#### Explanatory notes on the FIFA Clearing House Regulations

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#### **Explanatory Notes on the FIFA Clearing House Regulations**

This document aims to provide additional and appropriate guidance to FIFA member associations (MAs) and their stakeholders, including all potential clients of the FIFA Clearing House, in relation to the amendments and additions to FIFA regulations for operation of the FIFA Clearing House, in particular by the introduction of the FIFA Clearing House Regulations.

#### 1. Introduction and objectives

The FIFA Clearing House is a central aspect of FIFA's ongoing commitment to introducing fundamental changes to the football transfer system. The idea of establishing a clearing house came from the FIFA Football Stakeholders Committee and was then endorsed by the FIFA Council back in October 2018, as part of the first reform package of the transfer system.

In the following months and years, the FIFA Clearing House project was taking shape with the main goals of centralising, processing and automating payments between clubs, initially relating to training rewards (training compensation and solidarity contributions), and of promoting financial transparency and integrity, via the establishment of an external entity, the FIFA Clearing House (FCH), to process those payments and ensure compliance with international financial regulations.

The process of distribution of training rewards through the FIFA Clearing House consists of three steps: (1) the identification of entitlement to training rewards, (2) the completion of the Electronic Player Passport (EPP) and (3) the payments between clubs through the FCH. This process is regulated through the FIFA Clearing House Regulations.

The FIFA Clearing House Regulations have the following structure:

- Section I Introductory provisions (articles 1-3): objectives, scope and description of the FCH entity
- Section II Identification and calculation of training rewards (articles 4-11): registration and transfer of players; training rewards trigger (first professional registration, international transfer, domestic transfer with an international dimension); EPP and review process; and FIFA determination
- Section III FIFA Clearing House payment process (articles 12-14): allocation statement; payment by the new club; payments by the FCH to the training club(s)
- Section IV Compliance assessment (articles 15-16): compliance assessment; consequences of compliance assessment failures
- Section V Sanctions and disputes (articles 17-18)
- Section VI Final provisions (articles 19-26): applicability in time; transitory provisions; references; matters not provided for; official languages; inconsistency; operational management; enforcement

#### 2. General questions

#### 2.a. What is a training rewards trigger?

A training rewards trigger is an event related to the registration of a player that may give entitlement to training rewards to the clubs having trained the player in accordance with the FIFA Regulations on the Status and Transfer of Players (RSTP). Examples of training rewards triggers are international transfers, domestic transfers with transfer compensation or the first registration of a player as a professional.

# 2.b. As from when will payments of training rewards be processed through the FIFA Clearing House?

Any payment of training compensation or solidarity contribution within the regulatory framework of FIFA in accordance with the RSTP, and arising from a trigger of training rewards occurring as from 16 November 2022, will be processed through the FIFA Clearing House.

It is worth noting that transfers or registrations of players having occurred before go-live of the FIFA Clearing House (16 November 2022) will be paid and processed with the current claims system. Accordingly, training rewards related to instalments falling due after 16 November 2022, but which still result from transfers concluded before the entry into force of the FIFA Clearing House Regulations (CHR), will be paid and processed with the current claims system.

# 3. Registration and transfer of players - Article 4, FIFA Clearing House Regulations

# 3.a. What role do clubs play in ensuring that reliable, accurate and complete player registration information is made available to FIFA (art. 4 par. 1)?

Clubs shall ensure that:

- players are always correctly registered in the national registration system of their member association, including the status (amateur / professional) and the type of registration (permanent / on loan);
- the International Transfer Certificate (ITC) process is followed, in accordance with the RSTP for players that were previously registered at clubs affiliated to other member associations; and
- the usage of the correct FIFA ID for the player is respected when entering any instruction in FIFA TMS or in a domestic electronic system, or when registering the player in the national registration system.



### 3.b. What are the requirements for an electronic player registration system and an electronic domestic transfer system (art. 4 par. 3)?

It is worth reminding that, in accordance with the RSTP and as stated in FIFA circulars <u>no. 1654</u> (26 November 2018) and <u>no. 1679</u> (1 July 2019), member associations must implement electronic domestic transfer and registration systems and integrate them with TMS, the FIFA Connect ID Service and the FIFA Connect Interface. These provisions have been mandatory since 1 July 2020.

Domestic electronic systems (national registration systems and domestic transfer systems) shall be integrated with FIFA Connect ID, for the assignment of FIFA IDs to players and clubs, and for the electronic exchange of registration and domestic transfer information, where required.

Moreover, domestic transfer systems must have a matching mechanism for ensuring that the correct information is entered and verified when declaring a domestic transfer.

### 3.c. How shall member associations ensure that the same FIFA ID is used for a player across member associations and TMS?

It is very important that member associations make sure not to assign a new FIFA ID to a player that already exists in FIFA Connect ID.

Member associations shall use the functionality provided by FIFA Connect ID to identify possible existing registrations of the player in other electronic systems and shall assign the corresponding existing FIFA ID to the player in their electronic systems, where applicable.

This functionality is also integrated in TMS in the process of deduplication of players.

### 3.d. Where shall member associations categorise their clubs for training compensation (art. 4 par. 5 and 6)?

Member associations shall categorise their clubs in accordance with the RSTP and relevant information provided by FIFA through circulars.

The categorisation of their clubs must be entered by the member association into their national registration systems, communicated by the system to the FIFA Connect ID Service and manually entered or confirmed in TMS.

#### 4. Training rewards triggers – Articles 5, 6 and 7

# 4.a. Which training rewards triggers or events shall member associations communicate to FIFA in relation to the distribution of payments of training rewards and how?

a) First registrations as a professional at domestic level: all change of status from amateur to professional of male players shall be communicated to FIFA through the FIFA Connect interface from the National Registration System of the member association (article 5

CHR), or shall be manually declared in TMS, if an exception has been granted in writing by FIFA (article 5.4 CHR), within 30 days of the registration of the player.

- b) First registrations as a professional arising from an international transfer: these registrations shall be declared as part of an international transfer instruction in TMS and shall not be declared separately via an automatic or manually declaration (article 5.9 CHR).
- c) National transfers of players with transfer compensation: all transfers of a player with transfer compensation (i.e. release/buy-out fee, fixed fees, conditional fees and/or a sell-on fee) between clubs affiliated to the same member association shall be communicated to FIFA through the FIFA Connect interface from the domestic transfer system of the member association (article 7.5 CHR), or shall be manually declared in TMS if an exception has been granted by FIFA (article 7.7 CHR), within 30 days of the registration of the player. It is important to point out that if a transfer of a player between clubs affiliated to the same member association does not include any transfer compensation, it shall not be declared to FIFA.
- d) Payments of transfer compensation in national transfers of players: all proof of payments related to the transfer compensation of the transfer of a player within the same member association shall be communicated to FIFA through the FIFA Connect interface from the domestic transfer system of the member association (article 7.5 CHR), or shall be manually declared in TMS if an exception has been granted by FIFA (article 7.7 CHR), within 30 days of the registration of the player.
- e) International transfers: shall be declared in TMS in accordance with RSTP and its annexe 3 (article 6 CHR).

#### 4.b. In cases where a player reacquires professional status, should the member association only declare the first registration as a professional if the reacquisition happens within 30 months of the player re-registering as a professional (article 5 CHR)?

No, all cases where a player changes status from amateur to professional must be declared.

# 4.c. Shall member associations communicate or declare all first registrations as a professional or domestic transfers involving transfer compensation, or may they filter out those without international dimension (articles 5 and 6 CHR)?

Member associations need to declare all first professional registrations of players and domestic transfers involving transfer compensation irrespective of whether there is an international dimension, i.e. of whether the player has been trained at clubs affiliated to other member associations or not.

In cases where the member association has been granted an exception by FIFA (art. 7 par. 9 CHR), they may declare only domestic transfers involving transfer compensation of players where they determine there is an international dimension.

All trigger events shall be communicated by member associations as they could potentially give raise to training rewards. If it is showed at the beginning of the EPP process that first professional registrations or domestic transfers do not have an international dimension, the case will be discarded (see section 5).

### 4.d. How should a club declare a training compensation payment to a former club when it is included in the transfer compensation (art. 6 par. 2 and art. 7)?

In cases where a player registers at a new club for which payment of training compensation shall be due to the former club and there is a transfer agreement between the former and the new club of the player with transfer compensation, an EPP will be generated.

Where applicable, the new club may upload the transfer agreement in the corresponding EPP demonstrating that there is no clause assigning the payment of training compensation in addition to the transfer compensation, which implies that training compensation was included as part of the transfer compensation. Within the EPP review process (section 5) in TMS, these agreements should be declared within the "waiver" section.

# 4.e. What is the process for a member association to request to declare first registrations as a professional and/or domestic transfers with transfer compensation manually in TMS (art. 5 par. 4 and art. 7 par. 5)?

Request for declaring domestic transfers with transfer compensation and/or first registrations as a professional, manually in TMS instead of electronically through the FIFA Connect interface, must be made in written form by the relevant member association's TMS manager.

Such request shall be sent via email to <u>CHhelpdesk@fifa.org</u>.

### 4.f. What is the process for a member association to request an exception for declaration of domestic transfers only with international dimension?

Request for an exception to declare only domestic transfers with international dimension shall be made following the requirements and in accordance with art. 7 paragraph 9 of the CHR, after prior written approval of the FIFA general secretariat.

Such request shall be sent via email to <u>CHhelpdesk@fifa.org</u> including the number of domestic transfers with transfer compensation that took place at the member association during the calendar year prior to sending the request.

#### 5. Electronic Player Passport – Articles 8, 9 and 10

#### 5.a. What is the Electronic Player Passport (EPP)?

An Electronic Player Passport (EPP) is an electronic document containing the consolidated registration information of a player throughout their career, including the relevant member association, their status (amateur or professional), the type of registration (permanent or loan),

and the club(s) (including training category) with which they have been registered since the calendar year of their 12th birthday.

The EPP is generated by FIFA whenever a training rewards trigger is identified. A review process will guarantee that all interested member associations and clubs can provide the relevant registration information and documents, so that the EPP is complete.

This electronic document is generated by and stored in FIFA TMS. It can be found in the "Player Passports" area.

### 5.b. Which registration information shall member associations provide to FIFA for the generation of the EPP of the player?

All registration information of a player throughout their career, including the relevant member association, their status (amateur or professional), the type of registration (permanent or loan), and the club(s) (including training category) with which they have been registered since the calendar year of their 12<sup>th</sup> birthday.

#### 5.c. When is the provisional EPP generated by TMS?

The provisional EPP for the relevant player is generated in TMS when a training rewards trigger is identified as defined in the aforementioned Section 3.

#### 5.d. Which are the training rewards?

As per art. 20 and 21 & Annexe 4 and 5 of the RSTP, the training rewards are the following:

- Training compensation, which is payable until the player's 23<sup>rd</sup> birthday for training incurred up to the calendar year of their 21<sup>st</sup> birthday when:
  - the player is registered for the first time as a professional (change of status from amateur to professional) before the end of the calendar year of their 23<sup>rd</sup> birthday, and has been trained at a club affiliated to different MA to where he is being registered; or
  - the player is transferred between clubs of two different associations before the end of the calendar year of their 23<sup>rd</sup> birthday, during or at the end of their contract.
- Solidarity contribution, which is payable during the player's entire career to clubs that trained the player up to the end of the calendar year of their 23<sup>rd</sup> birthday when:
  - the player is transferred internationally (or nationally and there is an international dimension) before the expiry of their current contract; and
  - there are payments in the context of the transfer of the player with the objective of transferring the player to the new club (transfer compensation).

#### 5.e. How are the training rewards calculated?

In line with art. 20 and 21 & Annexe 4 and 5 of the RSTP:

- Training compensation is proportional to the amount of training cost that would have been incurred by the new club if it had trained the player itself (calculated by category of club and confederation as per the relevant FIFA Circular);
- Solidarity contribution amounts to a maximum of 5% of any transfer compensation paid for the purpose of transferring the player (excluding training compensation).

#### 5.f. Who can access a provisional EPP in TMS?

The provisional EPP is available for inspection to <u>all member associations and clubs</u> for ten (10) days in TMS after generation. All TMS managers (of clubs and member associations) are advised to check the "Player Passports" area in TMS regularly.

### 5.g. How is a member association able to participate in the review of an EPP and how will it be notified about this?

There are three options:

- Added automatically when providing information through FIFA Connect interface
- Invited to participate by FIFA general secretariat
- Requests to participate and accepted by FIFA general secretariat

In all these cases, the member association will be notified of its participation by email and in the TMS dashboard.

# 5.h. How may a club request that a registration of the player at their club is added in the EPP of the player?

A club that is not listed in the provisional EPP and believes that it should be included in the final EPP may request its member association to be included in the EPP review process and to provide pertinent registration information.

### 5.i. Which member associations and clubs participate in the review process of an EPP?

There are five possibilities:

- The member associations that have provided registration information relating to the player through the FIFA Connect interface;
- Their relevant affiliated club(s);
- The new club and its member association;



- Any member association that has requested to be included (cf. article 8 paragraph 3) and their relevant affiliated club(s), at the discretion of the FIFA general secretariat; and
- Other member association(s) deemed relevant by the FIFA general secretariat, at its discretion.

#### 5.j. How long does the EPP review process last?

The review process opened by FIFA lasts for ten (10) days and may be exceptionally extended by the FIFA general secretariat, at its discretion.

### 5.k. Which amendments can a participating member association request in the EPP review process?

Participating member associations may request to amend: registration information, training category, the status of a player (professional/amateur) or the type of registration (permanent/loan).

Likewise, a new registration can be requested to be added (Club FIFA ID is required; if not existing yet, it must be generated in the national registration system), and existing registration can be requested to be removed.

### 5.I. How can a participating member association request the amendment of registration information in the EPP review process?

The member association shall submit its request to amend registration information directly in the EPP of relevance, in TMS, along the following documents, without limitation:

- Proof of registration
- Employment contract (if permanent)
- ITC (optional)

### 5.m. Which documents can be provided by participating clubs in the EPP review process?

Participating clubs can provide relevant information and documents during the EPP review process. These include waivers (to be provided by the new club of the player) and contract offers (by former club of the player), among others.

### 5.n. How may a training club challenge a waiver provided by the new club of the player in an EPP?

The respective training club may challenge the validity of the waiver provided by the new club by submitting its position in TMS along the documentation it deems relevant in support of its challenge.

### 5.o. How may a new club challenge a contract offer provided by the former club of the player in an EPP?

The new club may challenge the validity or content of the contract offer provided by the training club (or prove that the training club is not able to provide a contract offer) by submitting its position in TMS along the documentation it deems relevant in support of its challenge.

# 5.p. What happens if the provided information within the context of a document (or its challenge) is unclear?

The FIFA general secretariat may request any party involved in an EPP review process to provide further information at any time.

### 5.q. How will FIFA contact the parties involved in an EPP for requesting further information (art. 10.2 CHR)?

FIFA will contact the parties via a communication tool directly available in the relevant EPP in TMS, under the tab "Messages". Parties will be notified in TMS and via email of new messages from FIFA in an EPP.

#### 5.r. What can a member association do in cases where the EPP review process has been started, or the EPP has become final, and they did not participate in the EPP, despite the player having been registered at their member association?

A member association that has failed to request its participation during the inspection period (art. 8.3 CHR) may not participate to the EPP review process unless being requested to do so by the FIFA general secretariat (art. 9.1 e)).

#### 5.s. For which complex matters may an EPP be referred to the DRC for decision?

The FIFA general secretariat may recognise situations of legal or factual complexity in an EPP and refer them to the DRC, such as, but not limited to, the alleged registration of a player or the validity of a waiver or a contract offer (art. 10.3 CHR).

# 5.t. How does the adjudication work in cases of referral of the matter to the DRC for decision?

The EPP review process will be paused pending the DRC decision and the status in TMS in the EPP of relevance will indicate that the EPP has been referred to the DRC. The DRC will decide on the case(s) of legal and/or factual complexity contained in the EPP, following art. 28bis of the Procedural Rules of the Football Tribunal (Procedural Rules) and in line with art. 22 par. 1 lit. f) of the RSTP.



### 5.u. Can the EPP and the Allocation Statement be appealed by the parties in an EPP process?

Yes. The final EPP (containing the grounds of the decision of the DRC) and the Allocation Statement will be notified to the clubs and member association participating in the EPP review process via TMS (art. 10.5 CHR). There is a period of 21 days for any party of the EPP review process to appeal at CAS the final EPP and/or the Allocation Statement.

Once the EPP is final and binding, the FIFA Clearing House procedure (compliance assessment and payment) can start.

#### 5.v. What happens if one of the notified documents is timely appealed at CAS?

A valid and timely appeal to CAS suspends the legal effects of an EPP and of the corresponding Allocation Statement for the duration of the respective proceedings before CAS (art. 10.5 lit. d)).

### 5.w. Where and how long will the final EPP be available for member associations and clubs?

A final EPP for each training rewards trigger will be permanently available in TMS for inspection by all member associations and clubs (art. 10.6 CHR).

# 5.x. What happens if a member association fails to provide accurate registration information during an EPP review process or whose electronic player registration system and/or electronic domestic transfer system is not integrated with the FIFA Connect Interface?

The member association in question may face the following sanction(s) (art. 17.3 CHR):

- A fine; and
- An order to pay to its affiliated club the training rewards that it did not receive as a consequence of the wrong or missing information provided, or as a consequence of the failure to communicate/manually declare a trigger.

### 5.y. What happens if a member association fails to automatically communicate or manually declare a training rewards trigger to FIFA?

The member association in question may face the following sanction(s) (art. 17.4 CHR):

- A fine; and
- An order to pay restitution to the training club, an amount equivalent to the training reward that should have been paid, if there had been no failure by the relevant member association.

#### 6. Proof of payment – Article 11

### 6.a. How will the declaration of the proof of payment of transfer compensation trigger the distribution of payments of solidarity contribution?

When an international or domestic transfer with payments is declared, a corresponding EPP is generated in TMS for review by the clubs and member associations.

Once the EPP has been finalized, each proof of payment declared or uploaded in relation to the transfer of the player in question will trigger the generation of an allocation statement for distribution of the corresponding solidarity contribution. If the proof of payment is declared or uploaded before the EPP becomes final, the corresponding allocation statement will be generated once the EPP is finalized.

### 6.b. Which amount must be retained in the payment of transfer compensation for the purpose of solidarity contribution?

The proof of payment declared to FIFA plays a crucial role in the calculation of training rewards.

Following article 1 of Annexe 5 to the RSTP, 5% of any transfer compensation shall be deducted for payment of solidarity contribution; consequently, the amount declared in the proof of payment within TMS will be considered to always reflect the 95% of the respective transfer compensation.

Member associations and clubs shall consider this when making and declaring payments of transfer compensation that trigger payment of solidarity contribution through the FIFA Clearing House.

#### FIFA Clearing House: compliance and payment process – Articles 12, 13, 14, 15 and 16

# 7.a. Which payments will be processed and which will not be processed through the FIFA Clearing House?

The FIFA Clearing House will only process payments based on Allocation Statements received from FIFA. The FIFA Clearing House will not process any other transactions, and clubs or member associations are not able to request any payments to be made.

In addition, payments will only be processed once the relevant clubs involved in the transaction have passed a compliance assessment.

### 7.b. Who bears the banking fees when payments are made to or from the FIFA Clearing House?

When a new club makes a payment to the FIFA Clearing House all costs charged by the bank of the new club to make the payment are to be borne by the new club. This is the same for any

charges to convert funds when the new club does not hold an account in the currency being requested by the FIFA Clearing House. It is essential that the FIFA Clearing House receives the full amount requested in the correct currency. Any shortfall can lead to sanction for a payment failure according to article 17.6.

The FIFA Clearing House will bear banking fees for payment out to the training club(s) in the currency stipulated in the allocation statement. If the training club does not hold an account in that currency the training club's bank may charge fees to convert to the local currency. These fees will be the responsibility of the training club.

# 7.c. How will the levy of 2.5% be paid to the training clubs in cases where the new club fails to pay the requested amount to the FIFA Clearing House by the specified deadline (art. 13 par. 4)?

When a new club fails to pay the full amount to the FIFA Clearing House within the 30-day deadline, the FIFA Clearing House will issue a dunning notification to the club with the 2.5% levy applied and giving the club further 7 days to make the full payment.

If the new club makes the full payment after the 30-day deadline and before the further 7-day deadline, including the 2.5% levy, then the payment will be made to the training club, including the corresponding 2.5% levy, as per the normal payment process through the FIFA Clearing House.

# 7.d. How will the FIFA Clearing House contact clubs and member associations for processing of payments?

The contact information available in TMS will be used for the primary contact at the club or member association.

- i. Where the club or member association is active in TMS, then the TMS manager will be the primary contact.
- ii. Where the club is not active in TMS but some contact information is available, this will be used as the primary contact.
- iii. Where no club contact information is available, the contact details of the member association TMS manager will be provided. The FIFA Clearing House will then contact the member association TMS manager to provide contact details of the club.

### 7.e. Why is the transitory measure in article 16 par. 1 lit. f) applicable until 31 December 2023? What is the purpose of this transitory measure?

FIFA understands that the FIFA Clearing House processes will be new to many clubs. To ensure that the payment of training rewards is not unduly affected by the implementation of the FIFA Clearing House, this measure will ensure that, where a Training Club has passed a compliance assessment and should receive funds, this entitlement will not be delayed due to a failure of a new club to pass a compliance assessment in the first year of operations.

# 7.f. Is a bank account required to pass the compliance assessment of the FIFA Clearing House?

Yes, each club or member association that is due to pay or receive training rewards must have a bank account in its own name. As part of the compliance assessment, the club will be required to provide evidence that the account is in its own name.

For the avoidance of doubt, if funds are received from a different account to that which was identified in the compliance assessment, the funds will be rejected.

# 7.g. Which information do clubs need to provide to the FIFA Clearing House for their compliance assessment?

The information to be provided to the FIFA Clearing House will vary depending on the risk rating of the party. It is at the FIFA Clearing House's discretion as to what documents need to be provided. The original copy of the documents needs to be provided, together with a translation into one of the three FIFA official languages (English, Spanish or French) if not originally issued in one of those languages. At a minimum, the club will be required to provide:

- i. For the legal entity
  - a. Certified copy of trade register, or equivalent
  - b. Articles of association, or equivalent
  - c. Bank statement for account to be used in the transaction in the name of the club
- ii. For the legal representatives and Ultimate Beneficial Owners (UBOs)
  - a. Certified copy of valid passport or ID

### 7.h. How will clubs or member associations be informed if they fail to pass a compliance assessment by the FIFA Clearing House?

Once a decision has been taken by the FIFA Clearing House it will be communicated to the relevant party via email to the primary club contact.

# 7.i. What can a club or member association do if they fail to pass a compliance assessment by the FIFA Clearing House?

Any decision of the FIFA Clearing House is final and binding; however, clubs have an opportunity to provide any missing documentation as part of the second compliance assessment. The allocation statement will be resubmitted to perform a second compliance assessment automatically 6 months after the notification of the first compliance failure, or before if the club requests it to the FIFA Administration at <u>clearinghouse@fifa.org</u>.

Any compliance failure will be subject to disciplinary proceedings according to article 17 of the regulations. If the cause for the failure is beyond the parties' control, this will be taken into account in the disciplinary process.

# 7.j. What does a club have to do in the 6-month window before a second compliance assessment?

Where a club has failed a first compliance assessment, the club should use the 6-month period to address the issue(s) which contributed to the failure. Once the club believes they have resolved the situation which caused the failure, they can request the FIFA administration to resubmit the allocation statement to the FIFA Clearing House to trigger the second compliance assessment. If no request is made by the club, then the allocation statement will be resubmitted automatically 6 months after the notification of the first compliance failure to the club.

#### 7.k. What if a club has a second transaction with the FIFA Clearing House after having failed a first compliance assessment but before the expiry of the 6month deadline for the second compliance assessment?

It is important to note that each transaction is treated individually, so a pass or failure for one transaction does not impact on whether the club will pass or fail for a different transaction.

#### 8. Sanctions, disputes and procedures – Articles 17 and 18

# 8.a. Can training clubs still lodge claims at FIFA for the payment of solidarity contribution or training compensation?

For transfers/registrations that occurred up until 15 November 2022, a training club may lodge a claim for training rewards against the new club in TMS, in accordance with art. 27 and 28 of the Procedural Rules. Training rewards relating to instalments falling due after 16 November 2022 that nevertheless result from transfers concluded before the entering into force of the CHR will be also paid and processed via the current claims system.

For transfers/registrations occurred as from 16 November 2022, claims are no longer possible, and they are substituted by the EPP review process (see section 5).

As an exception to the previous, and only for training clubs that did not take part in the EPP review process and comply with the rest of the requirements of art. 18.2 of the CHR (see questions 8.b), a claim may be lodged for training rewards against the relevant clubs.

# 8.b. How may a training club claim training rewards payments once the EPP is final, if it was excluded but believes it should have been included in the EPP?

As per art. 18.2 of the CHR, a club that:

a) did not take part in the relevant EPP review process; and

b) considers, as a result of a bridge transfer (cf. article 5bis of the RSTP), exchange of players or information declared by the new club or its member association (including the training category of the club), that:

i. it was incorrectly not entitled to any training rewards, or entitled to a lesser amount than should have been calculated; or

- ii. an EPP review process should have taken place; and
- c) considers that it is entitled to receive training rewards,

may lodge a claim against the relevant clubs in accordance with article 27 of the Procedural Rules.

#### 8.c. Which FIFA body will adjudicate on such cases?

The Dispute Resolution Chamber is competent to hear such disputes in accordance with art. 22 par. 1 lit. d), e) and f) of the RSTP.

#### 8.d. Will such a claim be processed within the EPP of reference?

No, such a claim will be processed in TMS in accordance with art. 27 and 28 of the Procedural Rules.

### 8.e. How can a club lift a ban on registering players imposed under articles 17.6 and 17.8?

To lift the registration ban due to a second compliance failure or failure to make a payment to either the FIFA Clearing House or a training club, the club must either pass the subsequent compliance assessment, or make the full payment, providing the relevant proof of payment to the FIFA administration.