

# **GIFTS AND HOSPITALITY DIRECTIVES**

**FIFA®**





Key message



Definition/example



Reference

## Fédération Internationale de Football Association

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## WHY WE NEED THESE DIRECTIVES

At FIFA, we are committed to promoting the game of football ethically so that we can be a force for positive change throughout the global football community. These directives apply to all FIFA team members.

## HOW WE ADDRESS GIFTS AND HOSPITALITY AT FIFA

### GENERAL PRINCIPLE

FIFA does business the right way. We never offer or accept gifts or other hospitality in exchange for improper business advantages. We only offer or accept gifts and hospitality with a clear and legitimate business purpose.



If something doesn't feel right, use the safe approach – report it!

### RAISING CONCERNS

All FIFA team members are responsible for promoting high ethical standards. If any of us observe, in good faith, any violation or potential violation of these directives, we must take action and report the issue. If you have a feeling that misconduct is occurring, you should report your suspicions.



To report a violation of these directives or an act of misconduct, please contact the FIFA Compliance Division, your Chief Officer/line manager or submit a report through the anonymous reporting mechanism.

This is the only way we can prevent breaches of our directives and protect our reputation. FIFA handles all reports of misconduct confidentially to the extent practically and legally permissible and thoroughly reviews each report of misconduct.

FIFA does not tolerate any form of retaliation against individuals who report concerns, violations, or suspected violations of these directives in good faith. Retaliation includes any adverse action taken against an individual who reports violations or acts of misconduct.



**REPORTING IN "GOOD FAITH" MEANS PROVIDING ALL THE INFORMATION YOU KNOW.**

### EXCEPTIONS

The relevant Chief Officer of the division and the Chief Compliance Officer must provide written pre-approval for any exceptions to these directives.

## FOCUS AREAS

### GIFTS

The exchange of gifts and hospitality is an acceptable part of any business. For certain occasions, such as weddings, baptisms, funerals or holidays, giving gifts can be standard cultural practice.

**i** A GIFT IS ANY OBJECT OR BENEFIT FOR WHICH THE RECIPIENT DOES NOT PAY. TICKETS TO FOOTBALL MATCHES AND VALUE-IN-KIND ITEMS (IF AGREED IN A CONTRACT BETWEEN FIFA AND ITS BUSINESS PARTNERS) ARE INTRINSIC TO OUR MISSION AND ARE NOT CONSIDERED GIFTS.

In general, we may give or receive an unsolicited gift without approval if it:

- Is valued at USD 200 or less per year from or to a certain person; and
- Passes the FIT test.



If you are not able to establish a gift's fair market value, consult the Compliance Division.

#### FIT TEST

Before accepting or receiving any gift, we must evaluate:

##### Frequency –

- Does it involve the same giver or recipient in a single calendar year? (For gifts, keep the threshold of USD 200 in mind.)

##### Intent –

- Is the intent anything other than relationship-building or promoting FIFA and football and is it consistent with local law?

##### Timing –

- Is the gift given or received shortly before a business decision will be made that may benefit the giver or receiver?

If the answer to any of these questions is **YES**, you should consult the Compliance Division.

If someone offers you a gift that is valued over USD 200, politely decline the gift and explain FIFA's policy. If returning the gift would offend cultural norms, you may accept the gift, but you must immediately report it to your Chief Officer and to the Compliance Division, who will then determine what to do with the gift.

## HOSPITALITY

In general, we may give or receive unsolicited hospitality without approval from the Chief Compliance Officer if it:

- Is reasonable in expense; and
- Passes the FIT test.

**i** **REASONABLE HOSPITALITY** MEANS HOSPITALITY THAT IS DIRECTLY RELATED TO FIFA'S BUSINESS WHERE THE INDIVIDUAL OR ENTITY PROVIDING THE BENEFIT IS PRESENT AND PARTICIPATES. IF YOU ARE NOT SURE, USD 150 PER PERSON FOR FOOD AND MODERATE ALCOHOL CONSUMPTION IS USUALLY CONSIDERED REASONABLE, BUT IT MAY VARY FROM COUNTRY TO COUNTRY.

**Ask yourself:** Would I pay for this hospitality myself?

If the answer is **YES**, it is probably reasonable.

You must notify your Chief Officer and the Compliance Division if you receive hospitality that is unreasonable or hospitality that could potentially reflect poorly on FIFA.

## FOOTBALL MATCHES

As part of our mission, we can provide suppliers and stakeholders with tickets to football matches and in some cases, VIP tickets that include sky boxes, food, drinks, and other forms of hospitality. To the extent it can be considered reasonable such offering is permissible. Similarly, our stakeholders often invite us to attend football matches with them or give us tickets to attend football matches.



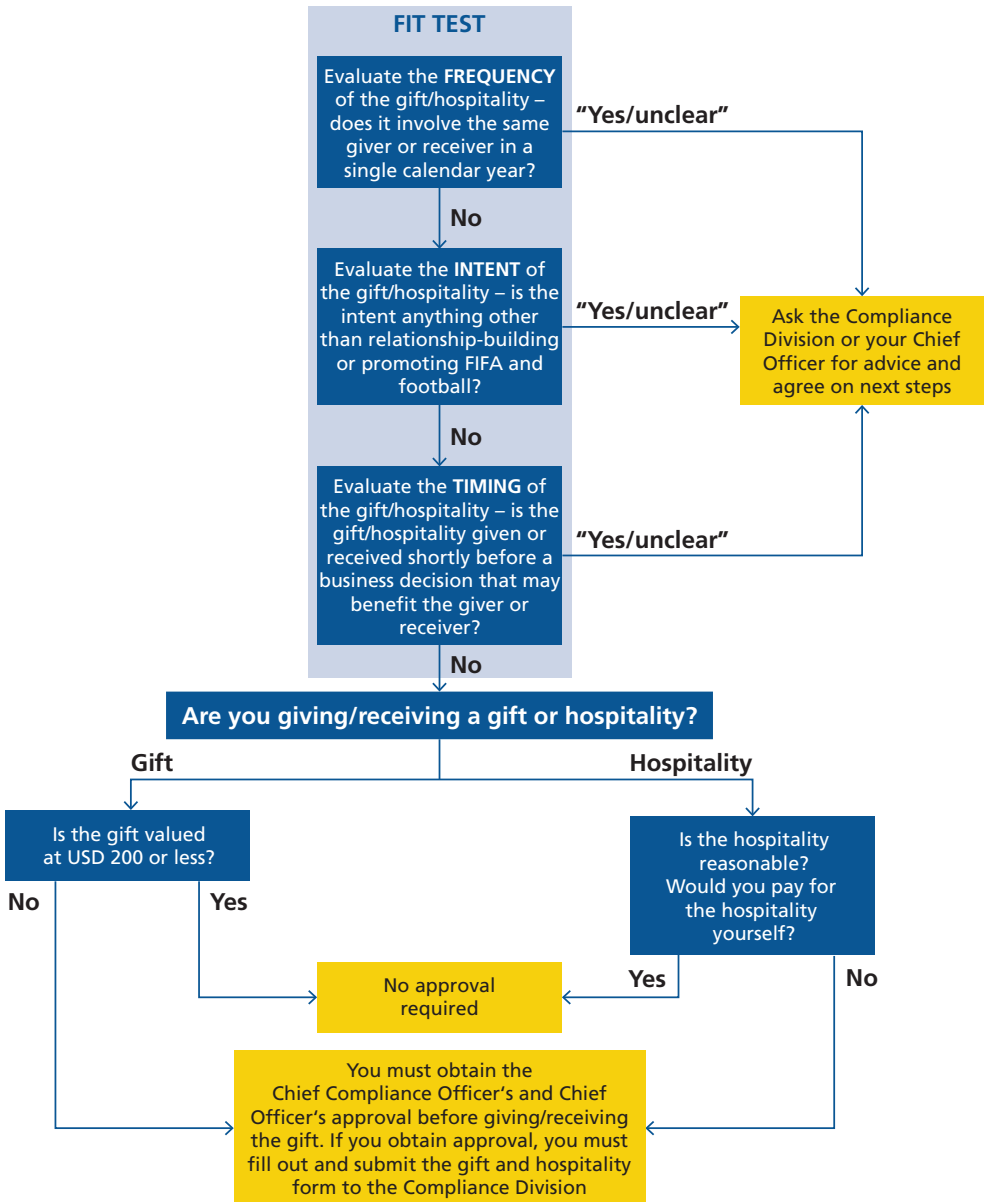
Tickets to football matches and reasonable hospitality offered by or to FIFA team members that are intended to promote FIFA's core mission are not subject to the restrictions set out in these directives.

Tickets to non-football-related sporting events are subject to the restrictions set out in these directives.

**i** **QUESTION:** I REGULARLY WORK WITH A CONFEDERATION AND THEY HAVE INVITED ME TO ATTEND A FOOTBALL MATCH WITH THEM AFTER OUR BUSINESS MEETING. MAY I ATTEND? MAY I ALSO ACCEPT THE COMPLIMENTARY HOTEL ROOM FOR THE ADDITIONAL NIGHT?

**ANSWER:** YES. SUCH TICKETS TO ATTEND FOOTBALL MATCHES WITH STAKEHOLDERS ALLOW US TO BUILD RELATIONSHIPS AND ARE NOT SUBJECT TO THE RESTRICTIONS SET OUT IN THESE DIRECTIVES. FOR THE COMPLIMENTARY HOTEL ROOM, PLEASE APPLY THE HOSPITALITY RULES AS DESCRIBED ABOVE. IF IT IS REASONABLE AND PASSES THE FIT TEST, YOU CAN ACCEPT.

DECISION TREE



## **FINAL PROVISIONS**

### **OFFICIAL LANGUAGES**

The present directives are issued in English and German. If there are any discrepancies in the interpretation of the different versions of these directives, the English text is authoritative.

### **ADOPTION AND ENFORCEMENT**

These directives were approved by the FIFA Secretary General on 10 May 2018 and come into force with immediate effect.

Zurich, 10 May 2018

A handwritten signature in black ink, appearing to be 'FS', is written over a horizontal line. The signature is stylized and cursive.

FIFA Secretary General  
Fatma Samoura



## ANNEXE



### RESOURCES

- Code of Conduct
- Anti-Corruption Directives
- Donations Directives
- Internal Organisation Directives



### FREQUENTLY ASKED QUESTIONS

Question	Answer
Are gifts or hospitality between team members covered by these directives?	No. These directives only apply to gifts or hospitality provided or received externally.
How do I determine the value of a gift or hospitality?	If you do not know the cost, you should use the fair market value of the gift or hospitality. If you cannot determine the fair market value of the gift or hospitality, you should consult the Compliance Division.
Do the Gifts and Hospitality Directives apply if a team member pays for a gift or hospitality and does not expense it back to FIFA?	Yes. The rules apply whether or not the team member seeks reimbursement from FIFA.
Are gifts or hospitality provided to or received from a TPI covered by these directives?	Yes. These directives applies to any gift or hospitality received from or provided to an external party, including a supplier or TPI.
I am attending a FIFA summit next month and the Local Organising Committee usually provides all participants with a welcome gift bag. May I accept it?	Yes. The summit is a FIFA event, so FIFA's rules apply. You may accept gifts provided at FIFA-related events. The gifts and hospitality restrictions set out in these directives do not apply to gifts that FIFA, as an organisation, provides to its team members.
I was recently on holiday with my family and as we were checking into our hotel, the hotel manager realised I work at FIFA and offered to upgrade my family to a larger room. The manager said: "Instead of the double room you booked, let me upgrade you to a junior suite. If you like the room, you should consider hosting the next FIFA event at our hotel." May I accept?	No. It does not pass the FIT test. The manager's intent is to influence a business decision – when the manager gave you the upgrade, he said: "If you like the room, you should consider hosting the next FIFA event at our hotel." You should politely decline and notify your Chief Officer and the Compliance Division.
One of FIFA's stakeholders who works for a member association is getting married. The stakeholder has a long-standing relationship with FIFA. Is it appropriate to send a wedding gift?	Yes. You may send the wedding gift as long as it is valued at USD 200 or less and passes the FIT test. It is recommended to give a unique, FIFA-specific gift that does not have a readily identifiable market value and is tailored to the occasion.



## DEFINITIONS

### **FIFA team members**

- The Secretary General
- The Deputy Secretaries General
- The Chief Officers
- All other employees of FIFA
- All freelancers and volunteers (to the extent permitted by law)
- All employees and members of executive bodies of FIFA's consolidated subsidiaries

### **Supplier**

Suppliers may include vendors, contractors, distributors, consultants, and/or other third parties providing goods, services, and supplies to support FIFA's mission.

### **Third-party intermediary (TPI)**

TPIs are third parties that interact with government officials or business partners on FIFA's behalf.



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