



**THREE-YEAR
ANTI-CORRUPTION PLAN**

2018-2020

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Introduction

CONI

CONI (Italian National Olympic Committee), International Olympic Committee's emanation, is a Public Institution under the Italian Presidency of the Council of Ministries' supervisory and represents the Confederation of National Sporting Federations and Associates Disciplines, according to D.Lgs. no. 15/2004. That Institution takes care of the organization and the promotion of Italian sport, with the aim of obtaining sport's practises maximum diffusion, athletes training, and providing appropriate means to take part of the Olympic Games and to the International and National Sporting Events.

In sporting environment, CONI plans the development of prevention and repression measures for the use of substances that can change the natural physical performance in sport activities and adopts any appropriate initiative to avoid and eliminate all forms of discrimination and violence in sport.

CONI Central Bodies are:

- The Chairman;
- The National Committee (GN);
- The National Council;
- The General Secretary;
- The College of Auditors.

CONI Bodies' Members must have requirements established by current legislations (e.g. D.Lgs. 39/2013,...), in addition to the specific requirements laid down by the Statute.

According to the Statute, CONI's Chairman is elected by the National Council and appointed by Decree of the President of the Italian Republic. This application has the legal representation of CONI and carries out the tasks provided by national and international sporting rules.

The National Committee represents policy, execution and control body of the CONI administrative activities; exercising the control over National Sporting Federations (FSN), Associated Sports Disciplines (DSA) and Sport Promotion Bodies (EPS).

The National Council, maximum representative body of Italian sport, works for the spread of the Olympic idea, ensuring necessary activities for the Olympic training, as well as it also regulates and coordinates national sporting activity and harmonizes the asset of FSN and DSA.

Requirements for the election are defined in the CONI's Statute.

The General Secretary, appointed by National Committee, provides CONI's administrative management, establishing CONI's Estimated and Final balance sheets and coordinating the offices' general organization.

The College of Auditors, appointed by Decree of the Supervisory Authority, is made up by three Members, one of whom is designated by the Ministry of Economy and Finance (MEF), another one designated by the Ministries Council President or by the Ministry delegated for sport, if appointed, and the last one chosen by CONI, between Members of the Statutory Auditors Registry or between people with specific professional requirements.

The Italian Court of Auditors exercises management control, which reports the results to the Chambers of Parliament.

Nowadays, in the execution of institutional duties, CONI recognizes:

- 44 National Sporting Federations;
- 19 Associated Sport Disciplines;
- 15 Sport Promotion Bodies;
- 20 Worthy Sports Associations.

CONI Mission

CONI, Confederation of National Sporting Federations and of Associated Sport Disciplines, is regulated by the Olympic Charter and the D.Lgs. 23rd July 1999, no. 242, modified by D.Lgs 8th January 2004, no. 15.

According to art. 1, comma 2 of the Statute, CONI is the Regulatory, Disciplinary and Management Authority of sporting activities, these latter understood as an essential element of the physical and moral training of the individual and integral part of national culture. CONI mission consists in:

- defining fundamental principles of sporting activities in order to ensure social and cultural inclusion, opposing any form of exclusion, inequality, discrimination and violence;
- promoting the maximum diffusion of sports practices in every age range;
- promoting national teams competitiveness, safeguarding the national sporting heritage, taking care of all necessary means for the Italian delegation participating' to the Olympic Games;
- protecting athletes' health, preventing and fighting the use of drugs or methods that can alter athletes natural physical performance during competitive/agonistic-sporting activities.

CONI SERVIZI S.p.A.

For the fulfilment of its duties, CONI relied on CONI Servizi S.p.A., according to art. 8 D.L. 8th July 2002, no. 138, edited by the Law 8th August 2002, no. 178.

In particular, CONI Servizi S.p.A. (hereafter also "Company"), established under the private law wholly owned-controlled by MEF, performs instrumental activities for the implementation of CONI's tasks and:

- takes care of all relationships active and passive with all stakeholders, including financing operations through Financial Institutions;
- is now the owner of assets previously owned by CONI, taking charge of all staff members previously employed by CONI.

Therefore, all the relationships, also those financial, between CONI and CONI Servizi S.p.A. are governed by a service contract signed by CONI Chairman and CONI Service S.p.A. CEO.

This contract constitutes the legal source of practical duties and fulfilments in relation to achieve the objectives entrusted to the CONI Servizi S.p.A., representing the instrument through which CONI, in agreement with the Company, identifies the objectives and the amount of resources designated for these purposes.

The art. 11 of Statute establishes that CONI Servizi S.p.A. should be administrated by a *Board of Directors composed of five Members, appointed by Ordinary Meeting* on a proper designation according to the law.

The Company Chairman and the others Members of the Board of Directors are designated by CONI and appointed by MEF, like single shareholder. Both roles's requirements provided by CONI Servizi S.p.A. Statute as well as current National legislations.

Board of Directors Ordinary Meetings are held once every three months or any time deemed necessary by the Chairman or under CEO request or at least one third of Board of Directors Members or of the Statutory Auditors.

Company general representative duties, in front of competent judicial or administrative authority as well as third parties are held by Board of Directors Chairman while the Company's relevant signature power is held by CEO. Within powers limits assigned to them, both of them may also grant special attorney power towards Company's employees and third parties.

The Statutory Auditors consists of three standing auditors and two deputy auditors. This composition must ensure compliance with the law provisions in force on gender balance.

The accounts legal audits shall be performed by independent auditors firm registered in Registry of Statutory Auditors established pursuant to the law.

Board of Directors appoints an Officer for corporate accounting documents.

CEO and Officer appointed verify, drawing up a report attached to the accounts, the adequacy and effective application of procedures during the period covered by the documents itself and verifying their match with books and accounting entries, as well as their suitability to provide a truthful and fair view of the Company's balance sheet, economic and financial position.

CONI Servizi S.p.A. corporate management control carried out by the Court of Auditors that reports to the Chamber of Parliament's Presidencies.

The Company has also a Corporate Compliance and Internal Auditing Office (UPCCIA), which refers administratively to the Company CEO and to the CONI Chairman, while operationally, carrying out internal control activities, to Board of Directors.

CONI Servizi S.p.A. Mission

CONI Servizi S.p.A. mission is to create value for Italian sport, based on CONI mandate.

The Company, thanks to its unique know-how in Italy, provides high added value service in the sport world. By way of example but not of exhaustive, also based on service agreement between the two, CONI Servizi S.p.A. performs all CONI institutional activities, gives logistic-organization support for the sporting events and for FSN and DSA, for CONI brand protection and for social responsibility projects realized, as well as international programs.

The Company manages Olympic Training Centres for the training of high-level athletes and the Sport and Sports Medicine School facilities dedicated, respectively, to the provision of training projects and health services in favour of the sports world.

Three-Year Plan for Corruption Prevention

The Three-Year Anti-Corruption Plan (PTPC or Plan) adoption is laid down by the Law no. 190/2012 that contains "Rules for Prevention and Punishment of Corruption in the Public Administration"; it complies the National Anti-Corruption Plan (PNA) approved by the National Anti-Corruption Authority (ANAC), in compliance with the art. 1 comma 2-bis of the same Law.

This regulation establishes that the Public Administrations must adopt that Plan to define corruption prevention strategy, outlining an activities program based on real exposure risk analysis for each offices and indicating the different sensitive areas, as well as the concrete measures to be implemented in relation to the level of hazard of the specific risks and those who are responsible for the application of each measure within a set time frame.

In addition, the "Document shared by MEF and ANAC for the strengthening of corruption prevention and transparency mechanisms in companies owned and/or controlled by the Ministry of Economy and Finance" published in December 2014, defines the scope of application for anti-corruption legislation and what concerns transparency towards companies controlled by the Ministry.

CONI and CONI Servizi S. p. A. have decided to draw up a Three-Year Anti-Corruption Plan "shared" between the two Entities.

This choice allowed to carry out the integrated and functional risk mapping activity, which ensures a more adequate and effective preventing corruption policy within the organizational and decision-making structure that characterizes both Entities.

The process is constantly monitored in order to assess its effectiveness over time, considering any regulatory changes.

Roles and responsibilities of CONI and CONI Servizi S.p.A. have been kept segregated within the detailed activities mapping and in relation to measures and controls identification, as well as for information flows.

1. Regulatory Context

1.1 International Context

In its widest definition, corruption consists in offering, giving, receiving or soliciting, directly or indirectly, anything value to improperly influence another part's actions.

The Council of Europe, the Organization for Economic Cooperation and Development (OECD) and United Nations (UN) require that Member Countries of all corruption prevention relevant conventions, criminalize "the offer", "the promise" and "delivery" of a bribe, recalling the concept defined above.

Italy has ratified a series of Anti-Corruption Conventions, including:

- *the Convention on Combating Bribery of Foreign Public Officials International Business Transactions (Anti-Bribery Convention)* in the 1997, ratified by Italy with the Law no. 300/2000, and the *Recommendation* proposed by the OECD), functional to the development of contents and systems of prevention and to the promotion of integrity and transparency;
- *the Civil and Criminal Law Conventions on Corruption* of Strasbourg, adopted by the Council of Europe in 1999 and ratified by our country in Laws 110 and 112 of 2012, which provide the criminalization of offences of active and passive corruption in the public and private sector, and effective judicial remedies for people who have suffered a damage caused by corruption act;
- the Merida Convention (United Nations Convention against Corruption) adopted by the UN General Assembly on 31st October 2003 and ratified by Italy in the Law 116/2009, which constitutes the first instrument underway by the International Community in the fight against corruption as a transnational phenomenon.

CONI also refers to the Code of Ethics of the International Olympic Committee (CIO), which includes principles and guidelines that the National Olympic Committees and the Sports Organizations must respect and implement to ensure integrity and good governance.

Finally, CONI joined the UN Global Compact in 2016, a voluntary code that wants to promote a sustainable global economy and requires companies and organizations, that join it, to adopt proactive behaviours for protection of human rights, environment, occupational safety, for the fight against corruption and, more broadly, to support the wider development objectives set by UN itself.

It is appropriate to specify that the sports system in corruption prevention matter has two different areas, but related, that shall be considered in the fight against that phenomenon. The first one is defined *on the field* concerns all aspects related to sports performance and to the sporting event's conduct (e.g. the topic of doping, match-fixing and money laundering, the fraud of referees and athletes). The second one called *off the field* concerns all aspects related to the organization and administrative structure of institutions (e.g. internal processes relating to the management of sponsorships, public procurement, personnel selection, elective mechanisms and event-bidding). The two aforementioned areas are the subject of a recent soft law production including:

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

1.2 National Context

In accordance with the legal notion of the Italian Criminal Code, corruption is a multiple offenders crime with necessary competition and its definition is comprehensive of multiple cases in which there is evidence of the power abuse entrusted by a Public Official to obtain private or Company benefits. In the category of crimes against the Public Administration, corruption crime occurs when the Public Official or who is in charge of Public Service receives or accepts the promise of remuneration in money or in another benefits from a private individual for himself or a third parties, which is not due, in order to:

- perform an act of his office (corruption for the exercise of its functions or improper corruption, pursuant to art. 318 of the Italian Criminal Code)
- not carry out his duties or to delay his duties or to perform an act that is contrary to the duties of its office (proper corruption, pursuant to art. 319 of the Italian Criminal Code);
- favour or damage a party in a lawsuit at civil, criminal or administrative level (pursuant to art. 319-ter of the Italian Criminal Code).

In the ANAC Plan, the corruption definition has been expanded by configuring it as *maladministration*, including all those actions and behaviours, although not configurable as specific crimes, which contrast with the necessary care of the public interest and undermine citizens trust in the administration and people impartiality while carrying out activities in the public interest.

The Law no. 190 of 6th November 2012 implements the Conventions provisions ratified by Italy (see paragraph 1.1.) and provides an organic system of corruption prevention, in its broadest sense, divided into two levels:

1. national level, with the issuance of the National Anti-Corruption Plan (PNA);
2. decentralized level, with the adoption by each Public Administration, on proposal of the Manager in charge of Corruption Prevention and Transparency (R.P.C.T.), of the Three-Year Plan for Corruption Prevention and Transparency (nowadays Three-Year Anti-Corruption Plan), based on the information provided by PNA and the implementing decrees.

With CIVIT Resolution no. 72/2013, on proposal of the Department of Civil Service, ANAC publishes the National Anti-Corruption Plan (PNA 2013), pursuant to the art. 1, paragraph 2 letter b) of the Law. no. 190/2012, asking individual Administrations to:

- appoint the Manager in charge of Corruption Prevention and Transparency (R.P.C.T.);
- define the Three-Year Anti-Corruption Plan, which provides department exposure level assessment to the corruption risk and indicates organizational actions with the aim to prevent the same risk, with appropriate selecting and training procedures for employees, who work in particular sectors exposed to corruption.

In the same year, D.Lgs. no. 39/2013 containing "Provisions on the foreclosure to confer an assignment and incompatibility of appointments to Public Administrations and private entities in public control" provided for a further mechanism to prevent corruption in order to avoid unlawful agreements and conflicts of interest in public offices, as well as to avoid the causes of the incompatibility and foreclosure to confer assignments in Public Administrations' offices and in private-law entities in public control.

With Determination no. 12 of 28th October 2015 (PNA 2015), ANAC provided additional indications and clarifications compared to the previous PNA, defining more clearly the roles of the internal bodies involved in the Plan adoption, clarifying the various stages of the corruption risk management process, deepening in the special risk area section related to public procurement.

Afterwards, with Resolution no. 831 of 3rd August 2016, ANAC approved the National Anti-Corruption Plan 2016 (PNA 2016), in which the Authority provided important clarifications regarding the contents of the previous PNA and of the new D.Lgs. no. 97/2016.

In particular, as a result of that Decree, the explicit reference to the Three-Year Transparency and Integrity Program (PTTI) has been deleted, introducing the need to identify implementing transparency measures, no longer in a separate document, but integrated within PTPC, in a specific inside section, within which the persons responsible for the transmission and publication of documents, information and data must be indicated in addition to the administrative solutions suitable to ensure compliance with the transparency obligations laid down by current national legislation.

Art. 2-bis, paragraph 2, of D.Lgs. no. 33/2013, as amended by D.Lgs. no. 97/2016, also has established that companies in public control must apply the same transparency rules applicable to Public Administrations “mutandis mutandis”, with regard to the organization and the activities carried out.

The above mentioned Decree shows that the transparency concept, closely connected to integrity, is a key tool to ensure compliance with the principles of impartiality and good conduct established by the Constitution, allowing a public scrutiny on the:

- correct and fair exercise of public authority;
- responsible pursuit of institutional functions;
- effective and efficient use of public resources.

Transparency makes the Public Administration more accessible to citizens and companies, ensuring a total accessibility to public administrations.

Finally, with Resolution no. 1208 of 22nd November 2017, ANAC definitively approved the 2017 Update to the PNA.

In the drawing up of the PTPC, CONI and CONI Servizi S. p. A. do refer to Resolutions:

- No. 833 of 3rd August 2016, containing Guidelines about the assessment of the foreclosure to confer an assignment and incompatibility of administrative offices by the Manager on charge of Corruption Prevention, as well as ANAC supervisory activities and powers to verify in cases of incompatible assignments;
- No. 1310 of 28th December 2016 relating to the First Guidelines about the implementation of the duties of publicity, transparency and spread of the information contained in D.Lgs. no. 33/2013 as amended by D.Lgs. no. 97/2016;
- No. 1134 of 8th November 2017, concerning Guidelines for the implementation of regulations about corruption prevention and transparency by companies and also by private law bodies when they are controlled and owned by Public Administrations and Public Economic Entities.

2. Anti-corruption Process

The process of preventing corruption, as a methodology used to decrease the probability that risk will occur, is structured in the following logical steps:

1. Internal and external context analysis;
2. Risk assessment;
3. Risk treatment;
4. Implementation and monitoring over the process operation.

2.1 External Context Analysis

Since the 90s, corruption has been internationally recognized as a global phenomenon that has affected the capitalistic system.

Similar to what happened in the private sector, corruption scandals have also affected the sport sector, starting from the events in reference to the Winter Olympic Games in Salt Lake City in 2002, following which the International Olympic Committee adopted its own Code of Ethics and corruption risk management, until the recent scandals that have involved FIFA.

Several initiatives have been activated internationally in response to these phenomena in the sporting world, including the IPACS (International Partnership against Corruption in Sport), in which National States and International Organizations such as OECD, as well as Council of Europe and CIO (CONI is the only National Olympic Committee that participates in it) meet with the aim of identifying anti-corruption and integrity standards.

The initiatives promoted by G20 are also highlighted, during the meetings of the Anti-corruption Working Group (ACWG), in which the issues of corruption prevention in sports organizations are deepened. The Resolution "Corruption in Sport" was published in November 2017, strongly supported by the Anti-corruption Coordination Department of the Italian Ministry of Foreign Affairs and International Cooperation, and it contains appropriate measures to combat the phenomenon, with particular reference to major events organizations, especially at international level (e.g. Olympic Games).

In the end, SIGA (Sport Integrity Global Alliance) represents an independent and neutral alliance that brings together over 80 multinational and international stakeholders, whose goal is to spread good governance principles and safeguard integrity in sport by promoting high level standards in this sector.

External Context Analysis has the aim to identify those external factor/events, that potentially could be a corruption risk driver.

That kind of analysis was carried out in relation to the following logical categories of factors/events:

1. Sporting and socio-cultural (e.g. major events organizations);
2. Legal, economic and political (e.g. lobbying activities);
3. Industrial and technological (e.g. the use of new technologies for data broadcasting).

It is considered that the most relevant categories in terms of impact and probability of occurrence are connected to sporting and socio-cultural factors/events, as well as legal, economic and political factors.

In fact, with reference to the first category, these are factors/events, due to their exceptional nature and for the tight and mandatory deadlines required for their realization, which may involve risks related to the deviation from the procedures and rules in order to obtain results, limiting effectiveness of existing control systems. In other words, the pressures generated could create an environment for which the achievement of the result is a priority that justifies the violation or the deception of existing procedures. It is known how these aspects have historically been found both in the participation step aimed at the awarding of the sporting event (event bidding) and its organization.

This is an inherent risk with a significant potential impact in terms of economic and reputational damage, whose probability of occurrence will be high for the pressures connected to the event.

In any case, the frequency of occurrence of these events is low.

Regarding the second ones, these are guesses essentially related to lobbying activities in order to obtain unduly rules in their favor, especially in terms of financial resources allocation and in stuffs that may impact on CONI, CONI Servizi S.p.A., FSN and DSA. These cases also include the possibility that in front of new regulations, in order to avoid sanctions for non-compliance, CONI and CONI Servizi S.p.A. may carry out corruptive conduct during checks and audits.

It is considered that the probability of this phenomenon is very low, even in the absence of historical cases relating to this category of factors/events.

2.2 Internal Context Analysis

The principal objective of the internal context analysis is to identify the sensitive areas where is the highest level of corruption risk.

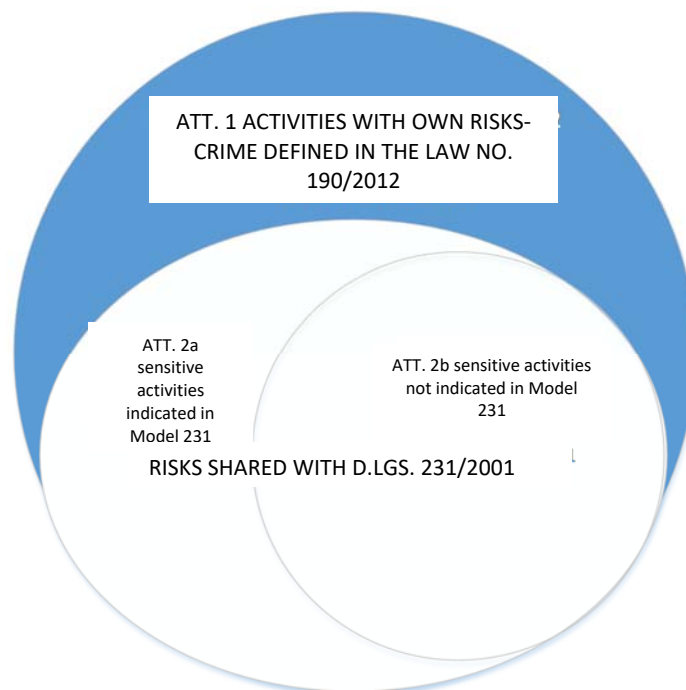
The identification of risk activities takes place through the construction of possible behaviour involved to the risks-crime provided by the Law no. 190/2012.

CONI and CONI Servizi S.p.A. risk activities have been subdivided into the following 3 categories:

- a) Activities (22) relevant to their own risks-crime indicated by the Law no. 190/2012 (see Table 1);
- b) Activities (15) relevant to risks-crime indicated by the Law 190/2012 and by D.Lgs. no. 231/2001 (presented in the Organisational, Management and Control Model of CONI Servizi S. p. A. or Model 231), for which further ways of misconducts needed to realize the infringement have been detected (see Table 2);
- c) Activities (15) relevant to risks-crime indicated by the Law 190/2012 and by D.Lgs. no. 231/2001, (Model 231), for which no further ways of misconducts needed to realize the infringement have been detected (see Table 3).

Briefly, in relation to the two regulations, it is possible to identify:

- ATT. 1 _ Activities with own risks-crime defined in the Law. no. 190/2012;
- ATT. 2_ Activities with risks-crime in common with D.Lgs. no. 231/2001 (further divided into two categories if these sensitive activities are indicated or not into the Model 231).



I. Activities defined in L. 190/2012 (ATT.1)

In this category, the activities reflect the CONI public nature, although carried out or assisted by CONI Servizi S. p. A. and, therefore, for the purposes of the abovementioned law, it's clear that CONI's employees assume the role of public service officers. In particular, in the field of offences of embezzlement and abuse of office, these misconducts could be carried out in activities that:

- represent the expression of an institutional task of CONI, for example the activity of administrative-accounting at the National Sports Federations;
- are preparatory or directed to the issuing of acts by which a specific legal situation for an external subject is established, modified or extinguished (e.g. contributions allocation to the National Sports Federations, National Sports Federations recognition, Anti-doping activities...);
- have an accounting representation on the CONI balance sheet, even if carried out and supported by CONI Servizi S. p. A. (e. g. sponsorship activities).

II. Activities relevant to the risks-crime in common with D.Lgs. no. 231/2001 (ATT.2)

In that category, the sensitive activities to the risks-crime are identified with reference to the two regulations, such as:

- ATT. 2A, activities already indicated in Model 231 and relevant to PTPC, in which further ways of misconducts needed to realize the infringement have been detected belonging to the same crime pattern.
- ATT. 2B, activities not indicated in Model 231, although considered sensitive to the offences by D.Lgs. no. 231/2001, because without Company interest or benefit.

Table 1. Activities (no. 22) concerning own risks-crime indicated by the Law no. 190/2012 (ATT. 1)

Code	Risk-Crime Activities	Inherent Risk Assessment
A1.6	Support Activities to Anti-Doping Controls Committee	HIGH
A1.21	Public Founded Projects Management	HIGH
A1.2	FSN and Sport Organizations Audits	HIGH
A1.3	FSN Balance Sheets Monitoring and Approval	HIGH
A1.4	CONI Accounting, Treasury and Balance Sheet Management	HIGH
A1.5	Support Activities for Committee for Therapeutic Use Exemption	HIGH
A1.7	Support Activities for Anti-Doping Department	HIGH
A1.8	Contributions Allocation for FSN Olympic/Paralympic/High Level Training Institutional Activities	HIGH
A1.9	Sponsorships, Partnership Agreements, Cooperation Development	HIGH
A1.10	Contributions Allocation to Military Bodies	HIGH
A1.12	Contributions Allocation to Sport Organizations (DSA, EPS, Worthy Sport Associations)	HIGH
A1.15	CIS Preliminary Management	HIGH
A1.18	National Committee Meeting and Resolutions Management	HIGH
A1.19	Administrative Proceedings for Local Committee (Public Procurement, Cooperations, Entertainment Expenses, Missions)	HIGH
A1.20	Contributions Allocation to the Italian Communities abroad	HIGH
A1.11	Sport Organizations Recognition (DSA, EPS, Worthy Sport Associations)	MEDIUM
A1.14	Support Activities for Sport Justice Bodies	MEDIUM
A1.16	CONI Disputes Management	MEDIUM
A1.17	Transparency Obligations Management	MEDIUM
A1.22	"Sport and SuburbsProject" Management	MEDIUM
A1.1	FSN and Sport Organizations Statute and Regulations Compliance Assessment	LOW
A1.13	Sport Associations Registry Management	LOW

Table 2. Activities (no. 15) concerning risk-crime shared with D.Lgs. no. 231/2001 (ATT. 2a) , in which further ways of misconducts needed to realize the infringement have been detected, in addition to those identified by D.Lgs. 231/2001.

Code	Risk-Crime Activities	Inherent Risk Assessment
A2.1a	Public Procurement Planning	HIGH
A2.2a	Award Procedures Compliance Identification to Implement	HIGH
A2.3a	Award Procedures Implemented and Awarding	HIGH
A2.4a	Contracts Management and Services Provision Assessment	HIGH
A2.5a	Staff Recruitment	HIGH
A2.6a	Staff Performance Assessment	HIGH
A2.7a	Staff Expense Reimbursement Management	HIGH
A2.8a	Third Parties Expense Reimbursement Management	HIGH
A2.9a	External Professionals Assignments	HIGH
A2.10a	Payments and Receipts Activities Management	HIGH
A2.11a	Small Business Cash Management	HIGH
A2.12a	Dismissal of Company Assets	MEDIUM
A2.13a	Assignments and Performance Report	MEDIUM
A2.14a	Entertainment Expenses Management and Audit	MEDIUM
A2.15a	Credit Cards Management and Audit	MEDIUM

Table 3. Activities (no. 15) concerning risks-crime shared with D.Lgs. no. 231/2001 (ATT. 2b) , in which further no ways of misconducts needed to realize the infringement have been detected, in addition to those identified by D.Lgs. 231/2001.

Code	Risk-Crime Activities	Risk Inherent Assessment
A2.1b	Employees Protected Classes Communications Management	N/A
A2.2b	Judicial and Extrajudicial Disputes Management	N/A
A2.3b	Public Officials Audits Management on Occupational Safety and Health (D.lgs. 81/2008)	N/A
A2.4b	Lazio Region Authorization Request for Medical-Health Activities Exercise	N/A
A2.5b	Safety, Habitability, Usability Properties Owned or Managed Certifications Request/Management	N/A
A2.6b	DATA/Information sending on the Italian Revenue Agency Periodical Request	N/A
A2.7b	Sports Plants Consultancy, Design and Training Services Sales	N/A
A2.8b	IMSS Audits Management	N/A
A2.9b	Public Officials Relationships and Audits Management	N/A
A2.10b	Tax Audits Management	N/A
A2.11b	Social Security and Insurance Audits Management	N/A
A2.12b	Support to Sport Plants Commission on the opinions issuance	N/A
A2.13b	Inrercompany Contracts Preparation	N/A
A2.14b	Social Security and Insurance Obligations Management	N/A
A2.15b	Doctors and Physiotherapists Assignments and Performance Report	N/A

2.3 Risk Assessment

For each activity belonging to type ATT. 1 and ATT. 2, R.P.C.T. supports the Company Managers involved in inherent risk assessment in order to define priority actions.

For the purpose of PTPC, risk activities in Model 231, in which are conceivable further conduct to carry out in addition to those identified, are not subject to risk assessment because they have already been assessed by the Supervisory Body (OdV).

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

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

		Probability Level		
		Low	Medium	High
Complexity	Low	M	A	A
	Medium	B	M	A
	High	B	B	M
		Low	Medium	High
		Interest/Benefit		

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 Servizi S.p.A. 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)
Reputational Impact	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.
Economic-Financial Impact	Economic-financial estimated impact is more than 1% of the production value of CONI Servizi S.p.A.	Economic-financial estimated impact is between 0.5% and 1% of the production value of CONI Servizi S.p.A.	Economic-financial estimated impact is less than 0,5 % of the production value of CONI Servizi S.p.A.
Legal Sanction Impact	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.

		Inherent Risk Level		
		Low	Medium	High
Probability	High	M	A	A
	Medium	B	M	A
	Low	B	B	M
		Low	Medium	High
		Potential Impact		

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.

2.4 Risk Treatment

Considering the organisational structure that characterizes CONI and CONI Servizi S. p. A., the control criteria to monitor the risk activities have been identified in relation to:

- Confindustria Guidelines for the construction of Organizational, Management and Control Models, pursuant to D.Lgs. no. 231/2001;
- measures for the prevention listed in the Anti-corruption Plan and considered more important and/or in consideration of the organizational structure of CONI - CONI Servizi S. p. A..

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

Control criteria	Institution/Company	
	CONI	CONI Servizi S.p.A.
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	n/a
8. Decision traceability	Applicable after single activity assessment	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	Applicable after single activity assessment

R.P.C.T. supports the Company Departments Manager 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:

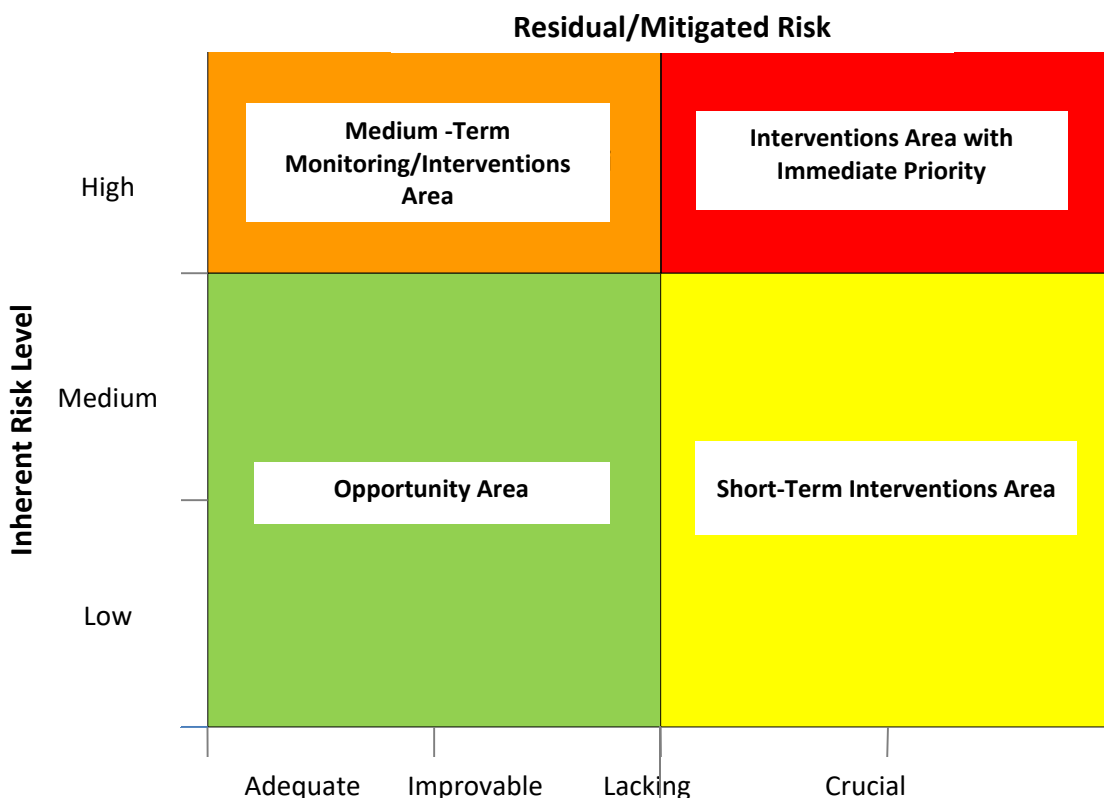
- 1 (Adequate);
- 0,5 (partially Adapted);
- 0 (No Adequate).

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:



Satisfactory

No Satisfactory

Monitoring System Assessment

◆ **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.

2.5 Process Monitoring

CONI and CONI Servizi S.p.A. identify 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 GN and CONI Servizi S. p. A. 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 D.Lgs. no. 39/2013.

In general,:

1. Afterwards residual risk assessments, some controls/measures may go through corrective actions in order to improve their logical adequacy level. These actions are implemented by Company Department Managers and monitored by R.P.C.T.;
2. if residual risk assessments is positive and it is no need corrective actions, the controls/measures will be monitored with specific tests in order to assess their operational effectiveness. These assessment reports, included in the intervention plan that R.P.C.T. shares with OdV, with the UPCCIA support. The whole process is defined in a specific Company Procedure. Furthermore, the competent departments receive the assessment reports with tips;
3. Risk activities are monitored also according to information flows defined by R.P.C.T. and OdV.

2.6 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.

Anti-corruption Plan 2013, 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 that 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.

The CONI's Committee ("GN"), like CONI policy-making body,:

- 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 from R.P.C.T.

The Board of Directors of CONI Servizi S.p.A., like Company policy-making,:

- appoints the CONI Servizi S.p.A. Manager in charge of Corruption Prevention and Transparency;
- approves the Three-year Anti-corruption Plan within the legal deadlines;
- receives the Annual Internal Report from R.P.C.T.;
- may appoint an OIV or a similar body.

The Plan is definitively approved when it is deliberated by both abovementioned bodies.

CONI Chairman and CONI Servizi S.p.A. 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 Council and the Board of Directors Meeting;
- may be delegated to make any changes to the PTPC during the year, notifying at the first useful GN and the Board of Directors Meeting.

CONI General Secretary and CONI Servizi S.p.A. CEO:

- receive R.P.C.T. reports regarding cases of support/collaboration lack, failure or delay in the fulfilment interventions or publication obligations and conflicts of interest;
- communicate to the Human Resources Department cases of support/collaboration lack with R.P.C.T. in order to take any appropriate action and/or disciplinary proceedings;
- carry out necessary actions in case of conflicts of interest indicated by 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, the detailed analysis of the role of the OIV, after D.Lgs. no. 97/16, is established by PTPC 2017-2019.

Manager on charge of Corruption Prevention (R.P.C.T.):

- prepare and update the Three-year Anti-corruption Plan and transmit it to GN of CONI and to the Board of Directors of CONI Servizi S.p.A. for approval and publish it;
- they prepare the Audit Plan, sharing its contents with the OdV of CONI Servizi S. p. A., informing the OIV;
- support the Structure Managers in activities of identification, evaluation and manage of potential corruption risks;
- monitor the implementation of corrective measures carried out by the Structure Managers;
- carry out second-level monitoring of first level controls and prevention measures about risk activities;
- plan and monitor staff training with risk-based logic;
- relate to the OdV of Coni Servizi S. p. A. in the various phases of activity planning, management and monitoring of corrective actions in order to assess possible synergies;
- refer, at least once a year, to GN of CONI and to Board of Directors of CONI Servizi S. p. A. or submit the PTPC and the annual report;
- report cases of lack of support or collaboration, failure or delayed fulfilment of interventions or publication obligations and any other critical issues to the Secretary of CONI and to the CEO of CONI

Servizi S. p. A. as well as to the OIV. In case of inaction of the above-mentioned organs, and if it is necessary, R.P.C.T. reports directly to ANAC;

- forward the Annual Report of the activities carried out within the legal deadlines to GN of CONI and to Board of Directors of CONI Servizi S. p. A. and to the OIV;
- verify any cases of incompatibility and foreclosure to confer an assignment, declare the nullity of appointments and assess the application of sanctions pursuant to D.Lgs. no. 39/13;
- receive conflicts of interest's reports detected by the company structures using the forms provided and report them to the Secretary of CONI and to the CEO of CONI Servizi S. p. A..

Responsible 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.

3. Appointment, Power and duties of R.P.C.T.

R.P.C.T. has to be able to perform their task impartially without any reprisal risk. For this aim:

- a) The office of R.P.C.T. has a term of office as the Olympic four years period;
- b) The role is can be renewed maximum four times, even tacitly;
- c) They can be suspended from the GN of CONI or the Board of Directors for just cause;
- d) The suspension of the office is automatic if, again the Responsible, penal legal measures have been applied for corruption reasons;
- e) In the case of previous both points c) and d), such as in the case of resolution of the working contract, is applied the regulation of art. 15 del D.Lgs 39/2013, that orders to communicate to ANAC the contestation in order to make a request for an internal review before the resolution becomes effective.

R.P.C.T. is independent and autonomous, they functionally report to the GN of CONI and to the Board of Directors of CONI Servizi S.P.A.

R.P.C.T. has been assigned with suitable and appropriate power to conduct the office with autonomy and effectiveness, including surveillance power on the actual fulfilment of the control measure expected by the Plan.

In order to complete their duties, R.P.C.T. has the liberty to access, with no limitation, to any corporate information relevant for their investigation activities, analysis and control; they can ask for information, relevant for the activities they are in charge of, to any corporate structure who is compelled to answer.

In the execution of the surveillance and control duties, R.P.C.T. can be supported by the *Corporate Compliance Internal Auditing* Office of Coni Servizi S.p.A., in order to have the highest level of specific professionalism and continuity of action.

R.P.C.T can ask for consultations to other internal functions, if it's necessary or appropriate, to dispose of the highest level of specific professionalism and continuity of action, as well as availability of dedicated and technically arranged resources.

R.P.C.T can dispose of adequate budget, for the correct and regular execution of their own functions and the realization of the Plan's objectives.

All the people involved in the system of corruption prevention are obliged to give the necessary collaboration to R.P.C.T., providing them with the requested information for the fulfilment of the role, both

for the predisposition/update phase of the PTPC and the following check and control phases of the implementation of the measures.

R.P.C.T., as well as the subjects that it refers to, in any qualification, are compelled to respect the obligation of privacy of all the information they become aware of in the exercise of their duties.

Anyway, any information is in accordance with the current legislation, specifically, with the Data Protection Law, D.Lgs. 30 giugno 2003, no. 196, and also the European Regulation no. 679/2016.

R.P.C.T. has to signal anomalies and cases of lack of support and collaboration to the Secretary-General of CONI and the CEO of CONI Servizi S.p.A., also to OIV, who will inform the HR direction in order to initiate disciplinary proceedings and application of the penalty provided by the CCNL, applied by the disciplinary system currently in force

In the case of non-compliance of the obligations linked to the role of Responsible Corruption Prevention and Transparency, provisions regarding liability are applied, described in CCNL and in disciplinary System currently in force. Also, according to art. 1, comma 12, Law no. 190/2012, in case of corruption offence established by a final court decision, R.P.C.T. is punished according to art. 21 D.Lgs. no. 165/2001, and following modifications, as well as in disciplinary matter for financial loss and image damage of CONI and CONI Servizi S.p.A., if it's not proven that:

- prior to the commission of the illegal act, the PTPC was set up and that all the provisions of Law no. 190/12 were observed.
- He has monitored the observance of the PTPC.

4. Information Flows

The information flows are an important prevention measure and are defined jointly by OdV, deputed to supervise on the Organizational Model established by D.Lgs. no. 231/2001, and by R.P.C.T who monitors Three-year Anti-corruption Plan respect. This synergy:

- ensures the efficacy and efficiency of auditing and prevention activities.
- allows an integrated risk vision, avoiding information and control duplications;
- avoids requests overload to corporate structures for information.

The information flows can be periodically revised, without prejudice of R.P.C.T. and OdV power of modifying or integrating ongoing the information needed to fulfil the control duties, also based on organizational or regulatory changes, as well as infringement alerts and reports.

Regarding these information flows, R.P.C.T. and ODV can request some specific details, using Company UPCCIA support, informing CONI General Secretary and CONI Servizi S.p.A CEO about weaknesses.

The information flows have been defined based on mapping and potential risk mapping and potential risk profile for CONI and CONI Servizi S.p.A. activities with reference to both Plan and to Model 231.

For each activity assessed, that shows “medium” or “high” risk, have been identified specific “red flags” indicators for potential fraud or misconducts/non compliant conducts (in reference to the offences of D.Lgs. no. 231/2001, and offences of Law no. 190/2012).

The *red-flag* are “anomalies”, not compliant and forbidden behaviours, events or actions with “exceptions” or “derogation” to daily operations or policies (i.e. are not allowed invoice paying requests by a supplier, forwarding of a resume by a candidate).

These *red-flag* or anomalies have to be recognized and identified by the competent corporate structure, that being the first level of corporate control have the duty to identify and point out to ODV and or R.P.C.T..

In relation to every *red-flag* identified some information flows have been defined based on following criteria:

- a) *Exception*: the flow contents relate to exceptions.
- b) *Drill Down*: information flows contents are generally not specific and can be subject to following detailed analysis or detail revision;
- c) *Periodicity*: the flow periodicity is defined in relationship of the risk level and the frequency of the sensible activities of which they are related to.

R.P.C.T. and OdV with UPCCIA support define the information flow and provide information to the CONI General Secretary and Coni Servizi S.P.A. CEO..

The competent corporate departments are in charge of first level control, anomalies warnings and information flow transmission to ODV/R.P.C.T., based on defined time set. Therefore, they provides all detailed studies if requested and supports audits.

UPCCIA supports R.P.C.T./OdV through the request and collection of alerts and flows coming from all competent departments.

5. Whistleblowing

CONI and CONI Servizi S.P.A. adopt a whistleblowing system in accordance with article 54-bis of the D.Lgs. 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.

Whistleblowing coming from employees that, in their own working duties, became aware of misconducts are regulated by the dedicated procedure (DRU 21 "Report Management for Whistleblowing -").

Whistleblowing submission and management takes place through a specific Company intranet application, who guarantees to whistleblowers confidentiality on privacy among all the process.

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;
- reports, related to the commission or the reasonable risks of commission of corruption crimes or not compliant with Plan and Code of Ethics, must be transmitted.

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.

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 Society or the people erroneously or bad faith accused.

In this regard:

- in the area of criminal actions, the identity of the reporter is secret within the limits of the art 329 c.p.c.;
- 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 artt. 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 and CONI Servizi S.P.A. 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.

This system guarantees confidentiality for the identity of the reporter and even the anonymous report though 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 the reports start from UPCCIA, who periodically verifies the presence of reports or after the automatic alert. Later, this department gives the information according to the respective competences of R.P.C.T. and OdV of CONI Servizi S.P.A., who evaluate if the warning is in good faith and correctly described, or considered mala fides.

In case where the report is objectively confirmed such as some critical aspects have been pointed out, ODV/RPCT inform the SG of CONI Servizi S.P.A. and, if appropriate, they request to DRU to evaluate to start a disciplinary action.

SG/AD will take action considered necessary and appropriate in relation to what reported by OdV/R.P.C.T. and will communicate the information to the competent authorities.

The reporting system is defined in the DRU21 procedure “Managing reports- Whistleblowing”.

6. Verification of compliance with the provisions of D.Lgs. no. 39/2013

In accordance with art. 15 of D.Lgs. no. 39/2013 and with the Decision n. 833/2016 dell'ANAC, the R.P.C.T. ensure the compliance with the dispositions of the Decree in incompatibility and foreclosure to confer an assignment matters. Specifically, R.P.C.T.:

- define the set of forms for the gathering of the self-certifications and they take care of collecting them for the interested in the moment of the designation (art.20 of D.Lgs. no.39/2013), even with the support of the *Corporate Compliance Internal Auditing* (UPCCIA);
- 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 D.Lgs. 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 D. Lgs 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 D.Lgs. no. 39/2013, in compliance with the principle of the contradiction and within the limits of the instruments available.

In case of proceeding assessment ends with incompatible situation, R.P.C.T.: (i) sends the notification to interested individual, within 15 days that person can renege because of incompatibility; (ii) expires of the entrustment resulted incompatible and the contract resolution according to art. 19 of D.Lgs. no. 39/2013.

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

7. Staff training

The training is intended as staff management in order to create a culture and control environment for corruptive phenomena prevention.

R.P.C.T. has the mission to define long-time risk-based training, in order to give to employees, above all who worked in process with higher corruption risk, providing an internal and external context representation concerning the methodologic tools designed in order to recognize the red flag cd or each process "fake positive" and whistleblowing system application.

8. Corruption prevention targets

In compliance with PNA currently in force, PTPC endorses and confirms the following strategic purposes for the three-year period 2018-2020 in order to:

- decrease the probability that risk will occur;
- improve the capability of identifying corruption risks and improving response times;
- create an unfavourable environment for corruption.

In order to achieve the strategic objectives, the R.P.C.T. defined the following specific objectives for 2018, which will be implemented with UPCCIA and, if necessary, external resources support.

Specific Purpose 2018	Linked Specific Purpose	Time
1. Corruption prevention procedures identified drawing up after audits and assessment 2017	To decrease the probability that risk will occur;	January - June
2. Code of Ethics review	To create no favourable environment for corruption;	January - March
3 Anti-fraud policy CONI-CONI Servizi S.p.A. completion	To create no favourable environment for corruption;	January - June
4 Conflict of interest in Tender Proceeding declaration introduction and assessment	To create an unfavourable environment for corruption;	January - March
5. Application system implementation to make more efficient UPCCIA data management concerning risks, controls, information flows	To improve the capability of identifying corruption risks and improving response times;	March - October
6. Audit Plan assessments	To decrease the probability that risk will occur;	March - October

The annual audits contained in Three-year Audit Plan will be shared with the OdV.

9. Disciplinary System

In relation to the management bodies, without prejudice to the responsibilities provided by D.Lgs. no. 231/2001, as well as the actions pursuant to art. 2392 of the Italian Civil Code for Company damages caused, pursuant to ANAC Resolution no. 1134 of 8th November 2017, it is promoted sanctioning

mechanisms implementation towards Managers who have not adopted organisational and management measures for corruption prevention according to the Law no. 190/2012 or PTPC.

The compliance with the provisions and conduct rules contained in the Plan and Anti-corruption policies and procedures constitutes CONI Servizi S. p. A. employees obligations implemented set by the art. 2104, comma 2, Italian Civil Code.

The provisions, conduct rules, procedures and policies infringement by employees is considered a disciplinary offence.

Disciplinary measures may be imposed in accordance with the provisions of art. 7 Law no. 300/1970 (so-called "Statutory Employee") and the National Collective Bargaining Agreement (CCNL).

With infringement event, it is possible to promote an action. In particular, in the assessment, the charge-penalties can be challenged to the employee and, in addition, guaranteed the term of reply provide by the National Collective Bargaining Agreement (CCNL) in order to defend that employee.

When the infringement is established, a disciplinary measure shall be imposed in proportion to its seriousness and possible recidivism.

Disciplinary proceedings initiation and conclusion is promptly communicated to R.P.C.T.

The disciplinary system's adequacy to the Plan requirements is monitored by R.P.C.T.

The type and extent of each sanction shall also be applied taking account:

- the conduct's intentionally or negligence degree, imprudence or inexperience with regard also to the event predictability;
- the overall employee behaviour, with particular regard to the existence or previous disciplinary procedures, within the limits allowed by law;
- the employee's duties;
- the individual operation position involved in the event;
- other particular circumstances.

CONI and CONI Servizi S. p. A. may claim compensation and damages resulting from Plan, policies and procedures violation.

Provision, conduct rules, policies and procedure infringement by managers, following confirmed it, the person accountable for the crime shall be punished with the most appropriate sanction in compliance with the CCNL provisions for managers. Afterwards, if trust relationship between Company and the manager failed, the sanction may be dismissal for just cause.

10. Transparency and Integrity Program

10.1 Transparency management process

Transparency is intended as a synergic element for PTPC purposes, contributing to embedding and developing the concept of "transparent administration" and reducing the possibilities of creating favourable environments to the corrupt phenomenon.

In that way, transparency or data disclosure relating to risk activities allows to assess the degree of containment and limitation of corruption risk.

Transparency days are also intended as an important means of stakeholders involving in the promotion and enhancement of CONI and Company's transparency, and are also important tools for listening to the stakeholders themselves.

CONI and CONI Servizi S. p. A. may publish on institutional website surveys to collect evaluations about the ease of site consultation, data and information completeness published CONI and Company and to receive suggestions for further publication requests concerning other data categories, in addition to mandatory ones.

To put transparency and accessibility principles into force and to create an administration as openly and as closely as possible to the citizen, it is possible to use this certified electronic mail address:

responsabiletrasparenza@cert.coni.it

The transparency management process covers both publication obligations management and specific purposes achievement. In general, R.P.C.T. requires CONI Servizi S. p. A. departments the necessary data to fulfil legal obligations and then they send it for publication through CONINet, that manages the corporate website.

Following the introduction of a special web-based application to manage the site, CONINet's intervention for the publication of data will no longer be necessary.

R.P.C.T. reports to CONI GN, CONI Servizi S.p.A. Board of Directors and to the same OIV, or directly to the ANAC if necessary, any failure cases or publication obligations delayed fulfilment, also for disciplinary action purposes.

OIV receives R.P.C.T. alerts in any failure case or publication obligations delayed fulfilment and reports to ANAC about the control of transparency obligations exact fulfilment.

CONI GN and CONI Servizi S.p.A. Board of Directors are informed of the failure cases or publication obligations delayed fulfilment by R.P.C.T. and they take necessary actions.

Company UPCCIA provides operational support to R.P.C.T. in requests to the competent Directions and in the data publication, with the data exception relating to request for tenders, published directly by the Purchasing Directions.

CONI Servizi S.p.A. Directions and offices provide the data and the documents requested, ensuring data timeliness and completeness.

The Administration, Finance and Control Direction may request to R.P.C.T. the data publication assessment before consultants and employees payment.

The following plan shows the responsibilities of the Directions for data collection and transmission and documents published.

SCHEMA ADEMPIMENTI "AMMINISTRAZIONE TRASPARENTE" EX D.LGS.33/13 DI CONI			
Review sito CONI AMMINISTRAZIONE TRASPARENTE come da allegato Delibera ANAC 1310 del 28.12.2016			
ADEMPIMENTO	CONTENUTI	Riferimento normativo	UFFICIO COMPETENTE PER LA RACCOLTA DEI DATI
Disposizioni generali	1) Piano Triennale prevenzione e corruzione 2) Atti generali	d.lgs.33/13: art.10 art.12	UFFICIO PRESIDENZA CORPORATE COMPLIANCE INTERNAL AUDIT
Organizzazione	1) Titolari di incarichi di amministrazione, di direzione o di governo (salvo gratuiti): I. Giunta Nazionale ; II. Presidente; 2) Titolari di incarichi di amministrativi di vertice III. Segretario Generale Per tutti i soggetti: Dati : - compensi (indennità e gettoni) - importi viaggi Documenti: - atto di nomina con indicazione della durata - cv - dichiarazione irpef parzialmente oscurata - dichiarazione predisposta secondo modello e contenente: . assenza cause di incompat. e inconf. (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 DIREZIONE AMMINISTRAZIONE FINANZA E CONTROLLO per gli importi dei viaggi delle cariche
Consulenti e collaboratori	Incarichi consulenti e collaboratori. Dati oggetto di pubblicazione per ciascun componente: i) estremi atto di conferimento, durata, ragione, oggetto incarico, soggetti percettori e compenso Documenti 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 UFFICIO ORGANI COLLEGIALI, UFFICI ANTIDOPING, SEGRETERIA ORGANI DI GIUSTIZIA SPORTIVA, SUPPORTO COMMISSIONE IMPIANTI SPORTIVI, DIREZIONE TERRITORIO E PROMOZIONE
Personale	OIV: Dati: - nominativi, compensi - cv	d.lgs. 33/13: art. 10 Par. 14.2, delib CIVIT n. 12/13	UFFICIO PRESIDENZA CORPORATE COMPLIANCE INTERNAL AUDIT

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SCHEMA ADEMPIMENTI "AMMINISTRAZIONE TRASPARENTE" EX D.LGS.33/13 DI CONI			
Review sito CONI AMMINISTRAZIONE TRASPARENTE come da allegato Delibera ANAC 1310 del 28.12.2016			
ADEMPIMENTO	CONTENUTI	Riferimento normativo	UFFICIO COMPETENTE PER LA RACCOLTA DEI DATI
Sovvenzioni, contributi, sussidi, vantaggi economici	Per gli atti di concessione superiore a 1.000 euro a: Federazioni Sportive Nazionali; Discipline Sportive Associate; Enti di Promozione Sportiva; Associazioni Benemerite; Gruppi Militari e Gruppi Civili. Delibere relative ai criteri di assegnazione Delibere di assegnazione Tabelle con importo contributo assegnato in favore di:	d.lgs. 33/13: art. 26 art. 27	UFFICIO ORGANI COLLEGIALI UFFICIO SERVIZI AMMINISTRATIVI CONI ENTE
Bilanci	A) Bilanci preventivi e consuntivi con allegati B) Entrate e spese in formato tabellare	d.lgs. 33/13: art. 29	UFFICIO SERVIZI AMMINISTRATIVI CONI ENTE
Provvedimenti	Provvedimenti organi indirizzo politico: accordi stipulati dall'amministrazione con soggetti privati o con altre amministrazioni pubbliche	d.lgs. 33/13: art. 23	TUTTE LE DIREZIONI INTERESSATE
Controlli e rilievi sull'amministrazione	A) Attestazioni OIV 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 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 D) Tutti i rilievi della Corte dei Conti ancorché non recepiti riguardanti l'organizzazione e l'attività delle amministrazioni stesse e dei loro uffici.	d.lgs. 33/13 art. 31	UFFICIO PRESIDENZA CORPORATE COMPLIANCE INTERNAL AUDIT
Pagamenti dell'amministrazione	A) dati sui propri pagamenti in relazione alla tipologia di spesa, all'ambito temporale e ai beneficiari B) indicatore di tempestività dei pagamenti c) ammontare complessivo dei debiti e numero delle imprese creditrici	d.lgs. 33/13: art. 4 bis art. 33	UFFICIO SERVIZI AMMINISTRATIVI CONI ENTE
Altri contenuti	Prevenzione della Corruzione: 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 Accesso civico e generalizzato: 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 Registro degli accessi Dati Ulteriori: link alle pagine dei siti web delle Federazioni Sportive Nazionali Altri dati sulle Federazioni Sportive Nazionali e sui Comitati Regionali del CONI Metodologia di Monitoraggio a distanza del sistema di controllo interno delle Federazioni Sportive Nazionale e delle Discipline Sportive associate e disciplina delle verifiche ispettive di dettaglio Manuale tecnico per i contributi soggetti a rendicontazione	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)	UFFICIO PRESIDENZA CORPORATE COMPLIANCE INTERNAL AUDIT

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SCHEMA ADEMPIMENTI "SOCIETA' TRASPARENTE" EX D. LGS. 33/13 DI CONI SERVIZI			
Review sito CONI SERVIZI - SOCIETA' TRASPARENTE - come da schema allegato alla Delibera ANAC. N. 1134 del 08.11.17			
ADEMPIMENTO	CONTENUTI	Riferimento normativo	UFFICIO COMPETENTE PER LA RACCOLTA DEI DATI
Disposizioni generali	1) Piano Triennale prevenzione e corruzione 2) Atti generali 3) Codice Etico	d.lgs. 33/13: art. 10 art. 12	UFFICIO PRESIDENZA CORPORATE COMPLIANCE INTERNAL AUDIT
Organizzazione	1) Titolari di incarichi di amministrazione, di direzione o di governo (salvo gratuiti): I. Presidente II. CdA IV. P.O. con deleghe Per tutti i soggetti 1): Dati per ciascun componente: - compensi (indennità e gettoni) - importi viaggi Documenti: - atto di nomina con indicazione della durata - cv - dichiarazione irpef parzialmente oscurata - dichiarazione predisposta secondo modello e contenente: . assenza cause di incompat. e inconf. (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 predisposta secondo modello contenente: invarianza / variazione delle cause incompatib. e della situaz. patrimoniale 2) Sanzioni per mancata comunicazione dei dati 3) Articolazione degli uffici organigramma con indicazione competenze 4) Telefono e posta elettronica: elenco completo numeri e caselle mail e pec	d.lgs. 33/13: art. 13 art. 14 art. 47 d.lgs. 39/13 art. 20	UFFICIO ORGANI COLLEGIALI per i dati e le dichiarazioni relative alle cariche DIREZIONE AMMINISTRAZIONE FINANZA E CONTROLLO per gli importi dei viaggi delle cariche
Consulenti e collaboratori	Incarichi consulenti e collaboratori Dati oggetto di pubblicazione per ciascun componente: i) estremi atto di conferimento, durata, compenso e oggetto incarico, ragione dell'incarico ii) il tipo di procedura seguita per selezione contraente e numero partecipanti Documenti oggetto di pubblicazione: I) cv	d.lgs. 33/13: art. 15-bis	TUTTE LE DIREZIONI
Personale	1) Personale: a) CCNL dirigenti b) CCNL non dirigenti c) personale a tempo indeterminato: dato distinto per categoria (tipo contratto, costo complessivo, numero risorse in servizio) d) personale non a tempo indeterminato: dato distinto per categoria (tipo contratto, costo complessivo, numero risorse in servizio) e) tassi di assenza - tabella strutturata per direzione con indicazione del tasso di assenza delle direzioni f) elenco degli incarichi conferiti o autorizzati a ciascun dipendente. Dati: oggetto, durata e compenso 2) Titolari di incarichi dirigenziali: Per ciascun titolare di incarico: Dati oggetto di pubblicazione: 1) sintesi dei dati del contratto (quali data della stipula, durata, oggetto dell'incarico) 2) compensi con evidenza delle parti variabili Documenti: 1) cv 2) dati relativi all'assunzione di altre cariche, presso enti pubblici o privati e relativi compensi a qualsiasi titolo; 3) altri eventuali incarichi con oneri a carico della finanza pubblica e indicazione dei compensi spettanti; 4) dich. insussistenza cause inconf. e incompatibilità dich. 39/13; Per ciascun dirigente l'amministrazione pubblica sul proprio sito istituzionale: Ammontare complessivo degli emolumenti percepiti a carico della finanza pubblica	d.lgs. 33/13: art. 14 art.14 c. 1-ter art. 16 art. 17 art. 18 art. 21 d.lgs. 39/13: art. 20	DIREZIONE RISORSE UMANE
Selezione del personale	Selezione del personale: Criteri e modalità: Provvedimenti/regolamenti/atti generali che stabiliscono criteri e modalità per il reclutamento del personale Avvisi di selezione: per ogni procedura selettiva: 1) avviso di selezione 2) criteri di selezione 3) esiti della selezione	d.lgs. 33/13: art. 19 L. 190/12: art. 1 c. 16 d.lgs. 175/16: art. 19	DIREZIONE RISORSE UMANE

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SCHEMA ADEMPIMENTI "SOCIETA' TRASPARENTE" EX D.LGS.33/13 DI CONI SERVIZI			
Review sito CONI SERVIZI - SOCIETA' TRASPARENTE - come da schema allegato alla Delibera ANAC. N. 1134 del 08.11.17			
ADEMPIMENTO	CONTENUTI	Riferimento normativo	UFFICIO COMPETENTE PER LA RACCOLTA DEI DATI
Performance	Premialità: criteri di distribuzione dei premi al personale e ammontare aggregato dei premi effettivamente distribuiti	d.lgs. 33/13: art. 20	DIREZIONE RISORSE UMANE
Enti controllati	Società partecipate: 1) Dati relativi alle Società partecipate (Coninet- Parco Foro Italo) TABELLA: - funzioni attribuite; - info relative all'oggetto sociale delle partecipate, ragione sociale, quota di partecipaz., data costituzione, durata impegno, onere gravante sull'ente, risultati di bilancio degli ultimi 3 esercizi finanziari e numero rappresentanti designati da CONI Servizi; - emolumenti di rappresentanti di Coni-Servizi e degli amministratori, dichiarazione sulla insussistenza cause di inconfiribilità e incompatibilità (dich. 39/13) (con link al sito dell'ente) 2) rappresentazione grafica rapporti tra Coni-Servizi e controllate 3) link a sito web delle controllate	d.lgs. 33/13: art. 22 d.lgs. 39/13: art. 20	DIREZIONE AMMINISTRAZIONE FINANZA E CONTROLLO
Bandi di gara e contratti	1) Dati oggetto di pubblicazione in tabelle riassuntive per ogni procedura: - Codice identificativo Gara (CIG); - Struttura proponente; - Oggetto del bando; - Elenco degli operatori invitati a presentare offerte/Numero di offerenti che hanno partecipato al procedimento; - Aggiudicatario; - Importo di aggiudicazione; - Tempi di completamento dell'opera servizio o fornitura; - Importo delle somme liquidate; - procedura di scelta del contraente; - la composizione della commissione giudicatrice 2) Documenti oggetto di pubblicazione per ogni procedura (art. 29 d.lgs. 50/2016): a - il provvedimento che determina le esclusioni dalla procedura di affidamento (entro 2 giorni); b - il provvedimento che determina le ammissioni all'esito delle valutazioni dei requisiti soggettivi, economico-finanziari e tecnico-professionali (entro 2 giorni); c - i curricula dei componenti della commissione giudicatrice; d - i resoconti della gestione finanziaria dei contratti al termine dell'esecuz. e - elenchi ufficiali di operatori economici riconosciuti e delle certificazioni (albo); 3) Ulteriori documenti sottoposti a pubblicazione (ex d.lgs. 50/2016): - Programma biennale degli acquisti di beni e servizi, e relativi aggiornamenti annuali (art. 21); - Programma triennale dei lavori pubblici, e relativi aggiornamenti annuali (art. 21); - Avviso di preinformazione artt. 70, 72, 73 e 98 d.lgs. 50/16; - Delibera a contrarre; - Avvisi, bandi ed inviti artt. 36, 72, 73, 114 e 122 d.lgs. 50/16; - Avvisi sui risultati della procedura di affidamento artt. 72, 73 e 98 d.lgs. 50/16; - Avvisi sul sistema di qualificazione artt. 72, 73 e 127 d.lgs. 50/16	L. 190/12: art. 1 c. 32 d.lgs. 33/13: art. 37 Delibera ANAC n. 39/13: art. 4 d.lgs. 50/16: art. 29	DIREZIONE ACQUISTI
Bilanci	A) Bilanci preventivi e consuntivi con allegati B) Entrate e Spese in formato tabellare	d.lgs. 33/13: art. 29 d.lgs. 175/16: art. 6	DIREZIONE AMMINISTRAZIONE FINANZA E CONTROLLO
Beni immobili	Dati: 1) Tabella relativa al patrimonio immobiliare - elenco impianti sportivi e immobili e loro indirizio; 2) Tabella relativa alle locazioni passive - info relative all'immobile con destinaz. d'uso, indirizio, locatario, canone annuo	d.lgs. 33/13: art. 30	DIREZIONE GESTIONE PATRIMONIO E CONSULENZE IMPIANTI SPORTIVI DIREZIONE AMMINISTRAZIONE, FINANZA E CONTROLLO
Controlli e rilievi sull'amministrazione	Nominativi OIV documenti: 1) attestazioni OIV 2) relazione dei revisori (ora alleg. al bilancio) 3) I rilievi della Corte dei Conti (Tutti, receipti e non receipti, su organizzazione e attività o singoli atti)	d.lgs. 33/13: art. 31 L. 190/12: art. 1 c. 8 bis	UFFICIO PRESIDENZA CORPORATE COMPLIANCE INTERNAL AUDIT
Pagamenti	Dati sui pagamenti: A) elenco pagamenti per importo, tipologia spesa e beneficiario Indicatore di tempestività dei pagamenti: B) indicatore di tempestività dei pagamenti C) ammontare complessivo dei debiti e numero delle imprese creditrici	d.lgs. 33/13: art. 4-bis art. 33	DIREZIONE AMMINISTRAZIONE FINANZA E CONTROLLO

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SCHEMA ADEMPIMENTI "SOCIETA' TRASPARENTE" EX D.LGS.33/13 DI CONI SERVIZI			
Review sito CONI SERVIZI - SOCIETA' TRASPARENTE - come da schema allegato alla Delibera ANAC. N. 1134 del 08.11.17			
ADEMPIMENTO	CONTENUTI	Riferimento normativo	UFFICIO COMPETENTE PER LA RACCOLTA DEI DATI
Altri contenuti	<p>Prevenzione della Corruzione: A) PTCF 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>Accesso civico: Accesso civico e generalizzato: 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>Dati Ulteriori: link alle pagine dei siti web delle Federazioni Sportive Nazionali</p> <p>Altri dati sulle Federazioni Sportive Nazionali e sui Comitati Regionali del CONI</p> <p>Metodologia di Monitoraggio a distanza del sistema di controllo interno delle Federazioni Sportive Nazionale e delle</p> <p>Discipline Sportive associate e disciplina delle verifiche ispettive di dettaglio</p> <p>Manuale tecnico per i contributi soggetti a rendicontazione</p>	<p>d.lgs. 33/13: art. 5 art. 7 bis art. 10 art. 43</p> <p>L. 241/90: art. 2</p> <p>L. 190/12: art. 1</p> <p>d.lgs. 39/13: art. 18</p> <p>Linee guida Anac FOIA (del. 1309/2016)</p>	UFFICIO PRESIDENZA CORPORATE COMPLIANCE INTERNAL AUDIT

10.2 Transparency Targets

In order to make effective, efficient transparency management and to maintain the compliance with legal requirements, the specific transparency purposes for 2018 are as follows:

Specific Purpose 2018		Strategic purpose	Time
1	Department and "amministrazione trasparente" and "società trasparente" (website sections) performance revision project in order to increase accessibility and to reduce management and supplying costs.	To increase the capabilities to detect corruption risks and to improve response times;	January - April
2	Implementation of documental user management application according to D.Lgs. no. 97/2016 and procedure drafting.	To increase the capabilities to detect corruption risks and to improve response times;	January - April
4	To plan Sport governance meeting in national and international context.	To create an unfavourable context for corruption.	November

Annex – Drill down

Conflicts of interests

CONI and CONI Servizi S.p.A. identify and manage conflicts of interests.

In general terms, according to the OECD *Managing conflict of interest in the public service* guidelines, a "conflict of interest" implies a conflict between a public official's mission and his/her private interests that could unduly affect the fulfilment of his/her duties and responsibilities.

Within these Guidelines, three types of conflicts of interest are identified:

- Real: there is a conflict between the public mission and the private interests of a public official, who has private interests which could unduly affect the fulfilment of his or her public obligations and responsibilities.
- Apparent: it seems, but not happening, that public official private interests may unduly influence the fulfilment of his obligations.
- Potential: a public official may have private interests that could give rise to a conflict of interest if the official will assume responsibility in future conflict situations.

The concept of conflict of interest has also been declined in Italian law. In general terms, in the Civil Code, in articles 1394, 1395 and 2373 and, subsequently, with particular reference to public employees, in the article 6-bis of Law 241/1990.

Italian Civil Code:

- Art. 1394. Conflict of interest.

The contract signed by the legal representative having a conflict of interest with the represented party may be cancelled if requested by the represented party if the conflict of interest was known or recognisable by the contract counter party.

- Art. 1395. Contract with itself.

The contract that the legal representative having a conflict of interest agrees with itself or on behalf of another third party he represents may be cancelled, unless the represented party specifically authorized the legal representative, or contract content is determined in order to exclude the possibility of conflict of interest. An appeal may be lodged only by the represented party.

- Art. 2373. Conflict of interests.

A resolution approved thanks to the vote of those who, personally or representing third parties, have conflict of interest with the company, may be challenged under article 2377 if it could cause damage to the company.

Directors cannot vote in resolutions concerning their responsibility. The members of the Management Board cannot vote in resolutions concerning the appointment, removal or duties of the Supervisory Board members.

Finally, the art. 6-bis of Law no. 241 of 7th August 1990 defines Conflict of interest:

The person in charge of proceedings and who in charge of offices competent to adopt opinions, technical evaluations, and the final decision must refrain in the event of a conflict of interest and report any situation of conflict, including potential conflict.

CONI Servizi S.p.A. requires specific declaration signed for conflicts of interest identification towards:

- consultants and external collaborators;
- internal staff working in risk areas;
- suppliers and institutions requesting direct assignment.

Purchasing Process Description and Monitoring

In the PNA 2015, ANAC carried out a purchasing process and contract management in-depth analysis.

The process was divided into 6 stages with specific alerts annexed, as well as possible preventive measures were identified for each ones.

Stage	Alerts
Planning	<ul style="list-style-type: none"> -Urgent Purchasing Procedure - Contractual Extensions - Repeated Direct Contracting to the same Supplier - Direct Contracting Value above EU thresholds for the Same Merchandise Categories
Contract/Project Tender Management	<ul style="list-style-type: none"> - Transparency Lack while Consulting Preliminary the Market - Approximative or Discriminatory Technical Specifications - Discriminatory Selection and Award Criteria - Lack of Contractual Essential Requirements - No Sufficient Estimate Value - Lack of Criteria to Evaluate and Permitte Variants from Technical Specifications - Restriction within the Participation Requirements - Most Economically Advantageous Tender (MEAT) Abuse
Contractor/Bidders Evaluation	<ul style="list-style-type: none"> - Lack of Tender Publication and Advertising - Unjustified Contractual Extensions - Tender Cancellation - Claims or Appeals by Excluded Bidders - No Sufficient Number of Bid Submitted/ Single Bid Submission - Contract Awarded to the same Bidder to often - Lack of Objective Selection Criteria for Weighting
Contract Awarding & Selection Proceeding Review	<ul style="list-style-type: none"> - Law Infringement Complaints/Appeals by Competitors towards the Contracting Authority - Missed/Inaccurate/incomplete/Untimely Communication on: <ul style="list-style-type: none"> * Invitation; * Exclusions; * Awards. - Final Contract Awarding Procedure Delay
Contract Implementation	<ul style="list-style-type: none"> - No Justified Variant Adoption - Lack of Necessary Opinions/Authorizations Collection - Service Execution with Variant before Approval - Dispute between Bidders and Contracting Authority - Lack of Coordination and Safety Plan - Lack of Authorization by Manager before Price Changes
Reporting	<ul style="list-style-type: none"> - Incomplete Documentation sent by Tender Manager - Non-Transmission of Documents sent to Tender Manager - Regular Execution Certificate Issued for Services not actually Performed - Financial Flows Traceability Obligations Avoidance - Failure to Acquire CIG or Smart CIG

CONI Servizi S. p. A., taking into account of above, has implemented the following measures:

- preventive:
 - a) internal regulations for the works, services and supplies acquisition for amounts up to 1,000,000 euros in order to regulate and manage the unitary and correct processes, in compliance with National and European legislation;
 - b) procedure about the goods, services and works purchasing administrative management in order to regulate and define Company purchasing process activities;
 - c) SAP application system, implemented with specific profiles authorization adoption and aimed at accounts management and active and passive cycle processes flows;
 - d) conflict of interest declarations form to be completed and signed by the applicant department and the supplier for direct contracting with amount above 5.000€.
- ongoing:
 - e) periodic information flows from the purchasing department to R.P.C.T. and to OdV, in relation to the following aspects:
 - number and total amount of direct contracting during the period;
 - negotiation procedures carried out during the period in which bid have not been received or awarded but for which only single bid has been received;
 - integration and contractual variants;
 - contractual extensions;
 - tender cancellation;
 - complaints and appeals.
- detective:
 - f) periodic survey about the negotiation procedures to check customer satisfaction concerning their transparency and effectiveness.
 - g) periodic Purchasing Process audits.