ABTO CONFLICTS OF INTEREST POLICY

Version 2.0 (February 2026)

1. Why does ABTO have a Conflicts of Interest Policy?

1.1. It is an important principle of good governance that conflicts of interest are recognised, recorded and managed, to promote integrity and transparency.

1.2. Maintaining a Conflicts of Interest Policy ("Policy") is consistent with objective 2.1 in ABTO's Constitution: to represent and safeguard the interests of ABTO and of its members.

1.3. The ABTO Constitution contains a requirement that the ABTO Management Committee shall maintain a policy for recognising, recording and managing conflicts of interest.

2. When does the ABTO Conflicts of Interest Policy apply?

2.1. This Policy applies to the governance and administration of ABTO by its members.

2.2. The conflicts of interest policies of the LTA and all applicable rules and regulations of the LTA, ITF, WTA, ATP, FIP and relevant tournaments apply when ABTO members are carrying out their officiating duties in their capacity as LTA Licensed / ITF Certified Tennis Officials, and when serving on Boards, Committees, Panels or other advisory groups of the LTA / ITF and related tennis and padel associations. See paragraph 7 for more information.

3. Who does the ABTO Conflicts of Interest Policy apply to?

3.1. This Policy applies to all members of the ABTO Management Committee, and to all members of any Panels, Working Groups or other Sub-Committees that the ABTO Management Committee may appoint and convene from time to time (collectively "ABTO Committee/s" unless otherwise specified).

3.2. References to the ABTO Chair mean the Chair of the ABTO Management Committee.

3.3. References to ABTO Officers mean the Chair, Vice Chair, Honorary Secretary and Honorary Treasurer of the ABTO Management Committee.

4. What is a Conflict of Interest?

4.1. A conflict of interest arises when an individual, or a Closely Connected Person of the individual, has competing interests or loyalties which might impair their ability to make an objective, unbiased recommendation or decision.

4.2. The perception of what is a conflict of interest and what are the potential personal benefits or advantages to be gained, are as important as the reality. To manage the risk of any allegations of impropriety this Policy covers:

4.2.1. All actual as well as perceived or potential conflicts of interest.

4.2.2. All types of benefits and advantages including, without limitation, financial and non-financial benefits and advantages such as influencing selections, influencing grading decisions, receiving gifts, entertainment and privileged access to tickets, other than tickets received through regular means such as the LTA Wimbledon ballot or other official tennis and padel channels.

4.3. Examples (but not an exhaustive list) of conflicts of interest that could arise and that should be declared under this Policy include an ABTO Committee Member and/or a Closely Connected Person:

4.3.1. Being in a position as an ABTO Officer or ABTO Committee Member to influence a decision relating to officiating selections, grading, training, development and any other matters relating to officiating that is an advantage or benefit for them and/or a Closely Connected Person, potentially at the expense of another LTA Licensed Official.

4.3.2. Being an officer, employee or representative of a tennis or padel association or venue, whether paid or unpaid e.g., LTA County Association, Tennis Wales, AELTC, ITF, FIP.

4.3.3. Having an employment relationship or commercial interest in tennis or padel e.g., as a coach or competition organiser, or as a shareholder, officer or employee of a racket manufacturer, tennis sponsor, padel sponsor or provider of IT, news or media services to tennis or padel.

4.3.4. Having a personal or financial interest in any services or goods providers, or professional advisors to ABTO e.g., request for quote from an accountancy firm where you or a Closely Connected Person works.

4.3.5. Being offered hospitality, privileged access to tickets, or free tickets by suppliers of services to ABTO.

4.3.6. Offering show court tickets allocated to Officials by the AELTC/LTA to suppliers of goods or services to ABTO, e.g., to ABTO's appointed professional advisors.

5. Who is a Closely Connected Person?

5.1. Who or what is a Closely Connected Person of an ABTO Committee Member?

5.1.1. Their spouse, civil / life partner or cohabitor;

5.1.2. Their close family members and financial dependants;

5.1.3. Their close friends and business associates; and/or,

5.1.4. Any enterprise or business in which the ABTO Committee Member, or a Closely Connected Person, has a personal or financial interest.

5.2. It may be difficult to assess whether a family member, friend or business associate is "close". Please use reasonable judgement in assessing whether a family member, friend or business

associate is a Closely Connected Person, and note the guidelines in 6.1 Responsibility for Recognising and Declaring Conflicts of Interest.

6. What are the key governance principles and procedures to be followed?

Having a conflict of interest does not mean that somebody has done something wrong. It is inevitable that conflicts of interest arise. What is important is that they are recognised, recorded and handled appropriately, so that there is transparency and so as not to risk the integrity and reputation of ABTO. This section summarises the responsibilities and procedures to be followed.

6.1. Responsibility for Recognising and Declaring Conflicts of Interest

6.1.1. ABTO Committee Members are responsible for recognising and declaring any actual or potential conflicts of interest relating to themselves, or their Closely Connected Persons, and ABTO. Because of the risk of perceived conflicts of interest, whether by other ABTO members, the LTA or other persons, they should err on the side of caution when considering whether the matter is a conflict of interest or not, and whether it requires disclosure. ABTO Committee Members may contact the ABTO Chair or the ABTO Honorary Secretary, and also the chair of the relevant ABTO Committee, to discuss the matter and receive guidance under this Policy as appropriate.

6.1.2. A shared obligation also exists for ABTO Committee Members to recognise when an actual or potential conflict of interest may arise with fellow ABTO Committee Members, and if they become aware of such a conflict of interest, to flag this to the ABTO Chair or ABTO Honorary Secretary, or to the chair of the relevant ABTO Committee, as appropriate. For example, the chair may flag a conflict of interest if the relevant individual is not present to disclose the matter themselves.

6.1.3. The chair will also have regard to previously disclosed conflicts of interest when preparing the agenda for Committee meetings and action plans.

6.2. Declaring and Recording Conflicts of Interest

Conflicts of interest should be declared at the earliest opportunity. ABTO has instituted the following procedures to support the process of declaring, recording and managing conflicts of interest.

6.2.1. Conflicts of Interest Disclosure Form

a) When ABTO members are elected or appointed to an ABTO Committee, they are expected to declare relevant interests by completing a Conflict of Interests Disclosure Form and returning it as indicated in Appendix A. ABTO Committee Members are requested to update this form annually, and to submit an updated form at the earliest opportunity, if a new conflict of interest arises, or if there is a material update to an existing conflict of interest, or if a previously declared conflict of interest no longer applies.

b) The ABTO Honorary Secretary or other nominated person shall maintain and regularly update a central register of declared conflicts of interest.

6.2.2. Committee Meetings

a) At the start of ABTO Committee meetings, the chair of the meeting will ask ABTO Committee Members to declare any new or updated conflicts of interest and to disclose any conflicts of interest that relate, or may relate, to specific agenda items. The chair of the meeting is responsible for ensuring that any declarations of a conflict of interest are recorded in the minutes and that the details are recorded in the Conflicts of Interest Register by the Honorary Secretary or other nominated person.

6.3. Managing Conflicts of Interest

6.3.1. The chair of the meeting is responsible for determining how a conflict of interest is to be managed having regard to the examples and principles contained in this Policy and by consulting with the individual, ABTO Committee Members and the ABTO Chair/Officers as appropriate. The ABTO Chair may also seek professional advice on managing a conflict of interest, e.g., by contacting a legal helpline, if appropriate.

6.3.2. The following list is not exhaustive but summarises some of the methods of managing conflicts of interest.

a) Disclosing and establishing a record of the conflict of interest may on its own be sufficient.

b) Releasing the ABTO Committee Member from the discussion and decision-making process and voting, or removing them from the ABTO Committee/s to which the conflict relates.

c) Declining the benefit, advantage, gift or entertainment offered.

d) See also Section 7 regarding obligations to decline and report any attempted bribery and corruption under the Tennis Anti-Corruption Program (“TACP”) and the Uniform Padel Anti-Corruption Program (“UPACP”). Note that the solicitation, offering or acceptance of a financial or non-financial advantage or benefit may amount to corruption or bribery under the TACP and the UPACP.

6.4. ABTO Committee Procedures

6.4.1. ABTO Management Committee Quorum

Where an ABTO Management Committee Member is to be excused from voting, they shall not be counted for the purposes of determining whether a quorum exists. Constitution Rule 4.5.3 defines a quorum for the ABTO Management Committee as: “50% of members entitled to vote, one of whom shall be an Officer…”.

6.4.2. ABTO Management Committee Casting Vote

Constitution Rule 4.5.4 states that in ABTO Management Committee meetings, “in the event of an equality of votes, the chair of the meeting shall have a second or casting vote.” If the conflict of interest concerns the ABTO Chair, the Vice Chair shall be appointed to chair the relevant section of the meeting with authority to exercise the second or casting vote if needed. If the

Vice Chair is unavailable, then another ABTO Officer i.e., the Honorary Secretary or the Honorary Treasurer, shall be appointed by the relevant ABTO Committee to chair the meeting.

6.4.3. Contracts for goods or services to ABTO

ABTO Committee members may not be involved in managing or monitoring a contract or commercial agreement on behalf of ABTO, in which they or a Closely Connected Person have a personal interest.

7. ABTO Best Interests and Alignment of Interests with LTA / ITF

7.1. Duty of ABTO Committee Members to exercise independent judgement

7.1.1. The Conflicts of Interest Policy develops the general obligation in the Constitution for ABTO Committee Members to exercise independent judgement and vote in the best interests of ABTO and its members as a whole.

7.1.2. It is a valuable point of process and debate that ABTO Committee Members represent different groups and membership interests e.g., Referees and Umpires, when formulating policy and making decisions on behalf of ABTO and its members. It is a collective duty of the ABTO Committee to consider all stakeholder interests when forming opinions and voting. The stakeholder interests of each ABTO Committee Member do not require separate disclosure under the Conflicts of Interest Policy as their role within Officiating is generally known and their personal interests e.g., in improving Referee expenses or developing certain aspects of ABTO's strategic objectives, are made known in debate with fellow ABTO Committee Members, through their involvement in ABTO Committees, and the publication of ABTO Committee minutes and papers.

7.2. Duty of ABTO Members to comply with LTA / ITF Rules

7.2.1. ABTO recognises that the duties of its Full Members[1], who are all LTA Licensed Officials, are also to act in the best interests of the LTA and tennis and padel in Britain.

7.2.2. All Officials are subject to the applicable rules of the LTA and (in most cases) the ITF, which contain additional requirements for reporting and managing conflicts of interest that arise in the course of officiating. For example, the obligation to maintain complete impartiality with respect to all players and not officiate matches in which they have a real or perceived conflict of interest; to be aware of their obligations under the TACP and the UPACP; and, to report any approaches or attempted corruption to the International Tennis Integrity Agency ("ITIA") or International Padel Federation ("FIP").

7.2.3. It is not the intention of this ABTO Policy to replace, amend or alter relevant LTA / ITF / FIP rules. If you are unsure whether there is a conflicting obligation you must additionally contact LTA / ITF / FIP as applicable who will advise and confirm their requirements for managing the situation.

[1] As distinct from the Associate and Honorary Member categories of membership of ABTO.

7.3. **Alignment of Interests between ABTO and the LTA**

7.3.1. At many levels there is an alignment of interests between ABTO and the LTA, for example in relation to the strategic objective of maintaining the highest officiating standards.

7.3.2. The ABTO governance structure serves to promote healthy debate and dialogue with a view to reaching mutually agreeable conclusions and solutions in support of the shared strategic objectives. For example, the LTA Representative is a member of the ABTO Management Committee and is eligible to vote on committee matters, and ABTO has a formal role in recommending grading structures to the LTA and reviewing selections.

7.3.3. However, due to the nature of ABTO as an advocacy association to safeguard the interests of its members, ABTO may take a different view to the LTA on certain policy and operational matters and members could vote for a course of action that is not the preferred LTA option.

7.3.4. Section 7.4 provides guidance on managing competing interests where ABTO Committee Members serve on the LTA Council or other LTA Committees.

7.4. **Considerations for ABTO Members also serving on the LTA Council or other LTA Committees**

7.4.1. ABTO Nominated Representative to the LTA Council

ABTO recognises that the Role of an LTA Councillor[2] includes always acting "*in the best interests of tennis and padel in Britain*" and that the LTA Council Conflicts of Interest Policy includes an obligation of Councillors "*to act in the best interests of the LTA".* In most situations there will be an alignment between the interests of tennis and padel in Britain, the LTA and ABTO and its members. However, as part of the normal process of debate and consultation, and consistent with the stakeholder role, the ABTO LTA Councillor must also represent and promote the views and interests of ABTO and its members in accordance with the objectives of the ABTO Constitution. If a situation arises where a vote is to take place on a matter that may be of detriment to ABTO members, the LTA ABTO Councillor must comply with their duty to act in the best interests of the LTA having listened to all views expressed within ABTO and the Council. The ABTO LTA Councillor is responsible for ensuring that ABTO's views and the interests of its members are appropriately represented to the Council before the vote takes place. See further information in the Process for electing the ABTO Management Committee Representative to the LTA Council.

7.4.2. LTA County Associations and other LTA Committees

ABTO Committee Members who also represent the LTA, LTA County Associations or other LTA Committees should disclose those roles in accordance with this Policy and remain alert to their dual obligations in Committee proceedings, making it clear when they speak for the LTA, themselves or their constituent group e.g., Referees, and when they speak for ABTO and/or the LTA, relevant LTA County Association or Committee as applicable. If they have any concerns about conflicts of interest, or a divergence of interests, they should alert the appropriate Committee chair(s) at the first opportunity.

[2] Source LTA document: "The Role of the LTA Council and LTA Councillor"

8. Record-keeping and Data Protection

8.1. Information provided under this Policy will be processed and stored in accordance with the ABTO Privacy Policy, which is designed to comply with the Data Protection Act 2018. The most recent version of the ABTO Privacy Policy is displayed in the Official Hub.

8.2. Completed Conflicts of Interest Disclosure Forms and the centralised register of ABTO conflicts of interest will be stored in a private Conflicts of Interest folder within the ABTO shared drive, with access limited to the ABTO Chair and the ABTO Honorary Secretary or other nominated person. The Conflicts of Interest Disclosure Forms will be deleted within twelve (12) months of the individual ceasing to be a member of an ABTO Committee.

8.3. When recording conflicts of interest in minutes of meetings, the minute record will be limited to:

8.3.1. The name of the individual ABTO Committee Member.

8.3.2. The fact that a conflict of interest has been declared in relation to an agenda item and noted.

8.3.3. If any action is to be taken e.g., recusal from the discussion and decision-making process and voting.

8.4. In addition, the following information shall be entered into the Conflicts of Interest Register:

8.4.1. The nature or type of conflict of interest declared e.g., employment, business interest, gift or entertainment.

8.4.2. The approximate / estimated financial value, if known and relevant.

8.4.3. The nature of the relationship with the Closely Connected Person(s) where relevant e.g., “relative” or “close business associate”. The names of Closely Connected Persons will not be recorded in the Conflicts of Interest Register for data protection reasons unless there are exceptional reasons and steps are taken to remove the name from the Conflicts of Interest Register as soon as the conflict of interest no longer applies.

8.5. The ABTO Chair / Honorary Secretary may record additional notes in the private Conflicts of Interest folder within the ABTO shared drive (access restricted to the ABTO Chair and Honorary Secretary or other nominated person) if it is considered relevant and necessary to record further details.

8.6. The ABTO Chair / Honorary Secretary or other nominated person may only share or disclose conflicts of interest information with third persons e.g., LTA Officiating, where necessary i.e., to decide on an appropriate course of action to manage a conflict of interest potentially affecting both ABTO and the LTA. The relevant ABTO Committee Member will be informed if this is considered necessary and a confidential record established of what was disclosed, why, to whom and the solutions or actions agreed.

9. Breaches of the Conflicts of Interest Policy

ABTO members are reminded that in their capacity as LTA Licensed Officials, they are subject to LTA Rules and Regulations, including the LTA Disciplinary procedure.

10. Policy Review and Update

This Policy shall be published to all ABTO members. The ABTO Management Committee will periodically review, update and publish it.