



**INTERNATIONAL  
SAMBO FEDERATION**

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## *FIAS Conflict of Interest Policy*

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### **1 Scope**

- 1.1 This policy sets out the procedures for identifying and managing potential conflicts of interests or duty (called “Conflicts” in this policy) affecting all persons involved in elected, appointed and professional positions within the International SAMBO Federation (FIAS) and its business (who are called “Parties” in this policy).
- 1.2 This policy was approved by the FIAS Executive Committee on October 4<sup>th</sup>, 2020.

### **2 Background**

- 2.1 Parties have an obligation to act in the best interest of FIAS and in accordance with its Statutes and Regulations. They are expected to act impartially and objectively and to actively take steps to avoid Conflicts.
- 2.2 Conflicts affect discussions and decision-making and may result in decisions being reached that are not in the best interests of FIAS. They can give the impression, both internally and to the wider public, that improper conduct has occurred even if it has not.
- 2.3 Conflicts come in different forms. It is the responsibility of each Party to identify if there is a Conflict or potential Conflict that may affect them, or someone connected to them.
- 2.4 This policy is intended to make decision making more transparent, and to allow the management of Conflicts that may arise. It is important that management of a Conflict is proportionate to the risk that it poses to the best interests of FIAS.

### **3 Identifying what a Conflict is**

- 3.1 There are two types of Conflicts:
  - a) A conflict of interests –this is where a Party has an interest personal to them (which may be financial or non-financial) which may conflict with the best interests of FIAS.
  - b) A conflict of duties - this is where a Party owes a duty to another body (such as being an employee, elected official, shareholder, trustee etc.) that conflict with their duties to act in the best interests of FIAS. This type of conflict does not have to be personal or financial to the Party. A conflict of duties can also be described as a conflict of loyalties.



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#### **4 Connected Persons**

- 4.1 A Conflict can still arise if it involves a benefit being given to a third party connected to the Party in question. A “Connected Person” is:
- a) any relation such as parent, grandparent, child, stepchild, grandchild, brother, sister or spouse or partner of a Party;
  - b) a firm, company or association in which the Party is a partner, officer, employee, consultant, director, member or shareholder (unless the Party owns no more than 1% of the issued shares on a recognised stock exchange);
  - c) a firm or company in which an individual listed in (a) above is connected in the ways set out in (b).

#### **5 Duty to avoid conflicts**

- 5.1 All Parties have a duty to avoid a Conflict where possible.
- 5.2 If a Conflict or potential Conflict exists, it must be declared by the Party and managed as set out in this policy.
- 5.3 Any doubt as to whether certain facts or circumstances may give rise to a Conflict should be resolved in favour of declaring those facts or circumstances.

#### **6 Declarations of interests**

- 6.1 On appointment, Parties must declare their interests on the Declaration of Interests form on the FIAS website. In particular, this declaration must include:
- a) directorships, partnerships and employments with a National SAMBO Federation, FIAS, businesses or organisations that are engaged in SAMBO and summer sports, or derive any substantial portion of their revenue from SAMBO and summer sports;
  - b) any office held with a National SAMBO Federation and any other international summer sports or sporting bodies;
  - c) trusteeships, or board positions with National SAMBO Federation, FIAS or institutions or charities that are engaged in the sport of SAMBO, or derive any substantial portion of their revenue from SAMBO; and
  - d) any material interests arising from close family or personal relationships with another Party in FIAS.



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- 6.2 The FIAS Secretary General will maintain a register of interests. The information provided in any declarations of interest will be processed in accordance with the data protection principles as set out in the GDPR. The information provided will not be used for any other purpose by FIAS.
- 6.3 Parties must update their declarations following any change in circumstances.
- 6.4 If a Party has an interest that should be disclosed as a Conflict, the chairman of the meeting shall disclose it if the Party does not do so at the relevant point on the agenda.
- 6.5 Any Party who has a concern or is unsure of the proper procedure to follow should contact the President, Committee Chairman and/or FIAS Secretary General for advice.

## **7 Managing conflicts of interest**

- 7.1 If a Party has a Conflict, then a decision as to how to manage it will be made by:
  - a) the President (for Conflicts relevant to members of FIAS Executive Committee);
  - b) the chairman of the meeting at which the Conflict becomes relevant;
- 7.2 If the President has a Conflict, then a Vice President chosen by the other Vice-Presidents will make the decision. If a Commission Chairman has a Conflict, the FIAS Ethic Commission Chairman will make the decision.
- 7.3 A Party is required to give the decision-maker any additional information asked for to determine how the conflict is to be managed.
- 7.4 The decision-maker may decide that the Party:
  - a) can continue to participate normally with the interest being noted in the minutes;
  - b) shall not participate and is to abstain from voting (but the body may ask the Party to provide any relevant information concerning the matter); or
  - c) is to withdraw for the whole or part of the affected proceedings.

## **8 Specific Situations**

- 8.1 This policy has set out general principles applicable to all situations. The lists are not exhaustive.

## **9 Relationships with NSFs**

- 9.1 Most Parties will have involvement with their NSFs, and this is to be expected. For members of FIAS EC, they are specifically elected in accordance with the FIAS Statutes Article IX and XII, "FIAS Executive Committee Members act and vote as independent individuals and not as representatives of their National Federations".



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- 9.2 There is no Conflict if this involves the Party's NSF, even when that NSF has made a submission that is being discussed, unless the discussion or proposed decision:
- a) affects the Party's NSF specifically;
  - b) affects the Party's NSF in a different way from all other NSFs; or
  - c) the Party is an employee of his NSF and that employment may be affected by the decision.

## **10 Own Competition participation**

- 10.1 Notably in the case of elected members of the FIAS Athletes Commission relating to their participation in FIAS EC and Committee Meetings, a Party does not need to make any declaration if participating in a discussion or decision which would affect their competition as an athlete (provided it is a general decision affecting all athletes equally - for example changes to the International Competition Rules).

## **11 Employment or Appointments by FIAS**

- 11.1 A Party would have a conflict in relation to any discussions or decisions concerning actual or proposed employment with FIAS or SAMBO Development Foundation; or
- 11.2 Article of the Statutes contains further provisions concerning members of FIAS Executive Committee members.

## **12 Provision of goods or services or other Commercial Arrangements**

- 12.1 Party would have a conflict in relation to any discussions or decisions concerning the actual or proposed provision of goods or services to SAMBO Development Foundation. This also applies to commercial arrangements with the company or with FIAS Events.

## **13 FIAS Officials**

- 13.1 FIAS Officials are governed by the ICR with respect to their appointment for assignments at events.
- 13.2 In relation to major event appointment decisions by the FIAS EC, the relevant provisions of the ICR and conflict of interest rules are to be followed by the nominating FIAS Technical Commission in the discipline concerned.



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**International SAMBO Federation - Declaration of Interests**

<b>Name:</b>	
<b>Positions held in FIAS:</b>	
<b>Date of declaration (or review):</b>	
<b>Discipline</b>	<p><b>Please give details of any interests (yours or from connected persons), including full background, any other parties involved and the likely duration.</b></p> <p><b>Please detail any current interests or those within the last 2 years.</b></p>
<p>Offices or positions (elected, volunteer or paid) held with:</p> <ul style="list-style-type: none"> <li>a) a Member National Authorities</li> <li>b) SAMBO Affiliate or Associate Members</li> <li>c) Continental Association</li> <li>d) Any other international SAMBO or sporting bodies</li> </ul>	
Involvement with the training or selection of competitors	
Contractual or commercial relationships with SAMBO Development Foundation, SAMBO Event Organiser	
<p>Directorships, partnerships or employment with</p> <ul style="list-style-type: none"> <li>a) Member National Authorities</li> <li>b) SAMBO Affiliate or Associate Members</li> <li>c) Continental Association</li> <li>d) businesses that are engaged in the sport of SAMBO or derive any substantial portion of their revenue from SAMBO;</li> </ul>	
<p>Trusteeships or board positions with</p> <ul style="list-style-type: none"> <li>a) Member National Authorities</li> <li>b) SAMBO Affiliate or Associate Members</li> <li>c) Continental Association</li> <li>d) institutions or charities that are engaged in the sport of SAMBO or derive any substantial portion of their revenue from SAMBO;</li> </ul>	
Membership of any SAMBO clubs	



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organisations	
Close family relationships, commercial/business or personal relationships with another FIAS EC, FIAS Commission Member	
Membership of any professional bodies, special interest groups or mutual support	
<b>For EC Members:</b> In respect of businesses that are engaged in the sport of SAMBO or derive any substantial portion of their revenue from SAMBO: a) Investments in unlisted companies, partnerships and other forms of business, b) Major shareholdings of more than 5% of the issued capital c) Beneficial interests	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis or more frequently if requested by FIAS.

I give my consent for it to be used for the purposes described in the FIAS Conflicts of Interest policy and for no other purpose.

<b>Signed:</b>	
<b>Date and Place</b>	