

FIFA Compliance Pocket Guide

INTERNATIONAL TRADE CONTROLS

WHAT?

Sometimes countries and organisations place trade sanctions or embargoes on people, companies, regions, industries and even whole countries. This could be because they are suspected of involvement in terrorism or organised crime, or because they are involved in conflict or political repression. Sanctions and embargoes can be imposed by a group of countries, or by a single country.

At FIFA, we can't enter into any commercial agreement or transaction if a sanction or embargo applies. The law is complicated and changes frequently, so before you start any relationship it's important to check the most up-to-date guidance. FIFA Compliance are also here to support you.

WHY?

Playing fair means we don't just follow Swiss law – we follow the laws of every country where we operate. Embargoes and trade sanctions are vigorously policed and enforced by national governments and any breach could lead to fines and serious damage to our reputation. Breaches could also mean that FIFA has to stop operating in some places. Team members can be held personally liable for breaking sanctions laws, which could lead to serious consequences. So protect yourself and protect FIFA – always seek advice before you act.



- **The State Secretariat of Economic Affairs** is responsible for implementing sanctions law in Switzerland.
- In the USA, **the Office of Foreign Assets Control**, part of the US Department of the Treasury, administers and enforces economic and trade sanctions.
- Visit the **United Nations Security Council website** for more information on the UN sanctions programme.
- For information on EU sanctions, visit the **European Commission website**.

WHO?

Sanctions laws can be very broad and have an impact on everything we want to do, especially when we're operating in specific places. The main places to be aware of are divided into Focus Areas and Key Focus Areas. Some potential examples are:



Dealing with commercial partners, member associations, local organising committee and freelancers, for example signing a media contract with a TV broadcaster in a Key Focus Area.



Providing payments and benefits (including travel and accommodation) to individuals and organisations including players, referees, agents and international visitors to our meetings and events. For example, paying a daily allowance to officials overseeing a match with the national team of a Key Focus Area.



Shipping certain types of equipment and goods to designated countries or people which could be restricted, for example sending sports equipment to a Key Focus Area.

Complying with international trade controls is your responsibility, with support from FIFA Compliance.

HOW?

You must:

- 1) Do your due diligence. Check who you're dealing with, where they operate, and if there may be any sanctions or embargoes in place. This is especially important in Focus and Key Focus Areas. Remember, you can always get advice from FIFA Compliance.
- 2) Get approval from FIFA Compliance *before* you agree to a transaction or payment where there is any link with a Key Focus Area.

Any doubts? Don't do it. Protect yourself, protect football and check with FIFA Compliance first.

FIFA Compliance Pocket Guide

INTERNATIONAL TRADE CONTROLS

Key Focus Areas	<p>These are the countries or regions with the most restrictive sanctions in place. Sanctions may be targeted at specific sectors like oil or luxury items, but some sanctions ban almost any transaction with people or organisations in the country or region.</p>	<ul style="list-style-type: none"> • Crimea region* • Cuba • IR Iran • North Korea • Syria • Venezuela <p>* Aims to prevent breaking of international sanctions in Ukraine</p>
Focus Areas	<p>These countries, organisations and regions have limited international trade control restrictions. Sanctions generally target individuals and organisations suspected of terrorism, organised crime or oppressive political regimes, sometimes called designated persons or entities. Focus Area countries or regions have an above-average number of sanctioned individuals and organisations.</p>	<ul style="list-style-type: none"> • Belarus • Burundi • Central African Republic • Congo DR • Guinea • Guinea-Bissau • Iraq • Libya • Lebanon • Mali • Myanmar (formerly Burma) • Nicaragua • South Sudan • Somalia • Sudan • Yemen • Zimbabwe • Rafi k Hariri (Lebanon)** • Taliban/Al-Qaeda*** <p>** Measures against people connected to the Rafi k Hariri assassination *** Measures against individuals and entities associated with Osama bin Laden, Al-Qaeda or the Taliban</p>

