



**- CONMEBOL -**  
FÚTBOL DESDE 1916

# **Anti-Corruption Policy**

**CONMEBOL**  
SOUTH AMERICAN FOOTBALL  
CONFEDERATION

**Anti-Corruption Policy**



<b>CONMEBOL</b> SOUTH AMERICAN FOOTBALL CONFEDERATION	<b>Anti-Corruption Policy</b>	Effective Date: 02/15/17			
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## Introduction

The South American Football Confederation, hereinafter referred to as CONMEBOL, is responsible for ensuring unrestricted compliance with the local and international regulatory framework. We have adopted principles, good business practices and policies aimed at structuring our operations within a framework of ethics and transparency that guarantee the continuity and sustainability of our activities. In addition, we seek to safeguard CONMEBOL's image and reputation, as well as to contribute to and positively impact its stakeholders, the government, and society in general, placing institutional principles and values first.

### 1. Purpose

The purpose of CONMEBOL's Anti-Corruption Policy is to publicly declare its commitment to act ethically and transparently before its related parties and stakeholders and to conduct its activities as a socially responsible institution, working with a philosophy of zero tolerance to acts that contravene our guiding principles.

### 2. Scope

This policy is applicable to all related parties and stakeholders, which are understood as: Members of Congress, Council, Permanent Committees, Member Associations, authorities, administration, employees, clients, suppliers of goods or services; and in general, to all those with whom, directly or indirectly, a contractual or cooperative relationship is established.

### 3. Glossary

- **Corruption: Corruption** is understood/defined as any act, attempt or deliberate omission to obtain a benefit for oneself or for third parties to the detriment of the guiding principles, regardless of the financial effects on CONMEBOL.
- **Bribery: Bribery** consists of offering, promising, giving, accepting, or requesting compensation, economic or of another type, in order to obtain an advantage of a commercial, contractual, regulatory or personal nature.
- **Facilitation payments not provided for by law:** they are a form of bribery made with the purpose of expediting or facilitating the actions of a person who is employed by either a private entity or a government official.
- **Improper Payments:** These are payments made for any valuable asset in order to obtain or secure business to achieve an undue economic advantage. It is not necessary that something of value actually changes hands to violate International Anti-Corruption Laws.



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The term “any valuable asset” is very broad and includes (illustratively but not limitatively):

- ♣ Money, gifts or personal favors;
- ♣ Food and entertainment;
- ♣ Securities values;
- ♣ Assuming or forgiveness of debts.

#### 4. Regulations and guiding principles

The central element of this policy is the set of all the governing documents such as the Statute, Manual for the Prevention of Money Laundering and Financing of Terrorism, Code of Ethics, Governance Regulations, Code of Conduct, Disciplinary Regulations, Code of Conduct for suppliers, guiding principles, and practices of good governance, where the guidelines that must be applied in CONMEBOL are expressed.

These regulations presuppose the condition of integrity that all CONMEBOL related parties and stakeholders have as ethical citizens. The application of this regulation and the guiding principles will not be discretionary, nor will it allow interpretations that give or attempt to give the appearance of legality to acts or situations where there are clearly reasonable doubts as to their pertinence and legality.

In the event of any doubts about its application, the governance bodies described later in this document should be consulted.

The guiding principles that conform to this policy are as follows:

##### • a. Consistency

All related parties and stakeholders (as detailed above) regardless of rank or hierarchical position in the institution, are benchmarks for acting in accordance with our condition as exemplary citizens; as well as institutional principles and practices, setting an example with our behavior.

None of CONMEBOL's related parties and stakeholders may directly or indirectly participate, hide or sponsor acts of corruption, whether involving public or private entities, both local and foreign.

##### • b. Commitment

The commitment to the prevention of anti-corruption practices implies a dynamic model of supervision and monitoring of corruption risks; therefore, the risk maps of the processes must be evaluated and ensure that the administration and control measures are reasonably shielding CONMEBOL from corrupt practices. Prevention must be developed under risk management principles, with emphasis on preventive measures and mechanisms, rather than detection or corrective framework.



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**• c. Responsibility**

Any fact reported or detected that has some kind of relationship with corrupt practices, either with public or private entities, will be carefully investigated, documented, and analyzed by the competent bodies of CONMEBOL. Those situations that indeed correspond to acts of corruption will be penalized; regardless of the amount, characteristics or hierarchical position of those responsible, keeping proportionality with the facts and guaranteeing due process. CONMEBOL's response to this type of situation will imply administrative sanctions, as well as the sanctions that may apply according to the competent legal bodies.

**• d. Obligation to report**

All related parties and stakeholders (as detailed above) are obliged to notify CONMEBOL of any facts or circumstances that may be considered acts of corruption. For this, the different channels arranged by CONMEBOL may be used for this purpose; protected by the principles of anonymity, non-retaliation and the confidentiality of the complainant established in Law 977/1996 Art. III paragraph 8, approved by the Inter-American Convention against Corruption and ratified by the Congress of the Republic of Paraguay. It is guaranteed that no one will be subject to any type of harmful treatment, retaliation or questioning for refusing to participate in corruption-related actions, or for presenting reports or complaints in which, in good faith, expose their suspicions related to corruption.

**• e. Transparency and legality**

The facts or circumstances that are detected and verified will be reported in accordance with the established protocols to the different stakeholders, respecting the official spokespersons of CONMEBOL for these matters, ensuring transparency, ethics and legality.

**5. Bodies and Committees of CONMEBOL. Responsibilities**

The Human Resources Department will be responsible for the compliance with this policy by CONMEBOL employees, through the distribution and communication of these policies once they have been approved.



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**a) Governance and Transparency Committee**

The Governance and Transparency Committee will ensure the correct application of the Anti-Corruption policy and will supervise that it is kept up to date. Likewise, it is the consulting and advisory body of the Ethics and Compliance Department in the event of any doubt regarding the interpretation and application of this policy.

**b) Compliance and Audit Committee**

It will be responsible for supervising the evaluations of compliance with the policy, ensuring its proper implementation, verifying aspects identified by the internal and/or external audit that hinder compliance with the policy, and proposing the measures or updates it deems appropriate and that lead to a strengthening of the policy.

**c) Finance Committee**

It will be responsible for supervising the internal and external audit reports and presenting the observations it considers to the Board, as well as ensuring the proper implementation of the Anti-Corruption policy.

**d) Ethics Committee**

It will be responsible for exercising disciplinary functions in accordance with what is established in the Code of Ethics and in the Disciplinary Regulation.

It will be responsible for dealing with complaints about acts of corruption that are brought to its attention and for ordering the appropriate investigations, in order to identify the sources that allowed the materialization of the risks and to provide feedback to the respective process owners about these vulnerabilities.

**e) Ethics and Compliance Department**

It will be responsible for proposing and supervising the implementation and adoption in CONMEBOL of anti-corruption principles and practices through control systems, as well as constant monitoring of compliance. The improvement plans, product of the deviations identified in the evaluations carried out by the Internal or External Audit, will be carefully supervised by this Department, in order to ensure that such measures are effective and contribute to the prevention of risk both from the probability of occurrence as well as the impact for CONMEBOL.

In addition, it will be responsible for the training aimed at consolidating the culture of compliance.



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**a) Secretary General**

The Secretary General will motivate and facilitate the incorporation of this policy in CONMEBOL's management models.

**b) CONMEBOL's related parties and stakeholders.**

They will be responsible for the unrestricted adoption and application of the Anti-Corruption policy, acting in accordance with the guiding principles.

**6. Effective Date**

This policy shall become effective upon its approval and shall remain valid for the duration of the relationship with CONMEBOL. Its principles and guidelines will be applied as established; any deliberate or intentional breach of it will be considered a serious offense.

The full text of this translation, as well as the documents derived from it, have been drafted in Spanish and, in case of discrepancies, the Spanish language version shall take precedence for its interpretation.