

RBFA

Ethical Code “off the pitch”



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DOCUMENT INFORMATION

CONFIDENTIALITY

The content of this Code is considered and classified as “for internal use”.

COMPLIANCE DUTY

This Code is issued by:

- the Koninklijke Belgische Voetbalbond vzw (Royal Belgian Football Association), with company number 0403.543.160;
- Association des Clubs Francophones de Football asbl, with company number 0820.547.150;
- Voetbal Vlaanderen vzw, with company number 0808.165.002;

RBFA, Voetbal Vlaanderen and ACFF (hereinafter referred to as the ‘Federation’) undertake to protect the collaborators and interested parties of the Federation, as well as the ethical values of the Federation against illegal or harmful acts, in accordance with the applicable laws, regulations and our common ethical principles. The present Code and all documents related thereto require a lawful, ethical and responsible behaviour in everything we do and in every decision we make.

The directors, executive board, management, employees and all service providers (including volunteers) of the Federation, as well as the members of the official bodies of the Federation are all obliged to comply with this Ethical Code. Non-compliance with this Code can lead to disciplinary measures, including dismissal, cancellation of the service or termination of a mandate.

This Code does not create any rights for the employees of the Federation, the contractors or members of the official bodies of the Federation. In general this Code constitutes a refinement and further expansion of the statutory and contractually binding clauses that are applicable to everyone performing a function for or on behalf of the Federation.

Insofar as necessary this Ethical Code shall supplement FIFA’s Code of Conduct, as well as the provisions of the articles of association and regulations of the Federation (hereinafter referred to as ‘the Regulations’) and with respect to the collaborators the Labour Regulations and the applicable policies.

APPROVAL AND REVIEW PROCEDURE

The Secretary-General and the Executive Committee are jointly responsible for this Code, which also needs to be approved by the Board of Directors of RBFA, VV and ACFF. Where the Code refers to employees, the works council is to be consulted.

This Code is to be reviewed every five years.

COMMUNICATION

For employees the valid version (most recently approved) of this Code is the version that is available on Footi. A paper version may be outdated. Only the digital version as presented on Footi is most up-to-date.

Directors and members of the Federation’s bodies shall receive a copy of this Ethical Code when taking up their duties and are to expressly agree to that.



GENERAL PRINCIPLES

1. WHAT WE AIM FOR

The objective of the Royal Belgian Football Association, “Voetbal Vlaanderen” and “Association des Clubs Francophones de Football” is the organization, distribution, development and promotion of football in all of its forms, where amongst others the principles of sportsmanship, integrity and fair play are top priorities.

The Federation’s disciplinary bodies monitor compliance with these basic principles of football and thus contribute to a fair sport.

In order to achieve these objectives the Federation issues its own regulations, and being a member of UEFA and FIFA, also international regulations are to be complied with.

In addition the Federation also has a social role to fulfil, where the key values of “respect, fair play and education” are always highlighted and promoted in Belgian society.

Also off the pitch we work together within our Federation in conformity with a common series of values defining who we are as an organization. **Integrity is the key to success. Within the Federation integrity means always doing the right thing.** This is of essential importance for our well-functioning, the safeguarding of our reputation and that of football in general.

Our basic principles of ethics help us to ensure integrity in our daily responsibilities. These principles constitute the basis of our “Ethical Code off the pitch” (hereinafter referred to as “Code”).

2. OUR BASIC PRINCIPLES OF ETHICS

This Code often contains broad guidelines, because it is impossible to discuss all the circumstances or situations that may occur.

Whatever the circumstances may be, every collaborator, director or member of a Federation’s body is to act in such a way that the interests of the Federation, of our collaborators, clubs, affiliates and fans, will not be harmed or may not be questioned.

In case of any doubt on the application or interpretation of the principles of this Code, as a collaborator you can always contact your direct superior, the members of the Executive Committee, the HR or legal department. The same is true if you are confronted with behaviour that is in conflict with the principles contained in this Code.

Members of the Board of Directors and of the Federation’s bodies can always address the “Integrity Commission”.

We encourage the reporting of unethical conduct. When unethical conduct is reported, in no case whatsoever this shall give cause to retaliation measures towards the reporter, insofar as the reporting is realized in good faith. If necessary the reporting can be done anonymously. Every report will be taken seriously and will be handled with discretion.



Our basic principles of ethics are as follows:

1. We comply with the applicable laws and regulations;
2. We treat everyone in a fair and honest way, and with respect;
3. Pursuant to our articles of association we are neutral and embrace the diversity within our organization and society;
4. We avoid conflicts of interest;
5. We protect and correctly use the Federation's means;
6. We respectfully treat confidential information and protect the personal data under our control;
7. We always express ourselves in a loyal manner towards the press and on social media;
8. Our management is transparent;
9. We adopt zero tolerance with respect to any form of bribery;
10. We do not participate in gambling activities and do not tolerate any kind of match fixing;



OUR BASIC PRINCIPLES APPLIED

1. WE COMPLY WITH THE APPLICABLE LAWS AND REGULATIONS

- We are jointly and individually responsible for the safeguarding of a culture of respect for the law and for the encouraging of respect for the laws and Regulations.
- Laws are often complex and subject to modifications. That is why we need to make ourselves aware of the regulations, guidelines and procedures that are applicable to our specific function or role within the Federation and adhere to them. In case of doubt do not hesitate to consult our legal department.
- Although the organization at least expects everyone to abide by the law at all times, the Federation also expects a fair and ethical conduct. The members of the Board of Directors, the Secretary-General together with the Executive Committee, and the members of the various Federation's bodies in particular, are to set the example by acting honestly and with integrity within the legal framework when making decisions and setting up operational management.
- In this respect we strive for a harmonious relationship with the public services.

2. WE TREAT EVERYONE IN A FAIR, HONEST WAY AND WITH RESPECT.

- The Federation appreciates the extent to which everyone (personnel, members of the Federation's bodies, volunteers, referees, trainers...) contributes to football in general.
- We undertake to treat everyone with respect, whatever may be his/her role or contribution within our organization. The same is true for the conduct we adopt towards affiliates and fans.
- Those who are in charge of other collaborators are furthermore to fulfil their role in a responsible manner. The tasks of managers and superiors include for example the creation and safeguarding of a work environment where every collaborator will be able to further develop his professional skills.
- Any complaints that are filed in good faith and relating to the work environment are to be treated promptly. The organization shall not tolerate any form of transgressive behaviour, including but not limited to sexually transgressive behaviour, discrimination, intimidation, threats or violence, either physical or verbal.
- If you feel that you, as a collaborator, are not treated correctly, you can always contact the Federation's internal or external confidential advisor, as well as your HR department.



3 PURSUANT TO OUR ARTICLES OF ASSOCIATION WE ARE NEUTRAL AND EMBRACE THE DIVERSITY WITHIN OUR ORGANIZATION AND SOCIETY

- Neutrality is a basic principle within FIFA, UEFA and is laid down as a principle in our articles of association and our Regulations.
- We respect human rights and will never discriminate anyone on the basis of so-called race, colour, religion, political belief, gender, age, language, mental or physical handicap, nationality or sexual orientation.
- Every one of us is to contribute in his behaviour to the creation of an inclusive environment embracing the diversity within our organization.
- In this respect we adopt a zero tolerance with respect to any form of racism.
- You are expected to make yourselves aware of and adhere to any anti-discrimination and anti-harassment laws that may be applicable to the organization's activities.

2. WE AVOID CONFLICTS OF INTEREST

- A conflict of interest arises when our personal or external interests restrict our ability to perform our activities objectively and with integrity, when these personal or external interests conflict with the Federation's interests or may make us look prejudiced. This is more in particular the case when you, a member of your family or an organization or club where you have interests in, receive inappropriate benefits because of your position with the Federation.
- We expect everyone to act in all fairness, not inspired by personal interests and to avoid any situation that may give cause to a conflict of interest. Members of the Board of Directors who are facing a potential conflict of interest with a specific subject and/or decision, shall report this in advance to the Chairman of the Board of Directors.
- When taking up his duties and in case of any modifications every employee, director or member of a Federation's body shall specify his/her ancillary positions and activities. Every employee who is planning to accept an ancillary position or activity shall report this in writing to the HR Manager before accepting the same. Members of the Board of Directors and members of a Federation's body shall report this in advance to the Integrity Commission.
- Every employee, director or member of a Federation's body shall refrain from personal interference, of any nature whatsoever, in legal or disciplinary procedures where the Federation is directly or indirectly involved.
- We refrain from accepting facilities or services from a supplier or club of the Federation that may have an impact on its independent position towards the provider, including but not limited to offers for private activities, or discounts on products for private use.
- It is not allowed to give, accept and keep gifts, donations or services worth over 50 euros each on account of our position with the Federation, except if the above is authorized in writing by the HR Manager (with respect to employees) or by the Integrity Commission (with respect to members of the Board of Directors and members of the



Federation's bodies). Members of disciplinary bodies cannot accept any gift or service, except for those provided by the Federation as such.

- If you believe that as an employee you may be involved in a conflict of interest, you must report this to your direct superior, the HR or legal department. If you feel another person is involved in a conflict of interest you are to report the matter to one of the above services or to the Integrity Commission.

5. WE PROTECT AND CORRECTLY USE THE FEDERATION'S MEANS

- We are to correctly use our organization's assets, including its buildings, facilities, vehicles, equipment, products and supplies and to protect these against theft, damage, loss or incorrect use. You must immediately report any suspicion of fraud or theft to your direct superior.
- Any personal use of the Federation's means (insofar as allowed) cannot jeopardise our possibilities to execute our duties for the Federation and is to be carried out in a safe, ethical and lawful way.
- In no case whatsoever match tickets that we receive on account of our role or position from the Federation, can be traded or sold, in any way whatsoever
- We must protect the Federation's computer hardware and software, as well as the data stored on the computer systems of our organization against damage, unauthorized changes, theft, fraud and unauthorized access. To this effect at all times we are to observe the specific safety measures and internal check-ups for the computer systems we have access to.
- Our technologies or computer systems can never be used for downloading or sending inappropriate, discriminating, sexually explicit or offensive statements or files. Furthermore we cannot use these systems for access to illegal material, sending unauthorized requests, or conducting business for another organization or for our own account.

6. WE RESPECTFULLY TREAT CONFIDENTIAL INFORMATION AND PROTECT THE PERSONAL DATA UNDER OUR CONTROL

- Apart from the material assets we also must protect the confidential, non-public information of our organization as well as the personal data that we control on behalf of the Federation. In principle confidential information comprises any information that is not known by or disclosed to the general public. This information comprises data regarding affiliates (players, trainers, directors, transfers, etc. ...), financial data, marketing strategies, contracts, legal or disciplinary procedures, data from agents, etc.
- Depending on your role within the organization, you may be asked to sign a specific confidentiality agreement.
- Do not give access to third parties to the confidential, non-public information from the Federation and always follow the organization's guidelines with respect to the classification and storage of information (restricted, confidential, public,...).



We can disclose confidential, non-public information and personal data only to authorized employees or external parties who need this information for appropriate purposes and insofar as the required (confidentiality) agreements have been signed.

- Never use confidential, non-public information for personal use or for personal gain.
- This confidentiality clause will remain in force, even after termination of the employment contract, mandate or position.

7. WE ALWAYS EXPRESS OURSELVES IN A LOYAL MANNER TOWARDS THE PRESS AND ON (SOCIAL) MEDIA

- In principle only the thereto appointed employees and the Chairman of the Board of Directors shall be entitled to address the press on behalf of the Federation. Every press release, verbal or written contact with the press shall always be realized in consultation with the Communications department.
- Every communication on social media or otherwise shall exclusively be made on a personal account and will in any case take into consideration all the basic principles of this Code.
- Members of the Federation's bodies shall furthermore adopt strict confidentiality with respect to the deliberations on matters handled by them and shall refrain from giving any public comments in any media whatsoever.

7. OUR MANAGEMENT IS TRANSPARENT

- We are to make sure that our books are correct and we are to comply with all the internal order, approval and control procedures. We also make sure that all entries and processing activities in all the applied systems and databases are introduced correctly and in accordance with the applicable laws, the Regulations and in application of the internal procedures (kick-off, mpleo,...).
- We can create, approve, enter, date, sign, send or otherwise validate only those documents that we believe are accurate and in accordance with the laws, the Regulations, the policy and the processes of the Federation. All the documents and data are to be saved in conformity with the applicable guidelines.
- We fully report the figures of our Federation in accordance with all statutory obligations. We report the requested information in a transparent and complete manner to the granting authorities.
- We must be able to provide all the information that is requested in case of an investigation or audit. If a government institution has contacted you, you are to contact our legal department immediately. You cannot destroy, hide or change documents in any way whatsoever. In addition you cannot make any incorrect or misleading statements or encourage another person to do so.



9. WE ADOPT ZERO TOLERANCE WITH RESPECT TO ANY FORM OF BRIBERY

- This means that we can never offer, try to offer, approve or promise bribes or kickbacks to an employee of a government institution, UEFA, FIFA, another association, clubs, suppliers or other potential partners. A “bribe” is something of value that is given in an attempt to influence the behaviour or decisions of someone in order to obtain or achieve business of company benefits.
- It is furthermore important to know that we cannot hire any third parties to execute something that we cannot execute ourselves from an ethical or legal point of view. Involving a third party in the indirect execution of an inappropriate payment shall constitute an infringement of our Code and the anti-corruption legislation.

7. WE DO NOT PARTICIPATE IN GAMBLING ACTIVITIES AND DO NOT TOLERATE ANY KIND OF MATCH FIXING

- We neither directly nor indirectly take part in bets, gambling activities or similar games of chance relating to football matches under our control, which may result in financial gains. It is also forbidden to perform a role or function within corporations organizing such activities.
- We do not tolerate any form of manipulation or influencing of match results. We will report any indication of match fixing to the Integrity Manager within our Federation so that immediate action can be taken in consultation with the competent government institutions.



EXCEPTIONS AND NON-COMPLIANCE

EXCEPTIONS

Any exception and derogation from this Code or the documents related hereto is to be documented and is to be formally approved in advance by the Executive Committee and the Integrity Commission.

NON-COMPLIANCE

Non-compliance with the Federation's Code may lead to disciplinary measures, including termination of the collaboration. In exceptional cases an infringement may also lead to civil and/or criminal proceedings, including claims for compensations, in accordance with the applicable laws and regulations.

FURTHER QUESTIONS

For any further questions or concerns, please contact the HR Department (hr@rbfa.be), the Legal Department (legal@rbfa.be) or the Integrity Commission (ethics@rbfa.be).

