

GIFT AND HOSPITALITY

WHAT?

Gifts and hospitality are part of doing business, but they have to be handled in the right way. Remember, at FIFA we have zero tolerance for any kind of bribery and corruption.

A gift is an object given for free, without expectation of return. At FIFA, we don't routinely accept gifts over the value of USD 200.

Hospitality is social-type activities directly related to our business. Hospitality should be reasonable and appropriate to the position of the team member and the occasion. If you're receiving hospitality and the person who invited you isn't there, then we consider that a gift, which means it can't be worth more than USD 200.

Also, 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 gift. However, tickets to non-football-related sporting events are subject to the restrictions set out in this guidelines.

WHY?

We play the right way. In some cultures, giving small gifts to mark occasions or getting together to celebrate a successful project are very much part of daily life. But gifts and hospitality must never influence business decisions or gain a business advantage. It's important to remember that bribes don't just take the form of an envelope stuffed with cash. Tickets to that must-see event, stays in 5-star hotels and valuable gifts can also be bribes.

WHO?

Working all over the world and experiencing all sorts of cultures is a brilliant part of life at FIFA. The way we work means almost any team member could offer or receive gifts and hospitality as part of their job. So it's up to you to do the right thing: think carefully about whether giving or receiving gifts and hospitality is the right thing to do in your situation.

If you work with government officials the risk – or the perception of the risk – of bribery can be higher, so it's always worth getting advice from your manager or FIFA Compliance before you accept or offer hospitality or gifts.

HOW TO REQUEST AN EXCEPTION

Have you been offered a gift worth more than USD 200, or been invited to take part in hospitality that you feel could break the rules?

Please decline politely and explain our policy. If you feel that returning the gift or declining the invitation would offend, you may accept but you must tell your manager and FIFA Compliance immediately. They'll help you assess the situation and agree the next steps. After discussion, if you want to request an exception you should complete the Gifts and Hospitality Disclosure Form and send it to FIFA Compliance.

Before accepting or receiving any gift or hospitality, we must evaluate the following:

FIT TEST

Frequency

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

Intend

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

Timing

Is the gift or hospitality offered shortly before a business decision will be made? Could the decision benefit the giver or receiver?



FIFA - Gift and Hospitality Form
FIFA - Raising Concerns Pocket Guide





FIFA team members are responsible for assessing whether he or she can accept or give an unsolicited Gift or Hospitality, here is what you need to know in order to accept or reject them;

"TO ACCEPT OR NOT TO ACCEPT, THAT IS THE QUESTION..."

1.

Did you receive a gift or hospitality?
Please remember:

1a

We can't give or accept money, or things like gift cards, gift certificates or the red packets commonly exchanged in Asia.

1b

"When you go, I go..."- person extending invitation must be present at the event, otherwise this is considered a gift and the USD 200 threshold applies.

2.

Is the gift worth less than **USD 200**?
Or is the hospitality invitation **reasonable** in expense?

2a

If you are not able to establish a gift's fair market value, please contact FIFA Compliance.

2b

Regarding the hospitality, ask yourself, would you pay this hospitality?

3.

Frequency – Does it involve the same organization, giver or recipient more than once in a single calendar year?

4.

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

5.

Timing – Is the gift or hospitality offered shortly before a business decision will be made? Could the decision benefit the giver or receiver?

If you answer YES to the questions, continue with the FIT Test
If you answer NO to any of the questions, contact FIFA Compliance

If you answer YES to any of the FIT questions, contact FIFA Compliance
If it passes the FIT test, you can self-approve it