International Olympic Committee

May 2025

GUIDELINES FOR SPORTS ORGANISATIONS ON IMPLEMENTATION OF THE OM CODE PMC

CONTENTS

1. Introduction and Objectives 32

2. Recommended Guidelines 3

2.1. General Adoption of the Code 3

2.2. Specific questions/matters 4

A. Definition of Benefit 4
B. Prohibition on betting on one's sport 5
C. Prohibition on sharing inside information 5
D. Failure to report 6
E. Failure to cooperate 6
F. Coordination with law enforcement authorities 7
G. Safe Reporting Mechanism 7
H. Appeal framework 7
I. Disciplinary framework 8
J. Standard of proof 8
K. Awareness-Raising Activities 8

3. Annex – Best Practices among sports organisations 9

1. INTRODUCTION AND OBJECTIVES

The Olympic Movement Code on the Prevention of the Manipulation of Competitions ("OM Code PMC", hereinafter "the Code") was adopted by the Executive Board of the International Olympic Committee (IOC) in December 2015. The Code was revised, following wide consultation with sports organisations, and the new version adopted by the IOC Executive Board in September 2022.

Compliance with the Code is mandatory for International Federations (IFs) (as per Rule 25 of the Olympic Charter), National Olympic Committees (NOCs) (as per rule 43 of the Olympic Charter) and for National Federations (NFs) (based on the combination of Rules 25, 29 and 43 of the Olympic Charter).

At the same time, sports event organisers and professional leagues are also strongly encouraged to adopt rules in line with the Code.

The Code also fully mirrors article 7 of the Council of Europe Convention on the Manipulation of Sports Competitions.

These Guidelines seek to support sports organisations, notably those bound by the Olympic Charter, to implement the Code, including IFs, NOCs, NFs and multi-sport event organisers. These Guidelines should be seen as concomitant with the Guidelines on Sanctioning Competition Manipulation, which mainly seek to support the disciplinary bodies of sports organisations to take measured and proportionate decisions and impose relevant sanctions when a breach has been established.

2. RECOMMENDED GUIDELINES

2.1. General Adoption of the Code

Sports organisations can adopt the Code either by reference or by adopting rules in line with the Code.

Adoption by reference

Adoption by reference can consist of a provision in the statutes, stating that the organisation and its members comply with the Code and its relevant principles. The benefit of this kind of adoption is that the sports organisation does not have to amend its rules every time there is an amendment to the Code[1].

For instance, an NOC can include a provision in its statutes stating "*The NOC of XXX adopts the OM Code PMC, and its members shall comply with its terms as may be supplemented by the NOC's own rules and procedures consistent with the aforementioned Code.*"[2]

NB: if an organisation with direct jurisdiction over a sports competition adopts the Code by reference, certain matters should be still clearly covered by the general regulations (e.g. which body will be in charge of first-instance and second-instance hearings; the existence of a reporting mechanism; globalisation of decisions; etc.).

Adoption of a full rulebook

The second option is the adoption of rules in line with the Code. Numerous organisations have done this, as it further enhances the rules and it makes it possible to further specify the rules based on the specific culture, technicalities, or existing structures of the sports organisation.

1 To be noted that the IOC's NOC Relations Department (which is in charge of approving the NOC Statutes) whenever receiving any amendments to NOC Statutes for approval, shall add explicitly the implementation of the OM Code PMC to the mission of the NOC.
2 It must be borne in mind that if an NOC also acts as the organiser of an event (e.g. national games), it should ensure that it includes provisions in line with the model rules for event organisers, in addition to those included in the model rules for NOCs.

In order to further support sports organisations that want to opt for this approach, the OM Unit PMC has developed model rules for IFs, NFs, NOCs and multi-sport event organisers.

Model Rules for NOCs
PMC-Model-Rules-NOCs-ENG.pdf

Model Rules for IFs
PMC-Model-Rules-IFs-ENG.pdf

Model Rules for NFs
PMC-Model-Rules-NFs-ENG.pdf

Model Rules for Major Event Organisers
PMC-Model-Rules-MEO-ENG.pdf

Although both options (adoption by reference/via model rules) present advantages (e.g. adoption by reference directly incorporates all future modifications of the OM Code PMC), adoption by rules is recommended for NOCs and NFs, given that it is possible to adapt the rules to the respective language, local laws and the NOC/NF-specific contexts (e.g. first-instance and second-instance hearings, existence of a reporting mechanism, etc.). If an organisation chooses to adopt the OM Code PMC by reference, it will still need to develop and adopt policies to address these matters.

OM stakeholders are of course allowed to translate the model rules into their local languages. Should support be needed with this, please contact the OM Unit PMC at omunitpmc@olympic.org

Once they have adopted the rules, sports organisations are kindly requested to share a link to the rules with the OM Unit PMC.

In the event of doubt or conflict concerning the implementation/interpretation of the adopted rules at a national level, the rules adopted by the IF will take precedence. A rule to this effect could be included in the national level/NF rules.

2.2. Specific questions/matters

The aim of this section is to provide guidance on how specific provisions of the OM Code PMC should be implemented/interpreted.

A. Definition of Benefit (section 1.1)

One of the amendments included in the 2022 revision of the Code was the addition of the following sentence in the definition of "benefit": "Sporting advantage is also a benefit."

The purpose of this addition was to ensure that sports-related competition manipulations would be clearly caught by the scope of the rule concerned. This rule should not apply, however, in situations where the action of the participant(s) is not with the intent of obtaining a "Benefit". For example, a sport strategy decision, such as conserving energy for subsequent competitions, cannot be considered a rule violation. Competition manipulation, as per article 2.2. requires "an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a competition", and so an act of underperformance by the active participants in a competition would be required[3].

3 Conduct in accordance with standard sets of behaviour or actions normally accepted in sport should not be considered a breach of the rules. The following are examples of behaviours or actions that normally, unless proved otherwise, should not constitute Manipulation of a Competition:

a) drafting, for example, in an open water swimming or triathlon race;

b) selecting specific athletes for a qualification event to maximise entry quotas of the associated club or representative team/squad;

c) resting players/athletes for a legitimate competitive objective such as the development of the team or other players, or the management of player fatigue or injuries;

d) resting players/athletes from a match or race of a Competition to maximise team performance in the finals;

e) not selecting a player for an entire series or tour to provide them with an extended rest period in preparation for a future series or tour;

f) playing a reserve in a preliminary round game where the result of the game will have no bearing on the team's placing in its pool;

g) conceding a hole in match play (golf);

h) performing at a lower level to qualify or maintain a berth as a result of managing an injury;

i) weighing in for a weightlifting competition but not participating.

Examples of Manipulation of a Competition where a Participant takes part (whether by act or omission) in improperly making an Attempt to remove all or part of the unpredictable nature of a Competition to obtain a Benefit for themselves or others include:

a) intentionally conceding points;

b) pre-arranging the outcome or the course of a Competition, including through influencing athlete selections and strategy;

c) deliberate underperformance (also known as "tanking") in any manner (through selections or not playing to a person's merits), including with the intention of getting an easier draw or benefitting from a "friendly" opponent;

d) intentional unfair or incorrect officiating.

B. Prohibition on betting on one's sport (section 2.1)

It is clarified that betting on one's sport (contrary to betting on one's competition) is a breach, and the rules should clearly be formulated accordingly. On this occasion, disciplinary bodies are encouraged to interpret "sport" as all disciplines covered by the respective IF (e.g. a diving athlete is not allowed to place a bet on swimming competitions). A reservation could be made, however, for situations where the discipline might be governed by separate federations at a national level in a certain country (e.g. in certain countries there is a different federation for rhythmic and artistic gymnastics). In such cases, it is left to the relevant governing body to determine whether such cases constitute a breach of the rules.

When it comes to football (and sometimes other sports as well), several national football federations currently prohibit only betting on competitions sport-spersons take part in (as opposed to football activity generally). It is nevertheless recommended that a betting prohibition on any football activity is applied for all professional football players, in line with the rule of the OM Code PMC.

In general, when sports organisations implement this rule, they can consider creating exceptions to the prohibition on betting for recreational athletes[4]. A relevant example is included in the rules of the Norwegian NOC, which is directly applicable to all NFs and their club members, providing that "The ban on betting on one's own sport does not apply to participants solely involved in recreational-level sport, provided they are not betting on competitions in which they compete or have inside information."

C. Prohibition on sharing inside information (section 2.3)

Article 2.3 of the OM Code PMC addresses three different scenarios:

- A sportsperson using inside information for the purpose of betting or competition manipulation by themselves or with/for somebody else (e.g. a sportsperson informs their siblings of certain information, so that they place a bet and win money through the bet).
- Disclosing inside information with or without benefit when the participant knew or should have known that such information could be used for betting purposes. It should be emphasised that, in order to find someone in violation of this rule, it must be proved that the "Participant knew or should have known that such disclosure might lead to the information being used for the purposes of Betting, any form of manipulation of competitions or any other corrupt purposes". This is an essential criterion.
- Giving or receiving a benefit for the provision of inside information regardless of whether the information was actually provided or used.

The prohibition on sharing inside information, especially for the second of the aforementioned cases, is very wide. Prima facie, any post/statement that includes information on the physical state or tactics of the sportsperson and/or team might be covered by the scope of this section.

It is recommended that disciplinary bodies focus on sanctioning cases when;

- the sportsperson in question cannot be caught by the scope of other breaches: e.g. when a sportsperson passes information to a sibling so that they place a bet and win. In such a case, we have a clear intent but no violation of other rules. Also, the sibling is outside the "sport's jurisdiction". Therefore, placing the obligation on the person covered ensures that such behaviour can be captured within the rules. The same is true for clear instances of sportspersons sharing information about tactics that should not be disclosed, and there is malicious intent or serious negligence.
- Instances of a sportsperson sharing information about health/tactics with a third party when it should be obvious that this information is to be used for betting purposes.

In general, if in doubt, disciplinary bodies are recommended to avoid imposing a sanction.

In the same way, public statements at an official press conference or even via the certified social media account (when information is in the public domain) of a sportsperson should not be considered a breach, unless proven otherwise.

4 Players in non-professional leagues, lower categories, etc.

As examples:

- It is acceptable if information on an injury is publicly announced by the athlete together with the coach/team during an official interview or an official statement, e.g. if the information communicated is simply that the athlete might not be in their best shape for a specific reason. It is also acceptable for sportspersons to share inside information with medical personnel/psychologists, etc., within the realm of professional sessions covered by confidentiality restrictions.

- It is not acceptable if the information is communicated in a private discussion to a third party but has not been officially communicated anywhere else.

When it comes to awareness-raising activities, sports organisations are encouraged though to pass a broad message to their sportspersons generally to avoid sharing information, particularly when this is related to health and tactics.

D. Failure to report (section 2.4)

This rule is defined very broadly in terms of scope of application. Despite the broad scope, disciplinary bodies are encouraged to refrain from imposing any severe sanctions on sportspersons who only indirectly or vaguely acquired knowledge of specific incidents. The focus should be on sportspersons who were clearly approached or had acquired concrete knowledge of a specific incident.

In terms of awareness-raising activities, sports organisations are encouraged to pass a general message on the importance of reporting any relevant potential breach that comes to the attention of the sportspersons.

Under this provision, it also needs to be noted that some individuals may be bound by professional rules/laws/obligations that prevent them from disclosing information received in their role as professionals (e.g. doctors, therapists and lawyers). Rules should specify that professionals who have these obligations are not subject to sanction for a failure to report[5].

5 It should nonetheless be borne in mind that notable exceptions might be in place in some jurisdictions concerning confidentiality for the purposes of concealing fraud.

E. Failure to cooperate (section 2.6)

Two major occasions are covered by the scope of this breach:

a. Failure to provide the required assistance or denial of access to evidence

b. Obstructing or delaying an investigation.

Various CAS and other international sports decisions[6] related to corruption have acknowledged that breaches of this type are ordinarily well hidden. Unlike in anti-doping, where there is the ability to conduct doping controls on a sportsperson suspected of being involved in doping, the ability to conduct a full, unfettered investigation is essential to protecting sport from corruption. Moreover, as sports bodies do not have policing powers, the cooperation of participants in the sport is fundamental to ensure that investigations can be properly conducted.

Certain IFs, such as the ITF (Tennis Anti-Corruption Program), consider failure to cooperate with an investigation if this is wilful, and the destruction of or tampering with evidence, as breaches of the Code of as serious as the underlying breaches which the investigation was seeking to probe. Much like the applicable sanctions for the anti-doping rule violations of evading or tampering, the sanctions imposed for failure to cooperate (with a nefarious intention) or deliberate destruction of evidence or related breaches could be considered equivalent to the sanctions which would have been imposed had the investigation been able to proceed unimpeded and the case proved. If this is not the case, there is a risk that there will be an incentive to sportspersons who have committed breaches to obstruct investigations so that their well-hidden conduct goes undiscovered and a lower sanction is imposed on them.

The above approach nonetheless needs to be seen in parallel with the principle of proportionality[7] when it comes to sanctions, as well as the right to not self-incriminate[8].

6 CAS 2011/A/2621 David Savic v. PTIOs, para. 8.7 (CAS panel states "the Panel is well aware that corruption is, by its very nature, likely to be concealed as the parties will seek to use evasive means to ensure that they leave no trail of their wrongdoing."), CAS 2020/A/7596 Aleksandrina Naydenova v. Professional Tennis Integrity Officers (PTIOs), Para. 163 deals with the hidden nature of corruption breaches as relevant to the wide admission of evidence.
7 Sammut, CAS 2013/A/3062: life ban to 10 years; Siasia, CAS 2019/A/6439: life ban to 5 years; Gauracs, CAS 2022/A/8651, award of 14.06.2023: ban reduced from 10 years (CEDB) to 3 years (AB) to 15 months (CAS). If the sanction for failure to cooperate = the "standard" sanction for competition manipulation, it may be considered as disproportionate.
8 In criminal law, **self-incrimination** *is the act of making a statement that exposes oneself to an accusation of criminal liability or prosecution. In disciplinary cases, CAS has recognised this principle (Valcke, CAS 2017/A/5003, Gauracs, CAS 2022/A/8651), when "clear and imminent danger that the privilege against self-incrimination (applicable before public authorities) would be circumvented".*

F. Coordination with law enforcement authorities (section 3.1.3)

For NOCs, NFs

It is recommended that there is an effort by the NF and mainly the NOC SPOC to share information and coordinate with the law enforcement authorities that might be running a parallel investigation. The OM Unit PMC will support this effort. If a national cooperation framework/national platform is in place in the county, the NOC SPOC is encouraged to pass on any relevant information to the platform. It is also underlined that NOCs are encouraged to be actively involved in national platforms in their country (if a national platform, as per article 13 of the Council of Europe Convention on the Manipulation of Sports Competitions, has been set up). Cooperation and information sharing with a betting regulatory authority, notably when it comes to the identification of betting breaches, can be also considered.

For IFs/multi-sport event organisers

It is recommended that information concerning a potential breach is passed on in a timely manner to the OM Unit PMC, which will facilitate the exchange with the competent law enforcement authorities. The IF/multi-sport event organiser should also pass any relevant information to law enforcement authorities directly, based on applicable legal requirements.

G. Safe Reporting Mechanism (section 3.6.)

The sports organisation should ensure that a safe and confidential reporting mechanism is available for sportspersons. This can be:

- a reporting mechanism of their own (a hotline or an email address) provided it can be guaranteed that the information received will be treated in a timely and secure manner (without any deliberate delays and without risking the confidentiality of the pre-investigation).

- a reporting mechanism of a national cooperation framework/national platform: for NOCs/NFs especially, if a national cooperation framework/ national platform already exists in their country and is already using a certain reporting mechanism, that mechanism can be used and communicated to the sportspersons in the country. If this is the case, it is important to ensure that the information received by the reporting mechanism is transmitted to the NOC SPOC as well.

- a reporting mechanism available with the respective IF: IFs and NOCs/NFs can also direct their athletes/sportspersons to a reporting mechanism made available by the respective IF, notably when the competitions in question are under the jurisdiction of that IF.

- the IOC Integrity Hotline, available to all sports organisations (www.olympic.org/integrityhotline).

Sports organisations are free to choose more than one option if they prefer. What is important is that the reporting channels are clearly communicated to sportspersons.

It is also to be borne in mind that some sportspersons may be bound by professional rules/obligations that prevent them from disclosing information received in their role as professionals (e.g. doctors, therapists and lawyers). Unless proved otherwise, a sportsperson bound by these obligations may not be sanctioned for a failure to report.

It is also to be noted that the OM Code PMC, in its 2022 version, no longer requires anonymous reporting possibilities. Sports organisations can still offer anonymous reporting if they wish, however this is not officially encouraged, as anonymous reports do not usually constitute an initial trigger that would allow for the investigation to advance quickly.

H. Appeal framework (section 3.7)

Sports organisations with jurisdiction over a sports competition need to clearly state within their rules which body will oversee the first-instance hearing (e.g. Disciplinary Commission, Ethics Commission, etc.). Additionally, a second-instance body (appeal body) needs to be in place. For national cases, a certain NOC body could play this role (in the absence of another appeal body at the level of the federation).

For IFs, the CAS can also play this role.

For multi-sport event organisers, CAS is highly recommended as the second-instance body, as this is a well-tested practice for many multi-sport event organisers.

I. Disciplinary framework (section 3)

Sports organisations do not need to amend/change their disciplinary rules already in place (applying to any wrongdoing). They do however need to ensure that the principles included in section 3 of the OM Code PMC are included within their rules. The disciplinary rules should describe the process from the initial discovery of a possible breach of the rules until the decision by a disciplinary body. The organisation should have such rules in relation to competitions they have jurisdiction over. NOCs do not need to include such rules, unless they directly organise sports events or if they can have direct jurisdiction over national cases[9]:

- Initial Review/Preliminary Investigation.
- Referral to NF/IF Executive Committee/President.
- Formation of Disciplinary Commission (composition, etc.).
- Jurisdiction, Powers and Investigation.
- Rights of concerned person and Confidentiality.
- Standard of Proof.
- Decision.
- Confidentiality[10].

If sports organisations do not have disciplinary rules in place, they are encouraged to contact the OM Unit PMC (omunitpmc@olympic.org) to receive support with creating such rules.

J. Standard of proof (section 2.3)

The standard of proof under the Code is the balance of probabilities, a standard that requires that it is more likely than not that a breach of the Code has occurred. Although this is the Code recommendation, sports organisations are free to opt for a higher-level standard, such as that of comfortable satisfaction. The disciplinary body dealing with the case should always apply the standard of proof mentioned in the applicable rules of the respective sports organisation. As per CAS established precedents, where the applicable rules say nothing about the standard of proof and none was agreed between the parties, the standard of comfortable satisfaction applies[11].

K. Awareness-Raising Activities (section 7.3)

As per section 7.3 of the Code, sports organisations are responsible for carrying out regular and ongoing awareness-raising initiatives. Sports organisations are encouraged to use the relevant tools prepared by the OM Unit PMC. The Guidelines for Sports Organisations on Awareness-Raising Activities (available here) could serve as a reference.

9 It is clarified that the jurisdiction in disciplinary cases is as follows:
- *Olympic Games: IOC (IOC Code of Ethics)*
- *IFs and international competitions: respective IF*
- *National competitions: NF*
- *Multi-sport events: multi-sport event organiser.*

10 It is clarified that these elements are minimum requirements as provided by the OM Code PMC. Sports organisations can actually go further and include additional elements, e.g. right to justified challenege.

11 Arbitration CAS 2018/A/6075 Igor Labuts v. Football Association of Ireland (FAI), award of 17 July 2020, para. 46. Note also: CAS 2020/A/7596 Aleksandrina Naydenova v. Professional Tennis Integrity Officers (PTIOs), para. 181 refers to the preponderance of the evidence (balance of probabilities) standard of proof used in tennis as being appropriate given the concealed nature of these types of breaches.

3. ANNEX – BEST PRACTICES AMONG SPORTS ORGANISATIONS

NOCs – NFs

Malta NOC
MOC-Statute-Approved-15.06.2022.pdf
(nocmalta.org) section 3.15

NOC of Argentina
Prevención de la manipulación de competiciones
(coarg.org.ar)

IFs

IHF Code of Ethics
Ethics Code (ihf.info)

FIS
Rules for the organization
of FIS World Championships

Tennis Anti-Corruption Program
TACP rules

ICC (Cricket)
nhq22muaguf5an22wjh5.pdf

Event organisers

IOC
Code-of-Ethics-ENG.pdf
(olympics.com)

EOC
EOC_CODE_OF_ETHICS_2023.pdf
(eurolympic.org)