

## IPACS Benchmark Guidelines

Updated 1 February 2022

### IPACS Benchmark B10 – The organisation has adopted an anti-corruption Code of Conduct or policy

#### Definitions

- Corruption – corruption is a term referring to a number of offences which may be explicitly defined in some jurisdictions; examples of offences relating to corruption can include bribery, extortion, embezzlement, trading in influence, abuse of functions, fraud, money-laundering, collusion and “sextortion” (an individual extorting money or sexual favours under threat in exchange for something within their power to grant or withhold), among others
- Anticorruption refers to activity designed to prevent, detect and combat corruption
- Code of Conduct – a document (or section of a document such as the Code of Ethics) that sets out the expected behaviour of individuals involved in the organisation
- Policy – a statement of intent adopted by a governing body and to which the governing body commits itself

#### Introduction to this Benchmark and its significance

- An anticorruption Code of Conduct defines and illustrates the various types of prohibited behaviours that could constitute corruption, and provides a set of binding rules which allow for a disciplinary case in the event of an alleged breach
- Having an anticorruption Code of Conduct can help to position an organisation in a positive way with stakeholders; awareness or suspicion of corruption severely damages trust in an organisation and can entail significant economic costs
- There are domestic laws related to corruption, which can expose organisations to legal proceedings

#### Commentary on the action to be taken

- Develop and formally adopt an anticorruption Code of Conduct or policy, that is clear, straightforward and unequivocal
- The organisation's policy may be published alongside other relevant regulations (refer to IPACS Recommendation A1), although practice varies from one country to another

Investment requirement – the costs of putting in place appropriate rules are low; beyond that, the level of investment should be proportionate to the specific nature of the organisation and the sport(s)

#### Guidance according to stage of organisation

##### Early stage

- The organisation has adopted a specific anticorruption Code of Conduct or policy, which is linked to the Code of Ethics or similar (see Recommendation B1) and the Conflicts of Interest policy (see Recommendation C8)

##### Developing

- The anticorruption Code of Conduct and the related procedures and policies constitute a coherent whole that is easily accessible for the organisation's internal stakeholders; it may be communicated to third parties (with appropriate procedures to protect any confidential information that it contains). There is evidence of implementation (e.g. all staff/officials must sign the Code).

##### Advanced

- The anticorruption Code of Conduct or policy is tailored to the organisation's corruption risks and provides practical guidance, illustrated by concrete examples, on how to address these risks; examples may include specific policies on gifts, sponsorship, lobbying, managing conflicts of interest, entertainment expenses, holding multiple jobs, or any other procedures contributing to the fight against corruption

- The organisation carries out additional activities such as mandatory training on corruption risks, such as bribery, and on good practices for managing risks
- The organisation conducts regular risk assessments related to corruption and acts on the findings (see also Recommendation E4 – risk assessment); the anticorruption Code of Conduct is clearly based on these findings and is improved accordingly

### Good practice examples

#### International Federations

- World Sailing: [Betting and Anti-Corruption Code](#) and [Anti-Bribery Policy](#) published
- IGF: [Betting and Anti-Corruption Policy](#)
- FIA: Article 2.1 of the [Code of Ethics](#) on Corruption and Bribery
- FIS: Detailed [Code of Ethics](#) in place, covering topics including gifts and other benefits
- FIFA: [Code of Conduct for Third Parties](#) and [Compliance Pocket Guide – Anti-Bribery and Corruption](#)

#### Overall standard among International Federations:

- Not included directly in the ASOIF study

#### Continental Bodies

UEFA: [Disciplinary Regulations](#) cover topics including bribery and corruption

#### National Olympic Committees

- None seen

#### National Federation

- Lawn Tennis Association (UK): [Disciplinary Code](#) Appendix 3 covers match fixing, financial speculation and betting

### Selected references

- Geeraert, A. (2018). [Sports Governance Observer 2018](#). An assessment of good governance in five international sports federations
  - Principle 37: The organisation has or recognises a code of conduct applicable to the members of the board, management, and personnel
- Agence Française Anticorruption – [Guidelines](#).
- IOC's ["Consolidated Minimum Requirements for Implementation of the Basic Principles of Good Governance for NOCs"](#):
  - Theme 3.6 "Code of Ethics and ethical issues", Principles 1-3:
    - Develop, adapt and implement ethical principles and rules.
    - The NOC Code of Ethics or ethical rules should comply with the IOC Code of Ethics' fundamental principles, as well as its rules on:
      - Integrity of conduct (including corruption and conflicts of interests, see also item 2.8);
      - Integrity of competitions (including compliance with the Olympic Movement Code on the Prevention of the Manipulation of Competitions);
      - Use of resources (including Olympic resources);
      - Obligation to report.
      - Ethical rules should refer to and be inspired by the IOC Code of Ethics.
      - Monitor the implementation of ethical principles and rules.
- Transparency International: [What is Corruption?](#)
- World Bank: [Combating Corruption](#)
- [OECD Convention on Combating Bribery](#)
- United Nations [Convention against Corruption](#)
- African Union [Convention on Preventing and Combating Corruption](#)
- Council of Europe – [Criminal Law Convention on Corruption](#)
- League of Arab States – [Arab Convention against Corruption](#)

- Organization of American States – [Inter-American Convention against Corruption](#)