



# Code of Ethics and Conduct

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# CONTENTS

1	MESSAGE FROM THE PRESIDENT .....	3
2	STAKEHOLDERS .....	4
3	VISION, MISSION AND VALUES .....	4
4	STRATEGIC PILLARS .....	5
5	DIVERSITY MANIFESTO .....	6
6	GUIDELINES FOR RIO 2016'S TEAM MEMBERS .....	6
	6.1 compliance with legislation .....	7
	6.2 Interpersonal relationships .....	8
	6.3 Personal integrity and Safety .....	8
	6.4 prohibition of drug and alcohol consumption in the workplace .....	9
	6.5 Prohibition of weapons in the workplace .....	9
	6.6 Preservation of the Rio 2016 Organising Committee's image .....	9
	6.7 Careful management of financial resources .....	10
	6.8 Anti-corruption measures .....	10
	6.9 Neutralising conflicts of interest .....	11
	6.10 Intellectual property and anti-piracy measures .....	11
	6.11 Protection of goods and property .....	11
	6.12 Information precautions .....	12
	6.13 Work environment .....	13
	6.14 External environment .....	13
	6.15 Internet and Social Networks .....	13
	6.16 Social and environmental responsibility .....	14
	6.17 presents and hospitality .....	15
7	GUIDELINES FOR RIO 2016'S LEADERS .....	15
8	RIO 2016'S GUIDELINES ON RELATIONS WITH SPONSORS AND PARTNERS .....	16
9	RIO 2016'S GUIDELINES ON RELATIONS WITH SUPPLIERS .....	17
10	RIO 2016'S GUIDELINES ON RELATIONS WITH THE COMMUNITY AND SOCIETY .....	18

11   RIO 2016'S GUIDELINES ON RELATIONS WITH GOVERNMENTS .....	18
12   RIO 2016'S GUIDELINES ON RELATIONS WITH THE PRESS .....	19
13   ETHICS MANAGEMENT .....	19
13.1 Ethics and Compliance Committee.....	19
13.2 Communication Channel .....	20
13.3 Agreement .....	20

# 1 | MESSAGE FROM THE PRESIDENT

Dear team member,

In 2016, the greatest athletes in the world will gather in Rio de Janeiro to take part in the largest sporting event on the planet. To be able to enjoy this once-in-a-lifetime experience, driven by their love of sport, all are already intensely preparing, dedicated to overcoming limits well before the start of the Olympic and Paralympic Games.

Like the athletes, we at the Rio 2016 Committee also have a challenge ahead. We have been entrusted with the mission of realising the dream of hosting the Olympic and Paralympic Games, staging a memorable event that will be a source of pride for all Brazilians.

However, before the Olympic cauldron's flame can be lit, we are counting not only on the efforts of our team members, but also their zeal for best practices and their attention to compliance with this Code of Ethics.

To achieve our objectives, it is fundamental to work in an integrated manner, acting exclusively through transparent relationships and attitudes aligned with the principles described here.

This Code is a valuable tool for decision making and the construction of a healthy working environment. I urge you to read it, practise it and encourage its use in our everyday working life.

**Carlos Nuzman**  
President

## 2 | STAKEHOLDERS

**Team member** - Board members, directors, employees, interns, apprentices and other individuals who have any link with the Rio 2016 Committee, whether as a representative, volunteer, authorised party or service provider.

**Sponsor and partner** - Individuals and legal entities that ensure the financial and operational feasibility of the Olympic and Paralympic Games.

**Supplier** - Any individuals or legal entities hired by Rio 2016 to supply goods and/or services.

**Government** - Entities of the federal, state and municipal public administration.

**Community** - Any and all inhabitants of or visitors to the city of Rio de Janeiro and the other cities where the Rio 2016 Olympic and Paralympic Games will take place.

**Society** - Entities that represent workers, such as unions and professional associations, or business sectors and non-governmental organisations, among others.

**Media** - Professionals related to communication channels of any nature, who perform journalism and other communication functions.

**Other stakeholders** - The International Olympic Committee (IOC), International Paralympic Committee (IPC), National Olympic and Paralympic Committees, International Olympic and Paralympic Sports Federations, and Olympic and Paralympic Sports Confederations, without prejudice to any other stakeholders.

## 3 | VISION, MISSION AND VALUES

### Vision

All Brazilians uniting to deliver the greatest festival on Earth, proudly advancing through sport, our national promise of progress.

## Mission

To deliver excellent Games, with memorable celebrations that will promote the global image of Brazil, underpinned by sustainable social and urban transformation through sport, contributing to the growth of the Olympic and Paralympic Movements.

## Values

The Rio 2016 Olympic and Paralympic Games are underpinned by the following values:

- Celebration: a youthful spirit of festive, engagement, joy, energy, passion and spontaneity
- Participation: teamwork, unity, hospitality, collaboration, solidarity, integration, social inclusion, diversity and accessibility
- Achievement: creativity, transformation, striving, progress, legacy and innovation, guided by the Olympic values of excellence, respect and friendship, and the Paralympic values of courage, determination, inspiration and equality.

# 4 | STRATEGIC PILLARS

- Achieve technical excellence in delivering high-level Games
- Capitalise on Brazil's passion to contribute to the holding of memorable celebrations
- Ensure that South America's first Olympic and Paralympic Games promote and enrich Brazil's global image
- Encourage legacy programmes that support sustainable transformation through sport
- Involve everyone in order to contribute to the growth of the Olympic and Paralympic Movements
- Promote the values of transparency, integrity and corporate compliance within the Brazilian and international business environment during the preparation and staging of the Olympic and Paralympic Games.

## 5 | DIVERSITY MANIFESTO

Our passion for diversity: the Rio 2016 Olympic and Paralympic Games represent the unity of all around a shared ideal. This unity is a catalyst for our passion for diversity, a passion that is contagious, attracting and respecting differences. Rio 2016 has a welcoming spirit, powered by a positive energy that invites everybody to be part of this experience, which will transform the country now and in the future. It is in this harmonious mixture that we demonstrate our appreciation for human diversity. It strengthens friendship between all, welcomes and respects the participation of each individual in this collective movement, emphasising the principle that we are all part of a single world. We want to be a stage for the diversity of people who every day embody the Olympic and Paralympic values, reinforcing a prosperous, aware and sustainable culture.

## 6 | GUIDELINES FOR RIO 2016'S TEAM MEMBERS

As they perform their functions, Rio 2016 expects its team members to show care, conscientiousness and transparency in their decisions and acts, thereby presenting conduct in accordance with the ethical principles present in this code.

Whenever queries arise in specific situations, the immediate superior, the Compliance area and the Ethics and Compliance Committee may be consulted and, in the event of possible violations of any of the guidelines specified here, the team member may report them by emailing [compliance@rio2016.com](mailto:compliance@rio2016.com), thereby informing the Ethics and Compliance Committee of the matter.

Team members' promotion of initiatives aimed at social and environmental responsibility is valued by Rio 2016. Likewise, respect for others, sincerity, trust and

moral integrity are fundamental principles for Rio 2016, which must be followed by all its team members.

Rio 2016 deems that breaching this Code may lead to disciplinary actions, including termination of employment contracts and other measures. Any and all suspicions of violations of this Code must be reported to the Compliance area, which in turn must report them to the Ethics and Compliance Committee. General breaches of this code will be analysed by Rio 2016's Ethics and Compliance Committee and the appropriate penalties may range from verbal or written warnings to termination of employment (with or without cause). All team members must cooperate with investigations into alleged conduct deviations.

## **Volunteers**

The Olympic spirit must guide the attitudes of all Rio 2016 Organising Committee volunteers. In addition to the common guidelines for all team members, volunteers have the following duties:

- Abide by the limits of their duties, as defined by the Organising Committee
- Be proactive in clarifying their own queries and seeking guidance
- Pay special attention to their own safety, as well as that of third parties, when performing their activities
- When in contact with the public, base their behaviour on courtesy, hospitality and respect for different cultures, and provide information with precision

The guidelines for Rio 2016 team members are based on 17 ethical principles.

## **6.1 COMPLIANCE WITH LEGISLATION**

All team members must perform their activities in accordance with prevailing legislation, as well as the by-laws of the Rio 2016 Organising Committee and the corporate policies and rules of the IOC and IPC.

Rio 2016 abides by the fundamental rights provided for in the Brazilian Constitution, with a specific focus on access to information and freedom of the press and expression, and repudiates the practice of any illegal act or criminal conduct.



It is our individual and collective responsibility to act so that any illegal practices or criminal conduct, once identified, are immediately reported to the Rio 2016 Organising Committee through the available channels, for them to be properly corrected and rectified.

## 6.2 INTERPERSONAL RELATIONSHIPS

Ethics and respect for others are fundamental principles for Rio 2016, to be followed by all its team members, whose duty it is to preserve the physical integrity, privacy, honour and image of others.

Freedom of expression is a guaranteed right for all Rio 2016 team members, although its exercise also involves the awareness that any discomfort to others should be avoided. Personal expressions, whether through words or even clothing, which indicate a religious or party political position, or affinity with any sports club, ought not to overshadow their professionalism.

No team member may act in a discriminatory manner, especially in terms of the origin, colour, religion, age, gender or sexual orientation of any person. In this context, words considered offensive or discriminatory must be removed from our vocabulary, as well as any acts that could harm anyone's physical and mental health.

## 6.3 PERSONAL INTEGRITY AND SAFETY

The safety of the Rio 2016 team depends on the actions of each team member. If any situation occurs that endangers a person's physical integrity, the activities must be halted and the immediate leader must be promptly notified in order to take the appropriate measures.

Through its Internal Accident Prevention Commission, Rio 2016 guarantees compliance with workplace health and safety legislation in the activities of its team members and service providers, all of whom must follow the safety and control rules to which they are subject.

All team members must ensure sure they have all personal protective equipment needed before starting their activities and use it properly. Those responsible for

health, safety and the environment have the additional responsibility of guaranteeing that team members are trained and orientated to use this equipment.

## 6.4 PROHIBITION OF DRUG AND ALCOHOL CONSUMPTION IN THE WORKPLACE

It is strictly prohibited, in the workplace or while working elsewhere for Rio 2016, to possess or consume illegal drugs and alcohol. Exceptionally, during social gatherings, events or ceremonies, the consumption of alcoholic beverages may be permitted, provided that prior consent is given by the director of the Functional Area.

## 6.5 PROHIBITION OF WEAPONS IN THE WORKPLACE

It is prohibited to bear arms of any kind or nature, except those explicitly authorised that are responsible for the security of other Rio 2016 Organising Committee team members and the Committee's property.

## 6.6 PRESERVATION OF THE RIO 2016 ORGANISING COMMITTEE'S IMAGE

Whenever we work at Rio 2016, we are contributing to the construction of its image. Our joint effort may be perceived by other professionals and organisations through the words and attitudes we express towards them.

Each of us has equal responsibilities and duties, as follows:

- Preserve the integrity of our brands and strive to use them correctly
- When wearing a uniform bearing our logos or driving a vehicle that refers to Rio 2016, do so in a manner that represents the Committee in a positive light
- Honour all commitments made, respecting deadlines, meeting demands and complying with agreements
- Strive to protect our name and reputation whenever making reference to Rio 2016
- Contribute to the fight against piracy of our brands and products, informing the Committee of any information you ma

## 6.7 CAREFUL MANAGEMENT OF FINANCIAL RESOURCES

All team members who have access to the Rio 2016 Organising Committee's financial resources or who manage its bank accounts must act with due caution and attention.

Their actions must occur in accordance with the previously established rules, their powers and levels of authority, and the Committee's objectives, and they must be supported by the appropriate documents. This guidance is valid for financial resources of any nature, such as travel expenses, cash originating from advance payments and/or fixed funds, corporate credit cards, presents, hospitality, donations, payments and other operations executed.

It is not permitted to use financial resources for purposes that are improper or illegal, or that could endanger the operation's integrity.

## 6.8 ANTI-CORRUPTION MEASURES

Rio 2016's team members are responsible for maintaining integrity and striving for best practices in performing their activities. Companies and government entities are also expected to act in this manner and to abide by the same principles.

Contact between Rio 2016 and public sector employees or governmental entities must only take place via designated team members and in accordance with prevailing communication protocols, fully abiding by the provisions of this Code, as well as the related policies and procedures.

We repudiate any acts in breach of Brazilian anti-corruption legislation in force in the country or any other legislation applicable to entities related to Rio 2016. Accordingly, we do not condone the offer, promise, authorisation or receipt of any kind of payment or granting of economic benefits, directly or indirectly, to entities, public sector employees, or any other persons that may be characterised as illegal or bribery.

The Rio 2016 Organising Committee has an Anti-Corruption Manual that may be consulted if you have any questions.

## 6.9 NEUTRALISING CONFLICTS OF INTEREST

No team member may perform activities that conflict with Rio 2016's interests. All decisions should be aimed at furthering Rio 2016's interests and be free from the influence of personal needs and the needs of suppliers, sponsors and other groups.

In order to impede conflicts of interest and mitigate actions harmful to Rio 2016's performance, team members should:

- Avoid doing personal activities during their working hours that could interfere with their everyday responsibilities
- Only use Rio 2016's equipment and materials for professional purposes. They should only be used for personal purposes in urgent cases, and always with authorisation from the Functional Area's manager.
- Impede actions that could generate personal benefits or improper advantages for third parties

Team members who receive information about the existence of business deals between Rio 2016 and one of their relatives, people with whom their relatives have close personal relations, or companies in which such people are partners, have significant stakes or perform a management role, must report this and obtain authorisation from the Functional Area's executive director.

## 6.10 INTELLECTUAL PROPERTY AND ANTI-PIRACY MEASURES

Rio 2016 deems that both its intellectual property and that of third parties must be respected and that the protection of its brands and/or licensed products depends on everyone's support. All team members have the duty to report to the appropriate channels whenever they are aware of piracy or falsification involving our name or activities.

## 6.11 PROTECTION OF GOODS AND PROPERTY

The reason that the Rio 2016 Organising Committee's goods and property exist is to support the staging of the Olympic and Paralympic Games and to enable the Olympic and Paralympic Movements to achieve their objectives.

For this to be possible, team members must direct their efforts for the care and conservation of these goods and only use them for their work. They have the duty to prevent damage, avoid misuse and take care to avoid losses or theft.

In external environments, the Committee's goods that are under the responsibility of team members will require closer attention. As well as laptops, mobile phones and other equipment, the information stored in them are also an integral part of the Committee's assets to be preserved.

## 6.12 INFORMATION PRECAUTIONS

Information produced or stored by the Rio 2016 Organising Committee is a valuable asset and each team member's conduct is fundamental to guarantee its integrity and protection.

Strategic plans, financial, accounting or management data, technical reports, contracts or other information regarding business partners, suppliers and sponsors are confidential and must be preserved. Even within the Committee itself, they should only be shared among those who need to access them.

Team members must not manipulate or take advantage of information about Rio 2016's activities that could influence decisions for their personal benefit, or generate benefits or losses for third parties, under penalty of civil and criminal liability.

Team members' personal records are also confidential, and may only be disclosed with the authorisation of the respective team member, in the case of legal demands or rulings.

Even after leaving Rio 2016, team members may not use for private purposes or pass on to others technologies, logos, methodologies and any other information belonging to Rio 2016, even if they obtained or developed them. They must maintain complete and absolute secrecy about all operational methods and routines, as well as commercial and tax procedures, under penalty of the applicable sanctions.

## 6.13 WORK ENVIRONMENT

Electronic and printed documents are produced every day, and sharing, reproducing and circulating them requires caution. It is necessary to respect the proper storage locations in services and the correct recipients of emails. Copies of printed documents must be properly stored or deleted when they are disposed of.

The passwords and login details for Rio 2016's electronic systems are personal and non-transferable. Each team member is responsible for protecting them, and their shared use is strictly prohibited.

The use of technological resources must be restricted to work-related topics. The Organising Committee does not permit access to websites featuring improper content nor the storage of such content on its computers and other equipment. It deems that the spreading of jokes, chain emails or non-corporate messages is harmful to the good performance of everyone, and should therefore not be practised.

It is important to note that the Rio 2016 Organising Committee may at any time audit its electronic systems, and team members should not expect privacy in using them.

## 6.14 EXTERNAL ENVIRONMENT

In public places such as restaurants, airports, lifts and taxis, team members should avoid discussing subjects related to Rio 2016. If absolutely necessary, they should use a moderate tone of voice, while safeguarding names, figures and information. This guidance also applies to informal environments such as at home or among friends. Outside corporate environments, relevant business topics should be avoided.

## 6.15 INTERNET AND SOCIAL NETWORKS

An environment for interaction and sharing of information, the internet and in particular social networks demand a cautious approach among our team members. They must not give opinions on behalf of Rio 2016 or share sensitive information, nor use offensive language or allude to its brands in messages or posts. We also expect the organisations with which we interact to be protected.

## 6.16 SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Rio 2016 is committed to conducting its activities in harmony with the community and environment. To achieve this goal, it encourages the development and implementation of systems to prevent, control and reduce the environmental impacts of its operations.

The Committee is committed to minimising its environmental impacts, guided by its Sustainability Management Plan, which encompasses the following:

- Transport and logistics
- Sustainable buildings
- Environmental conservation and restoration
- Solid waste management
- Diversity and inclusion
- Stakeholder engagement and awareness raising
- Universal accessibility
- Sustainable supply chain
- Responsible management and transparency
- Generation of jobs and income

The Sustainability Management Plan has the following objectives:

**Planet** - General environmental commitment of the Games, by promoting local measures.

**People** - Need for important social benefits for the whole population.

**Prosperity** - Well-administered, transparently managed Games, contributing to the city's economic growth.

Team members' health and physical integrity, and environmental protection are priorities for Rio 2016, which is determined to achieve the goals established for the staging of the Olympic and Paralympic Games. Accordingly, Rio 2016 will transparently treat all information related to health, safety and the environment that could affect team members, communities or the environment, whether on social networks or in any other information, communication, diversity and inclusion medium, electronic or otherwise.



## 6.17 PRESENTS AND HOSPITALITY

Team members must not take improper advantage of their position at Rio 2016. They must not receive, permit others to receive or grant to third parties advantages that go beyond usual commercial policies, nor in any way broker Rio 2016's commercial interests established with third parties.

They must also never accept or offer, directly or indirectly, favours, money or presents that could affect decisions, facilitate business deals or benefit third parties.

One delicate issue in external relations concerns courtesies offered, meaning gifts, offerings, discounts in transactions of a personal nature, invitations or any other kindnesses, insofar as they could cause suspicions of favouritism.

Offering courtesies is a habitual practice to develop relationships in business and, with some restrictions, it is a legal practice. The courtesies that may be offered and/or accepted must be of symbolic value, without intending to influence decision making in business.

Rio 2016 has a specific policy on presents and hospitality. Team members must abide by the conditions and limits established in this policy before receiving or offering presents and hospitality.

# 7 | GUIDELINES FOR RIO 2016'S LEADERS

All those who occupy leadership positions at Rio 2016 are responsible for promoting a culture of honesty and integrity, and setting the necessary conditions for everyone to be treated with respect and dignity.

Leaders at all levels are also responsible for guaranteeing that their subordinates know and apply the provisions of this Code, and that they provide the Ethics and



Compliance Committee with the necessary support to do its work and spread a culture of compliance.

Duties of the Rio 2016 Organising Committee's leaders:

- Respect the team members and third parties with whom they interact and avoid any conduct that could be characterised as abuse of power, bullying or sexual harassment
- Promote an exciting and inclusive work environment and do not make any distinctions based on the personal characteristics of clients, team members, candidates or third parties
- Preserve the integrity of the information with which they have contact due to their position and never use it for their own benefit
- Take decisions and use Rio 2016's tangible and intangible resources and assets in accordance with previously established standards and the Committee's objectives, refraining from any actions resulting from personal affinity or any kind of individual favouritism
- Refrain from any practice of bribery or corruption and work to avoid it

## 8 | RIO 2016'S GUIDELINES ON RELATIONS WITH SPONSORS AND PARTNERS

The success of the Rio 2016 Olympic and Paralympic Games is directly related to ethics in relations with sponsors, suppliers and partners, as well as the transparency of these relations in society. The principles that guide our positioning are loyalty, free competition and compliance with anti-trust laws.

The Organising Committee combats child, forced, slave or slave-like labour, and repudiates all forms of prejudice or discrimination, valuing ethnic and cultural diversity. It reserves the right to exclusively interact with organisations that act in accordance with these same values.

Sponsors and partners are chosen based on objective and fair selection criteria. Any personal relationships that may exist between team members and sponsors or partners must be disclosed.

Team members are prohibited from adopting any attitudes that denigrate the image of sponsor companies. Their products and services should not be publicly criticised by Organising Committee team members and actions suggesting preference or advertising for their competitors should be avoided.

Likewise, we expect all representatives of sponsor companies and partners to act prudently whenever their actions could affect Rio 2016's image.

## 9 | RIO 2016'S GUIDELINES ON RELATIONS WITH SUPPLIERS

Suppliers must be treated with loyalty. Just as Rio 2016 respects the confidentiality of information and establishes relationships free from favouritism, suppliers must comply with legal, labour and environmental requirements, as well as having a good reputation.

Rio 2016 bases its actions on commercial criteria featuring requirements in the areas of costs, sustainability, accessibility, legal conditions and quality. The aim is for the commercial proposals submitted by suppliers to be fair and competitive from the start.

Suppliers are required to provide formal documents demonstrating their social responsibility in areas such as prohibition of child, forced or slave labour, appropriate work relations, the adoption of environmental standards, and a ban on all forms of discrimination, celebrating ethnic and cultural diversity, as well as basic criteria related to legislation. Suppliers' partners must also abide by the same values and principles.

## 10 | RIO 2016'S GUIDELINES ON RELATIONS WITH THE COMMUNITY AND SOCIETY

Rio 2016 aims to ensure that the first Olympic and Paralympic Games in South America promote and enrich Brazil's global image, based on sustainable transformation through sport, contributing to the development of an Olympic legacy in the social and urban fields, through:

- Socioeconomic development
- Continuous, transparent and accurate communication of its activities and achievements
- The building of partnerships that contribute to the development of the state and country

## 11 | RIO 2016'S GUIDELINES ON RELATIONS WITH GOVERNMENTS

Rio 2016 works to establish and maintain harmonious and productive relations with government authorities, in accordance with the principles of universality and neutrality regarding the policy of the Olympic and Paralympic Movements. The Committee values synergy and integrity in dealings with all government spheres, pursuing independence and exemption in relation to governments and political parties.

The Committee acts transparently in all its activities and is available to cooperate and provide accurate information whenever necessary.

In its relations with public authorities, agents and inspectors, the Rio 2016 Organising Committee maintains a stance of not directly or indirectly favouring any individuals, not supporting or funding political parties or candidates for public office, and not conducting any act that could be characterised as corruption or bribery to obtain decisions that are favourable to it.

## 12 | RIO 2016'S GUIDELINES ON RELATIONS WITH THE PRESS

One must strive for the reliability of information communicated to media organisations and guarantee that all comments, declarations or pronouncements on behalf of Rio 2016 are only made by authorised people.

All other team members whose job description does not specify the role of interacting with the media must refrain from making any comments on behalf of the Organising Committee and refer media inquiries to the Communication area to provide necessary information.

## 13 | ETHICS MANAGEMENT

### 13.1 ETHICS AND COMPLIANCE COMMITTEE

This is the main body responsible for deliberating on matters handled in the Communication Channel and enforcing compliance with the Code of Ethics and Conduct.

Its main duties are to:

- Promote and encourage understanding of the Code of Ethics and Conduct



- Sponsor educational initiatives to raise awareness and promote the principles and guidelines of the Code of Ethics and Conduct
- Discuss and clarify queries regarding interpretation of the Code of Ethics and Conduct
- Evaluate, discuss and deliberate on the results of analyses of reports received by the Communication Channel, as well as take stances regarding violations of the Code of Ethics and Conduct

## 13.2 COMMUNICATION CHANNEL

The Communication Channel is a space open to all those who wish to share their concerns and opinions regarding violations of the Code of Ethics and Conduct. It is available 24/7, by emailing [compliance@rio2016.com](mailto:compliance@rio2016.com).

Whistle-blowers must always identify themselves, but their confidentiality and anonymity will be guaranteed. All information reported is confidential and the Rio 2016 Organising Committee does not permit retaliation against anyone who uses the channel in good faith.

## 13.3 AGREEMENT

All team members must sign the Agreement regarding this code, which will be provided by their immediate superior or the Human Resources area. Accordingly, all team members are obliged to know, understand, follow and strive to enforce this code.

It is important to emphasise that there will be no reprisals or penalties for reporting information about possible violations of this code, and complete confidentiality will be guaranteed, except with the prior authorisation of the respective team member.

Under no circumstances or pretexts will Rio 2016 accept alleged ignorance of the guidelines contained in the present code. Everyone is responsible for seeking to remain up to date with respect to this information.



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