

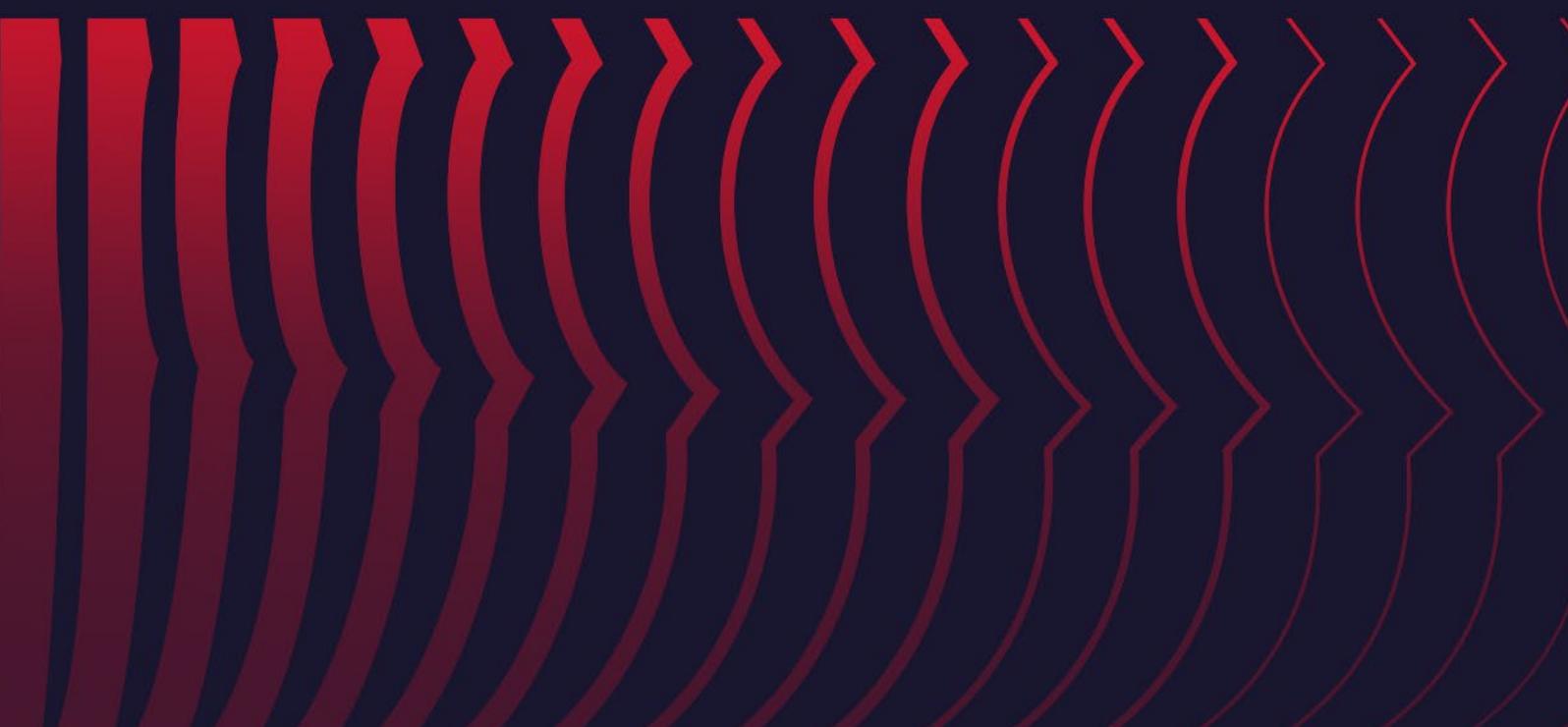


FC BARCELONA

SPORTS CORRUPTION PREVENTION POLICY AND BETTING REGULATION

VERSION 03

APRIL 2025





IMPORTANT INFORMATION ABOUT THIS DOCUMENT	
Document identification	Sports Corruption Prevention Policy and Betting Regulation
Document version	Version 03
Territorial scope of application of the Compliance Management System	Global
Rules developed	Integrity and Anti-Corruption Policy
Rules it replaces	Sports Corruption Prevention Policy and Betting Regulation v02
Related Standards	Other documents that make up FC <i>BARCELONA</i> 's Compliance Management System.
Business unit or function affected	All the units and functions of FC BARCELONA.
Staff affected	All <i>FC BARCELONA</i> Members and related <i>Third Parties</i> , as applicable.
Primary responsible for your surveillance	Compliance Area
Date of approval and entry into force	It does not require approval considering that the changes made are of a non-substantial nature, in accordance with the <i>Policy on the development and approval of rules</i> . April 2025.
Approval Body	Board of directors
Version Control	V01 (2019) V02 (July 2021) V03 (April 2025)



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1. Objective

This *Policy* aims to establish principles and measures to prevent and deter practices related to corruption in the field of sport, such as techniques and behaviours aimed at manipulating sports competitions and bribery behaviour aimed at professionals, entities and/or organisations in the field of sport. All this by virtue of the provisions of article 286 bis of the Spanish Penal Code and as a development of the section on the prevention of sports fraud of the FC BARCELONA Code of Ethics. This *Policy* also regulates and restricts the participation of FC BARCELONA Members in all types of *Bets*.

The purpose of this Policy is therefore to detect and suppress any irregular practice in the areas mentioned in the previous paragraph, in relation to the possible participation or involvement of *Members of the Entity*, especially the Players and sports professionals (including the coaching staff) of FC BARCELONA.

This Policy derives from FC BARCELONA's Integrity and Anti-Corruption Policy, which will be of supplementary application in all matters that are not specifically regulated in this Policy.

2. Development

2.1 Manipulation and bribery in sports competitions

FC BARCELONA is committed to promoting and establishing a *culture of fair play* and economic integrity among the *Members of the Entity*, with the aim of detecting and preventing any irregular conduct or suspicious economic deviation that may call into question the integrity of the sports competitions in which it participates.

This section develops the prohibitions provided for in article 286 bis, section 4, of the Criminal Code and in the section on the prevention of sports fraud of the FC BARCELONA Code of Ethics, by virtue of which the conduct of (i) manipulation and alteration of the results of sports competitions and (ii) bribery committed by *Members of the Entity* is prohibited towards other professionals or sports organizations.

- **Manipulation and alteration of the results of sports competitions:** The *Members of the Entity* undertake not to commit, in any of its forms, any conduct that may involve the manipulation and/or alteration of the results of sports competitions.

In this sense, conduct that may lead to the manipulation and/or alteration of the results of sports competitions is understood to be any agreement, deal, trick and, in general, any action or omission that intentionally aims to inappropriately alter the result or course of a sports competition, with the aim of totally or partially eliminating its unpredictable nature and with a view to obtaining an undue benefit for the person who commits the conduct or others.¹

FC BARCELONA expresses its absolute rejection and **prohibition** of carrying out **any type of practice**, actively or by omission, that may lead to the **alteration of the result and/or the normal development of any sports competition** in which FC BARCELONA participates and/or may be

¹ Description based on the definition set out in the *Council of Europe Convention on the Manipulation of Sports Competitions* (2014).



involved. In the same way, it is forbidden to carry out threatening, intimidating or any other acts likely to alter the free will of the person and their sporting development, with the aim of deliberately and fraudulently predetermining or modifying the result of any sporting event or competition.

- **Bribes of sports professionals and organisations:** in relation to the provisions above, FC BARCELONA and the *Members of the Entity* **will refrain from offering and accepting any type of payment or favour**, in their relationship with other Sports Professionals and/or members and other positions of other Sports Organisations, which may be **qualified and/or perceived as an act of bribery**, with the intention of altering, manipulating or predetermining the result of a test or a sports competition and that may even influence games of chance or betting.

2.2 Sports Betting

FC BARCELONA is committed to the fight against fraud and, in this regard, promotes preventive and dissuasive actions, as well as the creation of control mechanisms with the aim of preventing the use of FC BARCELONA's internal information, privileged or confidential, by *Members of the Entity* or by *Third Parties* who participate in any other way in the Sporting Event.

In particular, the field of sports betting has experienced a high degree of expansion in recent years. Therefore, it may be that the *Members of the Entity* have also increased their interest in these games of chance, which causes the need to regulate the possible practices in which these people may incur and that contravene current legislation and/or the neutrality of their participation. This context has made it possible to assess the existence of possible areas of fraud for various reasons, both on gambling platforms and in other contexts, such as that of the "fixers" of sporting events who seek to make a profit in betting.

In this sense, the Directorate General for the Regulation of Gambling specifies that **betting fraud linked to the manipulation of sporting events consists** of "*using bets to obtain a profit when it is known that a certain sporting fact or event has been previously manipulated*".

It should be borne in mind that, within the scope of this *Policy* and in accordance with current legislation², a Bet *is understood to be* any activity, in any of its modalities, in which assets are risked due to the result of an event that, to a certain extent, depends on chance and/or the skill of the participant.

In this sense, several types of Betting are distinguished depending on the environment in which they are developed, and they can be: *Physical Betting* or *Online Betting*.

In addition, within *Sports Betting*, current legislation distinguishes between pari-mutuel betting, counterpart bets and cross betting, depending on the organization and distribution of the sums bet.³

² Law 13/2011 on the regulation of gambling and the Council of Europe Convention on the manipulation of sports competitions.

³ For more information on the characteristics of each type of bet, please refer to Annex I *Definitions and abbreviations of this document*.



2.2.1 Prohibited conduits

FC BARCELONA establishes the following actions as prohibited conduct for persons linked to the Club and for athletes of any of its sections and categories, with respect to their participation in sports betting:

a. Prohibition of participating in sports betting

The prohibition of participating in sports betting, or organising it, on the occasion of sporting events involving football teams or any of the sports sections of FC BARCELONA extends, in accordance with current legislation⁴, to certain cases, both objective and subjective.

In this sense, it is prohibited to organize and participate in sports bets that:

- *Violate the dignity of people, the right to honour, personal and family privacy and one's own image, the rights of young people and children or any constitutionally recognised right or freedom.*
- *They are based on the commission of crimes, misdemeanours or administrative offences.*
- *Correspond to events prohibited by current legislation.*

On the other hand, the following prohibitions are established regarding the groups indicated:

- The management and executive staff, the Players, the sports professionals (coaching staff) and other *Members of the Entity* who intervene directly or indirectly in an FC BARCELONA *Sports Event*, official or not, will refrain from placing sports bets on the result of competitions in which any FC BARCELONA sports section participates through any of its teams.
- The prohibition of betting is extended to members of FC BARCELONA who, because of their position, employment or performance, know or are able to know confidential information about sporting events in which any sports team of FC BARCELONA and any of its sections participates.
- In the same way, FC BARCELONA extends the prohibition, in any of the cases set out above, to spouses and cohabitants and to ascendants and descendants up to the first degree, regardless of whether participation in the games by any of them occurs directly or indirectly through natural or legal third parties.

b. Non-spreading of rumours

Under no circumstances, whether it is information considered confidential or not, may rumours related to FC BARCELONA or third parties not be spread with the aim of increasing or decreasing the participation rate or the prize of a sports bet.

⁴ Art. 6 of Law 3/2011 on the regulation of gambling.



c. Not to disseminate or provide to third parties any information important for a sports bet

Under no circumstances may information be disseminated or provided, whether it is considered confidential or not, from FC BARCELONA or from third parties with the aim of increasing or lowering the participation rate or the prize of a sports bet.

Players and Professionals of any section and category of FC BARCELONA, due to the great media coverage generated by their statements, will refrain from making comments or predictions on the results of sporting events and competitions in which they participate directly, beyond generalist expressions aimed at generating team spirit among members. followers of FC BARCELONA.

In this sense, it is necessary to consider the provisions of FC BARCELONA's internal regulations, such as *FC BARCELONA's Conflicts of Interest Policy* and the *Confidentiality Policy*.

d. Prohibitions relating to minors

Current legislation⁵ expressly prohibits the participation of minors in sports betting of all kinds.

In this sense, FC BARCELONA will promote different actions in order to prevent minors from participating in any type of sports betting and to make them aware of the risks associated with these practices.

The prohibition of participating in sports betting will be extended to parents or persons who hold parental authority, guardianship and custody or guardianship of the minor.

On the other hand, in order not to encourage betting between minors and/or practices that may affect the integrity of minors, FC Barcelona prohibits the organisation of any type of sports betting based on competitions in which minors participate.

Similarly, the sponsorship of companies related to sports betting in events in which minors participate or participate will also be prohibited.

2.3 Formation

FC BARCELONA will carry out training and awareness-raising actions aimed at all Members of the Entity, according to the periodicity considered necessary in accordance with the Training Plan established by the person who holds the position of *Chief Compliance Officer*.

⁵ Art. 6 of Law 3/2011 on the regulation of gambling.



3. Ethics Channel and disciplinary regime

The commitment to compliance with ethical rules and standards commits all FC Barcelona members and business partners, and is a strategic objective for the Club. It is for this reason that it is expected that all members of FC Barcelona know and respect the content of this rule. Any FC Barcelona Member who detects a breach of internal regulations or current legislation must notify Compliance through the Ethics Channel.

FC Barcelona will guarantee the confidential treatment of all communications received through the Ethics Channel, as well as the absence of reprisals of any kind against whistleblowers in good faith.

To find out how to access and use the Ethics Channel, as well as obtain more information about it, you can consult the Management Policy of the Internal Information System published on the Internal Regulations Portal and on the FC Barcelona website.

FC Barcelona will react immediately to any breaches of the provisions of this rule, within the parameters established in current legislation. In this sense, FC Barcelona members who infringe this rule may be sanctioned in accordance with the provisions of current legislation, applicable collective bargaining agreement and applicable internal regulations.

4. Updating and improving this standard

This standard will be updated periodically in order to reflect the changes and improvements made.

FC Barcelona will carry out a periodic verification of the application of this rule and will propose the appropriate modifications in the following circumstances:

- 1) When it is deemed convenient for the better functioning of the Club.
- 2) When relevant infringements of the rule are revealed, its lack of effectiveness or obvious shortcomings that make it advisable to modify it
- 3) When there are significant changes in FC Barcelona, in the control structure or in the activity it carries out.
- 4) When there are relevant legal or jurisprudential modifications that make it advisable.