ORGANIZED CRIME AND CORRUPTION IN SPORT

E-Handbook on Standard and Norms in the Area of Crime Prevention and Anticorruption in Sport

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ISPAC

United Nations Interregional Crime and Justice Research Institute
UNICRI

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INTRODUCTION
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The “E-Handbook on Standard and Norms in the Area of Crime Prevention and Anticorruption in Sport” has been commissioned by UNICRI in order to provide a comprehensive overview of the legal tools adopted to prevent and combat criminal phenomena in the sport industry. A large number of official documents, studies and researches have been published in the last years on this topic, following the raising awareness of a deeply rooted illegality that threatens integrity in sport. Public events and conferences have flourished as well, thereby showing the great interest of civil society in the issue/field.

These analyses have addressed mainly the empirical dimension, by focusing on the regulation of club ownership and the transfer markets, bidding, awarding and planning of major sporting events, as well as betting. Those studies have highlighted the risk of perpetration of several criminal offences, such as frauds, bribery, money laundering, extortion, abuse of power, match-fixing, among others. In-depth studies have investigated the causes of these crimes, which range from governance issues in the sport world to enormous high-profit activities related to public event bids, image rights and sponsorship.

Nevertheless, none of these analyses has dealt with the specific issue of the legal tools and the self-regulation instruments international organizations and sports federations have introduced in the course of the last decade, nor with the more traditional international conventions and codes of ethic able to tackle the phenomena today.

The E-Handbook aims at collecting and ordering these old and new texts, in order to offer a clear and updated overview of this changing legal framework, which gives rise to a rich and complex criminal policy in this field. First, the E-Handbook allows to measure the concrete efforts that have been engaged so far at the legal level, mostly as a consequence of the recent scandals the media have reported all over the planet, often incurring criminal investigations. Second, it shows the main features of the legal approach, namely the necessary interaction between public and private actors, thereby confirming the well-established idea that ‘big corruption’ deserves a combined effort of several stakeholders instead of the unilateral intervention from a single one. Third, the E-handbook’s ambition is to represent the basis for further research in the field by identifying gaps and inconsistencies in the existing normative approach.

The E-Handbook is conceived as a practical tool for everybody interested in this changing legal world: international organizations, enforcement agencies and officials, sports federations and clubs, corporate sponsors, non-governmental organizations, academics and journalists. Preventing and punishing corruption is the purpose that all involved stakeholders should cooperate in: individual illicit enrichment deeply harms sport integrity and contradicts its basic values; recent scandals threaten sport’s popularity and symbolic dimension, especially for young generations; fight against white collar crime cannot be seriously undertaken if safe heavens for enormous illicit gains are publicly and privately tolerated.
To the reader, the *E-Handbook* appears as a long, comprehensive list of hard-law and soft-law instruments issued by public and private institutions, structured in chapters and sections, where the relevant texts can be easily identified at a first glance. Collection of documents is updated at 30th September 2016, although further changes can be foreseen. For the sake of clarity, the choice has been made to include in the *E-Handbook* hyperlinks instead of reproducing the whole texts, making the presentation simpler and the access to the contents easier. Where needed, the *E-Book* addresses specific references by focusing on the relevant parts of the legal texts. With a view to facilitating the reading, the methodology used and the most relevant contents of Chapters 1 and 2 - respectively addressed to International Organizations and Sports Federations policies — are explained in detail in the last two paragraphs of this introduction. Behind such a plain presentation, an extended analysis of an extreme variety of sources, never assembled before and frequently difficult to collect, has been carried on. Finally, the reader must be aware that the number and the complexity of the existing texts can sometimes undermine the accuracy of the *E-Book*.

2. Forms of Corruption in Relation to Sport.

The term corruption is used here to refer to illegal activities taking place in the global sport industry, aimed at obtaining illicit economic gain and relying on a criminal organization. Reference is made not only to bribery (corruption in the narrow sense) but to a wide range of criminal behaviors characterized by the basic features mentioned above and increasingly reported by the media (so called ‘big corruption’). Such a vague notion encompasses four main categories: a) match-fixing; b) money laundering; c) criminal conducts related to ‘mega-events’; d) sponsorship and hospitality related offences.

Further offences, in particular doping, could have been included in the study. In this area, a huge amount of legal texts has been recently adopted, both at the international and national level, and judicial practice has shown how widespread the phenomenon is. Doping nevertheless remains outside the *E-Book*, since its main criminological dimension consists in altering sport results. Economic and financial implications are often accessory even when, as it happens, they correspond to the perpetrators’ aim.

a) **Match-fixing** is the conduct consisting in altering sport results as a consequence of an illicit agreement between athletes and other individuals. Gaining a game or getting a better score is rarely an objective *per se*; on the contrary, even negative sport results can be pursued as consequence of undue payments to players. The very essential nature of match-fixing is connected to legal and illegal betting and relies on its financial implications (UNODC/IOC 2013; Council of Europe, 2013; UNODC/ICSS 2016). In football, cricket, horse races and other popular sports, amazing amounts of money, often cash, are on stake. Thus, ‘following the money’ has become the most useful system to detect match-fixing: when bets appear to be unusual and unpredictable, alerts are launched, often thanks to the cooperation between public enforcement agencies and private companies. Given its complexity, match-fixing is far from being the result of an individual behavior relying on athletes’ lack of integrity: not only coaches, agents, clubs’ managers can be individually involved; but also, and more importantly, structured criminal organizations play a key-role, the involvement of mafia-type groups being largely proved.
b) Competition venues create exceptional circumstances both for legal and illegal economic-oriented activities, and **offences related to major events** are a reality. The planning and hosting of sports mega-events can be threatened by illegal activities (UNODC 2013, OECD 2016).

Due to the huge economic potential of such events, the bidding process for the award of international competitions can be tainted by corruption: recent cases reported by the media, and now largely investigated both inside and outside sports federations, show how concrete the risk is that one country is preferred to another due to illegal arrangements. Among the most relevant cases, one can recall the scandal over the Salt Lake City Winter Olympic Games in the 1990s, involving alleged bribes for votes. More recently, attention has been drawn on the widely commented FIFA scandals, relating to the selection process for the 2018 and 2022 World Cups, as well as the CONCACAF case, concerning allegations of bribery and tax evasion. National governments officials have been suspected to play a role in paying bribes, as well as representatives and mangers of top sports federations have been charged for having illegally used their power of vote and unduly influenced the final decision in exchange for benefits.

Corruption can also take place during the execution phase of big sport events: due to the impressive financial resources available, as well as the lowered controls imposed by the short time allowed to create structures and infrastructures, public and private tenders procedures are weakened, therefore giving rise to opportunities for illegal actors. Clear rules to ensure labor rights, human rights as well as environmental and social sustainability often lack, and anticorruption policies are insufficiently designed and implemented. In addition, open access to official bid documents, internal compliance processes, clear policies and reporting on ethics, conflicts of interest, gifts and lobbyists are extremely scarce.

c) Recent studies have highlighted the role **money laundering** can play in the world sport industry (FATF 2009). Described as a process “whereby illegal money is put through a cycle of transactions so that it can come out the other end as appearing to be legal money”, money laundering is linked both to the financial dimension of sport market and to the lack of transparency appearing in the field. As reported by the FATF, “During the summer of 2009 there was a huge scandal involving money laundering in cricket which lead to the arrest of a prominent investor in the cricketing world. Many feel that other sports such as football due to the large sums of money passing through the hands of individual clubs, players and agents has huge potential for money laundering”. Specific factors have been identified which facilitate money laundering in the field of football: the legal structure of football clubs, a lack of regulation for the ownership of football clubs and the volume of money involved in the sport are the three main factors explaining the phenomenon. Similar reasons increase the risk of money laundering in many other sports. The connection between money laundering and organized crime is self-evident: no complex financial transaction aimed at hiding illicit sources of money can be carried out by individuals acting without a structured network, including bank accounts and shell companies.

d) Recent initiatives have shown that **misuse of sport sponsorship and sport hospitality** in order to obtain an undue advantage is a widespread phenomenon (Global Compact, 2014). Some cases concern sport sponsorship, primarily for the purpose of inappropriately obtaining a commercial contract from the client, and corrupt practices linked to these transactions. Sponsors may also face the risk of being forced into a sport sponsorship relationship, for example, where a potential refusal to sponsor would result in loss of contracts or even extortion, namely when sport entities are closely related to public officials or major business partners. Sport hospitality can hide illegal transactions when it unduly influences business partners or public officials.
3. Main Causes of Corruption in Relation to Sport.

As it has been recently reported, “Sport is a global phenomenon engaging billions of people and generating annual revenues of more than US$145 billion” [Transparency International, 2016]. Such economic data does not explain in itself the well-rooted criminal activities mentioned above. Causes can be identified in some specific features and weaknesses clearly characterizing the global sport industry.

Sport is organized according to the historic and well-enshrined principle of autonomy. The revised version of the Olympic Charter, published in 2011, states that: “Recognising that sport occurs within the framework of society, sports organisations within the Olympic Movement shall have the rights and obligations of autonomy, which include freely establishing and controlling the rules of sport, determining the structure and governance of their organisations, enjoying the right of elections free from any outside influence and the responsibility for ensuring that principles of good governance be applied” [Fundamental Principle 5 of the Olympic Charter]. Even if autonomy cannot be questioned, it also appears as being a source of fragility of the sport industry.

The special status international sports federations enjoy — they are not governmental, nor intergovernmental bodies, nor corporations — implies, as a consequence, that they “are not easily held accountable to standards of good governance”. Moreover, most international sports bodies are not subject to national or international laws or norms that govern business practices since they are incorporated as associations — that is, voluntary membership organizations — and are legally characterized as non-profits” [Pielke, Obstacles to accountability in international sports governance, in Transparency International. Global Corruption Report: Sport, Routledge, 2016, p. 29 ff].

The main factor explaining the high rate of corrupted practices in the world sport industry is commonly identified in the poor governance system, both of federations and clubs. “Governance is the process of decision-making and how those decisions are implemented. In essence it is the system of oversight and the approach used to achieve specific goals. In this regard sport should be treated no different than any other sector and the aforementioned autonomy of sport organizations should not prevent compliance with the good governance principles of transparency, accountability, neutrality, co-operation, prevention and pro-activity “ [EPAS, 2015]. The underestimation of governance makes sport industry a unique ground for opaque transactions and represents the main factor encouraging the flourishing of illicit behaviors [see ICG FIFA, 2012 and 2013; Transparency International, 2016].

The poor quality of anticorruption policies in the private sector is currently discussed and reforms are envisaged in order to get the right standard of good governance in this area by focusing on different issues. First, the lack of financial transparency of sports federations and organizations is frequently questioned in relation to the rules on salaries, financial revenues disclosure, conflicts of interest, publication of finances, internal and external audits, budgeting processes and tender procedures. Second, the insufficiency or inability of internal controls plays a major role: the lack of independent ethics commissions and ethics advisers, as well as the poorness of disciplinary measures, sanctions and procedures, are prominent elements facilitating corrupt practices. Third, the poorness of democratic standards in sport organization election processes is underlined, focusing on the election procedures of bodies members, the duration of terms, the eligibility and integrity checks.

Chapter 1 of the *E-Handbook* collects and orders the most relevant legal instruments issued by International Organizations in preventing and fighting corruption in sport.

The *E-Handbook* assembles a variety of different sources, listing the more traditional hard-law legal texts (such as Conventions, recommendations and protocols), as well as new and more practical tools, such as guidelines, handbooks and codes. Attention has been given also to some declarations and reports, with the intent to offer an overview of the background and efforts engaged over time in approaching the phenomena.

The *United Nations Convention against Corruption* and the *United Nations Convention against Transnational Organized Crime* represent the starting point in addressing the issues at stake. They are complemented by the *OECD Convention* and the *Council of Europe Treaties* against corruption, thereby giving rise to a well-structured web of general legal texts at the international level.

**a) Concerning match-fixing**, the international framework has been recently completed by the Council of Europe Convention on the Manipulation of Sports Competitions adopted in 2014. The provisions of the Convention are primarily relevant for the **definition** of match-fixing/manipulation, that is “an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sport competition in order to remove all or part of the unpredictable nature of the aforementioned sport competition with a view to obtaining an undue advantage for oneself or for others”*. With the aim to develop a common European and global framework for the development of sport, the Convention seeks to involve all the stakeholders in the fight against the manipulation of sports competitions. It requires Member States to encourage sports organizations, competition organizers and sports betting operators to cooperate in the fight against the manipulation of sports competitions and entrust them to implement provisions in some crucial areas. It enlists: measures for sports organizations and competition organizers (article 7), including prevention of conflicts of interest, effective monitoring of the course of sports competitions exposed to the risks of manipulation, and effective mechanisms to facilitate the disclosure and reporting of any information concerning potential or actual cases of manipulation; measures regarding the financing of sports organizations (article 8); measures regarding the betting regulatory authority or other responsible authorities (article 9); measures to prevent conflicts of interest and misuse of inside information by natural or legal persons involved in providing sports betting products (articles 10), and measures to fight operators of illegal sports betting (article 11).

Looking at the **soft-law tools** specifically addressed to prevent match-fixing, and in general the manipulation of competitions, the studies, guides and models issued by the UNODC (in partnership with the International Olympic Committee or with the International Centre for Sport Security) may be pointed out as the most relevant texts.

The document titled *Criminalization approaches to combat match-fixing and illegal/irregular betting: a global perspective*, issued by UNODC/IOC in 2013, is a comparative study on the applicability of criminal law provisions concerning match-fixing and illegal/irregular betting in the existing legislation of 19 countries.
The study also assesses the applicability of the United Nations Convention against Transnational Organized Crime and the United Nations Convention against Corruption in match-fixing and illegal betting cases. The report concludes that there is a need for further changes in the legislation of many countries; a need related not only to substantive issues of match-fixing but also to procedural aspects, and provides a corpus of guiding principles and model provisions that may be useful for countries in order to develop a comprehensive criminal law response to match-fixing, also in order to facilitate international cooperation in criminal matters. The Annex 2 of the document contains a first group of provisions addressed to the criminalization of match-fixing and irregular betting, while a second group provides guidelines for the regulation of other important issues, such as jurisdiction, sanctioning of participatory acts and organized criminality, the liability of legal persons, whistle-blowers protection, anti-money laundering measures, and special investigative techniques.

As a follow-up to this 2013 study, and with the aim to implement the IOC International Forum on Sports Integrity Recommendations of April 2015, in June 2016 the UNODC, in partnership with the IOC, published a booklet for legislators titled Model Criminal Law Provisions for the Prosecution of Competition Manipulation. The document broadens the perspective of 2013 by looking at specific legislation in 52 countries, it develops a checklist of good practices identified in the above-mentioned legislation and proposes additional criminal law provisions and guidelines for national legislators to combat competition manipulation.

In 2016 the Corruption and Economic Crime Branch of UNODC, in partnership with the ICSS, issued the Resource Guide on Good Practices in the Investigation of Match-Fixing. The guide uses as its basis the United Nations Convention against Corruption and the United Nations Convention against Transnational Organized Crime, which provides the legal framework for law enforcement agencies to combat match-fixing. However, also sports organizations and other bodies with the jurisdiction and powers to investigate match-fixing allegations, despite not being bound by the mentioned international instruments, may benefit from the principles developed in the Guide. As a matter of fact, using almost thirty case studies and practical investigation techniques, the source offers a concrete support to enhance investigative skills and to achieve successful outcomes from detection, intelligence and investigative activities. Some key learning points detailed in the conclusion of this document are notable in the perspective to understand and, therefore, prevent the phenomenon: a) the primary form of match-fixing is betting-related; however, match-fixing activity can also be done for sporting reasons, which is no less serious; b) organized crime is attracted by match-fixing, because it is currently a low-risk, highly rewarding activity; c) match-fixing is a specific form of complex financial corruption that has a cost to society as a whole; d) match-fixing defrauds a number of stakeholders in sport, including supporters and betting operators; e) match-fixing is a global cross-border crime that is difficult to investigate because of a lack of specific laws and a wide range of approaches.

b) Specific tools in preventing corruption in sports have been issued also for a particular sector, which is the organization and managing of major events. The Corruption and Economic Crime Branch of UNODC, guided by the principles in the United Nations Convention against Corruption, has developed a handbook titled A Strategy for Safeguarding against Corruption in Major Public Events, featuring a set of practical measures (as well as a corruption prevention checklist) designed to better respond to the specific challenges associated with the organization of major events.
The book identifies the main factors that may lead to a successful prevention of corruption in the organization of major events, which are: the presence of political determination and commitment to address the issue; a central, singular and accountable authority responsible for the delivery of the event; a shared commitment to prevent corruption among key stakeholders; a sound and transparent governance, organizational and accountability structure; a strategic approach to corruption prevention based on a systematic and continuous risk assessment process; effective leadership in the implementation of a comprehensive risk management strategy; the presence of effective compliance monitoring schemes; and a commitment to transparency and integrity in public reporting. As far as preventing corruption measures are concerned, the most relevant parts of the book can be identified in the following chapters: general preventive anti-corruption policies and practices, which include also strategic approaches to the prevention of corruption, risk mitigation and risk management strategies, as well as precautions concerning partners, agents, consultants, lobbyists, and politically exposed persons; financial management; public procurement, which, in particular, provides measures to reduce the risk of corruption in the authority’s supply chain; private sector involvement, which focuses also on the prevention of corruption in the private sector, the integrity provisions within private sector organizations, the sponsorship activities, and the selling process of broadcasting rights.

Managing activities at risk of corruption in major events is also the object of a document issued by OECD in 2016 titled High-Level Principles for Integrity, Transparency and Effective Control of Major Events and Related Infrastructures. Drawing from the cooperation between the Italian National Anti-Corruption Authority (ANAC) and the OECD in improving the transparency, propriety, effectiveness and efficiency of the procurement procedures related to staging EXPO Milano 2015, the document summarizes the main key findings that shall allow better governance and management models for the implementation of future large events and related infrastructures.

c) The most relevant and specific tool addressed to sport sponsorship and sport related hospitality is the UN Global Compact Guide, issued in 2014. The objective of the Guide is to provide sponsors of all sizes, with or without an established overall anti-corruption program, a practical framework on how to approach sport sponsorship and hospitality in a transparent and accountable manner, as well as the means/strategies to address associated major risks of corruption. According to the definitions provided by the Guide, hospitality in intended as “tickets, passes and ‘invite only’ invitations to Sport Entity events”, while sport sponsorship is intended as “a contractual exchange of benefits between the sponsor and the sport entity, when: a) the company receives the right to associate its name or distinctive mark with the activity of the sport entity in order to promote the sponsor’s exposure, identity, brand or products/services in a positive manner; or b) other forms of support for a sport entity by a sponsor, such as patronages or donations usually do not oblige the sport entity and have to be distinguished carefully, especially for tax reasons”. After having illustrated the peculiar perspective of sponsor and sport entities in preventing corruption, the document outlines six sequential steps that should be carried out by sponsors on a continuous basis to address the corruption-related risks associated with sport sponsorship and hospitalities: commit, assess, define, implement, measure, communicate.
For every step the Guide provides detailed minimum standard rules and best practices in managing activities, operations and relationship, as well procedures to be adopted. Special attention is drawn, in Chapter on Define, on the provisions concerning the procedures for large scale hospitality, especially in larger companies, and procedures for sponsorship. Similarly, the Addendum to the Guide illustrates concrete examples of Code of Conduct for sport entities, hospitality and gift policy, hospitality register, as well as public reporting policies and procedures.

c) A final mention goes to the study issued in 2009 by Financial Action Task Force (FAFT) on **Money Laundering through the Football Sector**. The choice to list also this report is justified by the fact that studies and cases show a connection between money laundering and the gaming sector. As the report highlights, betting in sport has reached new levels of sophistication, with various operators involved across several countries and continents, and new offshore betting companies being established. This sophistication, as well as the use of the Internet for online betting, also increases the risk of money laundering. The report analyses, in particular, several cases that illustrate the use of the football sector as a vehicle for laundering the proceeds of criminal activities, and concludes that the influx of big money, in combination with some specific factors, has made football one of the many sectors that can be attractive for criminals in order to launder proceeds of crime.


Chapter 2 of the *E-Handbook* provides an extended overview of self-regulation instruments issued by international sports federations. This part of the research is highly innovative and far more complex than the presentation of the international organizations policies. Due to the complexity of the legal framework, special attention has been paid to the collection, selection and presentation of the relevant texts. The research methodology can be summarized as follows.

a) A *preliminary screening* of the International Olympic Committee (IOC) and all International Sports Federations web sites has been carried out, in order to check rules, regulations, guidelines or policies adopted by each federation in preventing and fighting corruption. The total number of federations investigated is 103, belonging to two groups: federations that are those that are not recognized by IOC. The first group includes a total number of 69 international sports federations: 28 recognized by the Association of Summer Olympic International Federations (ASOIF), 7 by the Association of International Olympic Winter Sports Federations (AIOWF) and 34 by the Association of the IOC Recognized International Sports Federations (ARISF). The second group includes a total of 34 international sports federations, all governing specific sports worldwide and members of SportAccord (the umbrella organization for both Olympic and non-Olympic international sports federations as well as organizers of international sporting events).

b) A *deep analysis* has been carried out concerning the sources, in order to identify general rules on anticorruption and integrity, as well as specific provisions focused on betting, match-fixing or other corruption related practices. As a result, only 45 international sports federations have been selected.

c) A *presentation of all the research findings* followed, as a third and final phase of the research. In relation to each selected federation, the *E-book* lists the documents of interest, quoting the relevant parts of the texts.
The described research achieved important results, both concerning the sources and their content. The main outcomes may be summarized as follows.

As far as the sources are concerned, a very complex and fragmented picture results from the research.

First, anti-corruption rules are spread out. They are not always immediately traceable, as the texts are often paragraphs, chapters or appendixes of hundred-pages handbooks, bye-laws, manuals or other documents, and anti-corruption measures are encompassed in different types of documents. This placement of sources does not favor an easy access to anti-corruption policies in the context of sport industry.

Second, what emerges from a comparison of federations’ approaches, and even looking at each federation’s approach, is that rules are not classified and organized in accordance with uniform principles, thereby giving rise to a very complex network of prescriptions. On one hand, documents not specifically or not only addressing corruption include references or rules directly or indirectly related to the topic (Statutes, Codes of Ethics, Codes of Conduct, Code of Good Standing, Disciplinary Regulations, Legal Provisions, Competition regulations). On the other hand, documents specifically designed to prevent corruption adopt different titles, they are incorporated in different kinds of tools and, again, they approach the topic in a fragmented way (e.g. Code against Manipulation; Anti-Cheating Guidelines; Betting Rules; Code of Prevention of the Manipulation of Competitions; Match-Fixing, Betting and Competition Irregularities; Anti-Corruption Code; Bye-laws on betting and anti-corruption; Code of Conduct in Relation to Betting: Wagering and Irregular Match Results; Rules of Conduct Applicable to Bidders; Betting and Other Anti-Corruption Violations Rules, etc.).

Third, self-regulation does not seem to reflect the well-established codification/classification of anti-corruption compliance tools, as it is known and applied, for example, in the corporate context, therefore appearing as quite confuse and sometimes not updated. Several titles are used interchangeably (“ethical code”, “code of conduct”, “disciplinary code”, “anti-corruption code”, “guidelines”), despite the fact that these instruments generally have a different role and function within the structure of the legal entity and compliance system. Guidelines, for example, are normally intended just as recommended practices (not as statutory rules), while Ethic Codes and Codes of Conduct are usually intended to have different recipients and contents. Statutes or Constitutions provide rules on ethical issues or disciplinary procedures, instead of focusing on the governance issues.

As far as the content is concerned, the E-Handbook provides an overview of the different kinds of instruments issued by each federation, with a substantial approach. Priority has been given to the single prescription value, beyond its placement and the incorporating tool’s nature, name, or legal qualification. This approach allows to list as ‘relevant documents’ also those texts, or parts of texts, which are not specifically or formally addressed to corruption issues, but which contain prescriptions typically recognized as anti-corruption rules and procedures.

The commitment of federations in forbidding corruption is largely present. Ethic Codes or Codes of Conduct, in particular under the voice “integrity”, are generally the texts where a clear ban of corruption practices is found. Formulations, of course, vary a lot in details, but usually they cover active and passive bribery and the attempt of corruption [for the most wide-ranging definitions, see, for example: AlBA Disciplinary Code; FIE Betting and Anti-Corruption Rules. Appendix to The Ethical Code; FISA. Manipulation of Competition and Betting. Appendix 3 Bye-Law to Article 58].
Occasionally, even the illicit influence or other minor forms of corruption are explicitly forbidden, such as accepting instructions to vote or to intervene in a specific way within the organs of the federation, undue pressure or influence on the vote or on the direction of decisions made inside the federation, as well as cooperation sought by influencing the work and evaluation of the judges. In addition, some codes also take into consideration those acts carried out directly or indirectly through, or in conjunction with, intermediaries or related parties. They also encompass the acceptance of commissions or promises of such commissions for themselves or intermediaries and related parties in order to negotiate deals of any kind while performing their duties [see, for example, the Fisa Code of Ethics].

Record-keeping, accounting policies, payment mechanisms regulations are, unquestionably, basic requirements of an effective anti-corruption program. Cases and studies indicate that the rules applied in these areas made improper payments possible, thereby facilitating corruption practices. Federations listed in the E-Handbook generally provide, even though with a diverse degree of details, financial rules and procedures. Prescriptions are mainly focused on income and expenditures, accounting principles, travelling and operational expenses, general funds managing, grants and contributions. In the context of competition regulations, financial rules are often also issued for bids related to sport events, which are accompanied with a deposit of fees.

In federations’ Ethic Codes or Statutes specific prescriptions target gifts, hospitality, and promotional expenses, which are notoriously typical activities at risk of corruption. However, these topics are more frequently regulated as general, ethical issues - under the title “Integrity”- rather than “corruption”-related conducts. Moreover, detailed guidance is rarely issued, as well as clear rules on the acceptable business practices and behaviors. Prescriptions often appear only as general prohibitions or recommendations with no strict boundaries, such as the following: “an overall sense of moderation should prevail concerning hospitality and accommodation”; “the hospitality shall not exceed the standards prevailing in the host country”; “only gifts of nominal value, in accordance with prevailing local customs, may be given or accepted”; “the hospitality shall not exceed the standards prevailing in the host country; only gifts of very small value may be offered or accepted”; the “hospitality may not exceed normal standards”. Only a few federations have developed a complete set of rules, or targeted policies [see, for example: International Netball Federation Code of Ethic; Code of Ethics of the International Cricket Council; World Curling Federation Gifts and Hospitality Policy].

Like gifts and hospitality, also sponsorship and conflict of interest are typical activities at risk, which should require a discipline. On sponsorship, only few focused self-regulations are available [see, for example: Fédération Équestre Internationale General Regulation]. Prescriptions on the conflicts of interest are, instead, most common, even though with a different level of details. Rarely, beside very general prohibitions or bans, do sports federations present complete and detailed policies in this field [see, for examples: The World Curling Federation Conflict of Interest Policy; World Karate Federation Conflict of Interest Regulation, International Fistball Association Conflict of Interest Policy, the WFDF Conflict of Interest Policy. On Conflict of Interest, see also the IOC Rules Concerning Conflicts of Interest Affecting the Behaviour of Olympic Parties].
Among the texts specifically designed to prevent and fight betting, match manipulation and the related offences, the rules adopted by the supreme authority of the worldwide modern Olympic movement - the International Olympic Committee (IOC) - play a major role and represent, at least for the recognized federations, the common minimum standard of compliance. Since 2006, the IOC Code of Ethics has prevented all participants at the Olympic Games from betting on Olympic events and obliges all participants to report any approach or suspicion of manipulation. In addition, specific rules have been drafted for each edition of the Olympic Games. In 2015, the IOC adopted a more stringent guide, the Olympic Movement Code on the Prevention of the Manipulation of Competitions. The purpose of the Code is to provide all sports organizations and their members with harmonized regulations to protect all competitions from the risk of manipulation. All National Olympic Committees, International Federations and their respective members at the continental, regional and national levels, as well as IOC recognized organizations should, therefore, take appropriate measures within their power to implement by reference, or to implement similar regulations, or even more stringent ones than this Code.

First, the IOC defines the violations in order to avoid any possible uncertain interpretations. Manipulation in sports competition is “an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the sports competition with a view to obtaining an undue Benefit for oneself or for others”. Betting is “any wager of a stake of monetary value in the expectation of a prize of monetary value, subject to a future and uncertain occurrence related to a sports competition”. Finally, corrupt conducts are defined as “providing, requesting, receiving, seeking, or accepting a Benefit related to the manipulation of a competition or any other form of corruption”. The Code then prescribes, at Article 3, the minimum standards that must be respected by all sports organizations in implementing disciplinary procedures, while it requires sports organizations to “impose an appropriate sanction upon the Participant from the range of permissible sanctions, which may range from a minimum of a warning to a maximum of life ban” under Article 5.

Except for a few of them (in relation to which no evidence of implementation is yet available), federations have implemented the Code either by adopting their own policies or by reference to the IOC one.

As far as the definition of violations is concerned, some federations have extended or specified the one provided by the IOC. The specific match-fixing offence may be found as dissociated from the act of betting on a fixed sport event or competition. With reference to the manipulation conducts, the choice to adopt a more wide-ranging or detailed definition of violations is quite common [see, for example: AIBA Disciplinary Code; FIBA Internal Regulations 2010. Book 1 – General Provisions. – Appendix 4. Betting And Corruption; FIE Betting and Anti-Corruption Rules; FIS Rules on the Prevention of the Manipulation of Competition; FISA. Manipulation of Competition and Betting; INF Anti-Corruption Code; IFAF Betting and Anti-Corruption Rules]. However, it is less common, although equally present, for the offence of betting [see, for example: IWF Guidelines on Competition Fixing; WTF Bylaws on Betting and Anti-Corruption; FIS Rules on the Prevention of the Manipulation of Competition; FISA Manipulation of Competition and Betting; IWF Guidelines on Competition Fixing; WTF Bylaws on Betting and Anti-Corruption].
Even sports federations that are not recognized by the IOC have voluntarily implemented specific anti-corruption rules, with a high level of commitment and the use of a large range of tools [the International Sambo Federation (FIAS), for example, has issued the *FIAS Rules on Betting and Anti-Corruption*, the *FIAS Code of conduct on sports betting integrity for athletes, officials and event participants*, and the *FIAS Action Plan against illegal and irregular betting and match fixing*. The International Fistball Association (IFA) has adopted the *IFA Rules against illegal and irregular betting and match fixing*. The World Minigolf Sport Federation (WMF) implemented the *WMF Code of Conduct On Sports Betting Integrity*, and the *WMF Rules Against Illegal and Irregular Betting*. The World Darts Federation has implemented the *WDF Anti-Corruption Code*. Most of these tools, listed in the second section of Chapter 2, demonstrate/prove significant accuracy in the description of violations, preventive measures and enforcement systems, sometimes going even further than the minimum standards suggested by IOC.

As far as the enforcement system is concerned, disciplinary measures and procedural provisions are internal matters of each sports organization. Every sport organization has its own penalty system and internal justice bodies, which is responsible for settling disputes and guaranteeing the correct interpretation of sporting rules and regulations.