

## CODE OF ETHICS

### I. PREAMBLE

compass is a Hamburg based non-profit European Table Tennis Youth Foundation that has set itself a goal of creating an optimal environment for young, ambitious talents, together with their coaches, parents, and other supporters, which enable them to reach their absolute peak performance and, if possible, the world elite meanwhile respecting compass' philosophy on the grounds of fairness, respect, responsibility, and integrity.

By implementing this document compass is aiming to preserve and promote the highest ethical and moral values that are part of the compass' philosophy.

This document reflects and defines the most important core values and principles for behaviour and conduct within compass and its affiliates.

compass undertakes to disseminate the culture of ethics, diversity, inclusion, respect and integrity within its respective areas of competence.

compass wishes to serve as a role model within the table tennis community and wants to regulate the ethical and safeguarding principles within its reach in order to properly ensure their application and to maintain its good reputation.

This document is based on the IOC Code of Ethics, ITTF Code of Ethics and ITTF Child Safeguarding Policy.

In any case of any conflict or discrepancy, the aforementioned documents shall prevail.

### II. SCOPE OF APPLICATION

1. The compass Code of Ethics (hereinafter: the Code) shall apply to the persons falling within the categories below, hereinafter referred as Parties.

- a) Talent – Who participates in compass Talent Support Program after signing the compass Talent Support Agreement.
- b) Talent's entourage: the Entourage comprises all the people associated with the athletes, including, without limitation;
  - o parents – the parents or official legal guardians of the Talent
  - o coaches – talents' trainers /personal coach/s
  - o physical trainers,
  - o physios,
  - o medical staff,
  - o scientists,
  - o sponsors, partners
  - o any person promoting the Talent's sporting career, including family members.
  - o any other Person working with, treating or assisting the Talent during the period of the Talent Support Program.

- c) compass team – compass, its
  - a. expert team including table tennis coaches, and other experts from compass, ESN Sports ACE and Spinsight,
  - b. administration,
  - c. officials
  - d. employees,
  - e. delegated third parties,
  - f. service providers and their employees.

These ethical rules are like sport rules governing the conditions under which table-tennis is played under the umbrella of compass.

All Parties defined in the present section are automatically bound by these rules as a condition of participation or involvement in table tennis with compass and they shall be deemed to have agreed to comply with the fundamental principles and values and integrity of conduct and to not engage in any prohibited conduct and to submit to the jurisdiction defined in present Code.

Each Signatory of the compass Talent Support Agreement shall ensure that all Parties are properly informed about these rules.

For the avoidance of doubt, following the completion of a compass Event, compass shall continue to have jurisdiction over Participants under this compass Code of Ethics and compass Child Safeguarding Policy in respect of any matters that took place in connection with a compass Event.

2. The conduct of persons bound by this Code shall reflect their support of the fundamental principles and integrity of conduct stated in the present Code and their efforts to refrain from anything that could be harmful to these aims and objectives. The code focuses on general conduct within table tennis and shall apply to conduct that damages the reputation and/or integrity of table tennis in especially unethical, immoral or illegal activities of any kind.

3. For the avoidance of doubt, the application of the Code shall be subsidiary to the Talent Support Agreement with regard to any behaviour which is specifically governed therein.

The application of the Code is also subsidiary regarding any behaviour by a compass staff which is governed by internal regulations applicable pursuant to the relevant contracts.

In this regard, the Compliance Officer shall appreciate if a behaviour or action is likely to constitute a violation to the Code or to the respective agreements.

4. The investigation of breaches of the provisions of the Code may no longer be initiated after a period of 10 years. Provided that the investigation is initiated in a timely manner, the Compliance Officer is entitled to complete pending cases and render decisions.

### III. FUNDAMENTAL PRINCIPLES AND VALUES

All Parties shall:

- Respect the international conventions on protecting human rights insofar as they ensure in particular:
  - o respect for human dignity;
  - o rejection of discrimination of any kind on whatever grounds, be it race, colour, sex, sexual orientation, language, religion, political or other opinion, national or social origin, property, birth or other status;
  - o rejection of all forms of harassment, be it physical, professional or sexual, and any physical or mental injuries;
- Respect of the principle of the universality and political neutrality
- Respect of the Olympic spirit, which requires mutual understanding with a spirit of friendship, solidarity and fair play;
- Maintaining harmonious relations with state authorities, while respecting the principle of autonomy as set out in the Olympic Charter;
- Ensuring the Parties' conditions of safety, well-being and medical care favourable to their physical and mental equilibrium. This general rule is also supported by compass Child Safeguarding Policy.

### IV. INTEGRITY OF CONDUCT

All parties concerned shall, at all times act in compliance with the principles below. The persons bound by the Code (Parties)

- shall respect the integrity and personal rights of all persons with whom they interact in the contact of their table-tennis related activity (Supported by compass Child Safeguarding Policy)
- shall act according to the rules of fair play.
- respect the regulations of the sport (e.g Anti-Doping; Competition rules)
- shall hold confidential information on confidence and not reveal them unlawfully. (*Confidential information shall include information that is stated in writing or orally to be confidential and information that would be regarded as confidential by a reasonable person.*)
- shall not act in a manner likely to tarnish the reputation name or goodwill of compass or the sport of table tennis or any other Party.
- shall refrain from defamatory statements towards compass, table tennis, or any other Party.
- shall not behave in an unsportsmanlike manner.
- shall act in social media according to the fundamental principles and the integrity of conduct. Parties accept and endorse the compass philosophy and acknowledge that their actions on all platforms represent compass in some way and therefore will be governed by the compass rules and regulations.

- may inform the Compliance Officer in case of potential violation of this compass Code of Ethics and shall promptly inform the Compliance Officer in case of a potential violation of compass Child Safeguarding Policy.
- shall fully assist and cooperate with honesty, confidentiality, and in good faith with the Compliance Officer at all times, regardless of whether they are involved in a particular matter as a party, as a witness, or in any other role.
- shall not abuse their position in any way, especially in seeking to take advantage of their position for aims or gains that benefit themselves or any persons or entities related or associated to them;
- shall refrain from any activity involving corruption and/or fraud.
- may not engage in or support any form of betting or gambling in connection with their own matches and competitions.

## **V. REGULATIONS REGARDING COMPASS COMPLIANCE OFFICER**

1. The Compliance Officer (hereinafter referred as "Officer") shall ensure that it functions and executes its tasks in an independent manner.

The Officer shall:

- bear recognised competence in the domain of sports and law or ethics.
- be fluent in English.
- be fully independent from the Parties defined in Section II. of present Code.

Details of the requirements, terms of engagement, including but not limited to the compensation, are determined in a separate contract.

2. The Compliance Officer is vested with the following duties and tasks:

- a) to investigate complaints and denunciations regarding violations of the rules of the Code and/or the compass Child Safeguarding Policy;
- b) to conduct the disciplinary procedure;
- c) to request statement from the Parties and independent experts;
- d) to conduct hearings,
- e) to render decisions in relation to breaches of the Code and/or the compass Child Safeguarding Policy.

3. In cases the Compliance Officer finds at any stage of the procedure that the potential breach of the Code or compass Child Safeguarding Policy may constitute a criminal act/ violation according to the national laws, she/he proceeds accordingly and reports the case to the appropriate authorities and suspends the respective compass disciplinary procedure.

In this case

- a) if the person under procedure is the Talent, or its entourage according Point II.1 a) b) of the Code, the Talent Support Program is automatically suspended. No funding/support shall be given to the Talent who is or whose entourage is under procedure during the suspension. Depending on the outcome of the respective criminal procedure the Talent support agreement may be terminated. If the procedures result in no violation and the programme has been previously suspended, the remaining period of the programme will continue.

- b) if the person under procedure is the person affiliated to compass according to Point II.1 c) of the Code the person's contract with compass can be suspended taking into consideration the respective legislation. Depending on the outcome of the respective criminal procedure the contract may be terminated.

The local authorities and laws will take precedent over compass regulations. The Officer does not have the power to conduct criminal investigations and will close the suspended case upon completion of the criminal procedure in accordance with the conclusions delivered therein.

## **V. REGULATIONS REGARDING THE DISCIPLINARY PROCEDURE**

### **1. COMPLIANCE AND CONFIDENTIALITY**

In accordance with Section III. and IV. of the Code, all persons bound by the Code shall comply with any and all requests for information and/or documentation and/or production of evidence by the Compliance Officer and are obliged to collaborate in establishing facts.

The Parties shall be treated impartially during the disciplinary procedure.

The principle of confidentiality shall be strictly respected by the Compliance Officer in all its activities. It must also be strictly respected by any person concerned with the activities of the Compliance Officer.

### **2. REPORTING**

Any person may address a complaint or report an alleged breach of the Code to the following e-mail address: [integrity@compass-tt.eu](mailto:integrity@compass-tt.eu).

The complaint or report must not seek personal gain or benefit and must not be undertaken maliciously to damage the reputation of any person or organisation.

The complaint/report must be handled confidentially and impartially.

The personal information of the complainant won't be disclosed unless she/he gives written consent or is needed to avoid harm for any Parties involved or conduct the respective procedure.

Following the receipt of the complaint or report compass has 5 working days to find and recommend a person with the appropriate qualifications to handle the case as a Compliance Officer in case there is a reasonable cause to suspect that an infringement has been committed.

For irrelevant emails and emails that do not constitute a complaint, compass is not obliged to recommend an officer, but should make every effort to ensure that the original email was not intended as a complaint and/or report.

compass will support those who wish to make a report and provide any guidance that may be necessary in relation to the making of a report.

Persons participating in the procedure may object to the Officer's identity only if she or he does not meet the conditions set out in point V.I. of present Code.

### 3. PRELIMINARY EXAMINATION & OPENING OF PROCEEDINGS

Officer shall

- define the parties based on the preliminary examination of the complaint/report;
- determine the facts that are taken into consideration during the proceedings.

The Officer shall inform the Parties if facts are not considered as falling under the Officer's scope of competence.

In order to establish the facts, the Officer ensures that any person who is directly concerned with the disciplinary case is duly informed and consulted.

The Officer may request additional information and documentation from the sender of the complaint or report, or any Parties bound by the Code at any stage during the proceedings. In this case the Parties are obliged to comply with the Officer's request and to collaborate in establishing facts and provide information.

In case of non-compliance with the Officer's request this shall be considered as a violation of the present Code.

The Officer shall consider the particularly sensitive nature of such cases when deciding appropriateness of not disclosing the personal information of the persons concerned.

The Officer shall inform all the persons directly concerned regarding the opening of the disciplinary procedure.

### 4. PROVISIONAL MEASURES

Upon initiation of the proceedings, in case

- it is likely that an infringement has been committed but
- the decision on the merits is expected to take a reasonably long time
- and the Officer considers it necessary.

The Officer may impose provisional measures by rendering a decision on the basis of the evidence available at the time, without any hearing. The decision shall come into effect immediately, but it shall be limited for a proper period of time which shall be no longer than 3 months.

The provisional measures are

- 1) suspend the relevant agreement until the disciplinary procedure is closed;
- 2) to perform certain acts or refrain from performing certain acts;

### 5. THE DISCIPLINARY PROCEDURE

The Officer shall lead the procedure and the investigation.

Parties shall be granted

- the right to be heard,
- right to be represented by a counsel,
- the right to present evidence (of any kind),
- the right to access the case files,
- the right to a reasoned decision.



The investigation shall be conducted by means of written inquiries and written or oral questioning of the parties, witnesses, and any other person.

The Parties may present all kinds of evidence and present a query of a hearing also via video-conference.

Regarding standard of proof, the Compliance Officer shall decide based on its comfortable satisfaction.

As soon the Officer decides that the file is complete, and all related investigations are concluded, she/he renders the appropriate decision after careful consideration.

## 6. TYPES OF SANCTIONS

The Compliance Officer will form its decision based on the written submissions and evidence from all Parties and a fair and impartial hearing of those involved (if any.)

The sanctions or measures must be proportionate.

Breaches of this compass Code of Ethics and compass Child Safeguarding Policy shall be liable to be sanctioned by one or more of the following sanctions:

- 1) reprimand or warning as to future conduct;
- 2) to perform certain acts or refrain from performing certain acts;
- 3) expulsion from compass training camps.
- 4) termination of the relevant contract with compass.

compass is obliged to proceed according to the decision of the Compliance Officer.

## 7. NOTIFICATION OF A SANCTION

The Officer shall prepare and share the reasoned decision with all parties involved via e-mail in 15 days from the final submission deadline/final hearing.

## 8. RIGHT TO APPEAL

In case the Compliance Officer imposing a sanction of termination of the relevant contract with compass, the other Party has the right to appeal to the courts of Hamburg according to the relevant article of the corresponding Agreement.

All the relevant information regarding the deadline will be sent along with the notification of the decision.

Regarding the other sanctions Section VI. Point 6, 1-3 the decision of the Officer shall be deemed final and enforceable.

## 9. PROCEDURAL COST

In case a Party is represented by a counsel the associated costs shall be borne by the Party concerned.

The costs of the Compliance Officer shall be borne by compass.

The other procedural costs are the expenses arising over the course of the proceedings which shall be borne by the party at fault.

If more than one party is sanctioned, the procedural costs shall be assessed proportionally in accordance with the degree of guilt of the parties.

The procedural costs may be reduced or waived in exceptional circumstances, in particular taking into account the party's financial circumstances.

#### 10. DOCUMENTATION

Compass is obliged to store the disciplinary files for 10 years dating from the final decision.

#### 11. COMPASS CHILD SAFEGUARDING POLICY'S APPLICATION

The compass Child Safeguarding Policy serves as an Annex I to the present Code.

The provisions of the present Code shall be considered to govern unless otherwise specifically provided in the compass Child Safeguarding Policy.

In case of any discrepancy between the provisions of the compass Child Safeguarding Policy and the Code, the provisions of the compass Child Safeguarding Policy shall prevail.

*During all the procedures Parties shall keep in mind, that the ultimate goal of the present Code is to provide a leading example of fairness and integrity.*