

CONFFLICT OF INTEREST POLICY

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APPLICABILITY

- ITTF President
- ITTF Executive Board
- ITTF Council
- Committee Chairs & Commissioners
- ITTF Staff & Service Providers

APPLICABLE ENTITIES

- International Table Tennis Federation
- International Table Tennis Asia-Pacific Limited

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INTRODUCTION

The International Table Tennis Federation ("ITTF") Conflict of Interest Policy ("Policy") provides the rules and procedures for the management of conflict of Interest ("COI"). This document provides guidelines on how the ITTF will administer this Policy, and with the correct procedures to follow. ITTF will keep this Policy current and relevant. From time to time, it may be necessary to modify and amend sections of this Policy, or to add new procedures.

BACKGROUND

Conflicts of Interest matter because they can influence discussions and decision-making, potentially leading to outcomes that are not fully aligned with the best Interests of the ITTF. Even when no improper conduct has occurred, the appearance of a COI can undermine confidence internally and among external stakeholders.

Conflicts may take many forms. It is the individual responsibility of every person covered by this Policy to identify and declare any actual, potential, or perceived conflict that could affect their impartiality, or that of a person connected to them.

This Policy is not designed to restrict legitimate debate or normal decision-making within the ITTF. Its purpose is to promote transparency and structured management of Conflicts of Interest that arise in the governing of an international sport. The response to each conflict should be proportionate to the level of risk it poses to ITTF's institutional integrity, and the confidence placed in its governance.

A. GENERAL INFORMATION

1. PURPOSE

The objective of this COI Policy is to safeguard the integrity and reputation of the International Table Tennis Federation (ITTF) by ensuring that all decisions and actions taken on its behalf are free from undue influence. Conflicts of Interest can undermine trust and create legal and reputational risks if they are not properly managed.

This policy defines COI, lays out responsibilities for disclosure and management, and establishes procedures and guidelines for submission, prevention, mitigation and sanctioning of conflicts.

This Policy is adopted and approved under Article 1.90.2 of the ITTF Statutes, and it complements the ITTF Code of Ethics (Chapter 6 of the ITTF Statutes).

2. DEFINITIONS

2.1 Covered Person or Individuals – All elected and appointed officials, members of the Executive Board, Commission and Committee members, employees, consultants, contractors, service providers, and volunteers are Covered Persons. Prospective candidates for elected or appointed positions are required to adhere to this Policy when seeking nomination. Table Tennis Parties as defined under the ITTF Statutes are also considered Covered Persons under this Policy.

2.2 Connected Persons – A spouse, partner, child, parent, sibling, grandparent, grandchild, in-law, domestic partner or any person with whom one has a romantic relationship, family relationship up to the third degree, or shares a household. Connected Persons can also be a firm, company or association in which the Covered Person is a partner, officer, employee, consultant, director, member, shareholder or in which the Covered Person has a direct or an indirect beneficial interest.

2.3 Conflict of Interest – A situation where a covered person's private interests or a connected persons' private interests (financial, professional or personal) could improperly influence, or appear to influence, the impartial and objective performance of their duties for the ITTF. COI's may be Actual, Potential or Perceived, and are defined as follows:

2.3.1 Actual Conflict – An actual conflict of interest occurs when a person, acting alone or within an organisation, expresses an opinion or participates to a decision while this person is liable to be influenced by relations that the aforementioned person has, has had or is on the point of having with another person or organisation that would be affected by the person's

opinion or decision. An actual conflict of Interest may occur irrespective of whether or not the person has declared the relevant Interests.

2.3.2 Potential or Perceived Conflict - A potential conflict of Interest or perceived conflict of Interest arises when the opinion or decision of a person, acting alone or within an organisation, could be reasonably considered as liable to be influenced by, relations that the aforementioned person has, has had or is on the point of having with another person or organisation that would be affected by the person's opinion or decision.

2.4 Conflict of Duties - A situation where a Covered Person's owes a duty to another body (within ITTF, such as staff appointment) that conflicts or may conflict with their duties to act in the best Interest of the ITTF. This type of conflict does not have to be personal or financial to the Party. A conflict of duties can also be described as a conflict of loyalties and will be referred to as a form of COI in this Policy.

2.5 Interest - Any financial, professional or personal relationship that may influence a person's judgement. Examples include shareholdings, directorships, employment, consultancy roles, family relationships, romantic relationships, gifts, hospitality, sponsorship and debts. An Interest is any Interest that a reasonable person would consider capable of influencing judgement or decision-making.

3. GUIDING PRINCIPLES

3.1. Integrity, impartiality and Respect - All Covered Persons shall act with honesty and integrity, putting the Interests of the ITTF and the sport of table tennis first. In every professional and sporting capacity, they must exercise impartial judgment and treat others with dignity and respect, consistent with the ITTF Statutes and Code of Ethics.

3.2. Transparency and accountability - Openness regarding personal Interests and possible conflicts is essential to maintaining confidence in ITTF governance. Individuals must proactively disclose relevant Interests, and ITTF shall manage and, where appropriate, publish such information in a manner that demonstrates fairness and accountability.

3.3. Responsible Management - Holding an Interest is not, in itself, unethical. What matters is that Interests are disclosed, assessed, and managed appropriately so that no improper influence occurs.

3.4. Presumption of good faith - Individuals are encouraged to disclose actual, potential or perceived conflicts promptly and honestly. Good faith disclosure or requests for advice

shall never, in itself, attract sanction. Seeking clarification from the Integrity Unit (or, in the case of ITTF Staff, the Legal Department) is regarded as a positive act of responsibility.

- 3.5. **Continuous Improvement and Learning** – This Policy is a living document. It will be reviewed periodically to reflect evolving best practices, lessons learned, and stakeholder feedback. The document history will record all approvals and amendments to ensure traceability and transparency.

4. SCOPE AND APPLICABILITY

This policy applies to all Covered Persons (see definitions) in activities affecting the ITTF and its business, whether within or outside the ITTF. It covers aspects including but not limited to:

- 4.1. **Decision making and voting** – participation in decisions on matters including but not limited to awarding events, approving supplier contracts, allocating funds or appointing personnel.
- 4.2. **Procurement and contracting** – selecting suppliers, negotiating contracts, evaluating tenders, signing agreements, and more.
- 4.3. **Appointments and promotions** – involvement in recruitment, selection or promotion of staff, volunteers or committee members.
- 4.4. **Governance and representation** – serving on committees, commissions or task forces representing ITTF or stakeholder bodies.
- 4.5. **External activities** – outside employment, consulting, directorships, business interests, public speaking engagements and publications that may intersect with ITTF's objectives.

5. DUTIES UNDER THE CODE OF ETHICS & THIS POLICY

- 5.1. **Prohibition against conflict of Interest when performing duties** – Covered Persons shall refrain from performing their duties (in particular, preparing or participating in the taking of a decision) in situations in which a conflict of interest (whether actual, perceived or potential) may affect such performance (ITTF Statutes, Art. 6.2.3).
- 5.2. **Duty to disclose** – Covered Persons must complete the Declaration of Interests and update it whenever circumstances change. Covered Persons must adhere to the COI rules, as stipulated in Chapter 6 of the ITTF Statutes, including:

- 5.2.1. Submitting a complete declaration before appointment, election, employment or start of the contractual relationship (ITTF Statutes, Art. 6.2.3.3);
- 5.2.2. Updating the declaration within 14 days of any material change.

5.3. **Ongoing duty to declare** – During a Covered Persons' course of duties, if any Individual or Table Tennis Parties who knows or reasonably ought to know that any conflict of Interest may affect the performance of their duties, they shall promptly declare the relevant relation and Interest to the relevant Table Tennis Party (ITTF Statutes, Art. 6.2.3.4). The relevant Table Tennis Party is the ITTF Integrity Unit as per ITTF Statutes, Art. 6.2.3.4.1.

5.4. **Duty to seek guidance** – When in doubt, Individuals should consult the Integrity Unit for advice. Staff members can also seek guidance from the ITTF Legal Department. The Integrity Unit remains the only body with binding decision-making authority.

5.5. **Duty to report** – As required by the ITTF Statutes, Art. 6.2.4.5, a Table Tennis Part[y] (or also Covered Person under this Policy) who become[s] aware of any violation of this Code of Ethics or any other rule or regulation of the ITTF Statutes or any related document shall promptly inform the ITTF Integrity Unit.

5.6. **Duty to cooperate** – As required by the ITTF Statutes, Art. 6.2.4.6 Table Tennis Parties, or Covered Persons under this Policy, shall fully assist and cooperate with honesty, confidentiality, and in good faith with the ITTF Integrity Unit at all times, regardless of whether they are involved in a particular matter as a party, as a witness, or in any other role.

B. CONFLICT DECLARATION PROCEDURE

6. SUBMISSION OF A COI DECLARATION

- 6.1. At the commencement of each term, contract, or appointment, upon election, employment, or engagement with ITTF, Covered Persons shall complete a COI Declaration Form (Schedule 2) covering any personal, professional, financial, or other Interests that conflict, may conflict or could be perceived to conflict, with ITTF duties and Interests.
- 6.2. Whenever a new situation arises, if at any time during the year, a Covered Person's circumstances change (e.g., new secondary employment, financial investment, family

relationship, or external role), a new or updated declaration must be submitted without delay and before any related decision-making activity occurs.

- 6.3. Upon request from the Integrity Unit, when prompted during investigations, or integrity reviews, any Covered Person must submit or reaffirm their COI declaration within the timeframe set by the Integrity Unit.

7. PROCEDURES FOLLOWING THE SUBMISSION OF A DECLARATION

- 7.1. Upon receipt of a COI declaration, the Integrity Unit shall acknowledge receipt within five (5) working days.
- 7.2. The declaration will be entered into the Conflicts of Interest Register, maintained by the Integrity Unit.
- 7.3. The Integrity Unit shall conduct a preliminary review to determine whether the declared Interest constitutes an actual, potential, or perceived conflict, assess the nature, materiality, and duration of the situation, and decide whether any immediate management or mitigation measures are required. The Integrity Unit may seek additional information from the declarant or relevant stakeholders to clarify details.
- 7.4. The Integrity Unit is fully entitled to initiate any investigations by itself.

8. FORMAL DETERMINATION AND DECISION

- 8.1. The Integrity Unit will issue a written determination within 30 days of the declaration's submission. In case the Integrity Unit needs more time to provide a decision, it may request a 10-days extension from the Integrity Board. This request must be reasoned and in line with the guiding principles of this Policy.
- 8.2. The determination shall specify whether a conflict exists, whether any interim measure or remedial action is or was required, and if any of the finding conditions further continuation. It will also underline whether this is a conflict that must be shared with Meeting Chairs.
- 8.3. The decision will then be shared with the declarant and relevant stakeholders and will be recorded in the COI Register.

9. APPEAL AND RECONSIDERATION

Individuals may request a review or appeal of the determination within twenty-one (21) days of notification. Any such appeal shall be reviewed by the ITTF Tribunal.

10. GUIDELINES ON POSSIBLE CONSEQUENCES

10.1. Understanding Breaches

A breach of this Policy occurs when a Covered Person does not meet their responsibilities in relation to Conflict of Interests. This may happen, for example, when a person fails to declare a conflict (knowingly or inadvertently), provides false, misleading, or incomplete information in a declaration, or continues to participate despite having been instructed to recuse themselves. A breach of this Policy can also be considered a Breach of the Code of Ethics.

10.2. Determination of Consequences

Consequences are applied in a proportionate and case-to-case basis. In deciding the appropriate response, the Integrity Unit will consider the seriousness of the conflict, whether the behaviour was intentional, careless, or accidental, the individuals' roles and influence, the timing of the declaration, any part issues, and the person's level of cooperation.

10.3. Mitigating and Aggravating Factors

Certain circumstances may reduce or increase the level of sanction. Mitigating factors include but are not limited to prompt self-disclosure, cooperation, a clean record, or voluntary corrective action. Aggravating factors include but are not limited to deliberate concealment, misuse of authority, repeated breaches, or conduct that harms the ITTF's Interests or reputation.

10.4. Exemplary Overview

The range of sanctions are stipulated under ITTF Statutes, Art. 6.2.7. As a reference the table below serves as an overview of potential consequences depending on the seriousness of the misconduct:

Category	Examples of Misconduct	Possible Consequences
Minor Breach	Late submission of declaration, unintentional omission of immaterial Interest	Written warning, reminder of obligations
Moderate Breach	Failure to declare relevant Interest affecting impartiality; repeated minor breaches	Formal reprimand; temporary suspension from committee work; withdrawal of decision-making rights
Serious Breach	Intentional concealment of conflict; interference with investigation; misuse of position for personal gain	Removal from office or function; contract termination; ineligibility for future ITTF roles for a defined period

Grave or Reputational Breach	Conduct causing serious damage to ITTF's reputation, integrity, or compliance obligations	Permanent disqualification from holding any ITTF position; referral to external authorities (e.g., Tribunal, CAS, law enforcement)
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10.5. Involvement of Human Resources

Shall the Integrity Unit decide to sanction an Individual under the Code of Ethics, and this Individual is an Employee or Service Provider of the ITTF, it shall involve Human Resources.

C. MEETINGS

11. MEETING DECLARATIONS

11.1. **Standard agenda item** – The first item on the agenda for all meetings of the Board, committees, commissions, and working groups shall be a declaration of any conflicts of interest by attendees in relation to the agenda items.

11.2. **Recording** – Any declared conflicts and actions taken must be recorded in the meeting minutes. Meeting minutes should never discuss the confidential details of the COI.

12. RESPONSIBILITIES OF MEETING CHAIRS

12.1. As underlined in Article 11.1 of this Policy, all meetings shall include Conflict of Interest as a standing item on every agenda. Such item must be placed at the beginning of each meeting to ensure that any type of conflict is identified, declared and addressed before any substantive discussion or decision takes place.

12.2. The Chair of each meeting holds a specific responsibility to uphold and enforce this Policy during the meeting process. The Chair shall ensure that the meeting agenda is circulated to all participants in advance, allowing members sufficient time to review actual, potential or perceived conflicts of interest or duties.

12.3. The Chair shall actively remind members of their duty to disclose any conflicts or restrictions related to the agenda items. This entails that the Chair shall verify whether any member has declared a conflict, recusal, or limitation on participation in advance.

12.4. If a member has not submitted a declaration in advance but indicates a possible conflict during the meeting, the Chair must pause discussion on the relevant item and, where necessary, seek clarification or advice from the Integrity Unit. The meeting must be resumed with the discussion of items, where no conflict is disputed.

12.5. Any decision by the Chair regarding an attendee's restriction or recusal shall be subject to review by the Integrity Unit, and the Chair must provide the Integrity Unit with the justification for such decision. The Chair must always act in good faith when issuing such decision.

12.6. The Chair shall ensure compliance with these measures throughout the meeting and remind all participants of their confidentiality obligations.

13. RESPONSIBILITIES OF MEETING ATTENDEES

13.1. Prior to each meeting, all attendees must review the circulated agenda and assess whether any declared or new conflicts relate to the items for discussion.

13.2. Attendees shall notify the Chair of any conflict, recusal, or restriction before the meeting begins. During the meeting, attendees must declare any conflict that becomes apparent as discussions proceed and shall consequently refrain from influencing any discussion or decision related to the matter in which they have a conflict. For the avoidance of doubt, such obligation shall also exist for the Chair, who must notify the Deputy Chair of any conflict he/she may have.

13.3. Attendees (including the Chair) must follow any recusal or participation restrictions determined by the Chair or the Integrity Unit.

13.4. All meeting attendees share responsibility for ensuring that Conflict of Interest requirements are correctly applied and managed. Each attendee must remain vigilant and raise concerns if they believe that a conflict has not been properly declared, recorded, or managed in accordance with this Policy.

14. SAFEGUARDING OF THE MEETING

14.1. If an attendee or the Chair reasonably believes that the Chair or an attendee is failing to apply the Conflict of Interest procedures adequately, is disregarding a relevant declaration or recommendation from the Integrity Unit, or is otherwise acting in a manner that could compromise the integrity of the meeting, the attendee or Chair shall request the Executive Board to decide on the matter according to the best interests of the ITTF.

14.2. Upon such a request, discussion of the item shall be paused without delay, and the matter shall be referred by the appointed staff member to the Executive Board for their decision.

14.3. The Executive Board shall determine whether the Chair's or attendee's handling of the Conflict of Interest issue complies with this Policy. Their determination may include requiring a recusal, applying restrictions, clarifying procedures, or confirming that the item may proceed. If considered relevant, the Executive Board may request the Integrity Unit or Integrity Board to oversee the meeting.

14.4. No attendee shall suffer any disadvantage or retaliation for raising such concerns in good faith. Any request made for personal gain or benefit, frivolously, maliciously, vexatiously, unfounded or otherwise in bad faith, may be treated as a breach of this Policy and the Code of Ethics. Protecting the integrity of ITTF decision-making is a shared duty, and attendees are expected to act when necessary to uphold the principles of transparency, impartiality, and fairness.

15. RECUSAL PROCEDURE

15.1. This procedure establishes the steps to be followed when a Covered Person identifies or is determined to have a COI that requires recusal from participation in any ITTF matter, meeting, vote, or decision-making process.

15.2. During the recusal, the individual concerned shall leave the meeting room (whether physically or virtually) for the duration of the discussion of the relevant item, shall not receive any confidential documentation or briefings related to that matter, and shall abstain entirely from any communication, engagement, or influence concerning the decision.

D. MISCELLANEOUS

16. REPORTING

Every year, the Integrity Unit shall provide a summary report to the Executive Board, highlighting the number and type of COI declarations received, actions taken, and compliance trends or recurrent issues.

17. TRANSPARENCY AND RECORD KEEPING

17.1. The COI Register will record all declarations, reviews, determinations, and actions taken.

17.2. A public summary of the Register, in line with the confidentiality obligations, shall be published annually to promote transparency.

17.3. All records shall be retained in accordance with ITTF's Data Protection Policy.

18. POLICY REVIEW AND FEEDBACK

This policy may be reviewed regularly to ensure it remains consistent with best practices. Table Tennis Parties are encouraged to provide suggestions and feedback. All comments should be directed to ittflegal@ittf.com.

E. ANNEXES

Schedule 1 - Examples of Conflict Situations

To aid understanding, a non-exhaustive, illustrative, and non-binding list of potential scenarios is provided. These examples draw on fictional scenarios:

- a. **Equipment procurement** – An ITTF Equipment Committee member has a family member who owns a company seeking ITTF equipment approval.
- b. **Event bidding** – A Board member also sits on the board of a national association bidding to host an ITTF event.
- c. **Application ratification** – A member of the Nominations Committee is asked to evaluate candidates for an ITTF standing committee. One of the nominees is the Nominations Committee member's long-time training partner and close friend.
- d. **Supplier contract** – A staff member responsible for procurement uses services from a supplier where they own a financial interest.
- e. **Family recruitment** – A manager is responsible for hiring staff and their spouse applies for the position.
- f. **Conflict of Duties** – A executive board member acts as the president of his national association and a discussion arises whether the national association that he sits as president in it to be suspended, bidding or more.
- g. **Outside employment** – An employee wants to work part-time for a company that does business with ITTF.
- h. **Gifts and hospitality** – A sponsor offers a high-value gift to an official which ascends the threshold set by ITTF's anti-bribery policy in value.
- i. **Post-employment** – A former ITTF official offers consultancy services to ITTF on matters they were previously involved in.
- j. **Impression of Bias** – An Ethics Commission member publicly endorses a candidate running for an ITTF committee, creating an impression of bias.

k. **Recusal** – An Integrity Board member, Mr. B, is assigned to investigate alleged misconduct by an ITTF coach. The coach in question previously worked with Mr. B's daughter at a regional training academy, and they remain in friendly contact on social media.

Schedule 2 – Sample Form for Conflict of Interest Declaration

SCHEDULE 2 -CONFLICT OF INTEREST DECLARATION

DISCLAIMER: This is a sample only. The ITTF Integrity Unit may, at its discretion, provide another form.

Pursuant to the Conflict of Interest Policy, all Covered Persons, including prospective candidates for elected or appointed office, must declare all Interests and relationships that may give rise to an actual, potential, or perceived conflict of Interest, as defined by the ITTF Statutes and reiterated in this Policy.

No sanction or disciplinary measure shall be imposed when a Conflict of Interest Declaration is truthful, submitted in a timely manner, and fully compliant with the obligations set out in the ITTF Code of Ethics.

This form records such declarations and the approval or rejection of any identified conflicts. It will be deposited in the confidential COI Register maintained by the ITTF Integrity Unit. Should the given text boxes provide insufficient space, please elaborate in the submission to the Integrity Unit.

By checking the box, I confirm that, prior to completing this declaration, I have read and understood the ITTF Conflict of Interest Policy and am aware of its content.

Name:

Position(s) held within the ITTF:

If applicable – Member Association:

If applicable – Position(s) for which you are applying:

Term of office or engagement within the ITTF:

1. External Roles, Appointments, or Involvement

In accordance with Interests underlined in this Policy, please list any management, association, trusteeship, employment, Board of Directors or similar role (elected, voluntary, or remunerated) currently held or held within the past two years outside of the ITTF, in relation to the following, that may cause an actual, potential or perceived COI or Conflict of Duties:

- a. A National Association/Federation (member of the ITTF) or a Continental Council of the ITTF;
- b. International or National Sports Federations (summer or winter sport);
- c. Sporting bodies or agencies at International, National or Regional levels;
- d. Charities engaged in sport or deriving substantial income from sport;
- e. Any company or entity that currently provides, has provided within the past two years, or (to the best knowledge) will be engaged with the ITTF within the next 6 months, any goods or services to the ITTF, an organizer of ITTF events, and/or a sponsor of ITTF Events (This includes the manufacture, sale, or endorsement of Table Tennis equipment).

Please list all relevant entities, positions and describe the relationship. If none, please state "NONE".

2. Relationships with Covered Persons

Have you had, within the last two years, any personal family, business, commercial or other Interest (as defined in the Policy) with a current Covered Person, that may cause an actual, potential or perceived COI or Conflict of Duties?

This includes, but is not limited to:

- a. Family relationships up to the third degree, or romantic relationships,
- b. Business partnerships,
- c. Joint ventures or shared financial Interests,
- d. Advisory or consultancy relationships.

Please list all relevant persons and describe the relationship. If none, please state "none".

3. Transactions or Business with the ITTF or Related Entities

Do you or any Connected Persons (as defined in this Policy):

- a. Transact business with the ITTF,
- b. Provide services to the ITTF,
- c. Transact with or provide services to an organizer of host of ITTF Events,
- d. Transact with or provide services to a sponsor or commercial partners of ITTF events,

Or have you or the Connected Person done so within the last two years or is likely to occur within the duration of your term/employment? If yes, please elaborate on the Position you or the Connected Person holds or have held, that may cause an actual, potential or perceived COI or Conflict of Duties:

- e. Officer, partner, director, trustee, owner,
- f. Beneficial owner (including indirect beneficial Interests),
- g. Shareholder of at least 5% equity in a public company,
- h. Consultancy roles,
- i. employee.

If applicable, please provide details. If none, please state "none".

4. Other Matters that may constitute an Interest

Please disclose any additional Interests, relationships, or circumstances not captured above that may give rise to an actual, potential or perceived conflict of Interest, or that a reasonable person could consider capable of influencing your judgement or decision making in connection with your duties within the ITTF.

Examples include, but are not limited to:

- a. Gifts, benefits, hospitality, or sponsorship received,
- b. Debts or financial obligations,
- c. Close personal friendships,
- d. Other personal or professional Interests.

If none, please state "none".

FINAL DECLARATION

I, _____, hereby declare that in the exercise of my duties on behalf of the International Table Tennis Federation (ITTF), I will act impartially and in the best Interests of the ITTF at all times. I will avoid any undue influence or other factors that could create an actual, potential, perceived conflict between my personal, professional, financial, or other Interests.

I certify that the information provided above is true, accurate, and complete to the best of my knowledge. I understand that I am required under the ITTF Code of Ethics and this Conflict of Interest Policy to disclose any new or evolving conflicts of Interest, actual, potential or perceived, throughout the course of my engagement or term of office as a Covered Person.

I acknowledge that failure to disclose a conflict of Interest may result in appropriate consequences, including but not limited to disciplinary proceedings, reputational harm, loss of trust, and legal action. I understand that the ITTF Integrity Unit may store, assess, and use the information provided in this declaration for compliance purposes, and that I am responsible for updating this declaration as necessary should my circumstances change.

Signature: _____

Date: _____