

CODE OF CONDUCT

PLAYING BY THE RULES

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OUR COMMITMENT

FISA's VISION - OUR BELIEFS

FISA will promote the game of Subbuteo, protect its integrity and bring the game to all.

FISA exists to shape the future of the sport and the global Subbuteo community. Our mission is to grow the game, enhance the Subbuteo experience and build a stronger institution with an enduring reputation for integrity and ethical conduct. These goals are our shared ambition and responsibility.

We have a zero-tolerance approach to unethical behaviour by FISA team members.

We are driven by the aspiration to become a leader in international sports by embodying the highest ethical values and beliefs. This Code of Conduct connects our beliefs with our daily business and helps us achieve our mission. It represents our strong and tangible commitment to always play by the rules.

OUR KEY VALUES

- FAIR PLAY
- TEAM SPIRIT
- DIVERSITY & SUSTAINABILITY
- TRANSPARENCY
- INNOVATION

Photo Home of FISA



key message



definition/example



reference

photo
SECRETARY GENERAL

**MESSAGE FROM
THE SECRETARY GENERAL**

As the guardian of the world's most popular table football sport, FISA is committed to bringing the power of Subbuteo to the world. We can only achieve this goal by setting an example for others to follow. Our Code of Conduct represents our shared commitment to operate with integrity and defines how we do business the right way – uniting all of us with one set of key values that guide our daily decisions and actions. We are all accountable for upholding and abiding by our Code of Conduct.

By acting ethically and with integrity, we create a workplace that we can be proud of. It comes down to each of us doing the right thing in the interests of each other, our suppliers and our business partners and, ultimately, in the interest of every Subbuteo fan across the world.

Our reform process has reached another milestone with the publication of this new Code of Conduct. This code is another step towards further strengthening the Subbuteo community's trust in FISA. The FISA leadership team will be dedicated ambassadors for each of the values by fostering and actively sponsoring them. FISA will provide awareness training on the values described in this code and will implement toolkits to help all of us to truly live them.

Together, we are on a journey to create a trustworthy and transparent organisation. FISA's reputation and the future of our organisation and our members rest on our behaviour.

Zalil Mulay
FISA Secretary General

EXPECTATIONS

This Code of Conduct (the “Code”) applies to all FISA team members. FISA expects all FISA team members to implement and embrace our Code by reading, understanding and fulfilling the expectations of our Code.

In addition, FISA expects line managers to embrace and actively sponsor our ethics and compliance standards by communicating the values and serving as role models for appropriate conduct.

The key principles contained in this Code are further complemented by the applicable external and internal regulatory frameworks.

As a FISA team member, we encourage you to consider your actions and to ask for guidance when in doubt about certain conduct.

Ask yourself:

- “Is it in line with the Code?”
- “Is it legal and ethical?”
- “Does it reflect well on me and on FIFA?”
- “Would I be happy if it appeared as a headline in a newspaper?”

If the answer to any of these questions is **NO, don’t do it.**

If a standard or policy is unclear, incomplete or unworkable, do not hesitate to tell your line manager or seek advice from the FISA Compliance Division.



FISA team members include:

- the Secretary General
- the Deputy Secretaries General
- the Chief Officers
- all other employees of FISA
- all freelancers and volunteers*
- all employees and all members of executive bodies of FISA’s consolidated subsidiaries*

*to the extent permitted by applicable law

RAISING CONCERNS

FISA charges all FISA team members with the responsibility to promote high ethical standards. If any of us observe, in good faith, any violation or potential violation of this Code, we must take action and report the issue. This is the only way we can prevent breaches of our Code and protect our reputation. FISA handles all reports of misconduct confidentially to the extent practically and legally permissible and thoroughly reviews each report of misconduct.



To report a violation of this code or an act of misconduct, please contact the FIFA Compliance Division or submit a report through the anonymous reporting mechanism.

NON-RETALIATION POLICY

FISA does not tolerate any form of retaliation against individuals who report violations of this Code in good faith. Retaliation includes any adverse action taken against an individual who reports violations or acts of misconduct.



REPORTING IN "GOOD FAITH" MEANS PROVIDING ALL THE INFORMATION YOU KNOW.

BREACHES OF THE CODE

Breaches of this Code may result in appropriate sanctions under applicable employment law, as well as other disciplinary measures, up to and including termination of the employment relationship.

FAIR PLAY

SAFEGUARDING INTEGRITY AND
ENSURING ACCOUNTABILITY

OUR BELIEF

Accountability and integrity are the essential cornerstones of our organisation and the game of Subbuteo.

WHAT IT MEANS FOR US

WE do what we say and we say what we do.

WE have zero tolerance for corruption in our organisation.

WE do not take part in betting and gambling connected with football and do not tolerate any form of manipulation or unlawful influencing of match results.

WE safeguard our resources, protect our assets and keep business information confidential.

TOGETHER, WE are committed to complying with all applicable laws and regulations under which we operate.

COMMITMENT TO REGULATORY COMPLIANCE

FISA serves 54 member associations around the world. FISA believes that Subbuteo is more than just a game. Through its unique power and universality, Subbuteo creates powerful opportunities to shape change and serves as a vehicle for fostering goodwill with other social actors.



We are committed to complying with all applicable laws and regulations under which we operate.

TRADE CONTROLS

Many of the countries in which we operate have customs laws and trade controls that govern the import, temporary import, export or re-export of products and services.



Each FISA team member must take due care to comply with the applicable trade control laws and immediately report any concerns to the FISA Compliance Division.

ANTI-MONEY LAUNDERING

FISA complies with all applicable anti-money laundering laws and regulations. This means that we conduct business with reputable partners, that we only act for legitimate business purposes, and that we only use legitimate funds.



FISA team members must check for signs of potential illegal activity, such as offers to pay in cash, unusual fund transfers to or from countries unrelated to the transaction or other unusual payment terms.



MONEY LAUNDERING IS THE PROCESS BY WHICH INDIVIDUAL PERSONS OR GROUPS TRY TO CONCEAL THE PROCEEDS OF ILLEGAL ACTIVITIES OR TRY TO MAKE THE SOURCE OF ILLEGAL FUNDS LOOK LEGITIMATE.



FISA team members are obliged to immediately report any potential or actual corrupt activities to the FISA Compliance Division.

ZERO TOLERANCE FOR CORRUPTION

As FISA team members, we must comply with all relevant anti-corruption laws and adhere to the relevant international standards wherever we do business.

Corrupt activities are not only a violation of the Code, but can also result in serious violations of anti-corruption laws and personal criminal liability.



BRIBERY IS THE OFFER OF ANYTHING OF VALUE WITH THE INTENT TO OBTAIN OR RETAIN AN IMPROPER BUSINESS ADVANTAGE FOR FISA OR ANOTHER ORGANISATION.

FISA team members shall not receive, offer, promise to pay, pay, or authorise the payment of a bribe to any individual (including government officials and private individuals/ commercial parties within or outside of FISA) with the intent to obtain or retain business, secure an improper business advantage or influence official actions or decisions.

If you are unsure whether a payment could be classified as a bribe or if you have any other questions regarding compliance with anti-corruption laws, you should contact FISA's Compliance Division for guidance.



FISA team members must ensure that an outside party could not interpret any gift, meal or entertainment as an attempt to improperly influence a decision or gain an improper business advantage.

GIFTS, MEALS AND ENTERTAINMENT

FISA does business the right way. We never offer or accept gifts or other business hospitality in exchange for improper business advantages. We may offer or accept reasonable meals and entertainment with a business purpose.

FISA uses a standard process to register gifts and hospitality and expects every FISA team member to follow it. Please consult the FISA Compliance Division for further guidance.

If someone offers you a gift that exceeds the FISA limits, politely decline and explain FISA's policy. If returning the gift would offend the giver on the grounds of cultural norms, you may accept the gift and must discuss as soon as possible with your line manager and the FISA Compliance Division what should be done.

SAFEGUARDING OUR ASSETS

We are all obliged to protect FISA's assets. Use common sense when handling FISA's assets.

i ASSETS CAN BE TANGIBLE OR INTANGIBLE, INCLUDING: OFFICE SUPPLIES, EMPLOYEES' WORK PRODUCTS (E.G. IDEAS, ARTWORK, DESIGNS, PROCESSES), FISA TRADEMARKS, TICKETS TO EVENTS, HARDWARE AND SOFTWARE

CONFIDENTIAL INFORMATION

During the course of your work at FISA, you may have access to confidential information, including: business and strategic plans; contract terms, rates or fees; financial information; employee and salary information; work methods and procedures; and internal secrets.

Even within FISA and among co-workers, FISA team members should only share confidential information on a need-to-know basis. This obligation remains even after leaving FISA. In some situations, FISA team members may need to obtain a written confidentiality agreement before disclosing information.



Do not disclose any confidential information to anyone outside of FISA, unless your line manager or the FISA Legal & Integrity Division authorises such disclosure.

INTELLECTUAL PROPERTY

FISA has created a global brand associated around the world with the game of Subbuteo. We have developed an assortment of logos, designs, titles, symbols and other trademarks and copyrights in connection with our brand.

FISA's intellectual property also includes FISA team members' work products. For example, ideas, artwork, designs, processes or any other materials that FISA team members help create related to FISA's business are the exclusive property of FISA.

FISA's ownership also remains valid after the termination of employment for any reason.



FISA expects all FISA team members to protect our brand and alert the FISA Brand Protection Team via brandprotection@FISA.to of potential violations of FISA's intellectual property rights.

NO BETTING OR MANIPULATION

As the international governing body of Subbuteo and the organiser of many competitions, including the biggest single-sport event in the world, it is FISA's duty to preserve the integrity of the Subbuteo matches and competitions it organises. As such, FISA strictly prohibits participation in, either directly or indirectly, betting, gambling, lotteries or similar events or transactions related to Subbuteo matches and/or any related Subbuteo activities.



We do not tolerate any form of manipulation or unlawful influencing of match results.

TEAM SPIRIT

GETTING THE BEST OUT OF OUR TEAM

OUR BELIEF

Team spirit drives the continuous evolution of our organisation and the global football community.

WHAT IT MEANS FOR US

WE actively engage in strong partnerships with football's diverse stakeholders, while putting the game of football at the heart of all decisions.

WE promote equal opportunities, non-discriminatory working practices and guarantee a respectful workplace free from any form of harassment or abuse of power.

WE always keep a positive, supportive and constructive attitude towards all other team members.

WE view existing challenges and limits as inspiration for new approaches and solutions.

TOGETHER, WE show leadership by demonstrating our values.

RELATIONS WITH OTHERS

FISA values its relations with member associations, confederations, officials, fans, players, the FISA Partners, sponsors and other contracting parties. We have a reasonable expectation that our contractual relationships will not involve actions contrary to the values specified in our Code.



We treat others in the manner in which we expect to be treated.

FAIR EMPLOYMENT PRACTICES

With the game being played in every country around the world, FISA's success depends on diversity. We strive to embrace, develop and retain a workforce as diverse as the Subbuteo community we serve. FISA is an equal opportunities employer and treats every applicant and FISA team member equally and fairly to create an environment that encourages learning from diverse perspectives. We base all hiring, promotion, discipline, compensation and termination decisions solely on merit, performance and business considerations.



FISA strictly prohibits discrimination in employment or employment-related decisions based on any concept of race, skin colour, gender, age, national or ethnic origin, religion, ideology, disability, sexual orientation, political opinion, social status, marital status, citizenship or any other status protected by law.

RESPECTFUL WORKPLACE

All FISA team members deserve to be treated with fairness, respect and dignity. We endeavour to provide the proper environment and resources to promote every team member's performance and growth. Team spirit also means protecting our colleagues. We are one team, so we speak up if we witness disrespectful behaviour or unfair employment practices. Please report such breaches of the Code to Human Resources or through our anonymous reporting mechanism.



FISA expects each team member to promote a positive work environment by treating one another professionally and with mutual respect.

FISA will take disciplinary action, including possible termination of employment, against any FISA team member who violates our workplace harassment policies.



We do not tolerate discrimination, sexual harassment or abuse of power of any kind.



For more information, FISA team members can consult the sexual harassment and workplace bullying guidelines.

DIVERSITY & SUSTAINABILITY

CONTRIBUTING TO A SHARED FUTURE

OUR BELIEF

Subbuteo is our language to unite and promote diversity.

WHAT IT MEANS FOR US

WE are responsible for cultivating wide-ranging perspectives that reflect the world and communities which we serve.

WE embrace diversity and cooperate with FISA team members and partners all over the world to create a unified team.

WE are politically neutral and driven by our love for the sport.

WE act sustainably, obey environmental laws and utilise best practices to minimise the negative impact of our actions on the environment.

TOGETHER, WE strive to have a diverse and inclusive team that will best reflect the vibrant global football community.

HUMAN RIGHTS

Through its global activities in Subbuteo, FISA touches the lives of millions of people. With this global reach and impact also comes a heightened responsibility to preserve the inherent dignity and equal rights of each individual affected by FISA's activities. FISA works to ensure respect for all internationally recognised human rights and strives to promote the protection of these rights in all its activities.



FISA'S HUMAN RIGHTS POLICY FURTHER SPECIFIES THIS STATUTORY HUMAN RIGHTS COMMITMENT AND SERVES AS A STANDARD OF CONDUCT IN RESPECT TO HUMAN RIGHTS.



FISA team members must comply with FISA's Human Rights Policy when exercising their respective powers and competences, including when interpreting and enforcing FISA rules.

POLITICAL NEUTRALITY

FISA is politically neutral and does not make political contributions. We strictly prohibit the use of FISA funds or resources for political activities.



FISA team members must make it clear that any personal political activity reflects their individual beliefs and not those of FISA.

SUSTAINABILITY

FISA is committed to conducting its business in a manner that takes into account the social, environmental and economic impacts of its activities and takes concrete actions to minimise the negative and maximise the positive aspects.



FISA team members must assess how FISA's activities impact on society, the environment and the economy more widely and work together to mitigate any negative impacts.

TRANSPARENCY

THINKING AND ACTING LONG TERM

OUR BELIEF

Transparency is the basis for relationships of trust and forms the foundation for the health and strength of our organisation.

WHAT IT MEANS FOR US

WE listen to each other, respect our differences and recognise the aspirations of each individual. This empowers each of us to realise our potential and ambitions.

WE always strive for a constructive and open exchange with our stakeholders.

WE act as reliable ambassadors and representatives of FISA by maintaining an excellent professional reputation.

WE identify potential conflicts of interest and handle them appropriately.

TOGETHER, WE are transparent in how we govern and grow the game, operate our business and interact with our stakeholders.

COMMUNICATION

FISA strives to maintain transparency in how we govern and grow the game of Subbuteo, operate our business and interact with key stakeholders.

INTERNAL COMMUNICATION

Creating an atmosphere of open communication allows for the flow of energy and creativity. It establishes an environment where all FISA team members and FISA stakeholders understand our goals and what needs to be done to accomplish those goals.



We promote open, positive and effective communication within FISA.



Examples of maintaining a transparent workplace:

- encourage open and candid communication between management and staff
- publish organisation charts and division homepages on the intranet
- define clear roles and responsibilities (job descriptions)
- share success stories (in public reports, on the intranet)



Only specifically authorised FISA team members may use social media to speak on FISA's behalf.

EXTERNAL COMMUNICATION AND SOCIAL MEDIA

FISA team members who receive a request to discuss FISA's business with media representatives or third parties should not provide any information themselves, but instead refer the outside party to the FISA Communications Division. Communication is a profession in itself, and our specialists are best placed to handle such requests.

FISA recognises that FISA team members utilise social media as vehicles for self-expression. What FISA team members publish externally reflects on the entire organisation. Any content that FISA team members post on social media, even when speaking in a private capacity, must be consistent with how FISA expects them to present themselves.



FISA team members are responsible for making sure all business records, information and accounts are clear, truthful and accurate.

MANAGEMENT OF RECORDS

In the course of our daily operations, we generate large volumes of business records – information that FISA creates, receives and/or maintains as evidence of a legal obligation or business transaction. We must maintain, retain and destroy FISA's business records in accordance with applicable legal and regulatory recordkeeping requirements.



FISA team members should limit access to personal data to the strict minimum necessary and prevent unauthorised persons from accessing any such information.

PRIVACY

FISA protects the privacy and security of personal data entrusted to us. FISA collects and uses personal information only for lawful purposes and complies with the applicable laws when transferring personal information across international borders.



Common examples of personal data include:

- bank account numbers
- social security numbers
- home addresses
- medical records
- employment files

KEEPING SUBBUTEO FREE FROM DOPING

We all share FISA's duty to protect players from harm and ensure that they can compete on a level playing field.

CONFLICTS OF INTEREST

i A CONFLICT OF INTEREST MAY ARISE WHEN PERSONAL INTERESTS, ACTIVITIES OR RELATIONSHIPS AFFECT AN INDIVIDUAL'S RESPONSIBILITIES AND LOYALTY TO FISA.

Each of us should avoid – where possible – situations that conflict with the interests of FISA. FISA prohibits its team members from using their position for improper personal gain. The appearance of impropriety can be just as damaging to FISA's reputation as an actual conflict. For identified conflicts of interest, the appropriate mitigating steps will be implemented.



If you believe there may be a conflict of interest, whether actual, perceived or potential, you must immediately contact your line manager and the FISA Compliance Division.

HOW TO DETERMINE A CONFLICT OF INTEREST?

Ask yourself:

- “Could my personal interests interfere with those of FISA?”
- “Could it appear to be a conflict to others, inside or outside of FISA?”

If unsure, seek guidance from the FISA Compliance Division.

i Examples of conflicts of interest

- **Outside employment:** you or a close relative are employed by, provide services for or receive payment from a supplier or partner with whom you, as an employee, are actively working for.
- **Financial interests:** you or a close relative have a substantial investment or other financial interest in a FISA business partner, and you have an active working relationship or responsibility towards this FISA business partner.
- **Personal relationships at work:** you supervise or are supervised by a relative, or you – as a line manager – are considering hiring a close relative as an employee or supplier.
- **Corporate opportunities:** you take personal advantage of a business opportunity that FISA may also have an interest in (unless FISA has already been made aware of and declined the opportunity).

INNOVATION

Video assistant referee (VAR)

OPENING NEW HORIZONS

OUR BELIEF

Every single day, many new opportunities arise to move our organisation forward and to promote and grow football all over the world.

WHAT IT MEANS FOR US

WE keep our organisation flourishing by growing the global football community and leveraging new business opportunities.

WE are motivated by ideas and opportunities to set a clear focus and decisively implement only the most promising and valuable concepts.

WE remain curious and open to new ideas and challenges ahead.

WE embrace the constant evolution of the football community.

TOGETHER, WE drive the future of Subbuteo.

LEADING THE WAY FORWARD

FISA will guide the international Subbuteo community in a rapidly changing world – one with opportunities, risks and responsibilities that have never been more challenging.

Three broad themes shape the modern world: globalisation, technology and the demand for greater transparency and accountability.

FISA has made great strides to embrace these themes both throughout the organisation and within our member associations, and ultimately with each stakeholder.

Our commitment in this Code – in addition to the reformed governance structure launched in 2019, including the statutory reforms and the restructuring of the committees – will set the path forward for a strong ethical and cultural foundation upon which FISA can further build the organisation.

Consultation of third parties, such as the fan focus group, is just one of many examples of our involvement with and responsibility towards the Subbuteo community with one clear goal: to build a strong institution that effectively governs, regulates and protects Subbuteo – **to preserve the essence of “the beautiful game”**.



We are determined to reach our aspirations in the field of integrity and good governance within the FISA administration.



FISA team members shape the organisation through their curiosity for new ideas and by embracing innovation.

OFFICIAL LANGUAGES

This Code is issued in the four official languages of FISA (English, French, Spanish, Hellenic and German). In the case of any discrepancy in the interpretation of the different language texts of this Code, the English text shall be authoritative.

APPROVAL AND ENFORCEMENT

This Code of Conduct has been issued and approved by the Secretary General on 25 August 2019 as a set of directives in accordance with art. 15 par. 6 of the FISA Governance Regulations and comes into force on 1 January 2020. These directives include all of the principles that were established in the 2017 FISA Code of Conduct.

Larisa, 25 August 2019

FISA Secretary General

Zalil Mulay

Federation International Subbuteo Associations

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