

ethics quality  
accuracy truthfulness  
**integrity**  
strong moral principles  
honest actions



## **Code of Conduct**

## **Embodying Integrity**

November 2018



## President's Foreword

Whether it's enhancing responsibility and reliability or delivering better services for our Members & stakeholders, all of us at the GLMS family are working hard to ensure that our association is on a solid foundation for the future.

Strong and efficient performance is critical to our success, but just as important is how we go about achieving results - with honesty and respect, without taking shortcuts, and by operating ethically and with integrity in all that we do.

In order to fully guarantee integrity and transparency, it is of the utmost importance that GLMS Member-Lotteries together with its associate members/service providers—operate legally, sustainably and responsibly. The GLMS Code of Conduct supports our continuing commitment to honest and ethical conduct and compliance with both the letter and the spirit of all laws, and regulations, and our policies, standards, and procedures

At the same time, to help guide and align our behaviours as we take business decisions that impact our daily operations, we rely on our Code of Conduct, which outlines our values and describes our standards for conduct, compliance, and avoiding conflicts of interest.

We created this Code because we are all accountable for ethical conduct. The Code will help you understand our obligations as a global integrity body and your obligations as member/supplier/partner. Whether you are engaged with colleagues, members, regulators, or business partners, you have an important role to play in helping our Association live up to our high standards.

I would like to thank all our Members, Members of the Executive Committee and collaborators for their ongoing commitment to operating and working in the most responsible and sustainable manner.

**Ludovico Calvi**  
GLMS President

# Table of Contents

Considerations & Definitions	4
GLMS Code of Conduct on Sports Betting	5
GLMS Code of Conduct for for lottery suppliers	12

# Considerations

## Considering that

- GLMS is the Global Lotteries' integrity body, entrusted with safeguarding the integrity and credibility of sports betting operations of its Members but also the integrity and credibility of sport in general
- Considering that the Council of Europe has developed an International Convention on the manipulation of sports competitions, which GLMS fully supports.
- Considering that Lotteries were the first to develop cooperation to be able to detect irregular betting patterns, which started in 1999 and resulted in the creation of the European Lotteries Monitoring System (ELMS) in 2009 and the Global Lottery Monitoring System (GLMS) in 2015.
- Considering that GLMS Members' sports betting operations are organised in such a way as to create attractive, low risk entertainment and to promote a more active involvement in sporting activities for reasonable consumers.
- Considering that in order to achieve its objectives GLMS works with respectable partners and stakeholders from different areas (sport, law enforcement, intergovernmental organisations, public authorities)
- Having regard to the objectives of the Members in respect of public order, the public interest, and in particular the integrity of sport
- Considering that GLMS, with the present Code of Conduct, aims to enshrine the **fundamental values** and principles that GLMS, its Members, partners, employees and Executive Committee members act upon:

## Credibility, Honesty, Solidarity & Respect:

All individuals within the GLMS family demonstrate integrity, respect and teaming. GLMS family comprises individuals with energy, enthusiasm and the courage to lead, individuals who build relationships based on doing the right thing

## Transparency, Ethics & Integrity:

GLMS Members and individuals within the GLMS family observe the highest standards of transparency, integrity and ethical conduct in their operations and daily work and shall act with honesty and transparency

## Authenticity:

GLMS promotes a flexibility-oriented organisational culture, based on support and innovation.

***The present Code of Conduct should be seen as complementary to the jurisdictional, legal and regulatory requirements within each national jurisdiction.***

# Definitions

- **GLMS Members:** The Lotteries (individual Members) that are a member of WLA or EL/CIBELAE/APLA/NASPL/ALA and conduct sports betting
- **Lottery suppliers:** Companies providing sports betting solutions to Lotteries conducting sports betting and have joined GLMS as an associate Member
- **Partners:** Organisations (sport, intergovernmental organisations, public authorities, law enforcement agencies) that have concluded a partnership with GLMS
- **Sports betting:** Sports betting is a very important part of the gambling industry. GLMS members offer sports betting products from Toto “pools” games to oddset products.
- **Underage betting:** The act of placing bets by an individual who is underage, as defined according to the legislation of the jurisdiction of the consumer.
- **Odds compiling/offering:** the act of setting the odds for events (such as sporting outcomes) for customers to place bets on.

## GLMS Code of Conduct on Sports Betting

### GLMS Members always operate legally

GLMS and its Members consider legal sports betting activity to be any sports betting activity whose type or operator is allowed under the applicable law of the jurisdiction where the license is awarded and the consumer is located, fully in line with article 3 paragraph 5<sup>1</sup> of the Council of Europe Convention on the Manipulations of Sport Competitions.

- GLMS Members **only operate sports betting** in countries where they are authorised.
- All games GLMS Members offer are **in full compliance with the regulatory authorisation issued in their jurisdiction.**

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<sup>1</sup> “illegal sports betting” means any sports betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located;



## GLMS Members protect Minors

GLMS Members understand the risks related to underage betting and ensure that there are procedures in place so that underage (as defined by each jurisdiction) individuals are prevented from placing sport bets.

GLMS Members refrain from directing sports betting advertisements at underage people.

## Players Identification

GLMS Members have measures in place, according to the specific requirements defined by the local gaming regulator and the State where the consumer is located, that **guarantee an efficient and safe identification process before the activation of players' accounts for digital betting.**

GLMS encourages Members to make their **best efforts to know their players in the retail sports betting channel as well.**

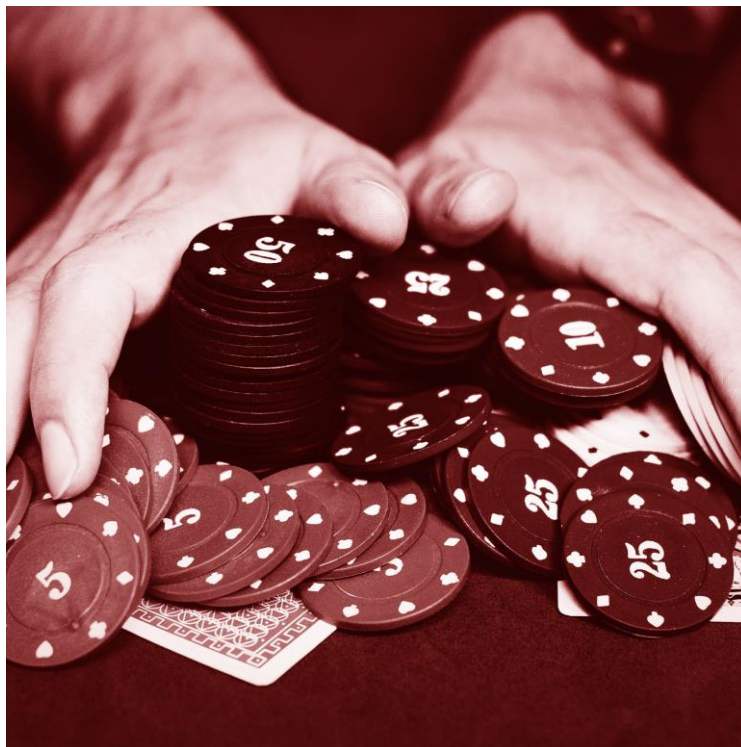


## Integrity – events & bet types selection

Beyond the regulatory restrictions in each jurisdiction, GLMS Members ensure that their sports betting offer is driven by responsibility, integrity and sustainability. Recognising that sports competition with no substantial sporting interest can present a higher risk of manipulation, GLMS encourages members to focus their betting offer **on competitions with a certain level of sporting interest**.

GLMS Members are encouraged to only propose betting opportunities on sporting events related to lower sport categories when they can ensure the highest level of vigilance can be attained.

GLMS encourages Members to **avoid offering bets on events involving minors only**. GLMS Members are also encouraged to selectively identify the bet types offered for live betting.



## Odds offering

GLMS encourages Members to **properly log and periodically audit** the odds being offered to customers.

These logs should co-exist with detection frameworks to prevent cases of fraud and other misuse.

## Integrity – monitoring of betting patterns & sharing of info

In case of suspicious betting activity, GLMS Members **should immediately alert GLMS operational team, the public and sport authorities as well as police and/or any relevant law enforcement authorities in a transparent manner.**

GLMS Members should make their best efforts to give feedback to relevant GLMS alerts within 24 hours from the generation of the alert.





## Integrity – education & prevention / national platforms / good governance

Realising the significance of education & capacity building when it comes to education and prevention, GLMS Members are encouraged to make their best efforts to support such programmes at a national level.

If their country has set up a national platform as per article 13 of the Macolin Convention<sup>2</sup>, GLMS Members make their best efforts to actively participate (if applicable). Should this not be the case, GLMS Members are encouraged to make their best efforts to coordinate and cooperate with their national stakeholders (i.e. regulatory authorities, law enforcement agencies, sport federations) and share information in a timely manner.

If applicable, in their sponsorship contract with federations, leagues or clubs, GLMS Members are encouraged to include provisions regarding the inclusion of integrity programmes/integrity officers to grow awareness on the phenomenon.

Recognising the issues of good governance and transparency that modern sport has to face, GLMS Members should undertake good governance and transparency standards, when sponsoring an event / organisation / club (normally this should be part of a commercial contract)

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<sup>2</sup> Article 13 – National platform

1. Each Party shall identify a national platform addressing manipulation of sports competitions. The national platform shall, in accordance with domestic law, inter alia:

- a. Each Party shall identify a national platform addressing manipulation of sports competitions. The national platform shall, in accordance with domestic law, inter alia:
- b. serve as an information hub, collecting and disseminating information that is relevant to the fight against manipulation of sports competitions to the relevant organisations and authorities;
- c. co-ordinate the fight against the manipulation of sports competitions;
- d. receive, centralise and analyse information on irregular and suspicious bets placed on sports competitions taking place on the territory of the Party and, where appropriate, issue alerts;
- e. transmit information on possible infringements of laws or sports regulations referred to in this Convention to public authorities or to sports organisations and/or sports betting operators;
- f. co-operate with all organisations and relevant authorities at national and international levels, including national platforms of other States.

2. Each Party shall communicate to the Secretary General of the Council of Europe the name and addresses of the national platform.



## ACCEPTANCE AND PAYOUT OF BETS

When the probability of corruption or anomaly is considered high, especially as indicated by a Red Alert from our proprietary system, GLMS Members are encouraged to take action, including the possibility of immediately stopping the bet acceptance process on the suspected game.

In the event that a fixed outcome can be reasonably established, GLMS members should endeavour to withhold payments to and freeze assets of any persons deemed to be seeking to financially benefit from such an outcome. However, regular customers should be treated according to circumstance with winning bets paid out as normal and losing bets being voided.

## Preventing Conflict of Interests

- GLMS encourages Members to avoid acquiring a significant stake of a sports club or substantial links with a sports person. However, if this is the case, Members should avoid having any influence on the sports decisions of the club. In a sponsorship contract, it should be clearly stated that GLMS Members play absolutely no role and have no direct influence on the sport-related decisions taken by the team or on the sponsored event.

## Preventing Conflict of Interests – odds compilers / players

- GLMS encourages Members to define in the employment contracts with their employees involved in Betting and Trading operations that they should abstain from participating in any capacity, directly or indirectly, in betting activities on events offered by any operators if they hold confidential information which can be exploited for their own personal economic benefit.

## Safeguarding moral integrity of sportspersons

As long as the legislation on data protection allows, upon new account registration of digital customers, GLMS members are encouraged to consider including a term in the “terms and conditions” section of the contract that athletes should refrain from betting on their sport competitions, as also required by the sports and Olympic movement. In case of identification of a breach, GLMS Members’ authorised employees should transfer these key evidences to the relevant sport authorities.



## Commitment to society

Beyond their legal obligations, GLMS Members are encouraged use their best efforts to support sport and raise awareness about the benefits of physical activity and the role of sport as a tool for social inclusion and development.

# Code of Conduct on Lottery Suppliers

- Suppliers/Service providers should be committed to providing solutions to conduct a fair and safe gaming experience that protect players from the adverse consequences of gaming and gambling. GLMS values the approach by which educating one another and the public about how to participate in gaming activities in a smart and safe way is critical to the success of our industry.
- Suppliers / Service Providers should always ensure that when operating sports betting on behalf of a Lottery, they prevent underage, illegal and compulsive gaming and gambling, and minimize any potential harm to society.
- Suppliers / Service Providers should make their best efforts to ensure and support the Lotteries they provide solutions to be compliant with GLMS Code of Conduct on Sports betting.

# Code of Conduct for employees and Executive Committee Members

## Standard of Conduct

GLMS conducts all its activities in an ethical manner, with integrity, trust, respect, and fair dealing. These values should govern our conduct in every decision we take which affects our association. It is GLMS duty to act always responsibly and with integrity, avoiding even the appearance of impropriety in carrying out GLMS operations.

The present chapter is applicable to GLMS Executive Committee Members and employees of all levels.

## Commitment to Integrity

Compliance is everyone's individual responsibility. We must comply with all applicable laws and regulations. Unless otherwise stated by local laws, as a condition of employment and formal engagement, we require all GLMS ExCo Members and employees to acknowledge their commitment to comply with this Code and all GLMS policies.

## Ensuring a healthy and productive working environment

GLMS is committed to providing a work environment where everyone is treated with fairness, dignity and respect. GLMS will not discriminate against anyone on the basis of race, colour, creed, religion or belief, national origin, age, disability, sex, marital or civil partner status, pregnancy and maternity/paternity, or any other legally protected status in accordance with applicable law and regulations. GLMS is also committed to respecting local employment laws and regulations, ensuring continuous education and development for its employees and ensuring that GLMS employees remain motivated and enthusiastic.

Any kind of harassment or bullying by or against GLMS employees, partners or Executive Committee members is prohibited. Engaging in any verbal or physical conduct which creates an intimidating, hostile or offensive work environment is unacceptable. Any GLMS employee, partner or Executive Committee member found to have harassed or bullied a colleague, or anyone directly involved with the activity of our Association will be subject to disciplinary or any other actions which the occasion may require.

## Enthusiastically serving sport and society

GLMS Executive Committee Members and employees should have full awareness that working for and being engaged in GLMS delivers high social values and promotes ethics-driven sport. Therefore through their work they serve society as a whole. GLMS Executive Committee Members and employees should make their best efforts to execute their tasks with enthusiasm and diligence. GLMS Executive Committee Members and employees should deal with people and issues openly, transparently and respectfully. They should take actions that are consistent with words and make their best efforts to foster a climate of trust and transparency between people.

GLMS Executive Committee Members and employees and partners should demonstrate an inclination for understanding and meeting the needs of GLMS Members. They should take active responsibility for the quality of services provided.





## We avoid Conflict of Interests

GLMS Executive Committee Members, employees and partners should avoid behaviours, relationships and situations which may or appear to conflict with their responsibilities or the interests of GLMS.



## GLMS employees

- No GLMS employee shall participate in sports betting activities. However, in limited instances, employees may place sport bets provided that such gaming activity is related to their job, is permitted under applicable laws and contracts, and the individual obtains prior approval from their supervisor.
- No GLMS employee shall accept or act in any position that could question his/her personal independence towards GLMS.
- No GLMS shall disclose to third parties any inside confidential information or documents.

## GLMS ExCo Members

- GLMS ExCo Members should not let the interests of their individual lottery prevail over the interests of the entire GLMS Association when participating in the GLMS decision-making process.
- When there is a possibility of a conflict of interest between GLMS and their Lottery, GLMS Executive Committee Members must declare the possibility of conflict of interest and if necessary, recuse themselves from decisions on the matter.

## GLMS Partnerships

GLMS takes its mission as a sports integrity body very seriously and this is why it works with respectable partners that comply with all relevant laws and regulations as well as with the highest level of values, like integrity, trust, respect, and fair dealing.

GLMS Partners make their best efforts to abide by the spirit of this Code and support GLMS, its Executive Committee members and collaborators in achieving the objectives set in the present Code.

## Confidential Information in particular

Confidential Information is very important to GLMS and the loss, theft, unauthorized disclosure or misuse of Confidential Information jeopardizes its mission, scope and causes harm to the Association. Employees possessing confidential Information shall not at any time either during or after the termination of their employment disclose to any person or use for their own purposes any Confidential Information concerning the organisation, administration, operations, finances, transactions or affairs of GLMS other than as required by local laws or regulations.

## GLMS Corporate Communications

### Ethical and Truthful Communications

GLMS is responsible for consistent and thoughtful communication and therefore we communicate in an honest and transparent manner. As part of this responsibility, only certain individuals within GLMS are permitted to speak on GLMS behalf.

GLMS press releases and any other communications always remain factual and truthful. All the information contained in all GLMS communications are accurate. They do not contain any personal or confidential information.

## Media Relations

No statements to the media should be made about any aspects of GLMS activities without permission to do so. All communications concerning GLMS with any representative of the public and private sectors, media or sport community, including reporters, journalists, authors, commentators, regulators, legislators and analysts, must be authorized by the GLMS President and/or General Secretariat.

# Gifts Policy and Entertainment

## Business Courtesies

Gifts and entertainment are frequently used as business courtesies designed to strengthen and foster institutional relationships. In some circumstances, however, lavish or disproportionate gifts or entertainment may be used as a form of bribe. We must avoid even the appearance of impropriety when giving gifts to or entertaining individuals who do business or are seeking to engage professionally with GLMS. Particular caution should be taken in relation to public officials. Any expenditure on gifts, entertainment or anything of value must be reported promptly and recorded accurately in the GLMS's records. A special database of relevant gifts is kept for this reason by the GLMS General Secretariat.

## Gifts

It is GLMS's policy to discourage the receipt or giving of gifts, directly or indirectly, by employees, Executive Committee Members or partners to individuals who do business or are seeking to engage professionally with GLMS. However, where not otherwise prohibited by law, we may give or receive gifts of a promotional nature on condition that: (1) the gift is reasonably connected to a business purpose, (2) the gift has a maximum value of CHF 250 unless the gift has been specifically approved by the GLMS General Secretary or his designee, (3) the gift is not intended, and is not likely to be perceived as intended, to influence a business choice of the recipient of the gift, (4) the same recipient has not received gifts which, in aggregate, over a period of six months would amount to more than CHF 250, (5) the gift complies with local applicable law, (6) the gift does not comprise cash or a cash equivalent, (7) the gift is given openly, and not secretly, and (7) to the best knowledge, the gift is not contrary to the policy or internal rules that apply to the recipient.

## Bribes

Conducting GLMS activities responsibly means never engaging in bribery.

We do not give or accept bribes – directly or indirectly – anywhere we conduct our core activities and provide our services. Without exception, we comply with all laws that prohibit bribery and improper payments.

- We never offer, give, solicit, or accept bribes, kickbacks, or any other improper benefits from anyone, whether in a commercial setting or with a government employee, public or private organisation official/representative.
- We never use a third party to work around the law.

## Money Laundering Prevention

GLMS will conduct business only with reputable customers and suppliers who are involved in legitimate business activities and whose funds are derived from legitimate sources. Money laundering is the process by which money acquired through illegal means or intended for illegal purposes is converted so that the money appears to be legitimately acquired or becomes untraceable to those using it for illegal purposes. GLMS's integrity and reputation can be severely damaged by failing to detect financial transactions which are attempts to launder money.

GLMS is committed to complying fully with all applicable anti-money laundering laws throughout the world.

## Conclusions

*The present Code applies to everyone engaged with GLMS, including all employees, members, and partners. Although the present Code might not address every issue that might arise, it seeks to provide a solid foundation for making good decisions.*

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## Whistle-Blowing Channel / Ensuring Compliance

GLMS Executive Committee Members, employees and GLMS individual & associate members are welcome to report any wrong-going or incident that might question the compliance with this Code through

- The email [ethicalconduct@glms-sport.org](mailto:ethicalconduct@glms-sport.org)
- Phone number: +41792608666

