

FIFA Compliance Pocket Guide

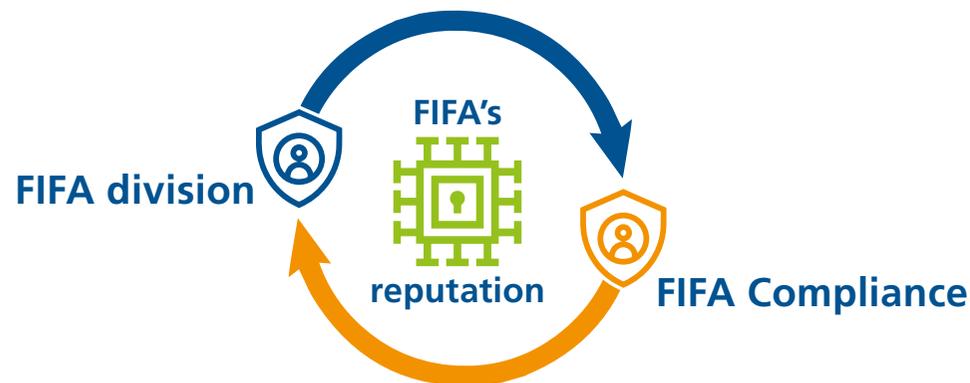
REPUTATIONAL RISK

WHAT?

In life, we're judged by the company we keep. It's no different in business. Every time we work with a third party, we expose FIFA to potential reputational damage, so it's important that we all follow the process to help us identify potential partners that do not meet our standards. During the course of a business relationship, we need to be able to take action to protect FIFA if a third party does something wrong. It's particularly important that FIFA doesn't handle money that could have come from, or be used for, any criminal act.

WHY?

We live football and doing the right thing is important for everyone on our team. That's how we build our reputation – we can't risk working with third parties that would damage our standing or brand. But if a third party breaks the law when working with us, it will do more than damage our reputation. It could also lead to criminal prosecution for FIFA and the team members involved.



WHO?

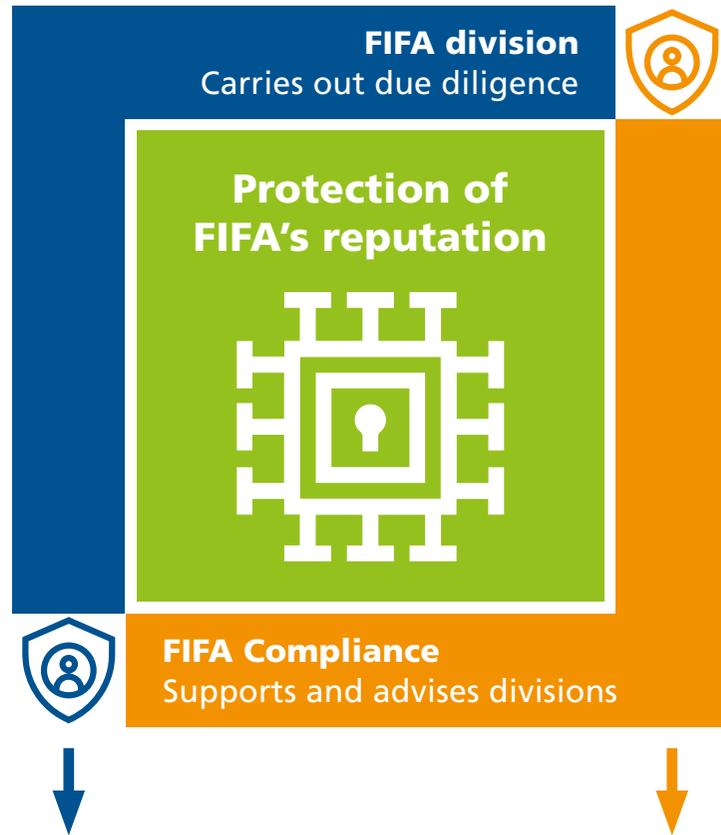
Every team member is responsible for making sure that FIFA doesn't unintentionally become involved in corruption or other illegal acts through working with third parties. That means thinking about our reputation and carrying out careful research when setting up a partnership. It also means knowing how to identify and report any issues or red flags during your day-to-day work with any third party.

HOW?

All team members are expected to:

- carry out due diligence on third parties to identify and put in place steps to resolve any risks to our brand or reputation. Where applicable, follow the specific due diligence process for your division, which has been agreed with FIFA Compliance. If you can't find enough information to make an informed decision, that's also a risk – talk to FIFA Compliance to find out what to do next.
- Contact FIFA Compliance if you:
 1. have carried out your due diligence and believe that working with a third party, or continuing to work with a third party, might put FIFA's reputation at risk, for example if a business partner is known for views which aren't in line with our Statutes;
 2. identify any red flags, for example if you find that the third party has been named in a bribery case or if you spot any wrongdoing.
- You should also follow the guidance on international trade controls and get approval from FIFA Compliance prior to engaging in an activity with a link to any of the Key Focus Areas.

REPUTATIONAL RISK



1. Could engaging with this third party put FIFA's reputation at risk?
2. Are there any red flags?
3. Is there too little information available to properly assess the risk?

➔ If you answer "Yes" to any of these questions, consult FIFA Compliance.

1. Performs and documents further due diligence
2. Advises the divisions on potential reputational risk
3. Makes recommendations to help divisional decision-making

Examples of red flags

Any crime involving violence
Any crime involving sexual abuse or illegal sexual activity
Bribery or corruption
Fraud, deception or similar crimes
Money laundering or handling the proceeds of crime
Insider trading or other financial crime
Forgery and counterfeiting
Participation in a cartel
Abuse of spouse or child prostitution
Child pornography
Illegal ownership or use of firearms
Illegal use of drugs including doping offences
Human trafficking, slavery and child labour
Illegal sales or trafficking of arms or military equipment
Illegal gambling
Breaches of international trade sanctions
Contempt of court
Sexual harassment
Exploitation of workers
Discrimination on the ground of race, gender or sexual orientation