeholders are responsible for awareness and compliance with all applicable laws countering anti-bribery and corruption in all jurisdictions in which they operate. 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.

3. As a FIDI Affiliate:

- 1) You warrant your pledge and responsibility to uphold at all times and communicate to all stakeholders, the highest ethical standards in your own business and throughout your supply chain, and through your affiliation to FIDI you have agreed to and signed the FIDI Anti-Bribery and Corruption Charter summarised herein and below (FAIM pre-requisite).
- 2) You must provide evidence that the FIDI Anti-Bribery and Anti-Corruption Charter is communicated to staff by management i.e. Demonstrated Top Level Commitment (See FAIM 3.2 - MS 3.1).
- 3) You must provide evidence that the FIDI Anti-Bribery and Anti-Corruption Charter is communicated to individuals (private customers or corporate accounts) (See FAIM 3.2 - MS 3.1).
- 4) You must demonstrate the process to mitigate the risk of Bribery & Corruption in your Supply Chain (See FAIM 3.2 - MS 3.1).

4. Supplier agent not affiliated to FIDI:

- 1) You warrant your pledge and responsibility to uphold at all times and communicate to all stakeholders, the highest ethical standards in your own business and throughout your supply chain, and agree to abide by the FIDI Anti-Bribery and Corruption Charter summarised herein and below:

That you will:

- a. Never engage in any form of bribery, either directly or through any third party.
- b. Never offer or make an improper payment, or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
- c. Never attempt to induce and individual, or a local or foreign official to act illegally or improperly.
- d. 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.
- e. 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 for a return favour.
- f. Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
- g. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
- h. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
- i. Never induce or assist another individual to break and applicable law or regulation.

11. Anti-Trust Management

1. This document reflects the determination of the international moving and relocation industry serving one another, our clients and transferees, our onward supply chain, and our employees, to lead the stand against cartels that restrict competition among suppliers to the detriment of the customers, to abide by the highest ethical standards and to free and fair competition (See FAIM 3.2 – FD 5.7).
2. A cartel is an agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition. A cartel is regarded as the most egregious violation of Anti-Trust laws in most jurisdictions, which may lead to the imposition of significant fines as well as, in certain jurisdictions, criminal penalties.
3. All stakeholders are responsible for awareness and compliance with all applicable Anti-Trust laws and regulations in all jurisdictions in which they operate.
4. As a FIDI Affiliate:
 - 1) You pledge to abide by the highest ethical standards and to free and fair competition.
 - 2) You commit to legal and ethical behaviour, and to refrain from engaging in any business that will harm the interests of FIDI, other affiliates, clients, or the industry.
 - 3) You are fully informed of applicable Anti-Trust laws and regulations in connection with cartel conduct and other Anti-Trust violations, and will monitor your employees and business partners to ensure full and continual compliance.
 - 4) You abide at all times by the FIDI Anti-Trust Charter (FAIM pre-requisite) which covers your employees and any associated third parties providing services to or on behalf of the FIDI Affiliates.
5. As a supplier agent not affiliated to FIDI:
 - 1) You warrant your pledge and responsibility to uphold at all times and communicate to all stakeholders, the highest ethical standards in your own business and throughout your supply chain, and agree to abide by the FIDI Anti-Trust Charter summarised herein and below:

That you will:

- a. Never make direct or indirect (via third parties including agents, suppliers or customers) contact with an actual or potential competitor or other third party, the object of which is to engage in cartel behaviour.
- b. Never propose or reach an agreement, whether directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issues, including:

- Fixing prices
 - Dividing or sharing markets, customers or territories
 - Rigging a competitive bidding process
- c. Report any indication or initiative of improper anticompetitive business conduct by an actual or potential competitor in accordance to your internal reporting procedure, including but not limited to, reporting to your legal department and/or to the relevant Anti-Trust authorities.
 - d. Never participate in a meeting of a trade association in which sensitive competition-related issues are discussed.
 - e. Ensure that all internal and external correspondence, including e-mails and texts, and documents, discussions and public statements do not contain any statements that might be misinterpreted by third parties or Anti-Trust authorities and courts in the context of a potential Anti-Trust investigation.
 - f. Maintain independent judgment in pricing or selling of any products and/or services.
 - g. Limit any information discussed during commercial negotiations, with or disclosed to competitors or other third parties, to that which is strictly necessary for completing or assessing the transaction.

12. Health & Safety including fire prevention

1. This document reflects the commitment of the international moving and relocation industry to observe and comply with workplace health, safety and welfare regulation and best practice, wherever you or we operate.
2. FIDI Affiliates must ensure they:
 - 1) Comply with all applicable Health & Safety laws in all jurisdictions in which they operate.
 - 2) Have a documented Health & Safety policy covering all aspects of their normal work to ensure adequate control of health and safety risks arising from work activities.
 - 3) Have nominated a senior manager to have responsibility for the enforcement and regular review of this policy.
 - 4) Communicate this policy to all personnel through training, supervision and the distribution of relevant health and safety instructions.
 - 5) Comply with all relevant Fire Safety legislation.
 - 6) Have a documented Fire Safety policy.
 - 7) Have nominated a full time [employee] Fire Safety officer.
 - 8) Maintain and will replace as necessary all firefighting equipment, fire alarm and fire preventions systems (see FAIM 3.2 - FD1.6).
 - 9) Conduct and record regular Fire Drill procedures for all employees.

- 10) Ensure that adequate Building escape routes are identified, clearly signed, kept clear of obstruction and that employees are made aware of them through regular drills.

13. Licensing

1. FIDI Affiliates must:
 - 1) Have all appropriate (and which must be current) licences required to operate their business in the jurisdiction(s) in which they are situated.
 - 2) Ensure that all vehicles which they operate or use are correctly licensed for the applicable purpose.
 - 3) Ensure that all vehicles which they operate or use are maintained for safety and roadworthiness, and periodically safety and roadworthiness tested according to local regulatory requirements.

14. Risk management and business continuity

1. This document reflects the commitment of the international moving and relocation industry to exercise risk management and business continuity planning, to protect all stakeholders, client's and transferee's, their goods and data and the assets of the business against internal and external risks and hazards.
2. FIDI Affiliates must ensure that they:
 - 1) Operate a documented risk assessment process to identify the risks associated with disaster interruption to the business, the workplace and work activities, including computer data.
 - 2) Have a documented process or set of procedures (e.g., Business Continuity or Disaster Recovery plan) to aid business continuity of operations and recovery of lost computer data.
 - 3) Maintain a documented IT Back-Up process which ensures that data stored in the business' computers is routinely transferred/copied to an alternative system and stored off-site, to facilitate recovery [in the event of data loss].
 - 4) Provide periodical instruction to applicable personnel on how to conduct business when working off-site, for example, from home, in circumstances caused by disaster interruption.