

# INTERNATIONAL TRADE CONTROL DIRECTIVES

FIFA®





Key message



Definition/example



Reference

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## WHY WE NEED THESE DIRECTIVES

FIFA undertakes activities throughout the world and consequently must comply with all applicable laws imposing international trade controls, sanctions and embargoes. These directives clarify what we must do to ensure that FIFA and FIFA team members comply.

## HOW WE ADDRESS INTERNATIONAL TRADE CONTROLS

### GENERAL PRINCIPLES

FIFA is devoted to maintaining the highest ethical standards in preventing unlawful practices while growing the game and enhancing the football experience. We must therefore be familiar and comply with applicable international trade laws and FIFA's internal requirements.

The applicable laws and regulations are complex and constantly changing. Therefore, in order to remain compliant, please consult the relevant guidance (see annex for resources). In case of doubt, please contact the FIFA Compliance Division.

These directives apply to all FIFA team members.

### KEY LEGAL REQUIREMENTS

Government institutions and international non-profit organisations (e.g. the United Nations) may impose restrictions on transactions with countries, organisations or individuals. Such restrictions are commonly referred to as "sanctions" or "embargoes".

Many of these restrictions come from international bodies such as United Nations Security Council resolutions. Some sanctions are imposed by a single country in furtherance of their national foreign policy objectives.



For FIFA and FIFA team members, the following legislation relating to sanctions is relevant:

- the laws of Switzerland
- the laws of the countries in which we operate
- the laws of the currency in which we deal (e.g. USD)
- the laws of the country of citizenship/residency, regardless of our place of work (e.g. a FIFA employee who is a US national and/or a national of a European Union country)

**SANCTION LAWS CAN BE BROAD IN THEIR APPLICATION:**

- transactions with its commercial partners, member associations, confederations and local organising committees;
- dealings with individuals and organisations, including players, referees, agents and international organisations (e.g. invitations to/participation in FIFA meetings and events);
- shipments of certain types of items/products (e.g. football equipment) to sanctioned countries or individuals.

**CONSEQUENCES OF FAILING TO COMPLY WITH THESE DIRECTIVES**

The trade control laws that are the subject of these directives are vigorously policed and enforced by national governments, including the Swiss Federal Government.

Any breach of these laws by FIFA or by FIFA team members may result in fines and serious damage to FIFA's reputation. In addition, FIFA could be prohibited from engaging in certain transactions with some countries if it is found to have been non-compliant with the relevant laws, which is why FIFA takes the subject so seriously.

**EXAMPLE OF CORPORATE LIABILITY**

A non-US-based firm transferred US dollars via its bank in Asia to pay for goods and services in connection with a project. The Office of Foreign Assets Control (OFAC) declared US jurisdiction on this transaction, as US dollar transfers were processed via a US bank, and consequently penalised the firm for violations of US sanctions and causing the bank to violate sanctions by processing the payments. The firm was required to pay USD 11 million.

Any FIFA team member found to have intentionally breached these directives or any international trade laws may be held personally liable and may also face disciplinary action, including the possibility of termination of employment.



If you have any questions about the applicable international trade controls laws or these directives, you can contact the Compliance Division at [compliance@fifa.org](mailto:compliance@fifa.org) or your dedicated compliance adviser.

## COMPLIANCE WITH INTERNATIONAL TRADE CONTROLS IS EVERYONE'S RESPONSIBILITY

The primary responsibility for complying with these directives lies with the **FIFA division or department performing the transaction or activity**. Every FIFA team member must take the relevant action to escalate any potential risk. For additional guidance, tailor-made decision trees for each division/department are available on the intranet.

Training on the applicable international trade control laws is available as part of each new FIFA employee's induction and at regular intervals thereafter. Additional training is available upon request and members of the Compliance Division are always available to answer any questions that may arise.

## FOCUS AREAS



Every FIFA team member must seek approval from the FIFA Compliance Division before engaging in a transaction or payment with a person or organisation from any of the key focus areas listed in the annex.

Around 30 countries and 1,500 designated organisations and individuals are currently subject to some form of economic or financial sanctions.

## GEOGRAPHICAL SANCTION FOCUS AREAS

Geographical sanctions restrict transactions with individuals and organisations in certain **countries/regions**. Sanctions are generally limited in their purpose and nature, for example:

- Some sanctions target specific categories of products or technologies (e.g. luxury items);
- Others are aimed at items that can be used for military purposes (e.g. weapons).

However, some sanction regimes are more comprehensive, banning almost all forms of trade and financial transactions with individuals and organisations within the specified country or region.



## KEY FOCUS AREAS

The key focus areas are those countries and regions with the most restrictive international trade control restrictions (sanctions).



Note: sanctioned countries, organisations and individuals are subject to constant change. For the latest list of key focus areas, please refer to the annexe of this document.

## SANCTIONED INDIVIDUALS AND ORGANISATIONS

The names of individuals and organisations that are subject to sanctions are published by the Swiss State Secretariat for Economic Affairs (SECO), the European Union and other national governments, including the United States.

These restrictions target individuals and organisations who are suspected of involvement in terrorism, organised crime or oppressive political regimes. They are generally referred to as "designated persons/entities". Countries or regions that have an above-average number of such sanctioned individuals and organisations are listed in the annexe.

FIFA prohibits the entering into of any commercial agreement or facilitating of any transaction with a designated person/entity where to do so would be illegal. Restricted activities could include the provision of financial support or any benefit granted (including travel or accommodation).



Every FIFA team member must undertake reasonable due diligence on counterparties with which they deal, in accordance with the guidance provided and take particular due care of (key) focus areas. When in doubt about the propriety of a transaction, contact the FIFA Compliance Division.

## FINAL PROVISIONS

### COMPLIANCE DIVISION'S RESPONSIBILITIES

The Compliance Division supports the implementation of these directives through education and training as well as by providing advice and guidance to FIFA employees. Compliance procedures and tools, including sanction-screening software and decision trees tailored to the activities of certain FIFA divisions/departments, are available to facilitate compliance with these directives.

The Compliance Division will periodically monitor and test the execution of these directives.

### OFFICIAL LANGUAGES

The present directives are issued in English and German. If there are any discrepancies in the interpretation of the different versions of these directives, the English text shall be authoritative.

### ADOPTION AND ENFORCEMENT

These directives were approved by the FIFA Secretary General on 10 May 2018 and come into force with immediate effect.

Zurich, 10 May 2018



FIFA Secretary General  
Fatma Samoura

## **ANNEXE**

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 **RESOURCES**

- Code of Conduct
- Reputational Risk Directives
- Gifts and Hospitality Directives
- Donations Directives
- Screening Guidelines
- Screening Decision Trees
- Internal Organisation Directives

 **DEFINITIONS****FIFA team members**

- The Secretary General
- The Deputy Secretaries General
- The Chief Officers
- All other employees of FIFA
- All freelancers and volunteers (to the extent permitted by law)
- All employees and members of executive bodies of FIFA's consolidated subsidiaries

**FIFA Compliance Division**

Your dedicated adviser or any member of the Compliance Division. The Compliance Division in general can be reached via [compliance@fifa.org](mailto:compliance@fifa.org)

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