

CONFLICT OF INTEREST

WHAT?

Conflicts of interest happen when you have, or could have, personal interests, activities or relationships that affect your responsibilities to FIFA.

Conflicts of interest can be **real**, **perceived** or **potential** – and perceptions matter here. In fact, a perceived conflict of interest could harm your reputation just as much as an actual one. That's why you should never take business decisions where you have, or could appear to have, a conflict of interest.

WHY?

It's not enough to play fair – we have to be seen to play fair. In order to make sound decisions when faced with a conflict of interest, all FIFA team members need to understand the risks of organisational and personal conflicts of interest, what situations to avoid, why they should be avoided and how to report conflicts. It's also worth knowing that conflicts of interest can sometimes set the stage for bigger problems, like fraud and bribery.

WHO?

Each FIFA team member is responsible for compliance with this Pocket Guide. It is you who owns compliance at FIFA. Breaches can lead to disciplinary and other action, up to and including termination of employment.

HOW?

IDENTIFYING CONFLICTS OF INTEREST

Conflicts of interest can happen to anyone – it's what you do about them that's important. A conflict that is not disclosed promptly at the appropriate levels within FIFA may become an issue. Being open and honest is always the best way to protect your and FIFA's reputation.

The most common examples of conflicting situations are:

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DISCLOSING CONFLICTS OF INTEREST

- **Annual disclosure of conflicts:** when you join the team, you're asked to disclose any conflict of interest to FIFA HR and FIFA Compliance. This is renewed every year through the Compliance Portal.
- **Ad hoc disclosure:** if anything changes, you must tell your manager to update your disclosure in the Compliance Portal.
- **Procurement process:** in addition to the above, each project lead must transparently declare any potential conflict of interest situation during the procurement process.

MITIGATING EXISTING CONFLICTS OF INTEREST

Disclosure protects team members. After receiving advice from FIFA Compliance and FIFA HR, team members and managers decide what to do to resolve the conflict. Mitigation of a conflict can range from general awareness of the conflict (e.g. line manager, chief officer of division) to complete resolution of the conflicting situation.



Compliance Portal
Annexe I – What to Avoid
Annexe II – Examples and Solutions



FIFA Compliance Pocket Guide

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CONFLICTS OF INTEREST: EVERYONE'S RESPONSIBILITY

FIFA takes conflicts of interest seriously, in order to protect its reputation and integrity as well as those of its team members.

This Compliance Pocket Guide empowers you to:

- prevent ethical misconduct and possible criminal activity that may start with a conflict of interest;
- safeguard FIFA team members by building a solid disclosure process;
- eliminate favouritism and unfair advantages;
- reject any preferential treatment or unfair advantages;
- minimise the risks of nepotism, cronyism and patronage.

Knowing the “what”, “why”, “who” and “how” enables you to make sound decisions when faced with a conflict of interest by identifying, disclosing and mitigating the conduct appropriately.

Identify conflict of interest situations



Report when in doubt, too

If you are not sure whether an outside interest might be considered a conflict of interest, do not hesitate to evaluate the situation with your line manager and FIFA Compliance.

Disclose conflicts of interest



Mitigate existing conflicts of interest



Feel better already?



Before making a business decision, ask yourself:

- Could my personal interests have any impact on my impartiality?
- Is this in FIFA's best interests?
- Could there appear to be a conflict of interest to anyone inside or outside FIFA?

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ANNEXE I – WHAT TO AVOID

Type of conflict	What to avoid
Outside employment and other engagements	<p>A FIFA team member must not:</p> <ul style="list-style-type: none"> • have any kind of paid or unpaid engagement with a FIFA business partner or any other person or company if this impacts their performance at FIFA • act in an official capacity for or as an adviser or consultant to any government agency with regulatory or supervisory power over FIFA or its member associations <p>You must get permission from your line manager, HR and Compliance to do any paid or unpaid work outside FIFA, even when you are on leave. This includes volunteering, freelancing, working for a fee, commission, in exchange for services or other reimbursement, and favours and side hustles.</p>
Financial interests and relationships with business partners	<p>A FIFA team member must not:</p> <ul style="list-style-type: none"> • own any stake equal to or greater than 1% in any company that competes with or does business with FIFA • conduct FIFA business with any entity in which he/she or a relative has a substantial interest or with which he/she has a substantial affiliation
Personal relationships	<p>A FIFA team member must not:</p> <ul style="list-style-type: none"> • be in a supervisory, subordinate, or control relationship (e.g., having influence over conditions of employment) with closely related persons • be involved in any hiring decision regarding closely related persons (including internal/external hiring and internal transfers) <p>Closely related persons/relatives are FIFA team members' family members, someone with whom the team member has an intimate relationship, and those living in the same household as the team member.</p>
Corporate opportunities	<p>Taking personal advantage of a business opportunity that FIFA may also have an interest in (unless FIFA has already been made aware of and declined the opportunity).</p>

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ANNEXE II – EXAMPLES AND SOLUTIONS

Real conflict of interest	Potential conflict of interest	Perceived conflict of interest
A situation where a person has an interest (not in line with FIFA's interests) that will influence his/her judgement and decision-making.	A situation where a conflict of interest can be foreseen but has not yet come into being. It will depend on a future event that may occur.	A situation where an independent third party might reasonably consider there to be a conflict of interest involving another person.
<p>Example: a line manager responsible for the evaluation of a team member is a relative of that team member.</p> <p>Solution: disclosure of the conflict to the manager of the line manager and to HR and the Compliance Division. HR will assess the situation and propose an acceptable solution (e.g. change of reporting lines etc).</p>	<p>Example: a FIFA team member may be involved in the decision-making process for a job for which a relative or a close friend may be interested in applying.</p> <p>Solution: there is no actual conflict yet, but one will arise if the relative or close friend actually applies for the position or asks for additional information. The FIFA team member is advised to disclose the potential conflict, particularly if in doubt, to be careful about providing information in order not to disadvantage other candidates and to withdraw from the decision-making process in general.</p>	<p>Example: a major supplier contract was awarded to a closely related person of a FIFA team member, leading to a perception from the outside world that favouritism occurred.</p> <p>Solution: this perception can be mitigated by demonstrating that there was full disclosure from the FIFA team member, that bids from several potential suppliers were considered and that the FIFA team member was not part of the decision-making process.</p>
<p>Example: a FIFA team member provides paid consulting services to a FIFA supplier during the weekend.</p> <p>Solution: disclosure of the conflict. Approval from HR and the Secretary General to be obtained. The FIFA administration may propose additional mitigation steps (e.g. no involvement in activities relating to the supplier).</p>	<p>Example: a FIFA team member works part-time in the evening for a company that works in the same area as FIFA but has no direct contact with it.</p> <p>Solution: disclosure and raising awareness of the potential conflict of interest. Together with the line manager, the team member can discuss the possible mitigation steps to be taken. Making the disclosure protects the employee should relationships arise unexpectedly at a later stage, bearing in mind that additional labour laws relating to external activities apply.</p>	<p>Example: a person responsible for the procurement of a supplier uses services of that supplier.</p> <p>Solution: disclosure and raising awareness of the potential conflicting situation can mitigate the situation, in addition to an assessment of the specific situation to see if additional steps need to be taken to mitigate any reputational impact.</p> <p>Example: a former FIFA team member offers his/her freelancing services to FIFA.</p> <p>Solution: disclosure and raising awareness of the potential conflict of interest can mitigate the situation, in addition to an assessment of the specific situation to see if additional steps need to be taken to mitigate any potential impact (e.g. ensuring that other freelancers without such a link are not at a disadvantage).</p>