

MORALS Principles HONEST Morals ACCOUNTABILITY HONORABLE Rectitude Right JUST VALUE HONOR FAIR  
CORE VALUES Truth Strong FAIR UPRIGHTNESS WISE Good Character Lawful  
Honest Truthfulness HONESTY Ethical philosophy FAITH Moral Values Ideology  
Ethics IDEALS LIFE  
VALUES TRUE

# EA Integrity Webinar

28 November 2025



# EUROPEAN AQUATICS®

## EA Integrity Webinar

Friday 28 November 2025

14:00 - 15:00 | CET

EA OFFICIAL LEARNING CENTER

<https://www.eaacademy.eu/lms/courses/ea-integrity-webinar>



**Noam Zwi**

General Secretary, European Aquatics |  
President, COMEN (Mediterranean  
Swimming Confederation)



**Marc Cavaliero**

Partner, Cavaliero & Cambreleng  
Chairperson, UCI Ethics Committee | Chief  
Ethics and Compliance Officer, World  
Aquatics



**Jouni Karvo**

Supervisory Council Member, Aquatics  
Integrity Unit, World Aquatics | Board  
Professional, Advisor, Business Consultant



## Programme

### **14:00 – Opening & Introduction (10 min)**

Noam Zwi

- Welcome and objectives of the session
- Reference to European Aquatics' strategy for the 2026 competitions

### **14:10 – Presentation of the European Aquatics Integrity Code (30 min)**

Marc Cavaliero

- Overview of the European Aquatics Integrity Code
- Key principles and implementation guidance for National Federations
- Q&A

### **14:40 – Integrity in Practice: The Integrity Charter (20 min)**

Jouni Karvo

- Presentation of the Integrity Charter
- Lessons learned and practical experiences

### **15:00 – Closing of the session**



## Integrity Milestones in EA

- **September 2023 – Creation of Integrity Chapter in the Constitution + Integrity Code**
- **January 2025 – Examining the implications of the changes**
- **March 2025 - A new approach for Integrity management:**
  1. Fix the integrity code to make it clearer and more accessible to everyone.
  2. Charter for Integrity and encourage member Federations for action
  3. Raising awareness among stakeholders for the Integrity principles and possible courses of action during EA competitions



## Integrity Milestones in EA

- EA named Sport Organization of the Year by SIGA (Sport Integrity Global Alliance) for remarkable governance reforms and integrity advancements





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# **2025 EA INTEGRITY CODE**

## **Overview & NFs Implementation**

By Marc Cavaliero – European Aquatics Ethics Officer

European Aquatics Integrity Webinar | 28 Nov. 2025



## PROGRAM

- 1. Overview of the EA 2025 Code**
- 2. Key changes (2023 to 2025)**
  - A. Procedural
  - B. Substantive
- 3. Implementation guidance for National Federations (NFs)**
  - A. NF's obligations
  - B. Alignment of national rules
  - C. Governance, reporting & collaboration



## 1. Overview of the EA 2025 Code

### A. Introduction (arts. 1- 6 Code):

- Definitions, Purpose & Scope, Covered Persons\*, Statue of Limitation, Language\*
- Came into force the 28 September 2025 (art. 2.9) Procedural v. substantive provisions

### B. Rules of Conduct (arts. 7 - 20 Code):

- I. General Duties: good conduct, loyalty, confidentiality, reporting and collaborating.
- II. Ethical Conduct & Financial Integrity: gifts, bribery and corruption, conflicts of interest, forgery.
- III. Integrity of Competitions: event manipulation and relationship w/ betting organizations.
- IV. Institutional Conduct: bidding for events and elections.
- V. Safeguarding Rules

### C. Enforcement of the Integrity Rules (art. 21-37 Code):

- I. EA Integrity Unit\*
- II. Adjudicatory process

### D. Sanctions (arts. 38-43 Code).



## 2. Key Changes

- **PROCEDURAL CHANGES:**

- **Personal scope:** broader definition of “Covered Persons”, now includes:
  - “Any person serving a sanction under this Integrity Code” (art. 3.1.d)
  - “Candidate and/or host cities seeking to or nominated to host and event” (art. 3.1.h)
  - Continuing jurisdiction over “Former” Covered Persons for matters occurring before their Covered Person ceases to be bound by the Code (art. 3.2):
    1. Termination can occur before or after
      - any investigation has been opened
      - or proceedings instituted against the Covered Person
    2. Restriction to participate in Events, hold any Covered Person role or engage w/ EA until all proceedings are fully completed
- **Official language of the Integrity Unit = English** (art. 6)
  1. Covered Person must cover the cost of any translation
  2. The Integrity Unit is entitled to disregard any material not provided in English.



## 2. Key Changes

### I. General duties:

- Duties of Good conduct (art. 7):
  - Broader scope of conduct at competition and Events
  - No association with persons/entities conflicting with Code principles– prior written EA warning no longer required (art. 7.9)
  - Among Other expressed Obligations:
    - Duty to abide by decisions of EA decisions (art. 7.5)
    - Political neutrality (art. 7.10)
    - Non-incitement to hatred or violence (art. 7.11)
    - Whistleblower protection (art. 7.13)
  
- Duty of loyalty (art. 8):
  - Reaffirms obligation to act in EA's and sport of Aquatics best interest



## 2. Key Changes

### I. General duties:

- Confidentiality (art. 9):
  - Confidentiality applies to all non-public information.
  - Expanded to include information “*obtained in the course of their duties*”, not only information “disclosed in confidence.”
  - Disclosure is prohibited if made “*for personal gain or benefit or with the intent to harm EA or others.*”
  - Disclosure is permitted if one of the conditions is met (art. 9.2).
  - Confidentiality does not restrict reporting concerns or cooperation (art. 9.4).
  
- Duty to report and to collaborate (art. 10):
  - Reporting authority = EA Ethics Officer (old 4.1 = EA Integrity Unit)
  - Stronger detail on cooperation requirements (accurate information, written/ oral testimony) (art. 10.2)



## 2. Key Changes

### II. Ethical Conduct & Financial Integrity:

- Offering and accepting gifts (art. 11)
  - Prohibited gifts expanded: gifts may never be in **cash**
  - Tokens of consideration capped at CHF 100 + consult with EA Ethics Officer if in doubt
- Bribery and Corruption (art. 12)
  - No longer limited to manipulation of Aquatics competitions.
  - Stand-alone provision.
- Conflict of interest (art. 13):
  - Clear Definition.
  - Exemplative list provided in the rules (includes perceived conflict of interest; art. 13.3).
  - Conflict apply to any Aquatics organization represented, not only EA (art. 13.2).
  - Continuous disclosure obligation (art. 13.4).



## 2. Key Changes

### II. Ethical Conduct & Financial Integrity:

#### ➤ Forgery and Falsification (art. 14):

- Explicit inclusion of electronic documents, records and information.
- Broader list of falsification examples: competition results, nationality, eligibility status, financial records, personal data.

#### ➤ Misuse and Misappropriation of funds (art. 15):

- Broader duty to act honestly, transparently and responsibly in all financial dealings (art. 15.1).
- Extended list of obligations, including acts intended to circumvent EA rules or policies (art. 15.3).



## 2. Key Changes

### III. Integrity of Competitions:

- Event manipulation (betting, manipulation, inside information)
  - Expands liability to indirect betting & third-party betting arrangements

### IV. Institutional Conduct

- Bidding for Events (art. 18):
  - Prohibition on agreement/ coalition/ collusion = now explicitly includes host cities too (art. 18.1.c).
  - NEW - Covered Persons must refrain from public endorsements or private promotion of any candidate or city (art. 18.2.c).
  - NEW - EA may require formal declaration of compliance with the Code as a condition for bidding (art. 18.3) + all individual acting for a bid entity are “*deemed subject*” to the Code (art. 18.4).
- Election (art. 19)



## 2. Key Changes

### V. Safeguarding Rules:

- Safeguarding-related conduct (art. 20):
  - Very complete provision including all form of abuse.
  - Sexual abuse (art. 20.1.g): expanded to include
    - Detailed examples of penetrative & non-penetrative acts
    - Non-contact abuse: viewing/producing images, watching sexual acts
    - Grooming as abuse, including online grooming



## 2. Key Changes

### C. Enforcement of the Integrity Rules:

- Scope (art. 21).
  - Jurisdiction clarified: applies to EA events, roles, activities & competitions (art. 21.2).
  
- EA Integrity Unit (art. 22): Integrity Council + Ethics Officer + Adjudicatory Body
  - Ethics Officer leads all investigations + monitoring powers (art. 23)
  - New appointment rules:
    - Integrity Council + Adjudicatory Body = Bureau nominates + Congress elects.
    - 4-year terms, renewable 3 times.
  - Independence strengthened:
    - Members cannot hold any EA decision-making positions.
    - Mandatory pre-appointment conflict of interest disclosure.



## 2. Key Changes

### C. Enforcement of the Integrity Rules:

- **Reporting** (art. 24) requirements strengthened:
  - Mandatory minimum information in reports in English (art. 24.3 & 24.4)
  - Anonymity – Ethics Officer or Adjudicatory Body will assess disclosure
  
- **Prima facie assessment** (art. 25):
  - Possibility to dismiss the case if reporting person fails to provide further information within the Ethics Officer prescribed timelines
  - Ethics Officer may initiate cases based on information from any source (not only reports)
  - Settlement agreement possible.
  
- **Provisional Measures (art. 26)**: imposed by Ethics Officer directly
  - Must be publicly disclosed
  - Covered Person may request review by Adjudicatory Body if circumstances change



## 2. Key Changes

### C. Enforcement of the Integrity Rules:

- Notice of charge (art. 28):
  - Notice of Charge to the Covered Person w/ EA Member copied
  - Must include: alleged violation + summary of the facts + (right to respond).
- Investigations (art. 29) fully conducted by Ethics Officer.
  - Structured process: document requests, interviews, confidentiality and handling of evidence.
  - Investigation closes with a formal written report submitted to the Adjudicatory Body.
- Adjudication (art. 31-37)
  - Detailed hearing procedure, including right to challenge adjudicators + witness protection/anonymity
  - Higher standard of proof : comfortable satisfaction, replacing the balance of probabilities (art. 35.2)
  - Publication of decisions strengthened, with options for redaction (art. 37.8)



## 2. Key Changes

### D. Sanctions:

- Type of sanctions (art. 38): NEW “withholding of grants or subsidies from an EA Member” + “exclusion”
- Determination of Sanctions (art. 39)
- Suspension of the Implementation of a sanction (art. 40):
  - NEW: 1-4 year probation + Possible compliance conditions
- Period of Ineligibility (art. 41):
  - Broader prohibition= act in any other official capacity within the sport of Aquatics
- Appeal (art. 42): Exclusively to CAS. No automatic suspensive effect.
- Recognition of the Decision (art. 43): change from “worldwide effect” to just the territory of EA.



### 3. Implementation Guideline for NFs

- NFs are directly bound by the 2025 Code, as they are EA Members and Covered Persons (art. 3.1.f)
  
- **Obligations of NFs under the Code:**
  1. Respect and promote all Rules of Conduct (arts. 7-20).
  2. Liaise with EA in cases of “dual” jurisdiction (art. 21.2).
    - If an NF fails to act effectively, EA may initiate proceedings itself (art. 25.2).
  3. Recognize and enforce EA decisions and sanctions, without the need of any formality (art. 7.5 and 43).
  4. Notification obligation when EA communicates to the Covered Person through the NF (art. 27.2).
  5. Cooperate fully with the Ethics Officer investigations (arts. 29)



### 3. Implementation Guideline for NFs

- **Incorporate and align national rules with the EA Code** (Examples)
  1. Adopt an Integrity Code
  2. Mirror key obligations
  3. Abide to minimum standards
  4. Specific safeguarding rules
  5. Reporting duties of any misconduct to the EA Ethics Officer

# QUESTIONS?

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# **Integrity in Practice: The Integrity Charter**

Jouni Karvo, Supervisory Council Member - Aquatics Integrity  
Unit | Board Professional, Advisor, Business Consultant



## **Lessons Learned From Past Integrity Cases**

### **Safe Aquatics Environment**

### **AQIU Strategic Near Term Objectives**

### **NF's role in Protecting the Integrity of their Organization – Integrity Index**

### **Questions**



## What Can We Learn From Past Integrity Cases?

### **Reports of Harassment and Unsafe Conduct by Mr Dmitriy Plyamin – Coach, Kazakhstan Swimming Federation (2024)**

- Coach reported for harassment, intoxication, and unsafe conduct at 2024 Junior Open Water Championships by a national federation.
- Misconduct included entering team areas, unwanted contact, and threatening behavior.
- AQIU issued a 6-month suspension also requiring a formal apology.

### **Learnings**

- Athlete safety is non-negotiable.
- Athletes, staff, and federations all play a role in identifying and reporting unsafe behaviour.



## What Can We Learn From Past Integrity Cases?

### **Suspension of the Lebanese Swimming Federation President - Mr Toni Nasri Nassar (2025)**

- Misuse of USD 50,000 from the Olympic Aquatic Support Programme intended for aquatics development.
- False invoices, reports, and financial documents were submitted to obtain the funds.
- Training activities claimed to have been conducted were confirmed to never have taken place.
- AQIU imposed an immediate ban and a seven-year suspension on the federation president.

### **Learnings**

- Misuse of funds erodes trust in sport.
- All World Aquatics covered persons are accountable for their actions as per the Integrity Code.
- Every federation must ensure transparency, honesty, and responsibility.



## Building a Safe Aquatics Environment

1. **Background checks of all staff in contact with athletes.**
2. **Clear safeguarding policy signed by all staff in contact with athletes.**
3. **Appoint a Safeguarding Officer and develop a safeguarding plan for every competition, including a full risk assessment of the venue.**
4. **Mandatory eLearning course on Safeguarding for all staff (coaches, officials, administrators, event staff and volunteers) involved with athletes.**
5. **No one-on-one meetings in closed room.**
6. **No athlete sharing hotel room with staff.**
7. **Ask the SafeSport entity in your country to do a risk assessment of your training centres and provide recommendations.**
8. **Report any potential crime to the police.**
9. **Provide support to victims/survivors.**
10. **Let an independent expert investigate and decide.**



## AQIU Strategic Objectives



**Assist Aquatics members to adopt an Integrity Code and to put in place an independent body to oversee national integrity issues.**



**Establish a network of national integrity officers amongst member federations.**



**Strengthen the management of Conflicts of Interests for International Technical Officers (ITOs).**



## What Should NFs Have in Place to Protect the Integrity of their Organisation?

- A reporting mechanism that allows anonymous reporting.
- An independent Integrity Officer to handle complaints.
- Programmes or policies in place regarding safeguarding from harassment and abuse.
- Guarantee fair, inclusive, and non-discriminatory treatment of all athletes, officials, staff, and other stakeholders.
- Conflict of interest policy identifying actual, potential and perceived conflicts with exclusion of members with an actual conflict from decision-making
- Ensure timely investigation and publication of disciplinary outcomes.
- To put in place integrity awareness/education programmes.

# Thank you

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# QUESTIONS?

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# CLOSING OF THE SESSION



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