



ASSOCIATION OF NATIONAL OLYMPIC COMMITTEES  
ASSOCIATION DES COMITÉS NATIONAUX OLYMPIQUES  
ASOCIACIÓN DE COMITÉS OLÍMPICOS NACIONALES

## **ANOC Compliance Policy**

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**Proposed draft  
ANOC Legal Commission  
02.06.2016**

## POLICY ADOPTION, TERM, AND APLICABILITY

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**Policy Adoption:** This ANOC Compliance Policy (the “Policy”) was adopted by the ANOC Executive Council at its meeting on 4 August 2016.

**Policy Term:** This policy will remain in effect unless and until revised or abolished by formal action of the ANOC Executive Council.

**Policy Applicability:** The Policy governs all of ANOC, its paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members.

**Policy Questions, Concerns:** Should you have a question or concern about the Policy or its application to a particular circumstance you may contact the ANOC Secretary General for assistance.

## POLICY FUNDAMENTAL PRINCIPLE

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### ***We are committed to the Fundamental Principles of Olympism***

ANOC is an unconditional supporter of Olympism and the Olympic Movement. The values and principles enshrined in the Olympic Charter underlie all that ANOC does. To act contrary to them is the antithesis of all that ANOC stands for.

ANOC cannot and will not tolerate its paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members acting in violation of the Olympic Charter, the ANOC Constitution or ANOC Code of Ethics, the IOC Code of Ethics, or their implementing provisions or policies. Acting in compliance with them is the only permissible course of action, no matter the cause for any violation.

## POLICY SPECIFICS

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### **1. *We are committed to good governance***

ANOC adopts and is committed to respect for the Basic Universal Principles of Good Governance of the Olympic and Sports Movement, including without limitation:

- transparency
- responsibility
- accountability

It is required and expected that all ANOC operations and activities in which it engages will honour these Principles of Good Governance.

### **2. *We are committed to integrity – no corruption***

ANOC will not tolerate corruption.

Corruption is contrary to Olympism. In addition, many countries treat corruption as a crime, regardless of whether the actual act takes place in their jurisdiction or in another country. Consequently, ANOC shall stand strongly against and firmly sanction any corrupt activities.

Thus, ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members are strictly prohibited from engaging in or attempting to engage in any conduct in contravention of the Olympic Movement Code on the Prevention of the Manipulation of Competitions, the World Anti-Doping Code, or any other form of corruption.

ANOC will not entertain any business dealings, or the awarding of any Games, hosting rights for a General Assembly, or other ANOC event, that involve the violation of any applicable laws or ANOC policies or rules relating to the granting or acceptance of favors.

The granting or acceptance of gifts must take place in compliance with the law as well as ANOC's Code of Ethics. In any situation where stricter rules and laws apply, then they must be observed as well.

A gift or advantage can take many forms. Examples include: cash, invitations to events, airline tickets, hotel stays, employment or a contract for oneself, a friend or relative, special personal favors and even the provision of lavish food or drink. Prohibited gifts include those given indirectly to, for example, friends, relatives or associates.

ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members are not allowed, under any circumstances, to demand personal gifts in connection with the performance of their duties. Likewise, they may not offer or grant gifts of cash, or gifts equivalent to cash, to any private individual or public official.

In all of their dealings, ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members must avoid granting or accepting any gifts in connection with the negotiation, award or performance of a contract or in the awarding of any Games, hosting of a General Assembly or other ANOC event. Any gift granted or accepted must be of a size deemed unobjectionable under the laws applicable to both the giver and the recipient. In case of doubt, please contact the ANOC Secretary General.

ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members are strictly prohibited from unlawfully influencing, or attempting to unlawfully influence ANOC business partners, whether through favors, gifts, or the granting of other advantages, anywhere in the world. This prohibition particularly applies to dealings with individuals acting on behalf of government agencies or other public institutions. Equally, ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members must not permit themselves to be influenced, or appear to be influenced, through the acceptance of favors, gifts, or the granting of other advantages from those who do or seek to do business with ANOC or seek some other benefit from ANOC such as to hold an ANOC Games, General Assembly, or other event.

**3. We are committed to the principle of sustainability – with respect to both human health and the environment**

ANOC is committed to:

- Protecting the environment and the health and safety of its employees and all those who in any way participate in its activities. This is extremely important to the way ANOC conducts its business.
- Sustainable development.

**3.1 Environmental protection**

ANOC believes in making its contribution to sustainable development through the efficient use of the resources it consumes. ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members are expected to explore all reasonable opportunities to limit consumption in order to reduce the consumption of energy and the equipment, materials and supplies ANOC uses.

**3.2 Work safety**

Employees who work in ANOC offices must be properly trained, and be properly supervised, and never put in a position of working in an unsafe working environment.

**3.3 Occupational health and safety**

Maintaining the health of our employees is in everyone's – the employees' and ANOC's – best interests. All necessary and reasonable steps must be taken to prevent accidents and illness owing to or arising from the employee's workplace or work.

Employees share in the responsibility for occupational safety in the workplace. Sometimes accidents occur because we become less careful.

Extreme care must be exercised when dealing with potential sources of danger. Every employee and ANOC volunteer must strictly and constantly observe all safety rules in his or her respective workplace: for his or her personal benefit, and for the benefit of colleagues and ANOC as a whole.

When an incident occurs, the responsible supervisor must immediately notify all required persons and agencies, and must immediately take all reasonable steps to mitigate the harm to the employee and workplace.

**4. We are committed to respecting confidentiality**

All of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members are required to maintain the confidentiality of any non-public information about ANOC and its dealings that is of a confidential nature.

Using such confidential or inside information of ANOC for personal gain or the gain of others is prohibited.

**5. *We are committed to proper record-keeping and transparent financial reporting – no deception***

An internal control system must provide for proper documentation of an entity's key business processes and the establishment of controls to ensure that all transaction details relevant for accounting purposes are fully and correctly captured.

Files must therefore be complete, orderly and readily understandable. All records and files must be kept in such a way as to permit delegation to a colleague at any time. Employees and individuals holding ANOC volunteer positions possessing ANOC internal records and files must retain records for as long as statutory or internal provisions require, and must never destroy documents relevant to threatened, prospective, or pending official or judicial proceedings.

Any item of correspondence, whether a letter, fax, email or even verbal comment, must be communicated in observance of proper etiquette and be clear and consistent in content so that it can be presented or delivered to a third party (such as an investigative body, court of law, other governmental institutions or certified public accountants). Comments attributable to ANOC that are inappropriate, unclear, incomplete, or made in haste may be extremely damaging because they can be misinterpreted, misused, or taken out of context. Employees and individuals holding ANOC volunteer positions must be courteous and professional when using email and other forms of online communication.

The following additional guidelines are essential for ensuring accurate and timely financial reporting:

All items with accounting relevance must be supported by complete and correct documentation and entered into the books accordingly. ANOC's accounting records and related documents must fully and accurately reflect all financial transactions and give a true and fair view of ANOC's assets and liabilities.

Every one of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members tasked with presenting information that is relevant to ANOC's financial reporting is responsible for ensuring that this information is complete and accurate. Employees and individuals holding an ANOC volunteer position must promptly notify the ANOC Secretary General in any instance where they have reason to doubt whether financial transactions have been correctly presented in financial reporting.

ANOC's annual audited financial statements are to be prepared in accordance with International Financial Reporting Standards.

ANOC will be guided by the principles of full disclosure and transparency in its financial reporting to its members.

**6. *We are committed to fair and respectful working conditions – no discrimination – no harassment***

No person is to be unfairly treated, disadvantaged, favored, harassed, or ostracized because of race, religion, politics, gender, sexual orientation, or other protected class in the particular country where an ANOC activity is taking place.

Everyone has the right to be protected against discrimination and harassment of any kind whether within ANOC or in ANOC's dealings with outside parties.

ANOC expects its employees and individuals holding ANOC volunteer positions to be courteous, objective, fair and respectful in their dealings with colleagues and third parties. By doing so, they also make an active contribution toward protecting ANOC's good reputation.

The responsibility for maintaining these standards of conduct rests with each and every employee and individual holding an ANOC volunteer position. Any violation must be referred to ANOC's Secretary General, or in the case of the Secretary General's involvement in the violation, to the President, who if necessary, will take the required action to appropriately address any wrongdoing and to prevent a repeat violation.

**7. *We are committed to keeping ANOC and personal interests separate – avoidance of conflicts of interest***

ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members must separate their own personal interests from those of ANOC.

Conflicts of interest – and even the mere appearance of such conflicts – must be avoided. A list of typical areas of conflict is given below. Where a conflict appears likely, ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members should disclose the conflict and seek assistance from the ANOC Secretary General.

- Personnel decisions: A person's own individual interests or relationships must not influence personnel decisions.
- Business relationships with third parties: Business relationships with third parties must be formed on the basis of objective criteria (for example, price, quality, reliability, technological standard, trustworthiness and capacity to deliver, existence of a long-standing and trouble-free business relationship).
- The execution of a contract or continuation or termination of a business relationship with a third party must not be influenced by personal relationships, personal interests or tangible or intangible personal advantages. The supply of products or provision of services to ANOC by companies that are controlled by ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members, or their close relatives, must be subject to close scrutiny and generally avoided.
- Contracting of suppliers or other business partners of ANOC for personal purposes: If one of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members wishes to place a personal supply or other business contract with a person or entity that also has a pre-existing business relationship with ANOC and that employee or individual holding an ANOC volunteer position is in a position to directly or indirectly influence ANOC's business relationship with the supplier or business partner in question, which includes Games Organizing Committees and Organizing Committees of ANOC General Assemblies or other events, the employee must

notify the ANOC Secretary General and receive the Secretary General's permission before placing the contract.

- Using the services of ANOC employees for personal purposes: ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members may not abuse their authority by availing themselves of the services of ANOC employees for personal purposes.
- Use of ANOC property (for example, equipment, goods, vehicles, office supplies, documents, files, data storage media): Employees and individuals holding ANOC volunteer positions may not use items belonging to ANOC for their own personal purposes or remove such items from ANOC's premises or control without the Secretary General's express consent. Likewise, no data, programs or ANOC papers may be copied or removed from the ANOC's premises or control without approval from the Secretary General.
- Use of the Internet and email system: ANOC provides Internet access and electronic communications for business purposes. Occasional, minimal use of the business Internet connection for private purposes during individual breaks is permitted. This permission may be revoked at any time. Private Internet use must be strictly limited in duration and must not interfere with an employee's duties. Use of the email system provided by ANOC is for business purposes only. The email system must not be used for private purposes.
- Personal involvement in political parties or other sport, social or political institutions: ANOC welcomes its employees' and individuals holding ANOC volunteer positions voluntary involvement in such organizations, and employed positions in the case of individuals holding ANOC volunteer positions, as long as it does not interfere with the performance of their duties for ANOC.
- Public expression of personal opinions by ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members: When expressing their personal opinions in public, employees and individuals holding ANOC volunteer positions must carefully avoid creating or fostering any impression that these opinions represent the views of ANOC.

**8. *We are committed to cooperating with our sport partners and with the authorities – no misinformation***

ANOC endeavors to be cooperative in its dealings with all sport partners and with authorities and government agencies while at the same time defending its own interests and rights.

ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members responsible for collecting company information and communicating to others or for the purpose of public announcements should communicate such information completely, openly, correctly, in a timely manner and understandably.

## POLICY APPLICATION

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ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members must adhere to this ANOC Compliance Policy. It is intended to protect both ANOC and its employees, and individuals holding ANOC volunteer positions.

This policy defines the framework within which ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members can act with confidence and directly benefits them by, among other things, safeguarding them from discrimination and establishing rules for the conduct of ANOC's business. Its observance therefore is in the best interest of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members both as individuals and as important contributors to ANOC's success.

Everyone who is part of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members is called upon to review his or her own behavior in light of the standards set forth in this ANOC Compliance Policy and to ensure that these standards are observed.

ANOC paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members should bear in mind that there are specific laws and internal policies that address in greater detail the topics discussed here. Employees and individuals holding ANOC volunteer positions are required to familiarize themselves with the applicable laws and ANOC internal policies governing their areas of engagement and to follow these laws and policies in their daily work or other ANOC engagement. Any ambiguities should be clarified by the employee or individual holding an ANOC volunteer position before acting.

Each member of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members is expected to set an example through his or her conduct by acting with integrity and thereby ensuring that compliance is internalized as a fundamental part of ANOC's culture.

All of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members are required to immediately report any violations of the ANOC Code of Ethics.

The principles set out in this ANOC Compliance Policy are implemented in the ANOC Code of Ethics and other ANOC policy and compliance documents. The ANOC Code of Ethics includes a requirement that any ANOC employee or volunteer must report Code violations.

When members of ANOC's paid and volunteer administration and officials including without limitation its staff, Executive Council members, Commission and Working Group members suspect corruption or the intentional mishandling of ANOC property or finances, for example, embezzlement, fraud, breach of trust or the offering or acceptance of bribes, they should report the matter without delay.

Promptly reporting this kind of information is likely to save ANOC from suffering additional, more serious harm or at least mitigate the damage, and importantly bring the wrongdoing to an end as soon as possible.