



FIFA®

COMPLIANCE HANDBOOK

2025 edition

FIFA COMPLIANCE HANDBOOK

Over the years, we have built a strong compliance culture, underpinned by essential elements such as the FIFA Code of Conduct, targeted training programmes, comprehensive risk assessments, thorough third-party due diligence and robust internal audits. These initiatives have collectively strengthened our commitment to integrity and transparency in football governance.

Our ongoing goal is to safeguard football and to create compliance resources that are accessible and easy to use for all stakeholders. We believe that by providing clear and practical guidance, we can foster a culture of compliance that is deeply embedded across all aspects of our operations.

In 2020, the first edition of the FIFA Compliance Handbook was published, and through this updated version, we aim to equip our member associations, the confederations and other sporting bodies with the best practices required to uphold the highest standards of conduct. This handbook is designed to be user-friendly, and it offers straightforward, actionable advice that can be easily incorporated into daily activities.

Compliance, much like football, is a team sport. Every individual within and outside of our organisation has a crucial role to play in maintaining the integrity of the world's greatest game, both on and off the pitch. By working together and adhering to the principles outlined in this handbook, we can continue to promote a culture of fairness, accountability and excellence.

**Thank you for your commitment to upholding the values that make football
THE WORLD'S GREATEST GAME!**



Emilio García Silvero
Chief Legal & Compliance Officer



Anja Zumkeller
Director of Compliance, Audit, Risk & Advisory



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Welcome to the FIFA Compliance Handbook

Wherever you are on your compliance journey, this handbook provides you with the building blocks to develop or enhance a compliance programme that works for your member association. It is an update of the 2020 edition and is full of practical resources, including templates, checklists and decision-making aids, which are to be shared with your team members, as well as the latest thinking and best practice in organisational compliance.

Who is this handbook for?

It is for everyone involved in compliance across our member associations and the confederations, as well as other sporting bodies, as we continue to play our part in inspiring the global sports compliance community.

What is this handbook for?

It is a tool designed to support compliance across our member associations and the confederations. We want to help our compliance community by providing strategies, ideas and advice, as well as sharing best practice to help you to create a compliance programme that works for you.

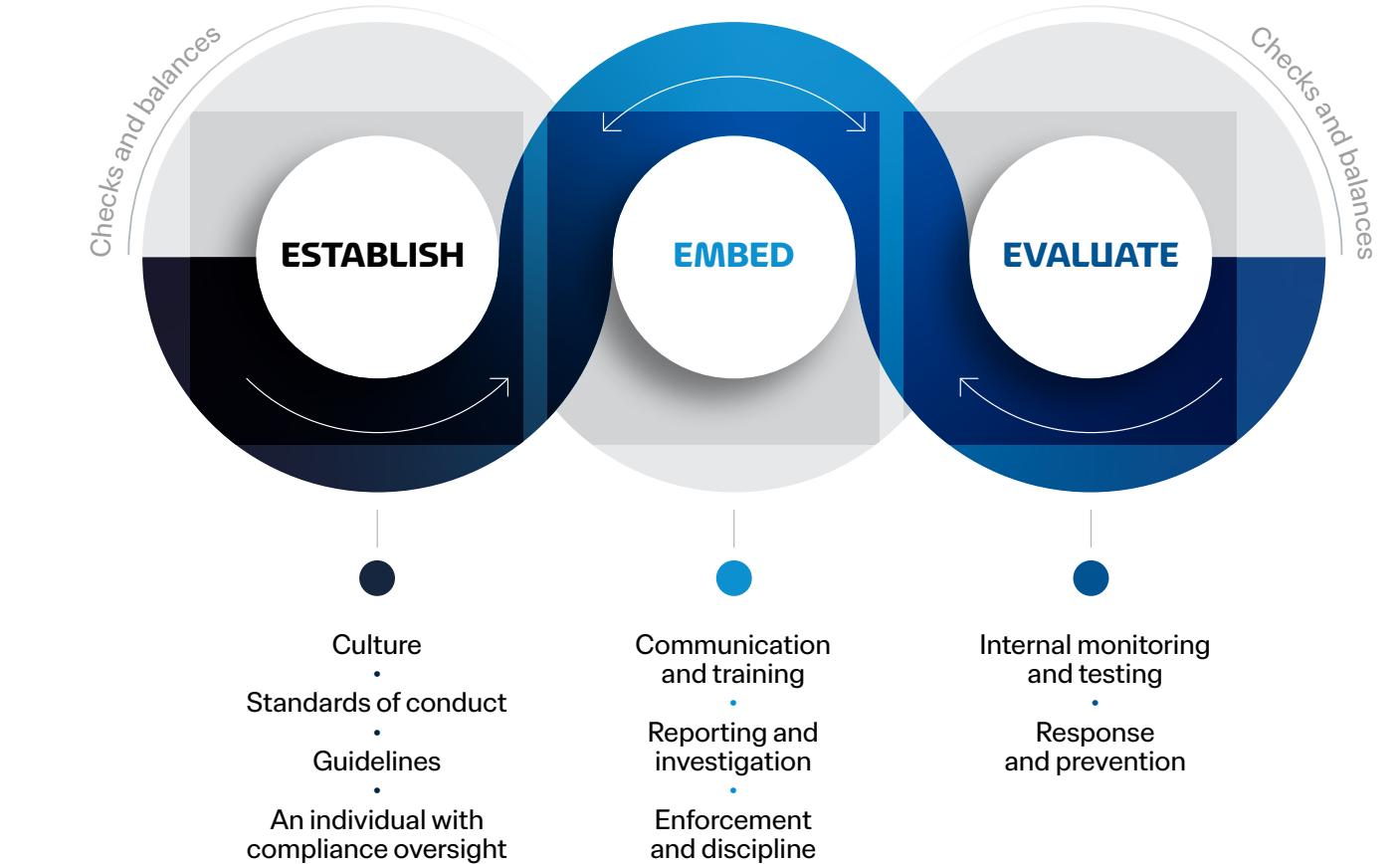
Creating a framework for an **effective** compliance programme



There are some generally accepted best practices for compliance programmes that have been adopted internationally and across industries. FIFA developed the

“Establish, Embed, Evaluate”

approach to compliance, which brings these basic elements together in an organised framework to create a world-class compliance programme.



Establish



Culture, standards of conduct and guidelines

Compliance starts with culture

A true compliance culture is about more than just policies and procedures.

Compliance belongs to everyone: getting it right is about creating a culture so that everyone across your member association knows how to do the right thing. But that starts with you. As a member of our global compliance community, you are a role model for fair play and when it comes to uniting the world through football every day.

Think of it this way: it is simply not possible to create rules and regulations for every single situation that might happen in today's complex world. It is much more effective to empower your team members by creating a flexible, supportive compliance framework and culture that is fully supported and endorsed by senior management. After all, **compliance starts at the top**.

We believe that there is always something new to learn from the members of our passionate community, so whether you are just starting out or working with an established compliance culture, you have come to the right place.



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Creating a compliance framework

The rules of the game

There are no hard and fast rules about creating a compliance framework. The idea is to create guidelines that cover the high-risk areas and to provide associated processes for your team members to follow in their daily work. Examples of typical high-risk areas are anti-bribery and corruption, conflicts of interest, gifts and hospitality, and fraud.

Even if you have a mature framework in place, it is always worth making sure that it still fits the needs of your organisation, which evolve over time.

Start at the top

As a FIFA member association, you are bound by the FIFA Code of Ethics, which we believe is one of the most important documents in football because it sets out our shared standards. It shows us all how to **unite the world through football**.

We strongly recommend that you create or adopt an overarching document agreed at local level (e.g. a code of conduct) that sits at the very top of your compliance framework. The document should set out the standards that you expect, with the rest of the compliance framework flowing from it. It is also crucial that senior management sets the right tone and plays an active role in setting up the programme in order for it to be effectively embedded.



Develop guidelines

We have developed some short guidelines, which are easy to use and to understand, regarding each of our most important policies and processes. We call them pocket guides. You are welcome to adapt or adopt our pocket guides to suit your member association's needs.

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Gifts and hospitality

Giving gifts and attending events is part of business life in many cultures, but giving and receiving gifts and hospitality should never influence business decisions.

We have zero tolerance for bribery and corruption at FIFA, so your policy should set clear limits and give team members the relevant tools to make good decisions. For example, our FIT (frequency, intent and timing) test asks our team members to think about the frequency, intent and timing of any offer of gifts or hospitality. It is a simple but highly effective tool.



[Pocket guide](#)



Anti-bribery and corruption

A bribe is defined as the giving or receiving of anything that aims to gain a business advantage.

At FIFA, we do not tolerate corruption, which means that we do not give or receive payments or goods to gain a business advantage. We steer clear of political contributions too and screen potential partners very carefully. As well as following FIFA's rules, stakeholders are responsible for complying with the law in the relevant country/territory, so your policy must reflect both.



[Pocket guide](#)



Conflicts of interest

Conflicts of interest can arise when individuals have interests, activities or relationships that could affect their responsibility to football.

They can be real or perceived – both matter. While conflicts of interest may sometimes seem trivial, they can have a big impact on the reputation of the game. It is important to have guidelines and mechanisms in place that encourage team members to speak up, such as FIFA's disclosure process. It is always better to raise the matter, discuss the risks and put safeguards in place than to let situations get out of control or go under the radar.

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Reputational risk

Compliance belongs to everyone. Ultimately, every team member is responsible for making sure that their member association does not become involved in criminal activity. One way to help to achieve this is by carrying out careful due diligence on potential partners and third parties.

The stakes are high: there is always a risk of exposing the organisation to reputational damage or breaking international sanctions or embargoes, so everyone in your organisation needs to know what to do and how to understand the constantly changing picture.

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[Pocket guide](#)



[Pocket guide](#)



Raising concerns

At FIFA, we all follow the same rules, play fair and maintain the integrity of the world's greatest game. We work together to create a culture of respect in which everyone can flourish. Part of this involves giving team members ways to speak up if they spot or suspect that something is not right. An open and a positive corporate culture requires legal, societal and corporate standards to be upheld. It is important to provide mechanisms for reporting potential misconduct that work for your member association.

An individual with compliance oversight

Designating an individual with compliance-related responsibilities is essential for your organisation's compliance programme to be effective.

This role involves overseeing the development and implementation of compliance policies, conducting communication and training to ensure that team members understand the rules of play, and promoting compliance with legal and ethical standards.

While everyone at your association shares the responsibility for compliance, not assigning a specific individual to oversee the above-mentioned activities can lead to them being neglected. Depending on your resources, the individual does not need to focus solely on compliance, but it should be a defined part of their role.

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embed

Communication and training

Developing a compliance communication and training programme helps your team to understand the rules, guidelines, external regulations and laws that apply to their work.

Base your training approach on the number of people who work for your association and the various policies and procedures in place. Whatever methods you use, remember that training is always more effective if it is based on real-life examples. Asking questions builds accountability, and if you really want to change attitudes and behaviour, make sure that compliance is built into performance reviews with a view to creating ownership. Also, just like getting ready for an important match, training regularly is usually better than trying to cover everything at once.



The following page provides some common training approaches and tools. Please remember that FIFA has lots of content that you can adopt and adapt.



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Awareness-building

Create awareness of important topics using accessible, easy-to-use formats. Video is particularly good in this sense, and it does not have to be an expensive option. You can share FIFA materials, or you could even create your own videos using a mobile phone. Any training that comes directly from colleagues is a powerful tool.

Online training

Online training helps you to reach a large audience, which makes it particularly useful for associations with a wide geographical spread. You may even want to consider using short compliance audio training sessions or podcasts, which can be accessed at any time from your team members' mobile devices.

 **Annual required training is the best practice.**

Face-to-face training

Nothing beats face-to-face training, but it does take time and planning. We recommend using it for key topics at certain times in the employee life cycle, such as annual performance reviews or when team members join the organisation. Face-to-face compliance induction training sets new employees up for success (although it is better to spread it out over the first few weeks rather than delivering it all on the first day). Remember that face-to-face training gives team members a great insight into how things really work on the ground, which is of huge benefit.



Get ready for kick-off: what is your training plan?

The next step is to create a flexible communication and training plan to fit your needs. Annual training is the goal, but if processes change or you are responding to something such as new legislation, you will need to react more quickly. Spread communications throughout the year and take advantage of any calendar triggers – for example, you could send out a reminder about gifts and hospitality just before major cultural holidays.

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Reporting and investigation

Make it safe to speak up

No matter how comprehensive your compliance framework, things do sometimes go wrong. Luckily, in football, we are surrounded by people who care about the game.

Our global community of employees, fans, officials and players are keen to tell us if they see something that is not right. Your stakeholders are your eyes and ears: it is your job to set up easily accessible communication channels with a view to enabling them to report any wrongdoing or concerns.

But people do not speak up unless they feel that it is safe to do so – that is human nature. To provide a culture in which it is safe to speak up, you need to create a non-retaliation policy for the public and your team members. The FIFA Raising Concerns Pocket Guide can help in this regard.

Learn to listen

Treat every report in good faith and ensure that the appropriate individual within your association has been tasked with handling it. Reassure those who submit reports that they will never be penalised for raising a concern that they believe to be true. Respond promptly and say what action you plan to take.

If a report or complaint is true, consider telling the individual what you have done to resolve the issue (if you can do so without breaching confidentiality). Listening is an important part of your compliance culture. Honest, open compliance leaders who are prepared to listen are vital in creating a space in which it is safe to speak up.

Blow the whistle on wrongdoing

First, help people feel that it is safe to speak up. Then, make it easy for them to contact you by creating reliable and accessible confidential reporting channels that you promote to your team members and the football community.



EMAIL

A dedicated, confidential email address is one of the simplest channels to set up. It should be widely promoted in your communications.

POSTAL LETTER

Some people still prefer to send letters, especially if internet access is difficult. Consider setting up a Freepost system so that it does not cost anything to submit a report. You could also install postboxes at the most popular stadiums in your country/territory or at your headquarters.

HOME PAGE REPORTING

These days, when people want to talk to you, they usually head to your website. Providing a hotlink allows people to submit reports safely and easily.

EXTERNAL HOTLINE

Setting up an externally run reporting hotline is a good way to promote trust, but it is expensive. If you do not have the resources to manage it properly, it is not an essential option.

Contacting FIFA:

riskcompliance@fifa.org

FIFA (Americas), Inc.
396 Alhambra Circle,
Coral Gables, FL 33134
United States

[inside.fifa.com/
organisation/contact-fifa/
contact-form](http://inside.fifa.com/organisation/contact-fifa/contact-form)

fifa.gan-compliance.com



Enforcement and discipline

Even in the best organisations, things can go wrong. When that happens, it is important that appropriate actions are taken to resolve the issue(s).

Clear and consistent disciplinary action following non-compliance or policy violations signals that unethical behaviour is not tolerated and helps to maintain high standards across your association. By providing an appropriate and a consistent response in these situations, you can also effectively promote and incentivise desired behaviours – it is a win-win.

In addition, recognising and rewarding employees who demonstrate ethical behaviour and policy compliance encourages others to follow suit. Ultimately, organisations that actively engage in effective enforcement and discipline practices contribute significantly to a culture of compliance and integrity.

evaluate



Internal monitoring and testing

The only way to find out if your framework is working is to evaluate it.

Monitoring means regularly checking key indicators to identify patterns and issues. For example, you might track the number of reports submitted to identify new and concerning trends. You should consider which key indicators make the most sense for your member association to monitor. This usually forms part of your regular reporting to senior management and other stakeholders.

Testing involves periodically reviewing your compliance programme areas, such as policies, training and communication, to see how effective they are in practice. This could include taking samples of documents to confirm whether your compliance policies were followed or talking to employees to test their understanding and awareness of compliance processes.



Given that you cannot test everything at once, it is important to establish an annual schedule.



Response and prevention

If you identify issues or improvement opportunities through monitoring and testing, the next step is to implement corrective measures to prevent non-compliance recurring and to make your compliance framework more effective. This shows employees and other stakeholders that your member association takes its policies seriously and is committed to creating an ethical and a legally compliant environment. It also helps to reduce the risk of future legal problems or reputational damage.

For example, if you find that employees are generally not aware of your policy on conflicts of interest, an effective corrective measure may be to conduct targeted training or communications.

You can then monitor the effectiveness of this measure by tracking conflict-of-interest disclosures over a certain period.

Implementing the compliance programme



Tools and resources

Wherever you are on your compliance journey, these tools give you the building blocks to develop or enhance a compliance programme that works for your member association.

These resources can be adapted and shared with your team members to help you create the best compliance programme for your association.

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Overall programme checklist

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Overall programme checklist

Are you feeling confident about your compliance set-up, or are there a few areas that you would like to brush up on?

Use the checklist below to make sure that you have established, embedded and evaluated a compliance set-up that is right for your member association.

Establish – the rules of the game

- Get the tone right.
- Understand compliance culture.
- Set up a compliance programme.
- Designate a compliance officer.
- Understand the importance of having a code of conduct.
- Implement policies – FIFA's pocket guides.
- Develop your own guidelines.
- Draw up a third-party due diligence checklist.

Embed – play by the rules

- Do you understand the rules of the game?
- Make it safe to speak up.
- Blow the whistle on wrongdoing.
- Learn to listen.
- Train, communicate and support the compliance community and your team members.

Evaluate – your post-match review

- How do you know when it is working?
- Draw up a game plan for monitoring, testing and sharing best practices.

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Third-party due diligence checklist

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[Checklist](#)



Third-party due diligence checklist

Who is in scope?

It would be costly and time-consuming to carry out full checks on every potential supplier, so start by identifying the third parties that pose the biggest risk.

Base the effort on the risk

One size does not fit all. Using a tiered approach based on the level of risk makes checks manageable and effective. Consider the following questions:

- Is the third party in an industry or area in which there is a higher risk of corruption?
- Does the third party perform services on your behalf? Is it authorised to represent the member association to other parties? Is it able to influence decisions or the conduct of others?
- Will the third party have contact with government officials when representing you?

Choose the right tool

A quick internet search is a good start, but it can only take you so far. Paid-for databases, such as LexisNexis, World-Check and Dun & Bradstreet, are accurate and updated daily. Technology is constantly evolving and so we recommend that you stay up to date with what is available within your budget.

Higher risk = deeper checks

For important or high-risk relationships, consider hiring an external expert to carry out in-depth research.

Stay on top

Due diligence is not only important at the start of a relationship. Things change and it is therefore good practice to check existing relationships too.



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Compliance training: preparation checklist

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Checklist



Compliance training: preparation checklist

One month before

- Decide on the training format (e.g. in person, online or hybrid).
- Send an invitation to participants.
- Book a room (include a 30-minute period both before and after the training session).
- Inform the line manager about the training session.
- Decide which topics will be covered.
- Prepare real-life examples.

One week before

- Divide slides between presenters (if required).
- Check the list of participants and send a reminder.

The day before

- Print the attendance list and slides.

On the day

- Bring printed materials, copies of deliverables and guidance materials.

Within a week after

- Send the presentation to the participants.
- Make sure your training records are updated properly and accessible if needed.

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Issues and Concerns Reporting Form

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Issues and Concerns Reporting Form

1. Subject of the report:

2. Do you wish to state your name?

- Yes
- No
- Unknown

You are not obliged to give your name. If you wish to remain anonymous, we recommend that you do not provide any information that contains any reference to you. If you decide to give your name, we will treat it as fully confidential, and you will be protected from any form of retaliation.

3. Please describe the incident in as much detail as possible:

4. Have you already informed anyone within the organisation?

- Yes
- No

If so, whom?

5. Are supervisors or management involved in the incident?

- Yes
- No
- Unknown

If so, whom?

6. For how long has the incident been going on?

7. When did you become aware of the conduct described in the incident above?

8. In which department did the incident occur?

Thank you for your report. We take all reports seriously and have a strict non-retaliation policy for reports made in good faith.



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Conflict of Interest and Secondary Employment Declaration Form

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Conflict of Interest and Secondary Employment Declaration Form

From:

Please email to:

Conflict-of-interest declaration

Maintaining transparency by disclosing potential conflicts of interest is vital, and it helps to protect you and the integrity and reputation of (the) [insert your member association's name followed by the abbreviation in brackets]. Please see the glossary on the next page for definitions and examples of conflicts of interest.

Please confirm the following:

As a team member at (the) [insert your member association's abbreviation], or as an applicant to become a team member at (the) [insert your member association's abbreviation], and in my personal capacity, I hereby declare the following:

- I or related parties have no personal interests, activities or relationships that could affect my ability to be impartial and to do what is in the best interests of (the) [insert your member association's abbreviation].
- I declare the following (potential) conflict(s) of interest that could affect the ability to be impartial and do what is in the best interest of (the) [insert your member association's abbreviation].

Please explain your answer:

Secondary employment declaration

According to article [insert article number] of the [e.g. Employee Directives, Code of Conduct, XX Handbook], secondary employment outside of (the) [insert your member association's abbreviation], even during periods of leave, and the discharge of public office, may only be entered into with the prior permission of the [e.g. Human Resources Department, the Compliance Division and the General Secretary or a Deputy General Secretary or other].

- I have no secondary employment.
- I declare the following secondary employment (even if reported previously):

- Role or activity:
- Company name and location:
- Time required (% or hours per year):
- Compensation (e.g. none, [currency code] 10,000, etc.):

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Gifts and Hospitality Disclosure Form

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Gifts and Hospitality Disclosure Form

Please complete the form and email it to [insert email address].

Please complete and submit this form to record details of actual or proposed gifts or hospitality received from or given to business partners. Please note that offering and accepting gifts is regulated in article [insert article number] of the [e.g. Employee Directives].

Name of the [insert your member association's name] team member involved	[Type your answer here]
Division/department	[Type your answer here]

Specify whether the [insert your member association's name] team member received or gave a gift or hospitality:

Type of record Received Given

1. Details of gift or hospitality

Use this section to specify the details of the gift or hospitality.

Brief description	[Type your answer here]
Reason for gift or hospitality	[Type your answer here]
Date(s) provided	[Type your answer here]
Value of item(s)	[Type your answer here]
Action on gifts received	[Type your answer here]

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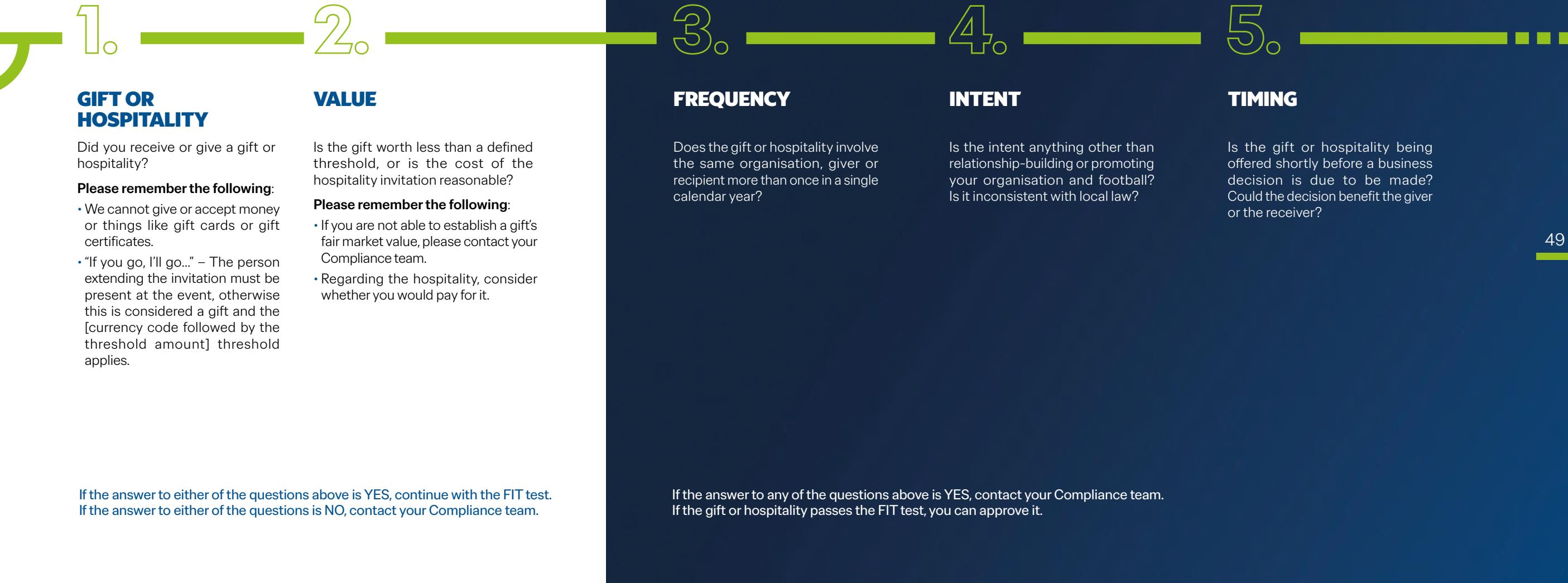
Gifts and Hospitality FIT Test

Please use this FIT test to establish if you can accept or receive a gift/hospitality offer from a third party.

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[FIT Test](#)



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Putting the right
players on
the pitch



Three lines of defence model

Most modern approaches to governance are based on the **three lines of defence** model.

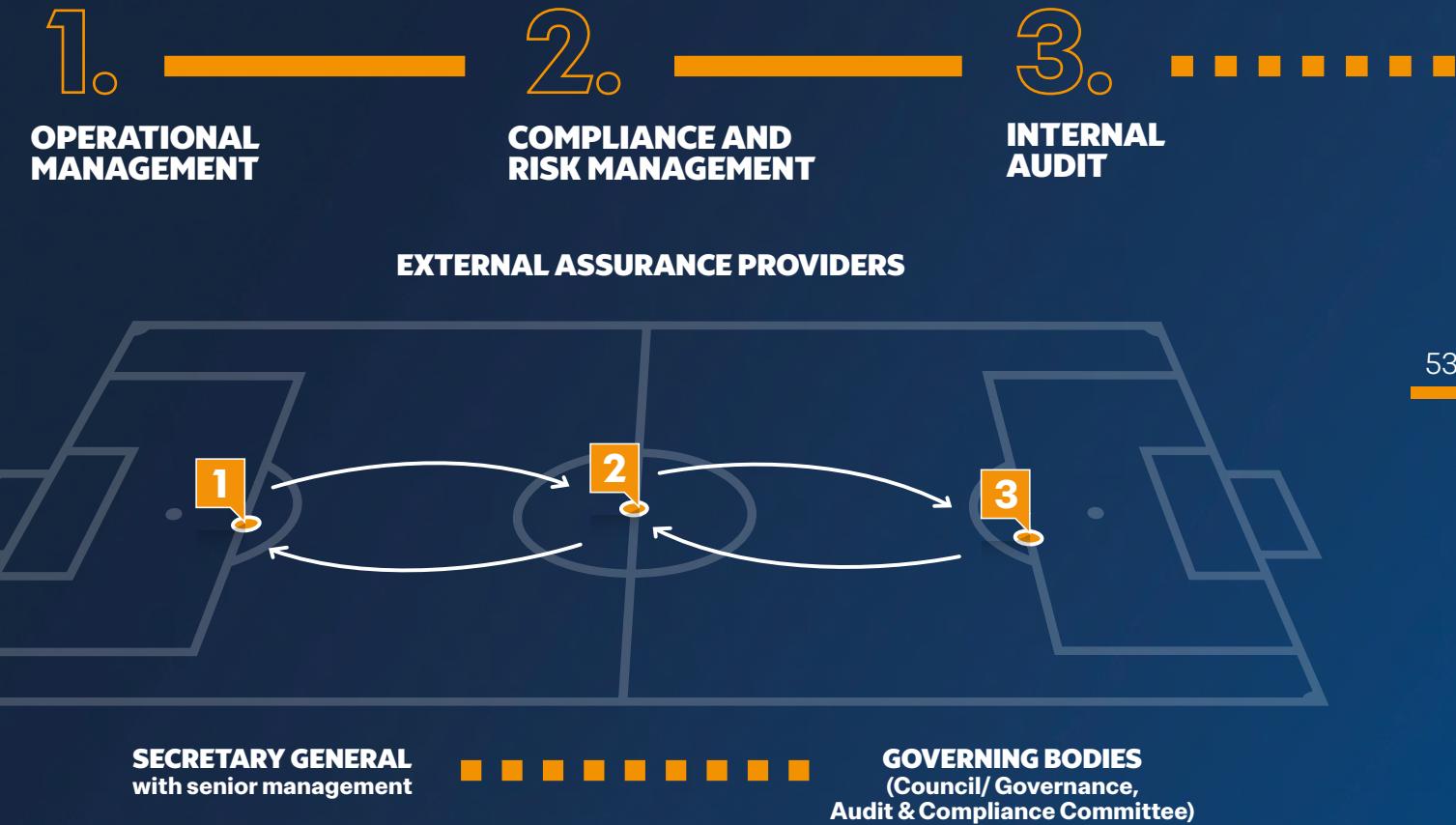
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The model is not only a simple way of implementing **compliance**, but it also explains other complementary functions, such as **risk management** and **internal audit**. The model focuses on clear roles and responsibilities for players across every area of the pitch.

This FIFA Compliance Handbook focuses on the first and second lines of defence (see the descriptions on p.54). Even if your organisation has already achieved a certain maturity level, it is important to understand what all of the parts of the three lines of defence model mean and how they can be incorporated into your member association's structures.

Even if your teams are well established, it is always worthwhile checking that you still have the right players on the pitch. Things change quickly in our world – are you still focusing on what really matters to your players, officials, fans and regulators?

 It is worth making sure that you have the right expertise in place to meet your area's unique challenges.



1.

FIRST LINE OF DEFENCE

This comprises everyone who works for your member association.

It is down to **everyone** to do things in the right way and to speak up if something is not working, supported by the right guidelines and processes. Some individuals in the first line of defence, such as those involved in **operational management**, may have extra responsibilities. For example, they may have to explain governance processes to their team, run reports or contact other areas if they require support.

Compliance

This is your **Compliance** team, which supports the first line of defence with things like compliance guidelines, controls and training, which were described earlier in this handbook.

Risk management

Besides compliance, the second line of defence typically oversees **risk management**, which is a systematic process used to identify and manage uncertainties that your member association faces, whether they are financial, legal, operational, reputational or strategic in nature.

2.

SECOND LINE OF DEFENCE

As part of the risk management process, potential risks are identified that might not only be related to football (e.g. scarcity of players, quality of the infrastructure), but also to external events (e.g. climate changes, political unrest in the country/territory). Do not underestimate financial and reputational risks or those related to your daily operations. Then, decide on the appropriate risk response to minimise the impact of the identified risks. Keep in mind that risk management is not a one-off exercise.

The first and second lines of defence support the **Secretary General and senior management**, which initiates the strategy and sets the organisation's objectives.

3.

THIRD LINE OF DEFENCE

Internal audit

This is your **Internal Audit** function, which is responsible for evaluating the organisation's approach and providing assurance to senior management. It can be carried out by a separate internal audit team or an independent, objective individual, depending on the size of your member association. In general, the third line of defence provides independent assurance by checking that the first and second lines are working effectively.

In practice, the Internal Audit team reviews processes and controls, including those related to procurement, finance and accounting, payroll and IT, to ensure their adequacy and effectiveness. The team

provides independent and objective assurance and advice to the **Secretary General, senior management** and **governing bodies**, such as the independent Governance, Audit & Compliance Committee, to support the achievement of organisational objectives and to promote and facilitate continuous improvement. Internal auditors must have a professional background, a solid understanding of your organisation's processes and be independent. In addition, they must uphold high ethical standards to ensure that they provide unbiased and accurate assessments.

External assurance providers, such as audit firms, are responsible for providing additional assurance to satisfy legislative and regulatory expectations.





The FIFA Compliance & Risk team works closely with the FIFA member associations to offer support and training at all levels and is always looking for new ways to enhance the skills and knowledge of the global compliance community.

Supporting your team

If you would like to learn more about the governance functions at FIFA or to discuss concerns and challenges, and share knowledge, insights and best practice, please get in touch with us.

Compliance & Risk Subdivision

riskcompliance@fifa.org

Audit & Advisory Subdivision

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