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**THREE-YEAR CORRUPTION PREVENTION AND  
TRANSPARENCY PLAN  
2021-2023**

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Rome,

CONI's Anti-Corruption and Transparency Officer

*(Mr. Marco Befera)*

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# 1. Foreword

## 1.1 The Three-Year Corruption Prevention Plan

The adoption of the PTPC is set out in Law no. 190 of 6 November 2012, containing "*provisions to prevent and suppress corruption and illegal conduct in Public Administration*", and fulfils the indications contained in the National Anti-Corruption Plan approved by the National Anti-Corruption Authority, according to art. 1, paragraph 2-bis, of the law itself. This law requires Public Administrations to adopt a Three-Year Corruption Prevention Plan to develop a corruption prevention strategy, outline an action plan based on the analysis of risk exposure levels of the offices and indicate sensitive areas, practical measures to implement according to each specific risk danger level and who is in charge of implementing each measure in a set time frame.

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CONI (Italian National Olympic Committee), an extension of the International Olympic Committee (IOC), is a Government body under the supervision of the Prime Minister's Office and is the Confederation of National Sports Federations and other sport organisations, according to Legislative Decree 15/2004.

The Body organises and promotes Italian sport focusing on achieving maximum sport diffusion, athletes preparation and provides suitable means to participate in the Olympic Games, in national and international sport events.

Law no. 145 of 30 December 2018 introduced significant governance changes in CONI, Sport e Salute S.p.A. (hereinafter "Company"), their relations and their areas of operation. In this respect, the rule has established that "*the top bodies of the Company are incompatible with the top bodies of CONI*". The State Attorney General's Office issued a ruling (Cs 44631119 Sez. A.G.) on the relations between CONI and the Company establishing that:

- the Company shall produce and provide public sport services while acting both as CONI's special purpose vehicle and independently implementing sports policies of the Government Body in charge of sport and supporting, for instance, National Sports Federations;
- the functions assigned by law are held by CONI, which shall use the Company's premises. The Company therefore shall act in an auxiliary capacity and shall be subject to CONI's management and monitoring powers for the functions performed by CONI;
- the service contract shall determine the services for the carrying out of the instrumental and executive activities necessary for the functioning of CONI, with the identification of the staff units necessary for the

carrying out of the activities themselves, it being understood that the Organisation exercises, in any case, on the organised structure, placed at its disposal, powers of direction and control, which are indispensable for the implementation of its institutional tasks, even if the employment relationship of the employees is exclusively linked to the Company.

On 4 November 2019, CONI stipulated a new service contract with Sport e salute S.p.a., which expired on 31.12.2019, in which the respective areas of activity were defined and the same Company issued some service orders that identified the offices dedicated to the functioning of CONI.

In 2020, taking into account all of the above, in discontinuity with previous years, it was decided to draw up the first Three-Year Plan for the Prevention of Corruption (PTPC) of CONI, independently from Sport e salute S.p.A.

On 29 January 2021, the Council of Ministers approved the Legislative Decree No. 5<sup>1</sup> on urgent measures concerning the organisation and functioning of CONI. In order to ensure the full functioning of the Committee and its autonomy and independence as a component of the International Olympic Committee (IOC), the text has given CONI its own staff, including executives, and provided that the staff of Sport and salute S.p.a., already employed by CONI on 2 June 2002, which at the date of entry into force of the decree is working for the same body under the regime of outsourcing, is transferred to the role of CONI staff with a qualification corresponding to the current one, without prejudice to the option to remain employed by Sport e Salute.

## 1.2 CONI's mission

CONI, Confederation of National Sports Federations (FSN) and Associated Sports Disciplines (DSA), is regulated by the Olympic Charter, by Legislative Decree 23 July 1999 no. 242, later modified by Legislative Decree 8 January 2004 no. 15.

According to art.1, paragraph 2 of the Statute, CONI shall govern, regulate and manage sporting activities, intended as an essential element for the individual's physical and moral training and an integral part of national education and culture. CONI's mission includes:

- defining the fundamental principles of sporting activities to ensure social and cultural integration and to fight all forms of exclusion, inequality, discrimination and violence;
- promoting maximum diffusion of sport in all age groups;
- promoting national teams' competitiveness, protecting national sports heritage and providing means needed for the Italian delegation to take part in the Olympic Games;
- protecting athletes' health and preventing and repressing the use of substances or methods that

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<sup>1</sup> On 23 March 2021, the Decree was finally approved but has not yet been published.

alter the athletes' natural physical performance in competitive activities.

With the legislative decree of 23 July 1999, no. 242, the so-called "Melandri law", having as its object the reorganisation of CONI, subsequently amended by legislative decree no. 15 of 8 January 2004, the Organisation was left without employees, assets, offices and instrumental means which were transferred *ex lege* to the company Coni Servizi S.p.A. (now Sport e salute S.p.A.), a company wholly owned by the MEF, whose President and other members of the Board of Directors were appointed by CONI and appointed by the MEF, whose President of the Company as well as the other members of the Board of Directors were designated by CONI and appointed by the MEF, as sole shareholder.

In order to carry out its tasks, CONI made instrumental use of CONI Servizi S.p.A., established by Article 8 of Legislative Decree No. 138 of 8 July 2002, converted with amendments into Law No. 178 of 8 August 2002, and amended pursuant to paragraph 629 et seq. of Article 1 of Law No. 145 of 30 December 2018. In particular, Sport e salute S.p.A. carried out the instrumental activity for the implementation of CONI's tasks and:

- succeeded the Organisation in all active and passive relationships, including financing relationships with Credit Institutions;
- has succeeded to the ownership of the assets belonging to the Public Organisation CONI and has taken over all the personnel employed by CONI.

Therefore, the relations, including the financial ones, between CONI and Sport e salute S.p.A. were governed by a service contract that was configured as the legal source of the concrete obligations and fulfilments with regard to the achievement of the objectives entrusted to the Company. CONI was responsible for the recognition and payment of contributions in favour of the sports bodies recognised by it (FSN, DSA, EPS, AB for approximately €277 million in 2018);

The relations between CONI and Sport e salute S.p.A., as well as their respective areas of operation, were changed by Law 145/2018, which made significant governance changes affecting both the Organisation and the Company. In particular, the new governance outlined by the aforementioned law has meant, among other things, that:

- the Board of Directors of Sport e salute S.p.A. is appointed by the Government Authority competent in sport matters, the Minister of Health and the Minister of Education, University and Research, in agreement with the Minister of Economy and Finance and in implementation of the choice of the Government Body competent in sport matters
- the governing bodies of the Organisation and of the Company are different and incompatible with each other;
- CONI appoints one of its deputy directors to the Board of Directors of Sport e Salute to take part in the meetings and decisions on the financing of sports bodies by the Company.

Legislative Decree no. 5 of 29 January 2021, on urgent measures concerning the organisation and functioning of the Italian National Olympic Committee, provided that CONI would have its own staff of 165, of which 10 would be non-general managerial staff. The process of converting the Decree into law was completed on 23 March 2021.

## 2. Regulatory Framework

### 2.1. International Framework

Corruption, in its broadest definition, means directly or indirectly offering, giving, receiving or requesting anything valuable to improperly influence the actions of another party.<sup>2</sup>

It is also defined as 'the unlawful use of influence in order to procure a benefit for oneself or others, in violation of the duties or rights of others'<sup>3</sup>

The Council of Europe, the OECD and the UN require their Conventions signatories to criminalise the "offering", "promising" and "giving" of a bribe<sup>4</sup>. This recalls the concept set out above.

Italy has ratified a number of anti-corruption conventions including:

- the 1997 *Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (Anti-Bribery Convention)*, ratified by Italy with Law no. 300 of 2000, and the *Recommendations* proposed by the Organisation for Economic Cooperation and Development (OECD), designed to develop content and prevention systems and to promote integrity and transparency;
- the *Strasbourg Civil and Criminal Law Conventions on Corruption* adopted by the Council of Europe in 1999 and ratified by Italy under Laws 110 and 112 of 28 June 2012, which establish the prosecution of active and passive public and private corruption offences and effective justice for people who have received damages resulting from an act of corruption;
- the *Merida Convention (United Nations Convention against Corruption)* adopted by the UN General Assembly on 31 October 2003 and ratified by Italy under Law 116 of 2009, which is the first tool implemented by the international community to fight corruption as a cross-border issue.

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<sup>2</sup> See 'Corruption: a glossary of International Criminal Standards' by OECD, 2007.

<sup>3</sup> A.C.F.E (Association of Certified Fraud Examiner).

<sup>4</sup> Bribery: "the offering, giving receiving or soliciting of corrupt payments to influence an official act or business decision"; Kickbacks: "improper, undisclosed payments made to obtain favourable treatment i.e., in relation to a government contracts".

CONI abides by the International Olympic Committee's *Code of Ethics*, which includes the principles and guidelines that National Olympic Committees and Sports Organisations must comply with and implement for the sake of integrity and good governance.

CONI also joined the *UN Global Compact in 2016*, a voluntary code that stems from the desire to promote a sustainable global economy and requires companies and organisations participating in it to adopt proactive behaviour to protect human rights, the environment, labour safety, fight corruption and more generally to support broader United Nations development goals.

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It is worth mentioning that there are two separate but related corruption prevention areas in the sports system, which must be taken into account in the fight against corruption.

The first area, defined *on the field*, concerns sports performance and events (e.g., doping, match-fixing, money laundering, referee and athlete fraud). The *off-the-field* area, on the other hand, covers organisational and administrative structure of institutions (internal sponsorship management processes, procurement, personnel selection, voting systems and event-bidding).<sup>5</sup>

These two areas have been the object of a recent production of soft laws, including:

- Committee of Ministers of the Council of Europe, *Recommendation Rec2005(8) on the Principles of Good Governance in Sports*;
- United Nations Office on Drugs and Crime (2010), *Good Practice Guidance on Internal Controls, Ethics, and Compliance*;
- OECD (2012), *Recommendation on Fighting Bid Rigging in Public Procurement*;
- United Nations Office on Drugs and Crime (2013), *Strategy for Safeguarding against Corruption in Major Public Events*;
- OECD (2015), *Effective Delivery of Large infrastructure Projects*;
- OECD (2015), *High-Level Principles for Integrity, Transparency and Effective Control of Major Events and Related Infrastructures and Recommendation on Public Procurement*;
- OECD (2016), *Principles for Leveraging Local Benefits from Global Sporting Events and Organising Sporting Events*;
- OECD (2017), *Recommendation on Public Integrity*;

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<sup>5</sup> CONI's PTPC is part of the off-the-field area.

- United Nations Office on Drugs and Crime (2018), *Manual on corruption surveys: Methodological guidelines on the measurement of bribery and other forms of corruption through sample surveys*;
- Group of States against Corruption – GRECO (15 April 2020), *Corruption Risks and Useful Legal References in the context of COVID-19*;
- OECD (2020), *Integrating Responsible Business Conduct in Public Procurement*;
- OECD (2020), *Procurement of major international sport-events-related infrastructure and services – Good practices and guidelines for the Olympic Movement*.

Finally, the CoE (Council of Europe) Convention concluded in autumn 2014 at the Macolin Conference of Sports Ministers against the Manipulation of Sports Competitions (match-fixing) is the first to contain rules binding the signatories to fight the manipulation of sports competitions. These include the countries duty to issue appropriate criminal legislation and mutual legal assistance. The "*Macolin Convention*" on the manipulation of sports competitions came into force on 1 September 2019, after being ratified by the first six countries (Italy, Norway, Portugal, Republic of Moldova, Switzerland and Ukraine). Italy signed the Convention on 7 April 2016 and finally adopted it at the end of the parliamentary procedure on 11 April 2019; on 16 May 2019 it was published in the Official Journal. To that end, the main goals of this Convention are:

- a) preventing, detecting and punishing national or international competitions national or cross-border match-fixing;
- b) promoting national and international cooperation among relevant government authorities, sport and betting organisations against match-fixing.

## 2.2. National Framework

Corruption, according to the legal concept provided by the Italian Criminal Code, is an offence that must necessarily be committed with complicity and its definition includes many cases in which a Public Official abuses their power to obtain private or Company undue advantages.

In the Criminal Code offences against Public Administration, a bribery is committed when a Public Official or a Civil Servant receives or accepts a promise of undue compensation from a private individual to:

- perform an act in their function (bribery to exercise a function or improper bribery, according to art. 318 of the Italian Criminal Code);



- delay or refrain from acting in the exercise of their function, or act against their function (proper corruption, according to art. 319 of the Italian Criminal Code);
- favour or damage a party in a civil, criminal or administrative trial (corruption in court proceedings, according to art. 319-ter of the Italian Criminal Code).

Law no. 190 of 6 November 2012 incorporates the indications of the Conventions ratified by Italy (see paragraph 1.1.) and introduces a corruption prevention scheme, in its broadest sense, on two levels:

1. national, by issuing the National Anti-Corruption Plan (PNA);
2. local, where all Local Governments adopt the Three-Year Corruption Prevention and Transparency Plan (now the Three-Year Corruption Prevention Plan) according to the indications provided in the PNA and in the implementing decrees. This was proposed by the Anti-Corruption and Transparency Officer.

With CiVIT Resolution no. 72/2013, on the proposal of the Civil Service Department, the National Anti-Corruption Authority published the 2013 National Anti-Corruption Plan (PNA 2013), according to art. 1, paragraph 2, letter b) of Law 190/2012 asking each Administration to:

- appoint the Anti-Corruption and Transparency Officer (R.P.C.T.);
- draw up the Three-Year Plan for Corruption Prevention and Transparency, assessing the level of corruption risk exposure for each office and indicating the measures to prevent such risk, with appropriate procedures to select and train employees in corruption-exposed departments.

In the National Anti-Corruption Authority's (ANAC) PNA, the definition of corruption is broadened as *maladministration*, which includes all those acts and behaviours which, even though not classified as specific crimes, hinder the necessary care of public interest and undermine public trust in the integrity of administrations and entities carrying out public activities.

In the same year, the introduction of Legislative Decree 39/2013 on "*The incompatibility of positions in public administrations and government-controlled private bodies*" provided an additional corruption prevention mechanism to avoid illegal agreements and conflicts of interest in public offices, as well as to prevent the causes of ineligibility and incompatibility of positions in public administrations and government-controlled private bodies.

With Resolution no. 12 of 28 October 2015 (PNA 2015), ANAC provided additional indications and clarifications on the contents of the previous PNA. It better defined the roles of internal actors involved in the Plan adoption process, specified the different phases of the corruption risk management process and, above all, in a special section, detailed the public contract risk area.

After that, the National Anti-Corruption Authority, with Resolution no. 831 of 3 August 2016, approved

the 2016 National Anti-Corruption Plan (PNA 2016), where ANAC provided important clarifications on the contents of the previous PNA and Legislative Decree no. 97/2016. More specifically, as a result of Legislative Decree no. 97/2016, the explicit reference to the three-year Programme for Transparency and Integrity (PTTI) has been deleted. Instead, the methods to implement transparency must be identified no longer in a separate act, but as an integral part of the PTPC, where those in charge of conveying and publishing documents, information and data are indicated in a special section along with organisational solutions that can ensure that transparency obligations in force are complied with.

Article 2-bis, paragraph 2, of Legislative Decree no. 33/2013, as amended by Legislative Decree no. 97/2016, also established that government-controlled companies must apply the same rules on transparency provided for Public Administrations, both in terms of organisation and activity carried out, "since they are compatible". The above Decree shows that the concept of transparency, which is closely related to integrity, is a key instrument to ensure compliance with the principles of impartiality and good performance, established by the Constitution, enabling public scrutiny over:

- fair and proper use of public authority;
- responsible fulfilment of institutional duties;
- efficient and effective use of government resources.

Transparency makes Public Administration more accessible to citizens and businesses and is a guarantee of total accessibility to public administrations.

On 2 October 2018, ANAC adopted Resolution no. 840 of 2 October 2018, which provided guidance on how to interpret and implement the R.P.C.T.'s powers to verify, monitor and investigate when cases of alleged bribery are detected or reported. The resolution was essential to provide consistent responses to several requests received from industry professionals and the very R.P.C.T.s.

With resolution no. 1074 of 21 November 2018, ANAC definitely approved the 2018 Update to the PNA. This document also provides clarifications on a few aspects concerning the R.P.C.T. revocation procedure and the creation of the Authority's list of Officers.

Lastly, with resolution no. 1064 of 13 November 2019, ANAC definitively approved the 2019 National Anti-Corruption Plan (PNA 2019). The Plan focuses on the general section of the PNA. It reviews and combines all past indications in one single steering document. It also includes directives developed over time, which have also been regulated by specific acts. In 2019 PNA, ANAC points out that corruption of public officials can occur in different environments and positions. There can therefore be corruption in political, law-making, legal and administrative decision-making. This does not change the unified nature of corruption as one single phenomenon. In this sense, expressions such as "*political corruption*" or "*administrative corruption*" refer to the context in which the phenomenon occurs rather than to

different kinds of corruption.

CONI refers to the following resolutions in its PTPC:

- no. 833 of 3 August 2016 containing guidelines on how the Anti-Corruption and Transparency Officer shall assess the ineligibility and incompatibility of administrative positions, as well as ANAC's monitoring activities and assessment powers in the event of ineligible and incompatible positions;
- no. 1310 of 28 December 2016 containing "First guidelines on how to implement the obligations of disclosure, transparency and dissemination of information contained in Legislative Decree no. 33/2013 as amended by Legislative Decree no. 97/2016".
- no. 1134 of 8 November 2017 containing "Guidelines implementing the legislation on the prevention of corruption and transparency by companies and private law entities subsidiaries of public administrations and public economic entities".

## 3. Corruption prevention process

CONI's corruption prevention process includes the following steps:

1. Outer context analysis;
2. Inner context analysis;
3. Risk assessment;
4. Risk management;
5. Implementing and monitoring process performance.

### 3.1. Outer context analysis

#### Recent international developments in the fight against corruption

Since the 1990s, corruption has been internationally recognised as a global phenomenon affecting public and private industries.

As in these industries, corruption scandals have also affected the sports industry, starting with the 2002 Winter Olympics in Salt Lake City, after which the International Olympic Committee adopted its own Code of Ethics and corruption prevention measures, up to the recent scandals involving FIFA.

Several international initiatives have been launched to respond to these phenomena in sport, including the IPACS (International Partnership Against Corruption in Sport), which involves both national states and international organisations such as OECD, Council of Europe, IOC, with the aim of establishing anti-corruption and integrity standards. It is a multilateral platform with the aim of "bringing together the different international sport organisations, governmental, intergovernmental and other relevant stakeholders to strengthen and support actions to fight corruption and promote the culture of good governance in sport", as outlined in the first working group meeting in June 2017. Both National States and international organisations such as the OECD, the Council of Europe and the IOC (CONI is the only Olympic Committee that participates) are involved in this partnership, with the aim of identifying anti-corruption and integrity standards. IPACS also set up three task forces in 2017 to help fight corruption in sport that will focus on the following priority areas:

- Reduce the risk of corruption in the procurement of sports events and infrastructure;
- ensure integrity in the selection of major sporting events, with an initial focus on managing conflicts of interest;
- optimising good governance compliance processes to mitigate the risk of corruption.

Each multi-stakeholder task force has developed specific initiatives such as checklists and pilot projects that are discussed at the annual meetings organised by IPACS, which are attended by representatives of numerous states, international sports organisations and experts from around the world.

In November 2017, UNCAC Resolution 7/8 "*Corruption in Sport*" was approved, which was firmly supported by the Anti-Corruption Department of the Italian Ministry of Foreign Affairs. It contains appropriate measures to tackle corruption, especially concerning international major events (e.g., the Olympic Games).

In the introduction, the Resolution underlines both UNCAC's key role in coordinating the actions of governments in the fight against corruption and the negative consequences that corruption has on sport as it undermines its importance in our society. The role of civil society, media, universities and private businesses is stressed with a multi-stakeholder focus. In the operational part, on the other hand, the importance of a solid domestic law-making system along with law enforcement procedures to coordinate and exchange information is emphasised. States are encouraged to develop confidential whistleblowing systems along with protection programmes for whistleblowers and witnesses. Finally, the Parties are encouraged to promote ethical practices, improve their own whistleblowing schemes and cooperate in the investigation of corruption, also in a broader sense.

On this, on 12 December 2018, the Council of Europe adopted recommendations calling on European governments to take measures to improve the fight against corruption in sport (*Recommendation CM/Rec 2018-12 of the Committee of Ministers to member States on the promotion of good governance in sport*).

CONI is strongly committed to anti-match-fixing policies and, in the framework of the EU Erasmus + programme, participated in the project AMATT - Anti Match-Fixing Top Training 2017-2019, which proposes specialised training to improve the capacity of sport bodies and promote qualified media involvement in the fight against match-fixing and the influence of criminal organisations in the world of sport. The project has seen the involvement of important international actors, including first and foremost CONI, ESSA (European Social Simulation Association), EASG (European Association for the Study of Gambling) for the world of betting operators). The project proposal significantly addresses the objective of tackling the transnational threat to the integrity of sport, and in particular match-fixing, because it proposes an action specifically aimed at seeking policy effectiveness through an emerging good practice in Italy. The last conference of the project was held at the CONI Hall of Honour on 8 October 2019, during the conference, the AMATT Multilevel Teaching Tool and the Guidelines for the Optimisation of Anti Match-Fixing Policies were also presented.

On this issue, on 8 October 2020, CONI and the Customs and Monopolies Agency signed two important memoranda of understanding. The first is aimed at combating the phenomenon of match fixing through a rapid and detailed transfer of information in the presence of abnormal flows of bets. The aim is to ensure fairness and transparency in the collection of bets and the regularity of the sporting competitions themselves. The second protocol is aimed at providing the most appropriate information and simplifying all the

formalities required for the introduction into the territory of the Union of the materials necessary for the holding of international events and exhibitions based in Italy.

Also of note are the initiatives promoted by the G20, on the occasion of the Anti-Corruption Working Group (ACWG) meetings, in which corruption prevention issues in sports organisations are discussed in depth.

Lastly, from 16 to 20 December 2019, the eighth Conference of States Parties (COSP) of the United Nations Conference against Corruption (UNCAC) was held in Abu Dhabi, a biennial appointment that allows to assess and guide the implementation of the Convention, a binding instrument of global scope aimed at preventing and combating corruption. Italy supported the resolution presented by Russia on safeguarding sport against corruption, for the recognition of the infiltration of organised crime in the world of sport and for a call to strengthen cooperation between sports federations and authorities, without prejudice to the principle of autonomy of sport. Italy also presented a resolution on the measurement of corruption, which underlines the importance of developing an international statistical framework based on scientific methodologies and reliable data sources, such as data of a direct experiential nature, official judicial statistics and risk and vulnerability indicators, in order to overcome the effects resulting from the use of merely perceptive indices, which risk increasing the public perception of the phenomenon depending not on its actual size, but on the effectiveness and notoriety of the law enforcement action developed by the competent authorities.

In the area of sport, the United Nations Office for Drug Control and Crime Prevention (UNODC) signed a Memorandum of Understanding with FIFA in September 2020 to intensify their cooperation to address crime threats to sport. The agreement seeks to build on the respective strengths of the two organisations to ensure a positive impact on the global fight against corruption and crime in and through sport, and to strengthen the positive influence of football on the world's youth, enhancing their resilience to violence and crime and promoting fair play, teamwork, non-discrimination, tolerance and respect.

At the G20 Summit on 21 and 22 November 2020 hosted by Saudi Arabia - which was held virtually due to the COVID-19 pandemic - Leaders of participating countries confirmed their commitment to promoting the fight against corruption at the global level and launched the "COVID-19 Call to Action Statement" which outlines the key objectives and priorities of G20 countries in their anti-corruption response to the crisis.

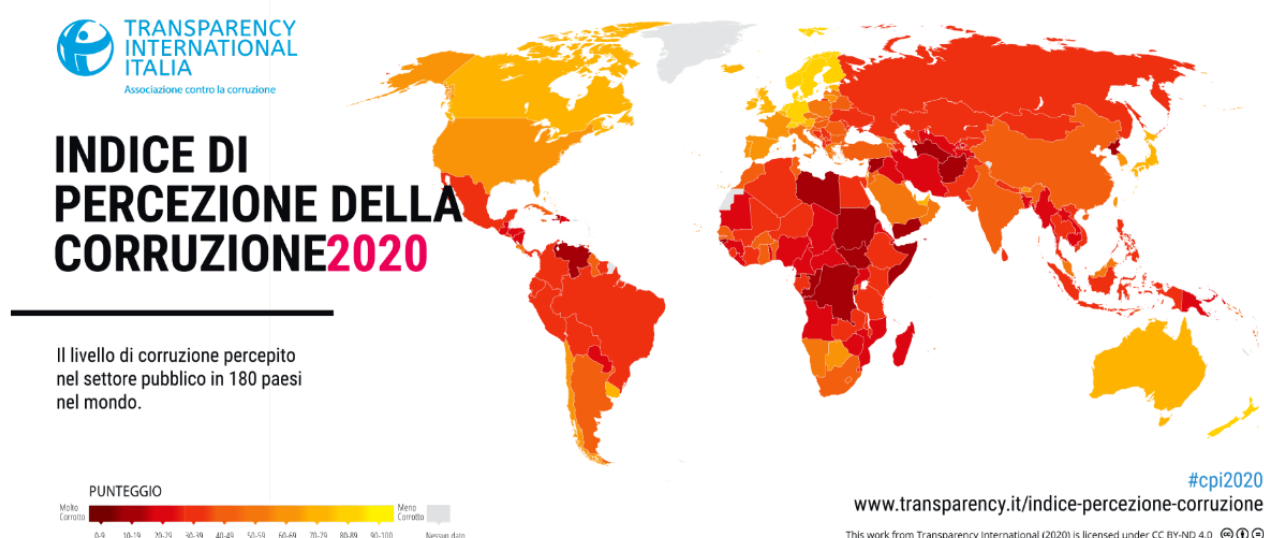
During the summit, the global anti-corruption achievements, as measured by the High-Level Principles adopted at the 2017 G20 Hamburg Summit, were presented and the initiative to create a global anti-corruption network to facilitate international efforts and cooperation formed by each country's anti-corruption law enforcement authorities was unveiled.

From December 2020, until November 2021, Italy assumed the chairmanship of the G20 with particular responsibility for the Anti-Corruption Working Group in order to provide a high-profile contribution to the preparation and implementation of the first UN Special Session on Corruption scheduled for 2021.

In his first speech to the Chamber of Deputies, the current Prime Minister, Mario Draghi, also addressed the issue of anti-corruption, stressing the need to "fight corruption that depresses the economy". In particular, the President said that "a country capable of attracting investors must defend itself against corrupt practices that depress the economic fabric and free competition. Legality and security are the basis for attracting investments, and the transparency of the PA is a logical prerequisite because it allows citizens to analyse every action".

Regarding the measurement of corruption, to date, the best known and most widely used index is the **corruption perception index** published by Transparency International (TI-CPI or Corruption Perception Index), which provides a national measure for most countries worldwide. The index quantitatively measures perceived corruption in the public sector by aggregating survey data produced by consultancy agencies (at least three for each country analysed). The study, published annually, is based on 13 surveys conducted by corruption experts in 180 countries around the world.

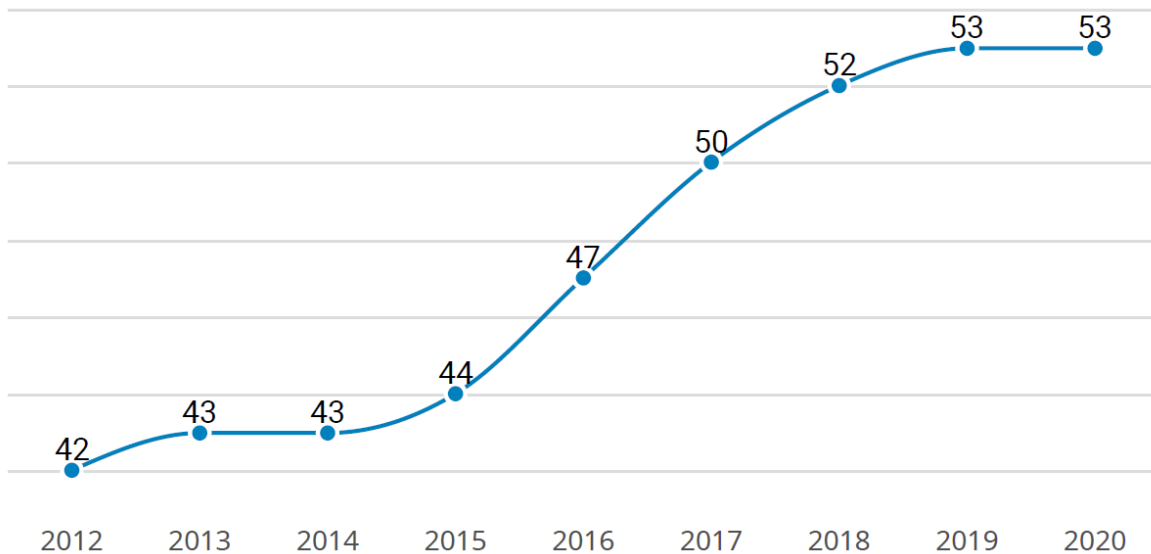
In addition, data from other studies in the field were cross-referenced: the "Democracy Index" produced by "The Economist Intelligence Unit", the "Freedom in the World Index" produced by "Freedom House", and the "Annual Democracy Report" produced by Varieties of Democracy.



source: <https://www.transparency.it/indice-percezione-corruzione-20120>

In 2020, the Corruption Perception Index sees Italy ranked 52nd in the world out of 180 countries, one position lower than in 2019, a score of 53 out of 100, recording a slowdown in the positive trend that had seen Italy gain 11 points from 2012 to 2019.

## ITALY'S TREND: 11 POINTS GAINED SINCE 2012



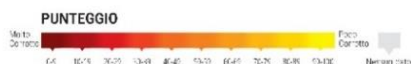
Source: <https://www.transparency.it/indice-percezione-corruzione>

## INDICE DI PERCEZIONE DELLA CORRUZIONE 2020

UNIONE EUROPEA

64/100

PUNTEGGIO MEDIO



PUNTEGGIO	PAESE	POSIZIONE	PUNTEGGIO	PAESE	POSIZIONE
88	Danimarca	1	50	Slovenia	35
85	Finlandia	3	47	Cipro	42
85	Svezia	3	37	Lettonia	42
82	Olanda	8	36	Polonia	45
80	Germania	9	54	Rep. Ceca	49
80	Lussemburgo	9	53	Italia	52
76	Austria	15	53	Malta	52
76	Belgio	15	50	Grecia	59
75	Estonia	17	48	Slovacchia	60
72	Irlanda	20	47	Croazia	63
69	Francia	23	44	Bulgaria	69
62	Spagna	32	44	Ungheria	69
61	Portogallo	33	44	Romania	69
60	Lituania	35			

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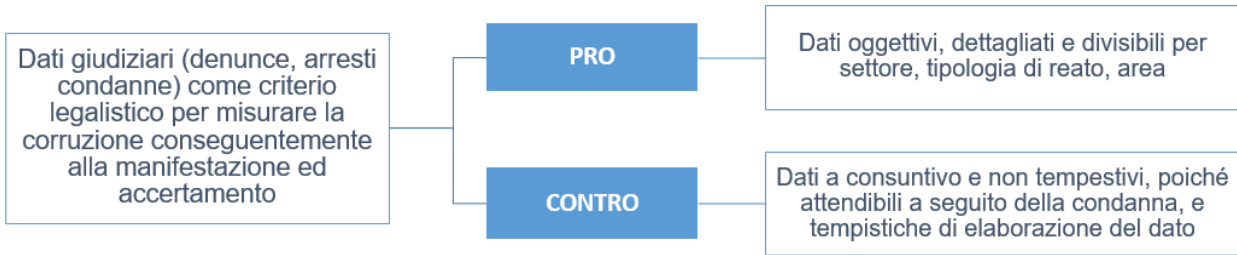
On this, there are three types of measurements.

- Court data:** corruption measured by the "legal" criterion, i.e., a direct experience of the phenomenon and corruption that already manifested itself (complaints, arrests or convictions);
- Perception indicators:** corruption measured in a broad sense, i.e., deviation from commonly accepted moral rules, and also measures latent corruption;
- Experience-based measurements:** corruption measured by surveying corruption episodes respondents' direct experience (rather than their perception). This strategy covers corruption in a broad sense and also measures the direct experience of latent corruption.

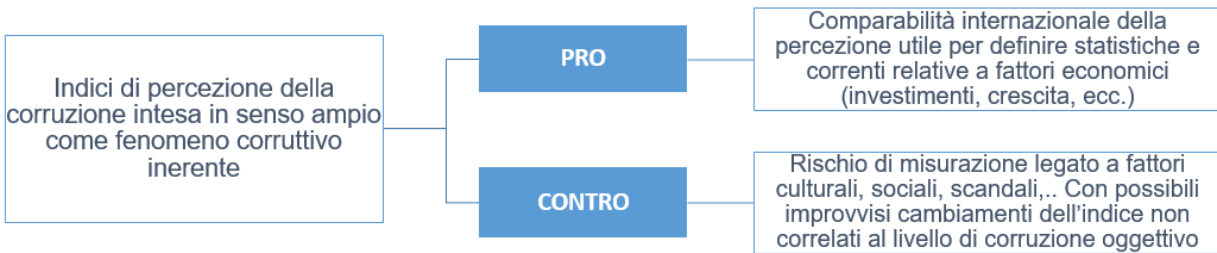


Each type of measurement has pros and cons, as summarised in the following tables:

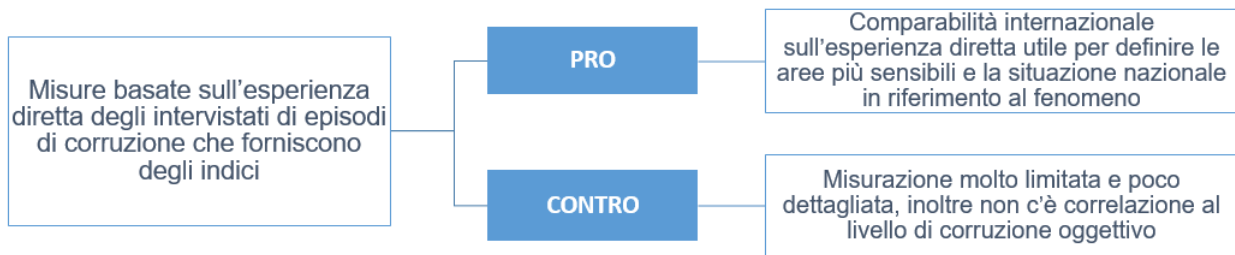
### Dati giudiziari



### Indici di percezione della corruzione



### Misure basate sull'esperienza



source: "la corruzione – definizione, misurazione e impatti economici" Vol.1 Formez.

### Recent national and international studies on corruption and fraud

The legal definition of fraud may vary according to jurisdiction. In Italy, there are several offences relating to fraud<sup>6</sup>, besides corruption.

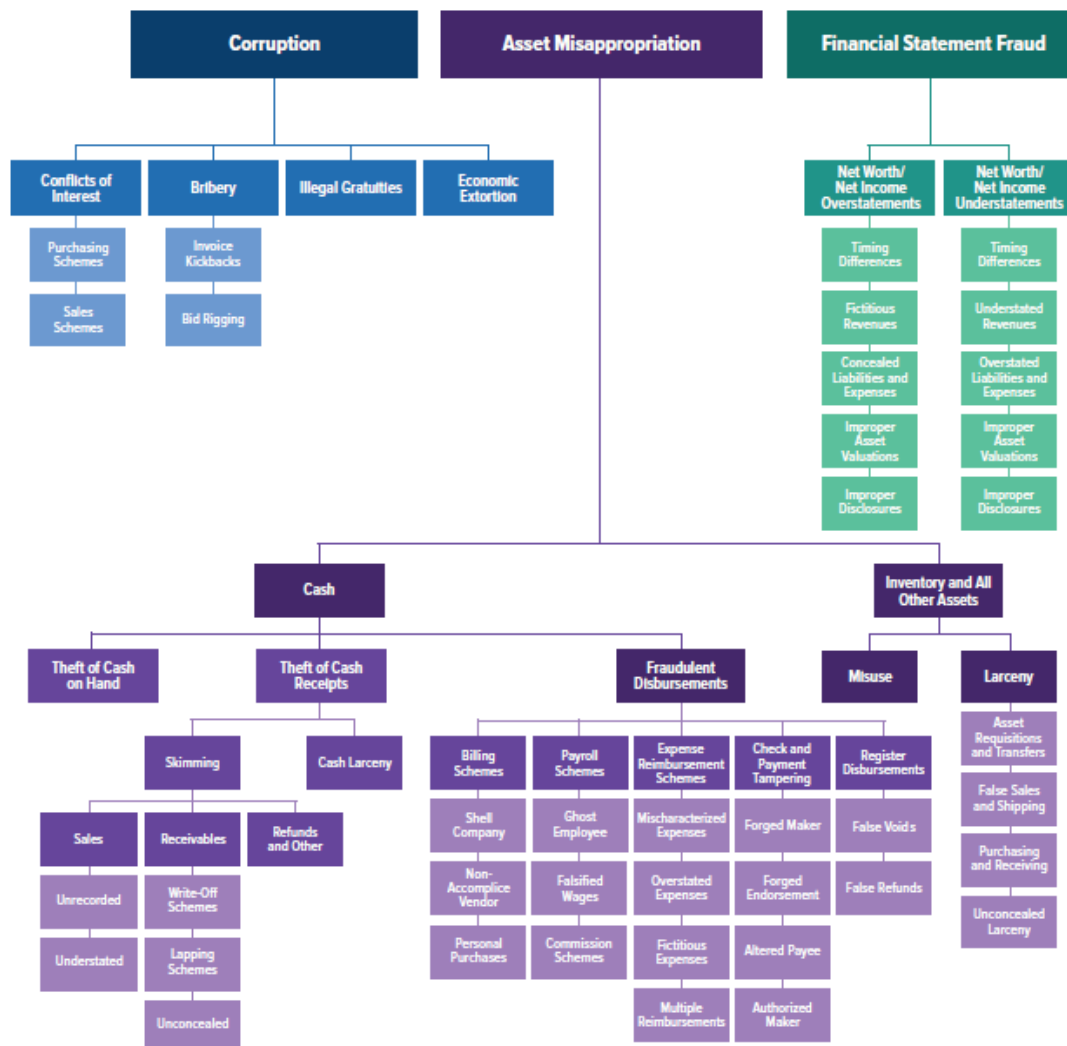
Internationally, a definition that is independent of individual national legal contexts has been developed by ACFE (Association of Certified Fraud Examiners) and AICPA (American Institute of Certified Public Accountants) and reads as follows:

<sup>6</sup> Such as, for instance:

- Fraud (art. 640 criminal code)
- Computer fraud (art. 640 ter criminal code)
- Insolvency-related fraud (art. 641 criminal code)
- Insurance fraud (art. 642 criminal code)
- Financial statement fraud (art. 2621 - 2621-bis - 2621-ter - 2622 civil code)
- Asset misappropriation (art. 646 criminal code)
- Sales fraud (art. 515 criminal code)
- Public procurement fraud (art. 356 criminal code)

“Any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain”.

ACFE has also developed the "Fraud Tree" diagram, which classifies the different types of fraud, in which corruption is one of the three main categories, along with asset misappropriation and financial statement fraud. The corruption "branch" is then divided into "conflicts of interest", "bribery", "illegal gratuities" and "economic extortion".

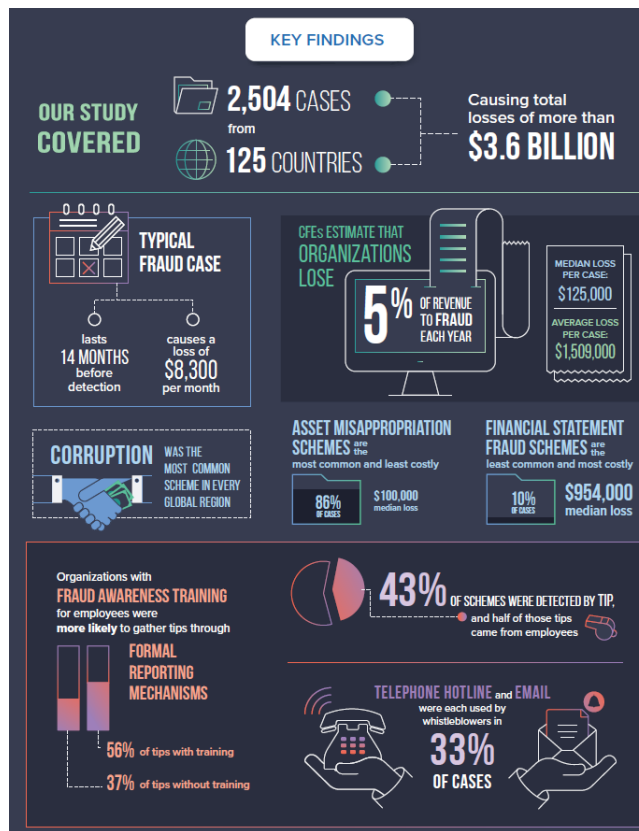


source: ACFE "Report to Nations 2020".

Finally, the ACFE itself produces every two years the "Report to Nations" in which data on global corporate fraud cases are reported.

The latest report was released in 2020 and is based on the findings of the 2019 Global Fraud Survey, which collected data on 2,504 cases of fraud between January 2018 and September 2019 in 125 countries (divided into 8 regions) with an estimated loss of over USD 3.6 billion.

With reference to the "Western Europe" region, no. 128 cases were analysed (of which no. 10 in Italy) with an estimated average loss of USD 139 thousand.

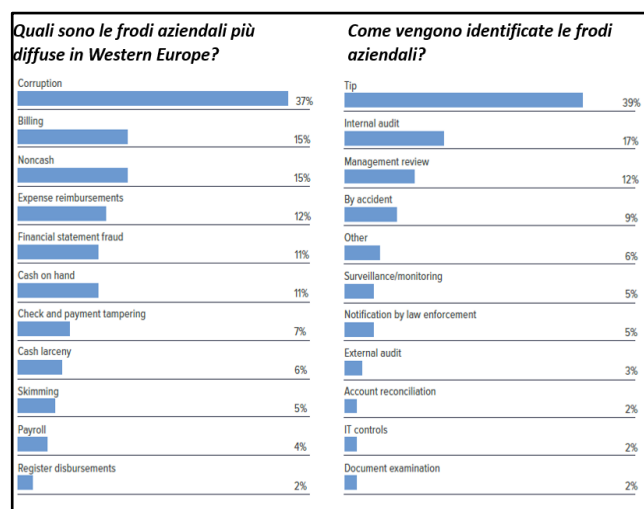


source: ACFE "Report to Nations 2020".

The study found that in "Western Europe", in line with what happened worldwide, the main fraud detected was bribery, followed by "billing schemes" (fraudulent payments, e.g., an employee charges the company for personal purchases) and "noncash" theft (e.g., theft of inventories, theft of confidential information, etc.).

Department*	Number of cases	Percent of cases	Median loss
Operations	288	15%	\$72,000
Accounting	277	14%	\$200,000
Executive/upper management	234	12%	\$596,000
Sales	225	11%	\$94,000
Customer service	175	9%	\$86,000
Administrative support	116	6%	\$76,000
Finance	101	5%	\$100,000
Purchasing	96	5%	\$200,000
Information technology	69	3%	\$200,000
Facilities and maintenance	60	3%	\$100,000
Warehousing/inventory	60	3%	\$85,000
Board of directors	45	2%	\$750,000
Marketing/public relations	40	2%	\$100,000
Manufacturing and production	35	2%	\$275,000
Human resources	27	1%	\$40,000
Research and development	14	1%	\$350,000
Legal	13	1%	\$195,000

\*Departments with fewer than 10 cases were omitted



source: Report to the Nations – 2020 Global Study on occupational fraud and abuse (ACFE)

The top three departments, as also reported in the 2018 report, by frequency of the "*fraud*" event are accounting, production and sales, which together account for 40% of the total fraud cases. In terms of "economic damage", the greatest damage is done by Executive and Upper Management, which caused a median damage of \$729k, along with Information Technology for \$225k and Accounting for \$212k.

Finally, the Report shows that in "Western Europe", the majority of cases (43%) were identified by "tip". (whistleblowing). In this regard, it is noted that it is of fundamental importance for companies, in order to reduce economic losses due to fraud, to implement a whistleblowing platform through which anyone can report potentially fraudulent conduct.

Finally, the ACFE study shows that, in executive and/or managerial positions, men on average cause more economic damage than women (also due to the fact that top positions are often held by men): the median economic damage caused by men amounts to \$150k, while that caused by women amounts to \$85k.

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In relation to the corruptive phenomenon in Italy, ANAC published on 17 October 2019 the document "*Corruption in Italy (2016-2019)*" in which, with the support of the Guardia di Finanza, the measures issued by the judicial Authorities in the last three years were analysed and a detailed picture of the corruptive events was drawn up in terms of geographical location, counterparts, entities, sectors and persons involved.

Although the type of analysis is of little use for the purposes of prevention, since it refers to a more restricted phenomenon of integrity and is drawn up with a considerable time lag from the event (e.g., a conviction is detected even many years after the corruptive episode took place), the results are objective and very detailed and broken down by territorial areas and sectors.

The most at-risk sector is public works, in a broad sense that also includes redevelopment and maintenance (buildings, roads, land safety): 61 corruption incidents were detected in the three-year period, representing 40% of the total. This is followed by the waste cycle (collection, transport, management, disposal in landfills) with 33 cases (22%) and the health sector with 19 cases (supply of medicines, medical equipment and instruments, washing and cleaning services), equivalent to 13%.

On the whole, an examination of the events that have come to light shows that corrupt exchanges take place in accordance with stable regulatory mechanisms, which ensure widespread compliance with a series of informal rules and which take on a different appearance depending on the predominant role played by the various centres of power (political, bureaucratic, business). In this respect, the ANAC analysis has made it possible to provide factual evidence of the so-called "dematerialisation" of the bribe, whereby the economic counterpart is becoming less and less frequent. Money continues to represent the main instrument of the unlawful agreement, so much so that it is used in 48% of the cases examined, often for small amounts (2,000-3,000 euros but in some cases as little as 50-100 euros) and sometimes as a fixed percentage of the value of

the contracts. In particular, the workplace is the new frontier of the *pactum sceleris*: especially in the South, the hiring of spouses, relatives or persons in any case linked to the corrupt (often for reasons of patronage) was found in 13% of cases. Next, testifying to the prevalence of more sophisticated criminal methods, is the assignment of professional services (11%), especially in the form of consultancy, often conferred on persons or legal entities linked to the bribe-giver or in any case compliant. Gifts are present in 7% of the cases.

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The outer context analysis aims to identify external factors/events, which may potentially represent corruption risk drivers.

This analysis was carried out according to the following logical categories of factors/events:

1. sport, society, culture (e.g., major events organisation);
2. law, finance and politics (e.g., lobbying activity);
3. industry and technology (e.g., the use of new data transmission technologies).

The most relevant categories in terms of impact and likelihood of occurrence are sports, social, cultural, legal, financial and political factors/events.

The first category is indeed made up of factors/events which, due to their unusual nature and the short, strict deadlines required to be prepared, may risk deviating from procedures and rules in order to obtain results, thus reducing the effectiveness of existing control systems. In other words, pressure generated could create an environment where achieving results is a priority that justifies violating or bypassing existing procedures<sup>7</sup> It is well known that such issues have historically been observed both in event bidding and in event organisation.

This is an inherent risk with high potential impact in financial and reputational terms and the likelihood of its occurrence is also high due to the pressure associated with the event.

In any case, these events do not occur very often.

As far as legal, economic and political factors are concerned, these are hypotheses that can basically be traced back to lobbying activities in order to unduly obtain rules in one's favour, especially in terms of allocation of financial resources and in matters that may affect CONI, FSN and DSA.

This case history also includes the hypothesis that in the face of new rules, for which compliance is required, CONI, in order to avoid penalties for non-compliance, carries out corrupt conduct in the face of controls and checks.

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<sup>7</sup>See *A Strategy for Safeguarding against Corruption in Major Public Events*, UNODC, 2013.

It is believed that the probability of such phenomena is very low, also in view of the absence of historical cases relating to this category of factors/events.

### 3.2. Inner analysis context

The ultimate goal of inner context analysis is to pinpoint sensitive areas where corruption risk is highest.

The activities at risk are determined according to how corrupt behaviours could be implemented, based on the risky behaviours specified in Law no. 190/2012.

CONI's activities at risk, which are in line with its institutional nature, mainly involve the offences of embezzlement and abuse of power, which take place as part of activities that:

- are the expression of one of CONI's institutional duties, such as administrative and accounting auditing at National Sports Federations;
- are necessary or in any case intended to issue acts which create, modify or eliminate a certain legal status for a given third party (e.g., recognition of National Sports Federations, etc.);
- are accounted in CONI's Budget.

The activities at risk, and their inherent risk assessment, were specifically analysed by the Managers of the departments involved, with the support of the R.P.C.T., (see par. 2.3 below "*Risk assessment - Operating procedures*") in order to understand the results of R.P.C.T.'s supervisory and control activities carried out during the year, the level of risk awareness and knowledge of the departments involved and recent important organisational and legal news on the matter (e.g. Law no.145 of 30 December 2018).

The following table contains the provisional list of activities at risk, considering the service contract between CONI and Sport e Salute S.p.a signed on 4 November 2019 and valid until 31 December 2019, the Company's service messages which established the offices totally or partially dedicated to CONI's operation and awaiting the service contract renewal. The following table contains the provisional list of activities at risk:

Table 1. Activities (n.16) relating to the risks of offences pursuant to Law 190/2012

Attività a rischio	Livello di RISCHIO INERENTE
Assegnazione dei contributi per l'attività istituzionale di preparazione olimpica, paraolimpica e di alto livello delle FSN	<b>ALTO</b>
Gestione contabilità, tesoreria e Bilancio CONI	<b>MEDIO</b>
Procedure amministrative dei Comitati Territoriali (acquisto di beni e/o servizi, collaborazioni, spese di rappresentanza, missioni)	<b>MEDIO</b>
Gestione istruttoria CIS	<b>MEDIO</b>
Gestione contenziosi CONI	<b>MEDIO</b>
Assegnazione dei contributi alle Comunità Italiane all'Estero	<b>MEDIO</b>
Attività di supporto al Comitato Controlli Antidoping	<b>MEDIO</b>
Attività di supporto alla Procura Antidoping	<b>MEDIO</b>
Sviluppo sponsorizzazioni, accordi di partnership, collaborazione	<b>MEDIO</b>
Riconoscimento degli organismi sportivi (Discipline Sportive Associate, Associazioni Benemerite ed Enti di Promozione Sportiva)	<b>BASSO</b>
Gestione obblighi trasparenza	<b>BASSO</b>
Convocazione della Giunta Nazionale e gestione delle delibere	<b>BASSO</b>
Verifica conformità di statuti e regolamenti delle FSN e degli altri organismi sportivi riconosciuti dal CONI Ente	<b>BASSO</b>
Gestione delle verifiche e delle richieste del Collegio dei Revisori / società di revisione	<b>BASSO</b>

Compared to the previous mapping of the activities at risk identified in the 2020-2022 PTCP, taking into account the evolution of the regulatory context and the consequent reorganisation of CONI, the following are the changes made to the risk and control assessment carried out:

New activities:

- *Administrative procedures of the Territorial Committees (purchase of goods and/or services, collaborations, entertainment expenses, missions)*
- *Support activities for the Anti-Doping Control Committee*
- *Support activities for the Anti-Doping Prosecutor's Office*
- *Management of transparency obligations*
- *Convocation of the National Board and management of resolutions*
- *Development of sponsorship, partnership agreements, collaboration*
- *Management of audits and requests from the Board of Auditors / auditing company*

Activities to which the level of inherent risk has varied:

- *CONI Litigation Management, from HIGH to MEDIUM,*
- *Recognition of sports bodies (Discipline Sportive Associated Sports Disciplines, Well-deserving Associations and Sports Promoting Organisations), MEDIUM to LOW.*

For the activities "Approval of the budgets of the FSNs" and "support to the sports justice bodies", no concrete risk hypotheses have been identified.

Following the conversion of the CONI reorganisation decrees into law, should further activities emerge that can be defined with reasonable certainty as falling within the competence of CONI itself, they will be the subject of specific self-risk assessment activities in order to assess the level of inherent risk and identify the relative control measures put in place by the Organisation.

### 3.3. Risk Assessment

For each activity, the CONI's R.P.C.T. supports the managers of the company structures involved in assessing the inherent risk in order to define a priority for intervention.

Inherent risk assessment is carried out through worst-case methodology, based on the following dimensions:

- probability;
- potential impact.

#### **Probability of occurrence assessment**

The probability of occurrence is assessed in relation to the following variables:

- Conduct complexity needed to realize the infringement, which is defined in relation to elements such as the number of people/departments that it is necessary to involve for the conceivable realization of the crime pattern, the publicity/spread of actions/documents abuse object, the technical complexity/accessibility of such documents, etc.;
- Concreteness of interest/benefit of the briber/extorted person, so the interest/benefit conceivable from the conduct is defined in a specific and detailed way in order to determine the real "*motivational drive*".

For each variable are defined the following three levels:



Variables	High (A)	Medium (M)	Low (B)
<b>Level of conduct complexity needed to realize the infringement</b>	People to be involved to realize the infringement have to be more than 3 and belonging to different departments/units. Actions needed to realize the infringement involve several business activities and information systems equipped with application controls. Documents needed to realize the infringement is easily accessible within the organization and contents are easily understandable.	People to be involved to realize the infringement have to be less than 3 and belonging to different departments/units. Actions needed to realize the infringement involves different activities and information systems. Documents needed to realize the infringement is accessible only to limited user categories and contents can be easily understood only by concerned people.	All people belong to the same department/unit. Actions needed to realize the infringement is not complex or difficult and do not require the use of information system equipped with application controls. Documents needed to realize the infringement is accessible only with formal request and contents are highly technical.
<b>Real interest/benefit obtained from the infringement</b>	Interest/benefit that could be realized is real, direct and immediate, either for passive and active parties. There are documented historical cases related to the infringement.	Interest/benefit that could be realized could be realized concrete, direct and immediate only for one of the parties (passive or active), while for the other one is more articulate and indirect. There are documented historical cases related to the infringement, even if not directly attributable to the sports system.	Interest/benefit that could be realized is difficult to configure. There are not documented historical cases related to the infringement.

Probability level assessment (High, Medium, Low) is carried out through the following matrix, which expresses a combined value of the two variables previously explained.

**Livello di probabilità**

<b>Complessità</b>	Basso	<b>M</b>	<b>A</b>	<b>A</b>
	Medio	<b>B</b>	<b>M</b>	<b>A</b>
	Alto	<b>B</b>	<b>B</b>	<b>M</b>
		Basso	Medio	Alto

**Interesse/vantaggio**

Additional qualitative/quantitative factors, such as the frequency of risky acts/measures, the presence of

strong external pressure, the professional/institutional/high risk market environment, etc., are also considered in the probability assessment.

**Level of potential impact assessment**

The potential impact of a corruptive event can be expressed in different ways connected to the corruptive crime pattern and to the type of sensitive activity and it is assessed in relation to the following dimensions:

- **reputational:** the reputational impact is assessed taking account of the news spread level from media and of any consequent damage of CONI image;
- **economic-financial:** the economic and financial impact is assessed taking account of CONI damages caused by crime commission;
- **legal sanction:** the legal impact at sanction level is linked to possible crime commission, which may involve the initiation of a judicial proceeding and/or the sanction imposition.

In this way, that dimension has the same impact level on each sensitive activity therefore, being a "constant", it is not assessment topic.

The table below provides the assessment scale of the level of potential impact.

Dimensions	High (A)	Medium (M)	Low (B)
<b>Reputational Impact</b>	Alert by national and international media with long-term damage of CONI public image	Alert continued by local media with consequence on CONI stakeholders	Minimum alert at local media level and with short-term.
<b>Economic-Financial Impact</b>	Economic-financial estimated impact is more than 1% of the production value of CIP S.p.A.	Economic-financial estimated impact is between 0.5% and 1% of the production value of CIP	Economic-financial estimated impact is less than 0,5 % of the production value of CIP
<b>Legal Sanction Impact</b>	Constant concerning the initiation of administrative and judicial proceedings and the imposition of the sanctions.		

**Inherent risk assessment**

The inherent risk assessment is carried out through the combination of probability and potential impact levels for each corruptive crime pattern.

Where inherent risk value is high (A) these activities have a high relevance, needed priority and the periodic monitoring cycle, for each subsequent stage of the risk management process.

Where inherent risk value is medium (M) these activities have a relevance that is conditioned by the priority assigned to activities with a high inherent level of risk. Where inherent risk value is low (B) these activities are characterized by opportunities assessment regarding monitoring terms and any corrective actions to be implemented.

**Livello di rischio inerente**

<b>Probabilità</b>	Alto	M	A	A
	Medio	B	M	A
	Basso	B	B	M
		Basso	Medio	Alto
		<b>Impatto potenziale</b>		

## Operating Procedures

R.P.C.T. supports the Company Managers competent to identify the relevant risk activities for the purposes of the Law 190/2012 and carry out an inherent risk assessment for each activity.

The results of the analyses carried out are formalized in a *matrix of risk activities*, in which for each activity the conceivable offences, the patterns of conduct and the assessment of the inherent risk are indicated. This documentation is considered to be an integrated part of this PTPC.

### 3.4. Risk Treatment

Considering the organisational structure that characterizes CONI, the control criteria to monitor the risk activities have been identified in relation to the measures for the prevention listed in the Anti-corruption Plan and considered more important and/or in consideration of the organizational structure of CONI.

The control criteria identified are applicable in relation to CONI as indicated in the table below:

Control criteria	CONI
1. Duties separation	Applicable after single activity assessment
2. DATA and documents traceability	✓
3. Powers formalization	✓
4. Procedures, protocols, acts on activities management	✓
5. Anti-Corruption Staff training	n/a
6. Conflict of interest management and integrity requirements related to corruption crime	✓
7. Collegial decision-making	Applicable after single activity assessment
8. Decision traceability	Applicable after single activity assessment
9. DATA, documents, actions transparency and accessibility	✓
10. Information flows towards R.P.C.T.	Applicable after single activity assessment

R.P.C.T. supports the Company Departments Managers in charge of specific prevention controls/measures identification and assessment for each activity mapped in the Plan through above criteria.

In particular, the assessment is carried out by the following values scale:

- adequate - the control/measure detected is adequately planned in order to reduce the inherent risk level of crime commission to a minimum residual risk level;
- partially adequate - the control/measure detected shows aspects to be reviewed/integrated or needs improvement in order to reduce the residual risk level to a minimum level;
- inadequate - The control/measure is not detected or is not logically able to reduce the inherent risk level, which remains substantially unchanged.

The following scores are associated with the individual controls assessment:

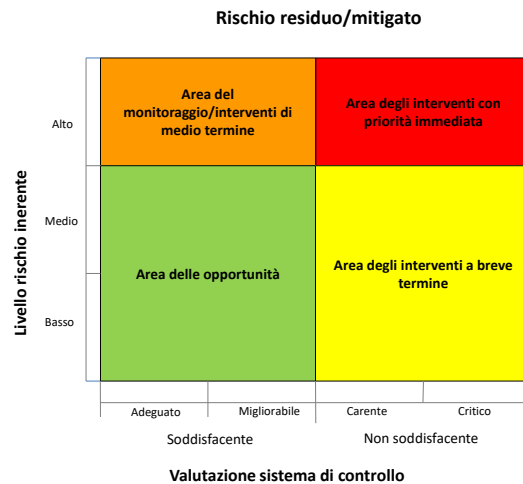
- 1 (Adequate);
- 0,5 (partially Adequate);
- 0 (Inadequate).

The scores sum obtained by the individual checks/measures detected expresses the summary monitoring system assessment based on the following ranges:

SATISFACTORY MONITORING SYSTEM (range 100%-80%)		NO SATISFACTORY MONITORING SYSTEM (range 79%-0%)	
Adequate	Improvable	Lacking	Crucial
Range: 100%-90%	Range:89% -80%	Range: 79% -51	Range:50%-0
Every single controls/measures deemed adequate or just one control showed improvable aspects in order to optimize monitoring system considered mainly satisfactory.	A Control/measure needed substantial changes or two controls showed improvable aspects in order to optimize monitoring system considered mainly satisfactory.	At least two controls/measures needed substantial changes or more controls showed improvable aspects in order to optimize monitoring system considered not satisfactory.	Most of controls/measures needed substantial changes or showed improvable aspects in order to optimize monitoring controls considered not satisfactory.

The adequacy individual controls/measures assessment and the monitoring system do not include any evaluation of their effectiveness, because next stage object of the risk management system.

The **residual or "mitigated"** level of risk, defined as risk remained in an activity after the assessment, derives from the combination of the inherent risk level and monitoring system assessment as indicated in the following matrix:



◆ **Interventions Area with Immediate Priority:** the inherent risk level in the activities has been assessed as "High" and the monitoring system appears to be "no satisfactory" overall (lacking or crucial) in relation to its ability to mitigate this risk level; it is therefore necessary to define and implement corrective actions to be carried out rapidly, giving priority sensitive activities that present critical control aspects.

◆ **Short-Term Interventions Area:** the inherent risk level in the activities has been assessed as "Medium/low" and the monitoring system appears to be "no satisfactory" overall (lacking or crucial) in relation to its ability to mitigate this level of risk; it is therefore necessary to define corrective measures to be implemented, giving priority actions in relation to the previous area, but maintaining a constant level of attention to these activities at risk.

◆ **Medium-Term Monitoring/Interventions Area:** the inherent risk level in the activities has been assessed as "High" and the monitoring system appears to be "satisfactory" overall (adequate or improvable) in relation to its ability to mitigate this risk level; it is therefore necessary to continue control the effective functioning of the monitoring system or the possible presence of organizational, technical and procedural changes. In some cases, the already satisfactory control system has optimization aspects, so as to asset possible intervention, giving priority actions in relation to the previous areas.

◆ **Opportunity Area:** the inherent risk level in the activities has been assessed as "Medium/low" and the control system appears to be overall "satisfactory" (adequate or improvable) in relation to its ability to mitigate this risk level; therefore, no needs priority actions.

### Operating Procedures

R.P.C.T. annually supports the Company Departments Manager in adequate controls/measures identification and assessment for each risk activities identified in PTPC.

Controls/measures Mapping and Assessment are formalized in **self-assessment forms** sent to the single activities Managers, in which those controls/measures description and evaluation are identified in reference to each applicable control criteria, as well as any necessary and appropriate corrective actions. These forms are integrated part of this PTPC.

### 3.5. Process Monitoring

CONI identifies the monitoring system procedures, techniques and frequency for corruption prevention measures, also in order to periodical update them.

Every 15th December of each year, R.P.C.T. publishes on the website in the “Amministrazione Trasparente” section, and sends to CONI Board of Directors a report containing the prevention activities results carried out with a form set by ANAC, as well as another internal report containing:

- achievement status on goals regarding corruption prevention, as well as transparency and integrity;
- periodic information flows;
- audit performed;
- training conducted;
- assessment performed on incompatibility declarations and foreclosure to confer an assignment according to Legislative Decree no. 39/2013.

In general:

1. given the residual risk assessments, some controls/measures may be subject to corrective actions aimed at improving their level of logical adequacy. These actions, whose implementation is the responsibility of the structure managers, are monitored by the R.P.C.T.;
2. if the outcome of the residual risk assessments is positive and the need for corrective actions on adequacy is not identified, the controls/measures may be subject to specific verifications (tests) aimed at assessing their operational effectiveness. The audit reports are forwarded to the competent structures with any suggestions and actions to be taken;
3. the activities at risk are monitored also on the basis of the information flows defined by the R.P.C.T. On this point, reference is made to what is described in the next chapter.

### 3.6. Roles and Responsibilities

“Corruption” risk management is a cross, ongoing and iterative process that provides for active participation and involves top management bodies, managers, staff and collaborators, who must apply corruption risk prevention actions.

2013 Anti-corruption Plan states: "*all departments employees involved in the activity shall maintain their own responsibility level in relation to actually duties performed. Furthermore, in order to achieve corruption prevention, the manager activity must be closely connected and coordinated with that of all departments employees activities*".

Within their own responsibilities, duties and tasks, all employees and collaborators must perform their activities in compliance with the procedures and controls, as well as they must make appropriate and necessary non-compliance reports, also in relation to malfunctions of monitoring system.

The Company Departments Managers perform relevant activities assessments - supported by R.P.C.T. - monitoring prevention controls/measures adequacy and effectiveness in those activities, as well as implementing any corrective actions identified and, finally, making any appropriate and necessary non-compliance reports, also in relation to malfunctions of management system applied.

The Top Management Bodies must know the organization main risks, the monitoring process, the anti-corruption goals in compliance with the organization mission, as well as the main control activities results and the remedies to be taken.

R.P.C.T. manages and monitors the corruption prevention process, eventual updating and integration needed, supporting the assessment management, auditing the corrective actions to implement.

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The CONI's National Board:

- appoints the CONI Manager in charge of Corruption Prevention and Transparency;
- appoints the Independent Assessment body (OIV);
- approves the Three-Year Anti-corruption Plan within the legal deadlines;
- receives the annual Internal Report form R.P.C.T.

CONI Chairman:

- in case of missed policy-making bodies meeting within the legal deadlines, they can approve the Three-year Anti-Corruption Plan, ratifying it at the first useful National Board and the Board of Directors Meeting;
- can be delegated to make any changes to the PTCP during the year, notifying the first useful meeting of the National Board.

CONI Secretary:

- receives reports from the R.P.C.T. about cases of non-support or collaboration, failure or delayed fulfilment of interventions or publication obligations and conflicts of interest;
- notifies the Human Resources Department of cases of non-support and collaboration with the R.P.C.T. for the purpose of eventual activation of the most appropriate actions and / or disciplinary proceedings.
- performs the necessary and appropriate actions in the event of reports of conflicts of interest reported by the R.P.C.T.

The Independent Evaluation Body (OIV):

- verifies that the Three-year Anti-corruption Plans are consistent with the mission and objectives, if formalised;
- verifies R.P.C.T. Annual Report contents in compliance with Anti-corruption Plan goals and transparency goals. For this purpose, the Body itself may ask R.P.C.T. necessary information and documents and may carry out hearings of employees;
- reports to the National Anti-corruption Authority the state of implementation of corruption prevention and transparency measures.

In any case, with regard to the detailed analysis of the role of the OIV following Legislative Decree 97/16, please refer to the PTPC 2017-2019.

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The Anti-Corruption Officer (R.P.C.T.):

- prepares and updates the Three-year Corruption Prevention Plan and sends it to the CONI National Board for approval and publishes it;
- prepares the audit plan, giving information to the OIV;
- supports the managers of the structures in the identification, evaluation and management of potential corruption risks;
- monitors the implementation of corrective measures by the Managers of structures;
- carries out second-level monitoring of first-level controls and prevention measures for activities at risk;
- plans and monitors staff training with risk-based logic;
- reports to the National Board at least once a year or transmits the PTPC and the annual report;



- reports cases of lack of support or cooperation, failure or delay in fulfilling actions or publication obligations and any other critical issue to the Secretary of CONI and, as far as it is concerned, to the OIV. In the event of inaction by the aforementioned bodies, and if necessary, the R.P.C.T. shall report directly to ANAC;
- transmits the annual report on the activities carried out within the deadlines set by law to the National Board of CONI, and to the OIV;
- controls any cases of incompatibility and incompatibility, declares the nullity of the appointments and assesses the application of sanctions pursuant to Legislative Decree 39/13;
- receives reports of conflicts of interest detected by the corporate structures by means of specific forms and reports to the Secretary of CONI.

Those in charge of corporate structures:

- identify and assess the risks and control measures of the activities for which they are responsible, with the support of R.P.C.T.;
- carry out first level checks and prevention measures;
- implement all the corrective actions identified with the support of the R.P.C.T.;
- make appropriate or necessary alerts to R.P.C.T., also in relation to malfunctions of the internal control system and conflicts of interest detected;

Employees and collaborators involved in corruption risk's area:

- carry out relevant activities in compliance with the procedures established for corruption risk activities;
- carry out appropriate and necessary reports, also in relation to malfunctions of the internal control system;
- sign declarations about conflicts of interest, when it is required.

## **4. Appointment, powers and duties of the R.P.C.T.**

CONI's R.P.C.T. must be able to unbiasedly perform their duties and be protected from possible retaliation. To this end:

- a) the R.P.C.T. term shall last four years, as the timespan between Olympic games;
- b) the term shall tacitly be renewable for a maximum of three terms;
- c) it can be revoked for a just cause by CONI's National Board;

- d) the revocation shall be automatic if criminal proceedings have been initiated against the Officer for corruption;
- e) in the cases referred to in letters c) and d) above and in case of employment contract termination, art. 15 of Legislative Decree no. 39/2013 shall apply, which requires ANAC to be notified of the dispute so that ANAC can request a review before the termination becomes effective.<sup>8</sup>

The R.P.C.T. shall be independent and shall only report directly to CONI's National Board.

The R.P.C.T. shall be assigned appropriate and adequate powers to independently and effectively perform their duties, including the power to monitor the actual implementation of control measures provided in the Plan.

In order to perform their duties, CONI's R.P.C.T. shall have unrestricted access to relevant information for their investigation, analysis and monitoring activities; they may request relevant information from any department, which is required to respond.

In order to perform their monitoring and control duties, the R.P.C.T. shall rely on Sport e Salute S.p.A. Internal Auditing and Corporate Compliance Department's support (IACC), so as to have the highest level of specific expertise and continuity of action available.

Where necessary or appropriate, the R.P.C.T. may use the advice of the other internal departments in order to have the highest level of specific expertise, continuity of action and availability of dedicated and technically prepared resources.

The R.P.C.T. shall have an adequate budget to properly and regularly perform their duties and achieve the Plan's goals.

All those involved in the corruption prevention system must cooperate with the R.P.C.T. by providing the information required so that the R.P.C.T. can properly perform their task both while preparing and updating the PTPC and during the following phases of measures implementation check and monitoring.

The R.P.C.T. and all those working with them, in any capacity whatsoever, must comply with the obligation of confidentiality on all the information they learn while performing their duties.

In any case, all information shall be managed according to the relevant legislation in force and, in particular, in compliance with Legislative Decree no. 101 of 10 August 2018 *"Adaptation to EU Regulation 2016/679 for personal data protection"*.

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<sup>8</sup> See also *"Rules on the Authority's power to request a review for revocation or discriminative measures adopted against the Anti- Corruption and Transparency Officer (R.P.C.T.) for corruption prevention activities"*, Resolution no. 657 of 18 July 2018.

The R.P.C.T. must report anomalies and cases of lack of support and cooperation to the Secretary General of CONI and to the OIV, who inform the Human Resources, Organisation and Sports School.

In the event of non-compliance with the obligations connected with the role of the Anti-Corruption and Transparency Officer, the provisions on disciplinary liability set out in the CCNL and the Disciplinary System in force.

Furthermore, according to art. 1, paragraph 12, of Law 190/2012, if a corruption offence is committed and confirmed by a final judgement, the R.P.C.T. is liable according to art. 21 of Legislative Decree 165/2001, as amended, and can also be charged of fiscal damage and damage to CONI's public image, unless the R.P.C.T. can prove that they:

- prepared the PTPC before the fact and complied with the requirements of Law 190/2012 about their duties;
- supervised PTPC implementation and compliance.

## 5. Information flows

Information flows are an important prevention measure and are defined by the R.P.C.T., who supervises compliance with the three-year Corruption Prevention Plan.

The information flows may be subject to periodic review, without prejudice to the power of the R.P.C.T. to amend or supplement, during the course of the year, the information necessary and functional to the respective supervisory duties, also on the basis of any regulatory or organisational changes, news and reports on possible violations, and the results of the reports themselves.

On the basis of these information flows, the R.P.C.T. may request specific in-depth analyses, with the support of the Internal Auditing Corporate Compliance (IACC) office of Sport e Salute S.p.A., and report to the CONI Secretary General any criticalities.

The information flows have been defined on the basis of the mapping and assignment of the potential risk profile of the activities of the CONI with reference to the Three-Year Corruption Prevention Plan.

For each activity assessed as having a "medium" or "high" risk, "red flags" have been identified, i.e., indicators of potential fraud or illegal/non-compliant conduct, with reference to the offences under Law 190/2012.

Red flags are "anomalies", non-compliant or prohibited conduct, events or operations indicative of "exceptions" or "derogations" with respect to normal operations or to the rules prescribed by the procedures (e.g.: request for payments on demand by a supplier's invoice, sending a candidate's CV).

Such red-flags or anomalies must be recognised and identified by the competent corporate structures, which, as the first level of corporate control, are obliged to identify and report them to the R.P.C.T. In relation to each red-flag identified, information flows have been defined on the basis of the following criteria:

*a) exception:* the flows have contents related to exceptions;

*b) drill down:* the information contents of the flows are normally defined at an aggregate level and may be subject to subsequent in-depth analysis or detailed checks;

*c) periodicity:* the periodicity of flows is defined in relation to the degree of risk and the frequency of the sensitive activity to which they relate.

The R.P.C.T., with the support of the IACC of Sport e salute Spa, defines the information flows and informs SG.

The competent company structures are responsible for first-level controls, reporting of anomalies and transmission of information flows to the R.P.C.T., according to the defined periodicity. They are also required to provide any further details requested and to support any hearings or audits.

IACC supports R.P.C.T. in requesting and collecting reports and flows from the competent structures.

## 6. Whistleblowing

CONI adopts a whistleblowing system in accordance with article 54-bis of Legislative Decree no. 165/2001, as amended by art. 1 of Law no. 179/2017, concerning the protection of whistleblower of crimes or anomalies they became aware in the context of the public or private employment relationship.

The submission and management of reports are carried out by means of a computer system which guarantees the confidentiality of the identity of the person making the report, including with regard to the offices responsible for receiving it.

The system is accessible both from the company intranet and from the CONI website at <https://www.coni.it/it/whistleblowing.html>.

The obligation to report through the intranet application applies to all departments in order to prevent and verify all measures or behaviors not compliant with corporate policies or national legislation. Intranet application will also highlight prevention measures and frauds.

The obligation refers primarily to corporate departments or units that manage processes exposed to corruption risks.

Apply the following general provisions:

- managers and staff, primarily those working on corruption risk activities, have to monitor the controls performed (first level control) and report anomalies, lacks or frauds;
- any reports relating to the commission, or reasonable danger of the commission, of bribery offences or, in any case, to conduct in general that is not in line with the rules of conduct adopted in implementation of the reference principles contained in the Prevention Plan, must be forwarded.

The procedure clarifies that no retaliatory actions and no prejudice will happen after reporting if done in good faith.

Pursuant to law, is recalled that any retaliatory action put in place after an internal report or addressed to the ANAC or after a report to Judicial Authorities, will be evaluated as invalid and, when verified, sanctioned<sup>99</sup>

Anyway R.P.C.T. will act in order to guarantee the reporter against any type of retaliation, understood as action that might lead to even only suspect of discrimination or penalization, guaranteeing through dedicated channels, the confidentiality of the identity of the reporter, without prejudice to the law obligations in protection of the rights of the Company or the people erroneously or bad faith accused.

In this respect:

- in the area of criminal actions, the identity of the reporter is secret within the limits of the art. 329 of the Italian Civil Code;
- in the area of the legal action in the Court of Auditors, the identity of the reporter can't be revealed until the conclusion of preliminary investigations;
- in the area of the disciplinary proceeding, the identity of the reporter can't be revealed, where the objection of disciplinary proceedings is validated on clear verification and other in compliance to the report.

The report-notification is also excluded from the right of access to the documents according to art. 22 and following in Law no. 241/90.

R.P.C.T. annually sends to every employee a communication of the existence and the modality of usage of the whistleblowing system.

CONI manage the reports done by employees and partners, though anonymous application "whistleblowing" into the corporate intranet with the final details that can be found in the available manual.

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<sup>9</sup> Art. 54-bis paragraph 6. If it is ascertained, in the context of the investigation conducted by ANAC, the adoption of discriminatory measures by one of the public administrations or one of the entities referred to in paragraph 2, without prejudice to the other liability profiles, the ANAC applies a pecuniary administrative sanction from 5,000 to 30,000 euros to the manager who has adopted this measure. If it is ascertained that there are no procedures for forwarding and managing reports or the adoption of procedures that do not comply with those referred to in paragraph 5, the ANAC applies a pecuniary administrative sanction from 10,000 to 50,000 euros to the manager. If it is ascertained that the manager does not carry out verification and analysis of the reports received, the administrative fine of from 10,000 to 50,000 euros is applied to the manager. The ANAC determines the entity of the sanction taking into account the size of the administration or body to which the report refers.

This system guarantees confidentiality for the identity of the reporter and even the anonymous report through an informatics system that gathers all the data, but these are not accessible and recognizable by the bureau in charge of the reports management.

The preliminary activities for reports start from the IACC of Sport e salute S.p.a., which checks for reports periodically or following an automatic alert from the application.

Subsequently, this office informs the R.P.C.T. accordingly, who assesses whether the report is in good faith and adequately substantiated, or considered to be in bad faith.

In the event that the report is objectively confirmed or critical aspects have emerged, the R.P.C.T. informs the SG of CONI and, if appropriate, requests the Human Resources, Organisation and Sports School to evaluate the initiation of disciplinary proceedings.

SG takes, therefore, the actions deemed necessary or appropriate in relation to what has been communicated by the R.P.C.T. and makes the necessary communications to the competent Authorities.

## **7. Verification of compliance with the provisions of Legislative decree no.39/2013**

In accordance with art. 15 of Legislative Decree no. 39/2013 and with the ANAC Decision n. 833/2016, the R.P.T.C. ensure the compliance with the dispositions of the Decree in incompatibility and foreclosure to confer an assignment matters. Specifically, R.P.C.T.:

- a) defines the forms for the collection of self-certifications and takes care of the collection of self-certifications from all the subjects concerned at the time of appointment (art. 20 of Legislative Decree 39/13), also with the support of the Internal Auditing and Corporate Compliance Office (IACC);
- b) in the case in which they come across spread news or information, even by media or internet, such as information described in details, even anonymous, or through other specific situations, ensuring the foreclosure to confer an assignment or incompatibility for the position.

In the hypothesis of point b) above, R.P.C.T. starts a verification procedure, alerting the interested party, with the intent to provide a brief indication of the facts, the reference to the position undergone on investigation of foreclosure to confer an assignment or incompatibility situations, the specification of the regulation that could be interpreted as violated and it's encouraged to present a statement of defense within 30 days after the receipt of the communication.

In the hypothesis in which the legal action is investigating on a possible situation of foreclosure to confer an assignment similar notice is transmitted from R.P.C.T. to the Authority, which made the appointment. The

examination, is annually done on sample case, and has as an object the reliability of incompatibility and foreclosure to confer an assignment of the declarations released by the interested person, according to art. 20 of Legislative Decree no. 39/2013, in relation to the accuracy and completeness of these.

The examination can be directly done or with the support of companies either outside, through public sources, noted depositions by the interested subject such as with the request of documents or certificates relevant with the content of the declaration.

R.P.C.T, in order to verify, can request the support of the Legal and Corporate Affairs Department.

The interest subjects are requested to provide the maximum collaboration and support of R.P.C.T. in order to get the maximum collaboration and support of R.P.C.T. in the purpose to verify objective and subjective elements.

In the case in which the procedure ends with the verification of the existence of a situation of foreclosure to confer an assignment, R.P.C.T.: (i) sends the notification to the interested subject; ii) provides for the invalidity of the conferral deeds/acts results not conferrable and for the related contract in compliance with the art. 17 of Legislative Decree no. 39/2013; (iii) sends the complaint to the body that made the appointment, proceeding with the assessment of any guilty profiles in order to apply the penalties referred to art 18 of Legislative Decree no. 39/2013, in compliance with the principle of the contradiction and within the limits of the instruments available.

In the event of proceeding assessment ends with incompatible situation, R.P.C.T.:

- sends the notification to interested individual, within 15 days that person can renege because of incompatibility;
- provides for the forfeiture of the incompatible conferment acts and the termination of the related contract pursuant to art. 19 of Legislative Decree no. 39/2013, in cases where the option is not exercised or where the option exercised has not resulted in the disappearance of the cause of incompatibility.

For the activity of assessment, complaints and sanctions enforcement, CONI ensure to R.P.C.T. maximum autonomy and independence.

## **8. Staff training**

Training is intended as a management lever aimed at creating a culture and an environment of control for the prevention of corruptive phenomena.

To date, CONI does not yet have its own personnel as Legislative Decree no. 5 of 29 January 2021 was definitively approved on 23 March 2021 but has not yet been published.



## 9. Post-employment Ban (pantouflage - revolving doors)

Pursuant to Article 53, paragraph 16-ter, of Legislative Decree 165/2001<sup>10</sup>, employees who have exercised authoritative or negotiating powers on behalf of the CONI are not allowed - in the three years following termination of service - to carry out work or professional activities in private entities receiving the activities of the Administration to which they belong carried out through the same powers.

The specific risk consists in the circumstance that, during the period of employment with CONI, the employee may pre-establish advantageous working situations, exploiting, for a private purpose, his position and power within the Entity, in order to obtain future employment with the company or private entity with which he comes into contact by reason of his service. Consequences of the breach are:

- the nullity of the contracts concluded and the assignments conferred on the former civil servant by the private entities indicated in the provision;
- the prohibition, for the private persons who concluded or conferred them, to contract with the public administrations for the following three years with the obligation to return any remuneration received and ascertained to refer to them.

The institution has been deepened by some interventions of ANAC in order to provide operators in the sector with indications on its scope of application.

In particular, ANAC considers that as soon as the R.P.C.T. becomes aware of a breach of the prohibition of pantouflage by a former employee, he should report such a breach to ANAC and to the top management of the Administration in which the employee was employed and, possibly, also to the entity which employed the former employee.

Moreover, ANAC has clarified that employees with authoritative and negotiating powers, to which the provision refers, are *"those persons who concretely and effectively exercise, on behalf of the public administration, the powers mentioned above, through the issuance of administrative measures and the completion of legal transactions by entering into contracts in legal and economic representation of the entity"* (see ANAC Opinions AG/8/ of 18 February 2015 and AG/2 of 2015).

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<sup>10</sup> Art. 53, paragraph 16-ter of Legislative Decree no. 165/2001: "Incompatibility, accumulation of jobs and appointments. Employees who, in the last three years of service, have exercised authoritative or negotiating powers on behalf of the public administrations referred to in Article 1, paragraph 2, may not carry out, in the three years following the termination of the public employment relationship, any work or professional activity with private subjects who are recipients of the activity of the public administration carried out through the same powers. The contracts concluded and the appointments conferred in violation of the provisions of this paragraph are null and void and it is forbidden for the private subjects who have concluded or conferred them to contract with the public administrations for the following three years with the obligation to return any remuneration received and ascertained in relation to them."

Finally, ANAC considers that the risk of pre-establishing favourable employment situations may also apply to an employee who has had the power to have a decisive impact on the decision which is the subject of the final measure, by collaborating in the preliminary investigation, for example by drafting mandatory end-of-procedure documents (opinions, expert opinions, certifications) which significantly influence the content of the decision. Therefore, the prohibition of pantouflage applies not only to the person who signed the act but also to those who participated in the procedure.

## 10. Corruption prevention goals

CONI's PTCP, in line with what is defined by the PNA currently in force, adopts and confirms the following strategic objectives for the three-year period 2021-2023:

- reducing the likelihood of corruption events;
- increasing the ability to detect corruption cases and improving response times;
- creating a corruption-unfriendly environment.

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In order to achieve the strategic goals, CONI's R.P.C.T. established the following specific goals for 2021, which will be implemented with IAAC and, if necessary, external support:

	<b>SPECIFIC GOAL 2021</b>	<b>REFERENCE STRATEGIC GOAL</b>	<b>TIMEFRAME</b>
<b>1</b>	Drafting of CONI's anti-corruption procedures following recent regulatory changes (Law Decree no. 5/2021 of the Council of Ministers)	Increase ability to detect corruption cases and improve response times	June -December
<b>2</b>	Revision of information flows following recent regulatory changes (Legislative Decree no. 5/2021 of the Council of Ministers)	Reducing the likelihood of corruption events.	June – September

## 11. Disciplinary system

In relation to the sanction mechanisms against directors and employees who have not adopted the organisational and managerial measures for the prevention of corruption pursuant to L.190/2012 or the Three-Year Corruption Prevention Plan, CONI - as soon as the Law converting Legislative Decree no. 5 of 29 January 2021, which was definitively approved on 23 March 2021 and which provides for CONI to have its own staff - will define its own disciplinary system.

## 12. Transparency plan

### 12.1. Transparency management process

Transparency is intended as a complementary element to achieve the goals of the shared Three-Year Corruption Prevention Plan. It helps to root and develop the concept of "transparent administration" and reduces the possibility of creating corruption-friendly environments.

In this respect, transparency, i.e., disclosure of data concerning activities at risk, is a criterion that can reveal the degree of corruption risk limitation.

Transparency days are also an important way of involving stakeholders, promoting and fostering CONI's transparency and also listening to stakeholders.

CONI may publish web questionnaires on its official website to collect feedback on how user-friendly their website is, on how exhaustive the data and information they publish are, and to receive requests to publish other types of data, besides those that are mandatory.

In order to implement the principles of transparency and data accessibility and to foster an open administration at the service of the public, the following certified e-mail address has been created: [responsabiletrasparenza@cert.coni.it](mailto:responsabiletrasparenza@cert.coni.it)

The transparency management process covers both disclosure obligations management and the achievement of specific goal. Generally, the R.P.C.T. requests CONI's departments the data needed to comply with legal obligations and then they send it for publication through CONINet, that manages the corporate website.

The R.P.C.T. reports to the National Board of CONI, to the OIV, or directly to the Authority if necessary, the cases of non-compliance or delayed compliance with the obligations of publication also for the purpose of the possible adoption of disciplinary measures.

The OIV receives the reports of the R.P.C.T. regarding the non-fulfilment or delayed fulfilment of the obligations of publication and reports, upon request, to ANAC on the control of the exact fulfilment of the obligations of transparency provided for by the regulations in force.

The National Board of CONI, as far as it is concerned, is informed of cases of non-compliance or delayed compliance with the obligations of publication by the Managers and initiates the necessary actions also with reference to any disciplinary proceedings.

IACC makes requests to the relevant functions to publish the data.

The CONI offices provide IACC with the requested data and documents, guaranteeing the timeliness and completeness of the data, as far as they are concerned. IACC verifies the conformity of the data received and

transmits them to the "Communications and Media Relations" Office, which takes care of their publication by sending the request to Coninet, which manages the institutional website.

The diagram below shows the responsibilities of the individual offices for the transmission of data and documents subject to publication.

Review sito CONI AMMINISTRAZIONE TRASPARENTE come da allegato Delibera ANAC 1310 del 28.12.2016			
ADEMPIMENTO	CONTENUTI	RIFERIMENTO NORMATIVO	OWNER DEI DATI E DELLE INFORMAZIONI
Disposizioni generali	1) Piano Triennale prevenzione e corruzione 2) Atti generali	d.lgs.33/13: art.10 art.12	INTERNAL AUDITING E CORPORATE COMPLIANCE
Organizzazione	1) <b>Titolari di incarichi di amministrazione, di direzione o di governo</b> (salvo gratuiti): I. Giunta Nazionale ; II. Presidente; 2) <b>Titolari di incarichi di amministrativi di vertice</b> III. Segretario Generale Per tutti i soggetti: <b>Dati :</b> - compensi (indennità e gettoni) - importi viaggi <b>Documenti:</b> - atto di nomina con indicazione della durata - cv - dichiarazione irpef parzialmente oscurata - dichiarazione predisposta secondo modello e contenente: . assenza cause di incompat. e inconferib. (ex D.Lgs. 39/2013); . dati relativi all'assunzione di altre cariche e relativi compensi, -altri eventuali incarichi con oneri a carico della finanza e relativi compensi (ALL. B - Sez. A) - . situazione patrimoniale (ALL. B - Sez. B); . mancato consenso coniuge e parenti (ALL. B - Sez. C) - dichiarazione secondo modello con: invarianza / variazione delle cause incompatib. e della situaz. patrimoniale	d.lgs. 33/13: art. 14  d.lgs. 39/13: art.20	UFFICIO ORGANI COLLEGIALI per i dati e le dichiarazioni relative alle cariche  ADMINISTRATION CONI PARTNER per gli importi dei viaggi delle cariche
Consulenti e collaboratori	<b>Incarichi consulenti e collaboratori.</b> <b>Dati</b> oggetto di pubblicazione per ciascun componente: i) <b>estremi</b> atto di conferimento, durata, ragione, oggetto incarico, soggetti percettori e compenso  <b>Documenti</b> oggetto di pubblicazione: ii) dichiarazione ex art. 15 d.lgs. 33/13 iii) cv	d.lgs. 33/13: art. 15  d.lgs. 165/01: art. 53	COMITATI REGIONALI  TUTTI GLI UFFICI INTERESSATI
Personale	OIV: <b>Dati:</b> - nominativi, compensi - cv	d.lgs. 33/13: art. 10  Par. 14.2, delib CIVIT n. 12/13	INTERNAL AUDITING E CORPORATE COMPLIANCE

Review sito CONI AMMINISTRAZIONE TRASPARENTE come da allegato Delibera ANAC 1310 del 28.12.2016

ADEMPIMENTO	CONTENUTI	RIFERIMENTO NORMATIVO	OWNER DEI DATI E DELLE INFORMAZIONI
<b>Sovvenzioni, contributi, sussidi, vantaggi economici</b>	<p>1) Atti di determinazione dei criteri e modalità di concessione per contributi e vantaggi superiori a 1.000</p> <p>2) Tabella con indicazione de:                      a) il nome dell'impresa o dell'ente e i rispettivi dati fiscali o il nome di altro soggetto beneficiario;                      b) l'importo del vantaggio economico corrisposto;                      c) la norma o il titolo a base dell'attribuzione;                      d) l'ufficio e il funzionario o dirigente responsabile del relativo procedimento amministrativo;                      e) la modalità seguita per l'individuazione del beneficiario;                      f) il link al progetto selezionato e al curriculum del soggetto incaricato.</p>	d.lgs. 33/13: art. 26 art. 27	UFFICIO ORGANI COLLEGIALI, ADMINISTRATION CONI PARTNER per i dati e i documenti
<b>Bilanci</b>	<p>A) Bilanci preventivi e consuntivi con allegati</p> <p>B) Entrate e spese in formato tabellare</p>	d.lgs. 33/13: art. 29	ADMINISTRATION CONI PARTNER
<b>Provvedimenti</b>	<p>Provvedimenti organi indirizzo politico:                      accordi stipulati dall'amministrazione con soggetti privati o con altre amministrazioni pubbliche</p>	d.lgs. 33/13: art. 23	TUTTI GLI UFFICI INTERESSATI
<b>Controlli e rilievi sull'amministrazione e</b>	<p>A) Attestazioni OIV</p> <p>B) Altri atti degli organismi indipendenti di valutazione, nuclei di valutazione o altri organismi con funzioni analoghe, procedendo all'indicazione in forma anonima dei dati personali eventualmente presenti</p> <p>C) Relazioni degli organi di revisione amministrativa e contabile al bilancio di previsione o budget, alle relative variazioni e al conto consuntivo o bilancio di esercizio</p> <p>D) Tutti i rilievi della Corte dei Conti ancorché non recepiti riguardanti l'organizzazione, l'attività delle amministrazioni stesse e dei loro uffici.</p>	d.lgs.33/13 art. 31	INTERNAL AUDITING E CORPORATE COMPLIANCE
<b>Pagamenti dell'amministrazione e</b>	<p>A) dati sui propri pagamenti in relazione alla tipologia di spesa, all'ambito temporale e ai beneficiari</p> <p>B) indicatore di tempestività dei pagamenti</p> <p>c) ammontare complessivo dei debiti e numero delle imprese creditrici</p>	d.lgs. 33/13: art. 4 bis art. 33	ADMINISTRATION CONI PARTNER
<b>Altri contenuti</b>	<p><b>Prevenzione della Corruzione:</b>                      A) PTCP                      B) Nominativo e recapito RPCT                      C) Relazione RPCT (entro il 15 dicembre di ogni anno)                      D) Atti accertamento violazioni di cui al d.lgs. 39/13</p> <p><b>Accesso civico e generalizzato:</b>                      Nome del RPCT a cui rivolgere la richiesta di accesso civico e nomi Uffici competenti a cui presentare la richiesta, nonché le modalità di esercizio di tale diritto, con indicazione dei recapiti telefonici e delle caselle di posta elettronica istituzionale</p> <p>Registro degli accessi</p> <p><b>Dati Ulteriori:</b>                      link alle pagine dei siti web delle Federazioni Sportive Nazionali</p> <p>Modello Metodologico per la realizzazione delle attività di verifica preventiva e ispettiva sulle Federazioni Sportive Nazionali, le Discipline Sportive Associate e gli Enti di Promozione Sportiva</p> <p>Documentazione Progetto Sport e Periferie</p> <p>Indicazioni in merito agli obblighi di pubblicazione riferibili alle Federazioni Sportive Nazionali e alle Discipline Sportive Associate</p> <p>Manuale tecnico per i contributi soggetti a rendicontazione</p>	d.lgs. 33/13: art. 5 art. 7 bis art. 10 art. 43  L. 241/90: art. 2  L. 190/12: art. 1  d.lgs. 39/13: art. 18  Linee guida Anac FOIA (del. 1309/2016)	INTERNAL AUDITING E CORPORATE COMPLIANCE

## 12.2. The Head of the Contracting Station Register (RASA)

The Head for the Contracting Station Register (RASA), ensures the effective inclusion in the ANAC' Single Register of Contracting Stations (*Anagrafe Unica delle Stazioni Appaltanti- AUSA*) of the data relating to the identifying elements of the Organisation, pursuant to Article 33-ter of Law Decree no. 179/2012, converted, with amendments, into Law no. 221/2012.

CONI, following Law no. 145 of 30 December 2018 and the publication of the law converting Decree no. 5/2021 of the Council of Ministers, will identify its RASA.

This appointment will constitute a specific organisational measure of transparency aimed at preventing corruption, which will remain on a transitional basis, in accordance with the provisions of Article 216, paragraph 10, of Legislative Decree no. 50/2016, until the date of entry into force of the qualification system for contracting stations referred to in Article 38 of the same Legislative Decree.

## 12.3. Transparency goals

In order to make the management of transparency effective, efficient and maintain compliance with the law, the specific objective for 2021 - planned in the period April-October 2021 - is **to update the sections of CONI's "transparent administration"** website to recent regulatory changes (Legislative Decree No. 5/2021 of the Council of Ministers).