



Code of Conduct



The Code of Conduct of Swiss-Ski: Fair play in every respect

As a leading sports federation in Switzerland we are positioned as an efficient, innovative, modern and professional organisation. Success in sport is of key significance for Swiss-Ski.

Our task is therefore to create and further develop the principles for successful sport by promoting clubs, top athletes, young talent and employees. We are an independent, reliable and transparent provider for our main target groups and partners in the field of all types of snow sport. We assume social responsibility, we are an example to our young people and fans, and we are a part of a national and international interest group.

These principles and values place clear and high demands upon our daily work. Accordingly, it is our duty to create transparency in our business activities, and to take precautions in order to decisively counter possible challenges such as abuse or deception.

Almost all regulations in this Code of Conduct should be deemed to be self-evident and have also been carried out as such in the past. These rules of fair play are now set out as binding. They should serve us as a resource to be able to recognise questionable circumstances early on, to provide guidelines in the event of uncertainty, and for deriving options for action.

This Code of Conduct is based on the Olympic values of “Excellence – Friendship – Respect” as well as the ethics charter of Swiss Sport. It encompasses the fundamentals of our activities, and what we expect from all members of the Swiss-Ski family – employees, supervisors and committee members.

With the Code of Conduct, we are all committing to healthy, respectful, fair and successful snow sport. We stand fully and completely behind this code, and personally advocate that every individual within the Swiss-Ski family upholds these framework conditions in their activities and in their relationships with our stakeholders. We live fair play!

Dr Urs Lehmann
President of Swiss-Ski

Markus Wolf
CEO

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Scope of validity

The Code of Conduct is compulsory for the exercising of activities and offices for Swiss-Ski. This applies equally to honorary / additional and main official activities.

The Code of Conduct applies expressly to the business relationships of Swiss-Ski and does not apply to the professional relationship of honorary committee members, insofar as these relationships do not affect any of the interests of Swiss-Ski and the exercising of the mandate for Swiss-Ski in any way.

Employees and members of committees of Swiss-Ski are appraised of the Code of Conduct as part of their introduction to the activity. By signing, they confirm they will recognise and follow the Code of Conduct.

Regular training for employees ensures ongoing adhesion to it.

Tips for dealing with the Code of Conduct

The following basic rules help us to apply the Code of Conduct correctly:

- 1. We do not do anything that we view as illegal, immoral or disingenuous, or which gives us this impression.**

The following questions may help us here:

- ▷ Am I acting fairly and honestly?
- ▷ Does the action I intend to take correspond with the laws in force and the regulations of Swiss-Ski?
- ▷ Is my counterpart acting according to our Code of Conduct?

- 2. We ask ourselves whether the actions follow a legitimate purpose in accordance with Swiss-Ski and whether they would be recognised by the public.**

The following questions may help us here:

- ▷ Would my manager / chairman be in agreement if they found out about it?
- ▷ Would I act the same way if a work colleague / official colleague or my manager were witness to my actions?
- ▷ Would I agree that my actions could be reported in the newspaper?

- 3. We do not hesitate to ask for advice if we are unsure what the reasonable decision is. We can turn to our manager at any time.**

Codex 1_Principles and guidelines for our activities

- ▷ We abide by the general legal principles of Swiss law and the rules of the IOC, Swiss Olympic and FIS.
- ▷ We follow the principles of the ethics charter for sport.
- ▷ We act professionally, honestly, with integrity and transparently. We are also aware of the special exemplary role that we have as ambassadors of the sport.
- ▷ We promote and demand sustained development of the sport by taking account of social, ecological and economic interests in a balanced way.

Codex 2_Dealing with athletes

- ▷ We respect the physical and psychological health of athletes and consider their social environment.
- ▷ We create safe training and competition conditions insofar as this is possible for us to do.
- ▷ We do not tolerate any form of violence, discrimination, abuse or sexual assault.
- ▷ We support the independence of athletes and encourage them in their integral career development.

Codex 3_Prevention of addictive substances and doping

- ▷ We adhere to the principles of the ethics charter for Swiss sport.
- ▷ We are familiar with the anti-doping regulations and apply zero tolerance with regard to the consumption and dealing of doping substances. We take an active role in the fight against doping and illegal addictive substances.
- ▷ We maintain and demand responsibility with regard to alcohol, and avoid tobacco during assignments.

Codex 4_Invitations

- ▷ We only accept and offer invitations if:
 - They are associated with representation duties for Swiss-Ski.
 - They do not exceed the usual reasonable scope.
 - No conflict of interest arises from them.

- ▷ In case of doubt, we disclose invitations received in connection with our activity / role at Swiss-Ski and declare them to the manager / chairman.

The following questions may be helpful for the decision; they should be considered as normal and reasonable:

- How is the invitation related to my activity at Swiss-Ski?
- How is the invited person related to me and to Swiss-Ski?
- Does the invitation primarily result from my role at Swiss-Ski?
- Does the estimated value of the entire invitation seem reasonable to me?

Codex 5_Gifts and honoraria

- ▷ We only accept and offer gifts if:
 - No conflict of interest arises from them.
 - They do not exceed the usual low value.
 - They are not supplied regularly.
- ▷ In case of doubt, we disclose gifts received in connection with our activity / role at Swiss-Ski and declare them to the manager / chairman.
- ▷ We do not accept or give any cash amounts, irrespective of the amount and form.
- ▷ We hand over to Swiss-Ski any honoraria that we receive from external parties for services connected with our activity / role with Swiss-Ski.

Gifts that exceed the usual low value and which can no longer be refused come into the possession of Swiss-Ski and are ideally passed on to a not-for-profit organisation. If possible, we inform the giver of this.

There is a thin line between a harmless gift and a bribe. The following features can be used to differentiate:

Gifts

- Are often give as gestures of politeness or friendship.
- Are usually given directly.
- Are generally given without any condition and have no lasting influence on the recipient.
- Cash sums are not gifts by definition.

Bribes

- Are usually given in secret as they are against the law and morally unacceptable.
- Are usually made indirectly via third parties.
- Influence the recipient in an unfair way and cause or oblige them to change their behaviour.

Honoraria

- Appearing as a speaker is essentially always associated with a position at Swiss-Ski, even if the speaker is asked or invited personally. Exceptions must be approved by the manager.

Codex 6_Integrity

- ▷ We never exploit our position / role in any respect for private purposes or personal advantages.
- ▷ We do not allow ourselves to be bribed, and we refuse undue advantages that are offered, promised or granted for the purposes of breach of duty or dishonest behaviour to our own advantage or to the advantage of third parties.
- ▷ We do not use bribery, are not incited to bribery and do not grant any undue advantages to officials, companies or other persons.
- ▷ We do not accept any commission payments, nor do we offer any, for the procurement of business of any kind in connection with the carrying out of our official duties or our sphere of influence.
- ▷ We do not make any bribes to officials, companies or other persons, and we do not accept any bribes.

What does bribery mean?

By bribery we mean the offering, promising or granting, or the acceptance, requesting or being promised unfair advantages. These are material or immaterial contributions that are granted to influence the decision-making of an employee or official. They may be in the form of payments of money, gifts, excessive invitations or refunds. A personal contribution or personal advantage is always involved. Aspiring to and negotiating for better business conditions for the employer do not come under bribery.

What is meant by bribe money?

Bribe money is the payment, usually of a small sum, to speed up the execution of a routine activity that the person making the payment desires.

What does granting an advantage and accepting an advantage mean?

Granting or accepting an advantage means that this is not associated with a specific action but is granted or accepted in relation to future negotiations. With granting or accepting advantages, there is no direct association between service and return. This is also known as so-called "sweetening" or "grooming".

Codex 7_Conflict of interests

- ▷ We avoid conflicts of interest and, if they cannot be excluded, we declare them and take action.
- ▷ We do not participate in any decision in which our personal or financial interests might come into conflict with those of Swiss-Ski.
- ▷ We declare vested interests, participation, business relationships and additional activities according to the regulatory stipulations of Swiss-Ski.

Conflicts of interest arise when employees or members have personal or private interests that affect the integrity of or independent and targeted fulfilment of their duties.

Types and examples of conflicts of interest

Personal conflicts of interest:

Personal or private interests include any advantage for the person themselves, their own family, relatives, friends or acquaintances.

Financial conflicts of interest:

These typically arise from business activities with friends and relatives, i.e. from transactions of all kinds, whereby employees or their family members pursue a personal financial interest.

Abuse of the position in the company as well as company property or money:

Conflicts arise in this area when employees or their family members receive impermissible personal advantages due to their position in the company.

Codex 8_Sport betting and competition rigging

- ▷ We do not take part directly or indirectly in betting or gambling connected with sport events, either at home or abroad, which are illegal under Swiss law.
- ▷ We do not tolerate any form of competition rigging.
- ▷ Persons who are directly associated with competitions (particularly athletes, supervisors and technicians) do not bet on the competitions in question.

Any commercial betting that is not offered by the Loterie Romande or by Swisslos, is essentially considered to be illegal in Switzerland according to the Lottery Act. This also applies to betting that is available via the Internet.

Swiss Sport is financed to a large degree by income from the Loterie Romande and from Swisslos. The Internet betting offers from foreign providers (e.g. *bwin*) are illegal under Swiss law. The corresponding companies do not make any contributions for not-for-profit purposes, particularly to the development of sport.

Codex 9_Dealing with partners

(Member federations, label schools, medical centres, customers, suppliers, sponsors, advisors, agents, representatives, media, etc.)

- ▷ We take the Code of Conduct as the basis for cooperation and business relationships with legal as well as individual persons and partners.
We ensure this is upheld by including the following integrity clause in contractual agreements:

The contract partner is obliged to respect the Code of Conduct of Swiss-Ski (i.e. with regard to the arrangement of defined services and return services) and to meet all measures required in order to avoid behaviour that is undesirable in terms of the Code. The Code of Conduct applies as an integrative element of the contract; neglect or deliberate breach of it may lead to premature termination of the contract for important reasons.
- ▷ We only work in cooperation with partners who agree with the values and interests of Swiss-Ski, and who confirm they will adhere to the legally valid provisions in force in their business activity with Swiss-Ski and in all their provision of services.
- ▷ In principle, we make all remuneration payments directly to those who are entitled to them. We do not undertake any transfers to accounts or in countries that are categorised as sensitive by the financial institution making the transfer.
- ▷ We do not make any agreements with competitors regarding economically sensitive questions such as offers, prices, conditions of business, sponsors, etc.

Codex 10_Awarding of contracts

- ▷ We award contracts according to the tender processes and competence amounts set out in the regulations, and in compliance with the relevant approval and the dual signatory principle associated with it.
- ▷ We ensure that the principles of sustainable procurement are upheld by Swiss-Ski.
- ▷ We describe the requirements of the service to be procured with sufficient clarity and detail.

Codex 11_Origin and use of financial resources

- ▷ We use financial means exclusively for the purposes set out in the statutes.
- ▷ We make transactions according to the authorisation set out in the regulations and the dual signatory principle.
- ▷ We carry out all transactions in the context of correct, comprehensive legally-compliant bookkeeping.

Codex 12_Financial grants and sponsoring

- ▷ We ensure that sponsoring services and financial grants for not-for-profit purposes are not used as a pretext for corruption.
- ▷ We disclose all sponsoring services and financial grants for not-for-profit purposes, as well as all political donations made.
- ▷ We may take a position on local and national political topics that affect our activities. We may provide limited financial means and resources for political action committees, parties or candidates if these are in accordance with the statutes of Swiss-Ski.

Codex 13_Data protection

- ▷ We do not use confidential information for personal advantage or for other impermissible purposes.
- ▷ We do not pass on confidential information to third parties, even after the ending of the working relationship or duties.
- ▷ After the termination of the working relationship or duties, we return to Swiss-Ski all operational documents that include confidential information.
- ▷ We protect the personal rights as well as the personal data of employees, athletes or committee members, along with all personal data from other persons that have been entrusted to us.

Reporting process

1. Reporting

In the event of suspicion of a breach of this Code of Conduct, this should be reported to the manager in the first instance. If not reported to the manager, then the head of human resources (HR) at Swiss-Ski should be notified as a neutral party. It should be reported personally or in written or verbal form. However, the person reporting should reveal their identity to the HR person at Swiss-Ski.

If the report goes to management, they judge the degree of severity and pass on the facts directly to the decision-maker (see point 3) in non-serious cases, and to HR in serious cases. If it is reported directly to HR, the CEO, or the president (if the case involves the CEO) is informed about the receipt of a report. HR ensures the anonymity of the person reporting, provided the person wants this.

There is now also the possibility to submit a report to an independent, external body.

2. Acceptance and treatment

The head of HR at Swiss-Ski is entrusted with the task and competence of accepting reports, checking their responsibility with regard to the Code of Conduct and, if there is responsibility, clarifying the facts. In particular, they may listen to the person reporting and if it appears necessary, also the person under suspicion, request documents and take all other measures they deem necessary. After processing of the facts has taken place, the head of HR at Swiss-Ski calls upon the CEO or the president (if the CEO is involved). Possible sanction measures according to employment law, for example, are prepared by HR at Swiss-Ski. However, specific sanction measures are pronounced exclusively by the decision-making body.

3. Decision-making body

The senior management team officiates as the decision-making body if it involves employees of Swiss-Ski, or the executive board of Swiss-Ski if it involves the CEO or other people subject to this Code of Conduct are involved. If the case involves a member of the decision-making body, they must automatically step aside.

Swiss-Ski protects the informer from any type of discrimination, insofar as the informer believes in good faith that their suspicion is well-founded.

Sanctions in the event of breach of the Code of Conduct

- ▷ Any breach of the Code of Conduct or other principles of Swiss-Ski, as well as any deliberate false reports of contraventions will be sanctioned by Swiss-Ski by applying the applicable law, and employment law in particular.
- ▷ Disciplinary measures for **employees** of Swiss-Ski range from verbal reprimand to termination to criminal charges in cases subject to criminal law.
- ▷ Disciplinary measures for **other persons falling under the Code of Conduct** range from verbal reprimand to possible exclusion from the association to criminal charges in cases subject to criminal law.
- ▷ Legal remedy / appeal
As an appellate court, the equal arbitration authority of Bern-Mittelland is responsible in employment law cases. All other cases are dealt with according to generally applicable jurisdiction in Switzerland.

Imprint

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