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IBA Reply on Points of Potential Non-Compliance with the Olympic Charter

This analysis is provided as response to the correspondence of Mr Christophe De Kepper, IOC Director General (“**Mr De Kepper**”) and Ms Pâquerette Girard Zappelli, IOC Chief Ethics and Compliance Officer (“**Ms Zappelli**”) dated 6 April 2023 in regard to alleged “*significant concerns regarding IBA’s practice and activities*” specified in the Points of Potential Non-Compliance with the Olympic Charter (“**PoPNC**”).

From the mentioned correspondence, the International Boxing Association (currently “**IBA**”, or “**AIBA**” before 12 December 2021) noted, that “[*if the elements mentioned in the “Points of Potential Non-Compliance with the Olympic Charter” are confirmed, the IOC Session could decide to withdraw IBA’s recognition on that basis*”]. Thus, we consider that the letter of 6 April 2023 along with the PoPNC is not a final decision, but rather official charges made by the IOC against IBA, and the final decision will be made by the subsequent meeting of the IOC Session considering said charges and IBA commentaries.

Below you will find IBA position against the PoPNC, which in general, it leads to the conclusion of the lack of legal basis and lack of reasonable grounds to withdraw IBA’s recognition.

Main Relevant Facts

On 21 May 2019, the IOC Inquiry Committee on AIBA Situation (“**Inquiry Committee**”) recommended to the Executive Board (**Exhibit 1: “IOC Enquiry Committee Report”**):

- 1. to suspend the IOC recognition of AIBA until sustainable improvements have been made in the areas of governance, ethics, refereeing and judging as well as financial stability and going concern; and*
- 2. to allow, on an exceptional basis and given the specific circumstances, the IOC Executive Board to develop a solution that allows the athletes of Olympic boxing to attend qualification events and the Olympic Games Tokyo 2020.*

On 22 May 2019, the IOC Executive Board agreed with the Inquiry Committee, and proposed to the IOC Session that the boxing shall maintain its place on the sports program of the Olympic Games Tokyo 2020, but the recognition AIBA by IOC should be suspended and the status of AIBA’s full recognition will in principle be reviewed after Tokyo 2020 (**Exhibit 2: IOC Executive Board Decision on 22 May 2019**).

On 26 June 2019, the IOC Session approved the proposals made by the IOC Executive Board on 22 May 2019, i.e. that boxing shall maintain its place on the sports program of the Olympic Games Tokyo 2020, while recognition of AIBA by the IOC will be suspended and evaluated after Tokyo 2020 (**Exhibit 3: IOC Session Decision on 26 June 2019**).





Before 12 December 2020, a chain of interim and permanent presidents succeeded each other, until Mr Umar Kremlev was elected as AIBA President, who has hold this position to this date.

Mr Umar Kremlev initiated reforms of the governance and sports integrity, as well as brought new sources of income to the AIBA, which paid the outstanding debts of the association, making it therefore a financially sound association. AIBA (later IBA) became a stable organization with many competitions held on regular basis.

On 9 December 2021, the IOC proposed IBA a roadmap and requested IBA to develop the Boxing Qualification System for Paris 2024 and to define the weight classes for the 13 boxing events (7 men's and 6 women's) confirmed for the Paris 2024 event programmer (**Exhibit 4: Letter from IOC to IBA on 9 December 2021**).

On 14 May 2022, Umar Kremlev was re-elected the IBA President by acclamation being alone candidate (**Exhibit 5: Letter from IBA to IOC on 14 May 2022**), whereas another candidate Mr Van der Vorst was recognized ineligible by the decision of the Interim Nomination Unit (**Exhibit 6: INU Decision on 12 May 2022**).

On 14 June 2022, the Sole Arbitrator of the Court of Arbitration for Sport (“CAS”) set aside the INU Decision on 12 May 2022 to exclude the candidates from the elections, but did not cancel the elections (**Exhibit 7: CAS Award**).

On 24 June 2022, the IOC Executive Board decided that the boxing qualifying events and the competitions at the Olympic Games Paris 2024 will not be run under the authority of the IBA (**Exhibit 8: Letter from IOC to IBA on 24 June 2022**).

On 25 September 2022, the IBA Extraordinary Congress met to decide the consequences of the CAS award of 14 June 2022. In result, 106 National Federations in attendance (74.65%) voted against running another presidential election (**Exhibit 9: IBA Extraordinary Congress Decision on 25 September 2022**).

On 6 April 2023, the IOC raised significant concerns regarding IBA’s practice and activities and delivered the PoPNC, granting IBA deadline to reply till 5 May 2023 (**Exhibit 10: Letter from IOC to IBA on 6 April 2023**).

Introduction

IBA provides these objections against the PoPNC with the Olympic Charter, which we suppose are biased drafted and do not take into account significant progress made by IBA since December 2020.

Despite the concern of the IOC, it must be noted that the organization which in December 2020 was actually office space with several employees, became really functioning sports body





with well-organized governing system (including the Board of Directors, which meets at least every two months, i.e. 6 times per year as recommended by the GRG), extensive staff of full-time employees, loads of competitions and other events, financial support to the Confederations and National Federations, etc.

As per the concern regarding IBA finances constantly circulating against IBA, it must be mentioned that IBA settled the debts of the past, it has a sound financial situation and currently demonstrates signs of a successful sports organization – we hold World Boxing Championships for both genders, we established and currently hold new competition – World Boxing Tour consisting of a chain of tournaments of gold, silver and bronze level, we pay the prize money for the athletes, we provide financial support to the Confederations and National Federations, we hold Global Boxing Forum etc. All these activities covered by IBA is thanks to its sponsors and diverse sources of income and, unlike other international federations that base their livelihood on IOC support, IBA carries out all of the above with absolutely no financial support from the IOC.

In terms of sports integrity and quality of work of the competition officials, significant work has been done by Prof. Richard McLaren and his team, who are recognized worldwide in their area of expertise and, in particular by the IOC itself for their work in the past in conjunction with WADA who followed up their report as an Independent Person on sanctions and a more independent, robust and effective anti-doping system. Unfortunately, the IOC ignored Summary of Key Integrity Achievements provided by IBA to IOC (**Exhibit 11: MGSS Key Achievements on 26 March 2023**), which demonstrates the progress done by IBA in this area. We are proud that we successfully returned credibility of the IBA competition officials and cleaned our sport of the high-risk officials we inherited from the previous management of CK Wu and Gafur Rakhimov. Of course, there are still mistakes in refereeing and judging, because it is almost impossible to upgrade significantly a level of the competition officials for such short period, and the referees and judges remain human being who will always do mistakes, as in many other sports (for example, if the IOC will focus how many mistakes the referees do in football, FIFA would permanently be on the spot). Of course, there will be one side of the bout, athletes and National Federations, who will always be unhappy with the results, because the boxing is a sport of young, ambitious, and expressive people, who hate to lose. But we are sure we are on the right track, and the conclusions of Prof. McLaren confirm it.

In terms of governance, we also made a lot of reforms which completely changed IBA. It was already confirmed by the Association of Summer Olympic International Federations' ("ASOIF"). In the report of July 2021, ASOIF ranked IBA's governing structure prominently in Group A2 (**Exhibit 12: ASOIF Report July 2021**): this is the second highest tier and includes, for example, the International Basketball Federation ("FIBA"), the International Table Tennis Federation ("ITTF"), World Athletics ("WA") or World Sailing. We continuously keep working on governance reforms, and we already improved our Constitution and the Regulations within 2021-2022.

However, from time to time we unfortunately meet with difficulties on our way, which hinder





the development of our organization, for example:

1. A group of individuals established a new organization - the World Boxing, which claims to be new international governing body for boxing, and by occasion, one of the members of the group that created this organization says in the press that the IOC encouraged and advised this group (**Exhibit 13: Stuff Press release**).
2. In 2021, IBA hired one of the "Big Four" auditor company to audit the IBA's financial statements, and the company accepted this mandate, but few months later this company unexpectedly terminated the contract and refused to provide audited financial statements relying on suddenly appeared conflict of interest with the IOC projects of this company. That unexpected termination has jeopardised IBA's ability to provide the IOC with audited financial statements, but thanks to our new Swiss auditor - Moore Stephens Refidar SA – it became possible to provide audited financial statements on time.
3. In November 2021, ASOIF announced the governance assessment of the international federations for 2021-2022. Satisfied with the results of the previous ranking, IBA set out to improve its previous result and worked hard to do so. However, in July 2022, following another concern from IOC against IBA, ASOIF suddenly informed IBA that the latter would not be ranked due to its suspended status with the IOC (**Exhibit 14: Email from ASOIF to IBA of 8 July 2022**). However, the same suspension did not prevent ASOIF from ranking IBA in 2021.
4. Finally, in October 2022, a company – global distributor of the big Equipment Producer¹ – in the very last moment refused to sign a sponsorship agreement with IBA, which had been agreed in writing in an exchange of emails and approved for public announcement, to be simply formalized in original between the parties at a later event. As IBA subsequently learnt from said company, the reason for this last moment withdrawal from the agreement was due to a reservation on the part of the Equipment Producer and interference from the IOC after the outcome of the IBA Congress in Yerevan in September 2022.

When something happened the first time it is an accident, when the second time it is a coincidence, and when the third time it is already a pattern. Unfortunately, we cannot believe in accident and coincidences anymore, and we are sure that somebody in the IOC does not want IBA to return its recognition and the boxing to be at the Olympics. A climate created by the IOC around IBA and its activities is clearly preventing IBA from developing boxing more effectively.

All the more so when IBA has repeatedly asked for a meeting between the two parties and these requests have not been dismissed, but simply ignored by IOC (see Exhibits 29, 36, 40,

¹ Names of this Equipment Producer and its distributor concerned cannot be disclosed because of the Settlement Agreement signed between the Parties following IBA's legal actions





41, 42 and 43 at pages 31 and 32).

We do hope that the IOC members will be able to read the entire and full IBA position, instead of biased review prepared by the several IOC officials.

Lack of legal basis to withdraw full recognition of IBA

IBA did not dispute the suspension of its recognition by the IOC, and hereby confirms that a decision to suspend IBA recognition of 26 June 2019 was never appealed (Exhibit 3: IOC Session Decision on 26 June 2019). Moreover, IBA did its best to eliminate IOC's concern on IBA's different areas of work and to improve them such finances, governance and sports integrity.

It must be noted that the decision above was taken on the recommendation of the Inquiry Committee and Organisation of boxing at Olympic Games Tokyo 2020 (Sports Department) on 22 May 2019 in which "*it concluded that the current situation of AIBA is such that its practices and activities continue to fall short of full conformity and compliance with the Olympic Charter and the IOC Code of Ethics, as required by Olympic Charter Rule 25§2 ("OCR").*" (Exhibit 2: IOC Executive Board Decision on 22 May 2019)

OCR25§2 provides "The statutes, practice and activities of the IFs within the Olympic Movement must be in conformity with the Olympic Charter, including the adoption and implementation of the World Anti-Doping Code as well as the Olympic Movement Code on the Prevention of Manipulation of Competitions. Subject to the foregoing, each IF maintains its independence and autonomy in the governance of its sport".

Based on the Inquiry Committee report attached as Appendix 1 and the report of the external expert Deloitte SA attached as Appendix 2 to the above-mentioned recommendation (Exhibit 2: IOC Executive Board Decision on 22 May 2019), it was concluded that "*there are sufficient grounds for deciding the withdrawal of AIBA's recognition in accordance with OCR3.7*"

OCR 3.7 provides "Recognition by the IOC may be provisional or full. Provisional recognition, or its withdrawal, is decided by the IOC Executive Board for a specific or an indefinite period. The IOC Executive Board may determine the conditions according to which provisional recognition may lapse. Full recognition, or its withdrawal, is decided by the Session. All details of recognition procedures are determined by the IOC Executive Board"

However, this does not affect the fact that the IOC must comply with the Olympic Charter when deciding to withdraw IBA's recognition. IBA insists that, even if the IOC puts in the agenda of its General Assembly the question of withdrawal of full recognition of IBA, there must be legal basis for that.

In accordance with the Rule 59 of the Olympic Charter (para. 1.2 "d"), a withdrawal of full





recognition with regards to the International Federation (“IF”) shall be the measure taken *“in the case of any violation of the Olympic Charter, the World Anti-Doping Code, the Olympic Movement Code on the Prevention of Manipulation of Competitions or any other decision or applicable regulation issued by the IOC”*.

Despite the allegations mentioned in the PoPNC (**Exhibit 15: Points of Potential Non-Compliance with the Olympic Charter (“PoPNC”)**), which will be commented below, IBA did not find in the IOC Correspondence of 6 April 2023 (**Exhibit 10: Letter from IOC to IBA on 6 April 2023**) any link to a specific rule of law that has been breached by IBA to be in the situation of potential withdrawal of the IOC’s recognition, but merely mention of an alleged unwillingness to cooperate by having requested further protective measures that our predecessor organisation, AIBA, did not request in the past from the independent experts.

Considering the above, on 7 April 2023, IBA requested the IOC (**Exhibit 16: Letter from IBA to IOC on 7 April 2023**) to specify which rule, article and/or paragraph of the Olympic Charter, the World Anti-Doping Code, the Olympic Movement Code on the Prevention of Manipulation of Competitions, any other decision or applicable regulation issued by the IOC has been violated by IBA.

In reply to the above-mentioned correspondence of IBA of 7 April 2023, on 12 April 2023 the IOC replied as follows (**Exhibit 17: Letter from IOC to IBA on 12 April 2023**):

- *“the (A)IBA’s recognition has been suspended by the IOC since 26 June 2019 given the serious concerns communicated to (A)IBA at that the time;*
- *for reference, the IOC Session decision of 26 June 2019 provided the grounds and the legal basis for such decision;*
- *the IOC is now finalizing the process started in June 2019 that will end with a decision by the IOC Session regarding the IBA’s recognition;*
- *within the framework of Olympic Charter Rule 3.7 and pursuant to Rule 25 § 2 of the Olympic Charter, recognition by the IOC presupposes that “[t]he statutes, practice and activities of the IFs within the Olympic Movement must be in conformity with the Olympic Charter [...]”;*
- *our letter of 6 April 2023 takes stock of IBA’s practice and activities as at 3 April 2023 by identifying some of the remaining and new points of concern and provides the IBA with the opportunity to comment before they are put in front of the IOC Session; and*
- *taking into account your comments, the IOC Session will make a decision regarding the IBA’s recognition.”*

Again, no rule of law (Olympic Charter, the World Anti-Doping Code, the Olympic Movement Code on the Prevention of Manipulation of Competitions, any other decision or applicable regulation issued by the IOC) was mentioned by the IOC as a legal ground to withdraw full recognition of the IBA.

In accordance with CAS jurisprudence, in case the grounds for the decision of non-compliance are not mentioned in such decision, a burden of proof to evidence that appellant





did not comply with the rules lies with the respondent (para.76, **Exhibit 18: CAS 2014/A/3621 JSC PFC Rostov v Football Union Russia (RFU) (final award)**).

Reply to Aspects monitored as part of the roadmap to 2023

1. Principles of good governance

1.1. *In the roadmap to 2023 shared with IBA in December 2021 that has never been contested, the IOC Executive Board requested the full implementation of the Governance Reform Group (GRG)'s recommendations, not only on paper but also in IBA's effective practice and activities as per the Olympic Charter. The monitoring of this full implementation was entrusted to the GRG led by Prof. Ulrich Haas. The relation between IBA and the GRG was terminated by IBA before the end of the process. In a letter to the IOC dated 7 September 2022, IBA explained that it took the decision to "undertake the final steps of the implementation process without external advice".*

IBA Reply:

IBA has never contested the Roadmap to 2023 ("**Roadmap**") provided by the IOC on 9 December 2021 (**Exhibit 4: Letter from IOC to IBA on 9 December 2021**), which includes:

- *"Defining a roadmap in consultation with AIBA to address the following areas of concern, in particular but not limited to:*
 - *With regard to finance, to increase financial transparency and sustainability including through diversification of revenues;*
 - *With regard to the credibility of the boxing competitions, to change its R&J process to ensure its integrity under the monitoring of PwC, including a monitoring period for AIBA's own competitions ahead of the Olympic Games Paris 2024; and*
 - *With regard to governance, to ensure the full and effective implementation of all the measures proposed by Professor Haas and his team, including the change of culture."*

"As part of the initial steps of this Roadmap and with regard to the Olympic Games Paris 2024, without prejudice to any IOC decision regarding AIBA or the inclusion of boxing in the Olympic Sports Programme, AIBA was required to:

- i. Develop the Boxing Qualification System, and*
- ii. Define the weight classes for the 13 boxing events (7 men's and 6 women's) confirmed for the Paris 2024 event programme".*

On 24 June 2022, the IOC Executive Board decided that the boxing qualifying events and the competitions at the Olympic Games Paris 2024 will not be run under the authority of IBA (**Exhibit 8: Letter from IOC to IBA on 24 June 2022**). Since this part of the Roadmap was unilaterally revoked by the IOC, IBA commentaries will be focused only on the 3 aspects of the Roadmap:





- 1) Increasing financial transparency and sustainability;
- 2) Credibility of the boxing competitions;
- 3) Implementation of all the measures proposed by Professor Haas and his team.

IBA is of the opinion that it successfully met the criteria mentioned in the Roadmap, which will be commented below.

However, IBA wishes to point out that keeping the relations between IBA and the Governance Reform Group of Prof. Ulrich Haas (“**GRG**”) was never criteria of the Roadmap, and recommendations of GRG can be implemented without contractual relations between IBA and GRG.

IBA is of the opinion that GRG made its significant contribution and developed the measures to reform the IBA governance, however, no one (including the IOC) can impose on IBA which contractors and methods to use within implementation of the governance reforms, which in any case was never imposed by IOC.

1.2 *As a result, on 25 August 2022, the GRG produced a Short Summary Report for IBA (which IBA shared with the IOC), that highlighted the differences between the legal implementation of the recommendations (i.e. enacting the necessary rules and regulations) and the administrative implementation of the recommendations (i.e. the actual implementation of the rules and regulations to make them operational in practice). On different points, the GRG noticed that the legal implementation was in principle completed, but the operational implementation was still pending.*

IBA Reply:

In its Short Summary Report of 25 August 2022 (**Exhibit 19: Governance Reform Group - Short Summary Report on 25 August 2022**), the GRG differentiated “*between the legal implementation of the Recommendations (i.e. enacting the necessary rules and regulations) and the administrative implementation of the Recommendations (i.e. rendering the rules and regulations operational in practice)*”, that is in principle normal for the organization implementing large-scale reforms.

First of all, such reforms were not possible without necessary legal basis. Here both the GRG and the IOC agree that the legal implementation of the reforms was in principle completed.

However, practical implementation of the new rules always takes time in any democratic system, especially if meanwhile there are elections, change of Board of Directors, of Secretary General and lawyer. Moreover, it must be noted that the GRG Short Summary Report of 25 August 2022 was drafted as of about six months after the first steps of the reforms adopted by the IBA Congress in December 2021.

1.3 *In her report dated 31 March 2023, Ms Kendrah Potts made similar observations*





emphasizing the still ongoing lack of effective implementation of the GRG's recommendations, which continues to raise concerns about the IBA's governance culture. Ms Potts also noted that the termination of the GRG mandate before the end of the full implementation of its recommendations is indicative of the lack of IBA's willingness to change its culture of governance and that this may have a negative impact on the boxing community's confidence in IBA's ability to conduct its affairs and to run the sport properly.

IBA Reply:

In addition, the IOC stated that “*Ms Kendrah Potts made similar observations emphasizing the still ongoing lack of effective implementation of the GRG's recommendations, which continues to raise concerns about the IBA's governance culture*”. But in reality, the Report of Ms Potts (**Exhibit 20: Appendix I - Ms Kendrah Potts Report**) says “*it is difficult to assess whether the Recommendations are being given full effect in practice and whether IBA has achieved, and continues to work towards, a real change in its governance culture*” (para.12 of Ms Potts's Report). **Thus, the IOC made wrong and misleading conclusion on the Report of Ms Potts.**

Also, the IOC stated that “*Ms Potts also noted that the termination of the GRG mandate before the end of the full implementation of its recommendations is indicative of the lack of IBA's willingness to change its culture of governance and that this may have a negative impact on the boxing community's confidence in IBA's ability to conduct its affairs and to run the sport properly*”. **However, there is no such conclusion in the Report of Ms Potts.** This is again misleading conclusion made by the IOC.

1.4 *In her report, Ms Potts took the example of the Boxing Independent Integrity Unit (BIIU) considering that IBA did not put in place the new BIIU by the end of 2022 as they pledged to do; indeed, the new BIIU is still not fully established, staffed and operational at the time of her report.*

IBA Reply:

Necessary documentary basis for the Boxing Independent Integrity Unit (“**BIIU**”) has been developed and adopted by the competent bodies of IBA, that is undisputed by anyone, including the IOC.

Once regulatory basis for the BIIU was ready, on 11 October 2022, IBA announced a first transparent call for the candidates to the BIIU (including, Managing Board, Managing Director, Tribunal, Dispute Resolution Chamber (“**DRC**”), Nomination Unit, Education and Development Unit). More than 80 applications were received by the IBA Head Office.

On 15 October 2022, IBA entered into the agreement with McLaren Global Sports Solutions (“**MGSS**”) with the purpose to appoint MGSS along with its subcontractor Harod Associates Limited (“**Harod**”) as the Independent Integrated Service Provider and Regulator for BIIU





(Exhibit 21: Agreement - IBA and MGSS on 15 October 2022). According to this Agreement, MGSS and Harod are independent from IBA including its bodies and officials, and BIIU, including its bodies and officials. Among others, MGSS and Harod (both together: **“McLaren Independent Investigation Group (MIIT)”**) are responsible for independent investigation of the cases in BIIU.

On March 8, 2023, the Independent Vetting Panel in result of selection process and based on the background vetting check approved the following composition of the BIIU Managing Board:

1. Bernhard Heinrich WELTEN (Switzerland) – former Chairperson of the IBA Ethics Committee
2. James Richard Victor KITCHING (Australia, Italia, United Kingdom) – no current or former role in IBA
3. Nader Jalal Mohammed ALAWADHI (Kingdom of Bahrein) – no current or former role in IBA
4. Richard R. YOUNG (USA) – no current or former role in IBA
5. *Vacant Position*

On 23 March 2023, the BIIU Managing Board had its first meeting (**Exhibit 22: BIIU Managing Board Meeting Minutes on 23 March 2023**), where Mr Gustaf Segerström (Sweden) was appointed as the BIIU Managing Director.

Thus, administrative bodies are in place in the BIIU.

On 25 April 2023, the BIIU Managing Board together with the BIIU Managing Director held the second meeting in which they formed the bodies of the BIIU as follows:

1. **Compliance Unit: Tribunal;**
 - a. Malek Badri, Tunisia (Chairperson);
 - b. Faisal Al-Obidan, Saudi Arabia;
 - c. Ennio Bovolenta, Italy;
 - d. Sally Clark, UK;
 - e. Loic Loutan, Switzerland;
 - f. Ioannis Mournianakis, Greece;
 - g. Adrian Stangaciu, Romania;
 - h. Harveen Thauli, Canada.
2. **Compliance Unit: DRC;**
 - a. Francois Strydom, South Africa (Chairperson);
 - b. Gauthier Bouchat, Belgium;
 - c. Gavin Dingley, South Africa/UK;
 - d. Divy Kadakia, India;
 - e. Ashot Kyuregyan, Armenia;
 - f. Dan Mihai, Romania;





- g. Franco Rodriguez, Peru;
- h. Yago Vazquez Moraga, Spain;
- i. Federico Venturi Ferriolo, Italy;
- j. Louis Weston, UK.

3. Nomination Unit;

- a. Emin Özkurt, Turkey (Chairperson);
- b. Pierfilippo Capello, Italy;
- c. Cambise Heron, Cyprus/France/UK;
- d. Nicholas Hooper, Switzerland/UK;
- e. Dmitry Morozov, Canada/Russia;
- f. Jorge Vaquero Villa, Spain.

4. Education and Development Unit.

- a. Martin V Burrows, USA;
- b. Bahram Ghafari Goushe, Canada/Iran;
- c. Dejan Laninovic, Croatia;
- d. Kristina Levsha, Belarus/Poland;
- e. Alberto Terranova, Italy.

Indeed, initial plan was to establish the BIIU till the end of 2022, however, it was decided not to rush for the sake of the quality of BIIU. Instead of making many mistakes in a hurry, it is better to approach the process of choosing people to the BIIU with due diligence. In the meantime, the judicial bodies of IBA have not ceased to function, but members of the Ethics and Disciplinary Committees take over the function on a temporary basis according to article 51 of the BIIU Rules.

However, there is not any single evidence in the Report of Ms Potts that IBA is acting in bad faith in respect of the BIIU and deliberately delaying the process.

1.5 *Perhaps the most problematic example identified by Ms Potts is the lack of democracy, in particular as the elections were significantly impacted by the decision of the Independent Nomination Unit (INU) to exclude five individuals from the elections of the President and Board of Directors members, which was subsequently overturned by the Court of Arbitration for Sport (CAS). Excluding a political opponent by abusing the eligibility check system is an example of improper way of governance.*

IBA Reply:

IOC came to the conclusion that “[e]xcluding a political opponent by abusing the eligibility check system is an example of improper way of governance”. This conclusion constitutes the opinion of two IOC officials – Mr De Keppeler and Ms Zappelli – which is not based on any official document (including CAS ruling issued on this matter).

The BIIU Interim Nomination Unit was appointed to control the elections, whereas independent





experts joined this body being previously approved by the GRG.

Where before IOC stated that “*the termination of the GRG mandate before the end of the full implementation of its recommendations is indicative of the lack of IBA’s willingness to change its culture of governance and that this may have a negative impact on the boxing community’s confidence in IBA’s ability to conduct its affairs and to run the sport properly*”, following the same indications of GRG, especially on a sensitive matter as the members of the BIIU Interim Nomination Unit to perform eligibility checks and assessments of all appointments and elections to key management and leadership positions, seems to be “*improper way of governance*”.

There seems to be a clear lack of consistency on IOC regarding the importance of GRG.

On 12 May 2022, the BIIU Interim Nomination Unit issued a decision (Exhibit 6: INU Decision on 12 May 2022) and declared several candidates, including, Boris van der Vorst, Michael McAtee, Steve Hartley, Per-Axel Sjöholm, and Lars Brovil ineligible to participate in the Elections on the IBA Congress on 13-14 May 2022 in Istanbul.

The reason of said decision was the participation of the concerned candidates in a group named the Common Cause Alliance, which were identified as international boxing organization, and cooperation between the said candidates, which, according to the BIIU Interim Nomination Unit constituted a breach of article 25.1(12) of the Regulations on the Congress and Elections.

Boris van der Vorst, Michael McAtee, Steve Hartley, Per-Axel Sjöholm appealed against the decision of the BIIU Interim Nomination Unit to the CAS, and on 14 June 2022 the Sole Arbitrator set aside the decision of the BIIU Interim Nomination Unit of 12 May 2022 (Exhibit 7: CAS Award). The Sole Arbitrator came to the conclusion that there was only a minor breach of the regulations governing the IBA elections, which was not enough to exclude the candidates from the elections.

The appellants (Boris van der Vorst, Michael McAtee, Steve Hartley, Per-Axel Sjöholm) did not request the court to cancel the IBA Congress in Istanbul on 13-14 May 2022. Therefore, the CAS set aside the INU Decision on 12 May 2022 to exclude the candidates from the elections, but did not cancel the elections (Exhibit 7: CAS Award and Exhibit 6: INU Decision on 12 May 2022).

Having this lacuna, the IBA Board of Directors met in Lausanne on 24 June 2022 to decide the consequences of the CAS Award. The Board of Directors, wishing to allow the National Federations to take a decision, called an Extraordinary Congress with the following two points in the agenda (Exhibit 23: IBA BoD Meeting Minutes on 24 June 2022):

1. *Do you agree to conduct new Presidential elections between the two candidates, who were deemed eligible by the Interim Nomination Unit or the Court of Arbitration for Sport (Boris Van Der Vorst and Umar Kremlev)?*





2. if the answer to #1 is yes: conduct elections

On 25 September 2022 in Yerevan, the Extraordinary Congress met to decide the consequences of the CAS Award. Over 30 delegates who expressed their wish to speak were given the floor at the Extraordinary Congress. In result, 106 National Federations in attendance (74.65%) voted against running another presidential election. It should be noted that the result of the vote was considerably higher than the highest qualification required in the IBA Constitution for a vote, i.e. is two thirds of the votes (66.6%) (Exhibit 9: IBA Extraordinary Congress Decision on 25 September 2022). *A sensu contrario*, to article 17.1 (d) of the IBA Constitution, this massive participation of the National Federations in a clear and democratic election in favour of the current President shows a motion of confidence on him, it can be interpreted as an indirect second elections to the presidency in which Mr Umar Kremlev has been legally elected and therefore, the IOC must respect.

The accuracy of the Congress procedure was confirmed by the Scrutineer and independent expert Prof. Richard McLaren who was present onsite in person together with his team (Exhibit 24: Letter from MGSS to IBA-Mr Yerolimpos on 4 October 2022).

Considering the above, the conclusion of the IOC about “[e]xcluding a political opponent by abusing the eligibility check system” constitutes clear speculations because of the following:

1. The INU Decision on 12 May 2022 was issued by the members of said body approved by the GRG (Exhibit 6: INU Decision on 12 May 2022);
2. The Sole Arbitrator in the CAS Award did not make any conclusion of abusing or exclusion of political opponents (Exhibit 7: CAS Award);
3. The excluded candidates did not request the court to cancel the IBA Congress in Istanbul on 13-13 May 2022. Therefore, the CAS set aside the INU Decision on 12 May 2022 to exclude the candidates from the elections, but did not cancel the elections. Such limited consequences should be attributed exclusively to them and not to IBA;
4. There was a democratic Extraordinary Congress meeting on 25 September 2022 in Yerevan to decide the consequences of the CAS award of 14 June 2022, in particular, if the National Federations wanted to conduct another elections, and 74.65% of the quorum voted against running another election (Exhibit 9: IBA Extraordinary Congress Decision on 25 September 2022).

Despite the CAS Award, time has demonstrated that the BIIU Nomination Unit was absolutely correct identifying the Common Cause Alliance as an international boxing organization conflicting with IBA. It took several months, when Common Cause Alliance led to the establishment of the World Boxing, which claims to be new international governing body for boxing (Exhibit 25: World Boxing Press Release of 13 April 2023).

To the regret of IBA, Steve Hartley – member of the Common Cause Alliance – stated that the IOC encouraged and advised this group (Exhibit 13: Stuff Press release).





- 1.6 *The functioning of IBA's organs, notably the new committees is also problematic in practice. For instance, as noted by Ms Potts, the Finance and Audit Committees' members were appointed in April 2022 (it is understood that there was no competition for these positions); eight months later, all the members of the Audit Committee and one member of the Finance Committee resigned; no explanations were given by IBA on these resignations. Such "mass resignations" raise significant questions regarding the effective practice and activities of these committees and IBA as an organisation.*

IBA Reply:

IBA published a call for candidates in a transparent way and shared it with all IBA National Federations on 25 January 2022. However, due to IBA's ongoing reform process as well as compressed deadlines imposed by IOC to comply with the GRG recommendations to have these committees constituted, unfortunately not many applications were received.

In fact, we are talking about 5 (five) members only who resigned from 2 (two) Committees (Finance and Audit), whereas, IBA currently has 12 (twelve) Committees (Corporate Governance Committees: Athletes' Committee, Audit Committee, Finance Committee and Strategy Committee; and Technical & Management Committees: Marketing Committee, Competitions Committee, Refereeing and Judging Committee, Coaches Committee, Champions and Veterans Committee, Diversity Committee, Medical Committee, Member Federations Committee) with 89 (eighty-nine) active members in total.

Therefore, the statement about "mass resignations" constitutes clear speculation.

- 1.7 *To conclude, Ms Potts noted that despite the work that has been done by IBA, there are several issues that continue to raise concerns about IBA's governance culture. Some of these issues have not yet been considered by the appropriate organs within IBA and there may be explanations. What is sure is that they corroborate the concern expressed in the GRG's Short Summary Report regarding the lack of administrative implementation of the recommendations (i.e. rendering the rules and regulations operational in practice). As noted above, it is disappointing that IBA did not continue its engagement with the GRG so that it could oversee the full implementation of its recommendations.*

IBA Reply:

An independent person who will read the report of Ms Potts (Exhibit 20: Appendix I - Ms Kendrah Potts Report), will find this report rather positive. It is hard to find ideal organization which is not subject to criticism, and the IOC as well from time to time faces with the criticism in different areas.

The crux of the matter does not lie in the commission of errors or the ensuing criticism thereof, but rather in the organization's deficient response to said errors. It is worth noting that IBA has taken significant measures since December 2020 to rectify the aforementioned mistakes of





the past.

The transformation of governance culture is not something that can be changed immediately overnight. Rather, such endeavor requires prolonged investment of time and arduous exertion.

In this respect the improvement has been recognized by the GRG in paragraph 11 of its Short Summary Report of 25 August 2022 (Exhibit 19: Governance Reform Group - Short Summary Report on 25 August 2022).

However, the improvement of the governance culture will require assets taking into account a starting point for change. As it was mentioned by McLaren's Independent Investigation Group (MIIT) in its Report of 30 September 2021 (Exhibit 26: MIIT Final AIBA Report on 21 September 2021), the 2016 Rio Olympics were clearly a low point for AIBA – this was a starting point, when AIBA completely lost reliability. According to the MIIT Final AIBA Report on 21 September 2021, the President CK Wu bears ultimate responsibility for that.

It is necessary to remind that CK Wu at that time was an IOC member, and it is completely wrong that IBA bears full responsibility for the wrongdoings of the IOC member. It is hard to believe that the IOC was not aware of the problems in the International Federation led by the IOC member, especially, most of these problems were directly connected with the Olympic Games and its qualifying tournament.

Indeed, AIBA lost its confidence of stakeholders in its ability to run its affairs, but this is not the case anymore. **74.65%** voted against running another presidential election at the Extraordinary Congress in Yerevan on 25 September 2022, this is a clear sign of confidence in the IBA President and the Board of Directors (Exhibit 9: IBA Extraordinary Congress Decision on 25 September 2022).

2. IBA's financial situation

2.1 *Following the EY's assessment of AIBA's financial situation in December 2021, the IOC Executive Board noted that AIBA was able to reduce its indebtedness, in particular by settling the Benkons debt.*

IBA Reply:

IBA settled all debts of the previous management, which were recorded in the financial statements, that had been announced in May 2021 (Exhibit 27: AIBA Financial Statements in May 2021). Most significant part of these debts fell on the Azerbaijani company Benkons.

On 21 May 2021, Beckons issued to IBA confirmation letter (Exhibit 28: Letter from Bekons to AIBA on 21 May 2021) stating as follows:

1. *AIBA has no obligations of any nature towards Benkons LLC;*





2. *Benkons LLC irrevocably waves any rights (even potential) to request from AIBA any further payments, interest, penalty, damages etc;*
3. *Benkons LLC is fully satisfied by execution of any previous arrangements, contracts and agreements by AIBA.*

2.2 *Considering the importance of the sponsoring contract with Gazprom, signed in April 2021 for the period up to 31 December 2022, the IOC Executive Board has been concerned about the IBA's financial transparency and sustainability, given IBA's effective dependence on a single state-owned company. Such concern is exacerbated by the fact that, in the meantime, such company has been sanctioned by international authorities. In various letters (in particular those dated 9 December 2021, 12 April 2022, 10 May 2022 and 8 September 2022) IBA was requested to inform the IOC of the actions it undertook to diversify its revenues and achieve financial independence. To date, no such information has been provided by IBA and the IOC cannot take comfort in this respect from publicly available information either.*

IBA Reply:

Concern on Gazprom has no basis since Gazprom sponsorship agreement expired on 31 December 2022, and it has not been extended. In this regard on 3 March 2023 IBA informed the IOC as follows (**Exhibit 29: Letter from IBA to IOC on 3 March 2023**):

"Lastly and for the sake of completeness, considering the IOC's concern on the past IBA sponsorship with Gazprom, we inform you that such Sponsor Agreement expired on 31 December 2022, and it has not been extended."

In addition, it is false statement by the IOC that no information on diversify of the IBA revenues has been provided by IBA.

This information was provided to Ms Potts on 10 March 2023 upon her request (**Exhibit 30: Reply from IBA to Ms Potts (Appendix II) on 10 March 2023**). Moreover, a matter of diversification of the IBA revenues is reflected in paragraph 48 of the Report of Ms Potts.

Thus, the IOC contradicts itself when it says that no information on diversify of the IBA revenues has been provided by IBA, whereas, this information is specified in the report of the IOC expert.

2.3 *As announced in the letter dated 23 February 2023, EY was reappointed to conduct an updated assessment of IBA's financial situation. IBA initially agreed to cooperate with EY and transmitted some documentation through the IOC as it has done in the past. However, before transmitting the remaining documentation, IBA added new preconditions, including a request for EY to sign a NDA, which was unacceptable as it would have de facto prevented EY to share its findings with the IOC making the monitoring process pointless. As a result, EY was unable to gain access to the requested information and to fulfil its mission.*





IBA Reply:

IBA wishes to express its surprise at the statements made by the IOC in this respect.

First, EY (or IOC) did not identify any particular section of the Non-Disclosure Agreement provided by IBA, which was similar to the one provided by EY, that would hinder or prevent EY from complying with its mandate. EY also did not make any attempt to propose an alternative version with modifications and negotiate it (**Exhibit 31: Exchange of correspondence between IBA and EY**).

We are specifically referring to the quoted text from the NDA provided by IBA, which states (emphasis added):

*“Confidential Information will be provided for the sole purpose of permitting EY, its personnel or other members of the global network of EY firms **to perform all its duties in the framework of its activities entrusted by IOC according to the Mandate** and only to the extent reasonably necessary i.e. **prepare a report which will be provided to IOC and IBA at the end of their work (“Report”).**”*

As a result, we infer that the NDA provided by IBA allowed EY to fulfill its mandate as it clearly stated that EY would receive the necessary information to prepare the report. Additionally, it seems that EY was not particularly willing to collaborate with IBA as they did not propose any alternatives and insisted on using their own NDA.

Furthermore, it should be noted that while not explicitly stated in your comments, IBA had expressed its willingness to provide additional documents and grant EY access to remaining documents in our offices that could not be extracted from the IBA Head Office due to their nature. In this regard, the IOC was fully aware of the IBA calendar, which included the organization’s largest event, the Women’s World Boxing Championships, during the period in question. As a result, it was understood that the top management positions would not be available at the office during this time.

IBA also acknowledges that if the IOC had plans to monitor IBA’s finances, it could have given prior notice to IBA, which would have allowed for more opportunity for cooperation between the two organizations.

Given the points mentioned above, the allegations made by the IOC appear to be baseless and lack validity. It appears that these allegations are being used as another pretext to make a decision against IBA.

2.4 *Thus, the IOC was left with no choice but to draw its conclusions from publicly available information, such as the financial statements ending on 30 June 2022 and the annual budget for the year ending 30 June 2023.*





IBA Reply:

First of all, the deadline set by the IOC to IBA to submit its financial information to EY coincided with the period of the IBA Women's World Championships in India, during which IBA key personal were located in New Delhi and fully occupied with the organization of the competition. Given this, it is reasonable to assume that there was no urgency to meet the deadline, and that if IOC deemed the financial information so important, IOC should have allowed for sufficient time to collect the necessary data and liaise with EY. Therefore, we can interpret these actions solely as a deliberate attempt to create significant difficulties for IBA by imposing an unreasonably tight deadline.

Second, as it was explained in paragraph 2.3 above, IBA was ready to provide necessary documents to EY, but EY in ultimate form refused to sign NDA proposed by IBA and did not make any attempt to propose an alternative version with modifications and negotiate.

Therefore, IBA disputes real intention of the IOC to collect necessary financial documents for fair assessment.

2.5 *It transpires from such information that the absence of sustainable financing and dependence on a state-owned sponsor have not been remedied.*

IBA Reply:

According to Budget Income Statement for the financial year July 2022 to June 2023 approved by the Board of Directors on 24 June 2022 (**Exhibit 32: Budget Income Statement**), which is publicly available on the IBA website and which probably was the basis for the IOC to said conclusion, total operating income expected for the current financial year was CHF 12'110'875, including:

- | | |
|-------------------------------------|---------------|
| - Sponsorship and TV Rights Revenue | CHF 6,106,875 |
| - Licensing | CHF 404,000 |
| - Sport Events | CHF 5,600,000 |

Even based on this document, it is clear that the expected income from the sponsorship constitutes only half of the IBA incomes. Moreover, any Budget contains only a forecast for the financial year, which might be changed from time to time. According to the updated Budget, presented to the Board of Directors on 25 March 2023 in New Delhi, the total operating income for the financial year already constitutes CHF 15,800,000, almost 30% (thirty percent) more of what was estimated, where sponsorship incomes constitute CHF 7,700,000 only, that means less than 50% of the total income.

Based on the Budget Income Statement for the financial year July 2022 to June 2023, published on the IBA website, total operating expenses was planning at the amount of CHF 11,889,138. According to the updated Budget, presented to the Board of Directors on 25 March 2023 in New Delhi, total operating expenses already constitute CHF 15,300,000.





Moreover, IBA has arranged to increase the License Fee up to 50% (fifty percent) with some Licensees, which also represents a good source of income that helps to consolidate the accounts.

Both initial Budget and updated Budget are surplus, therefore, the IOC's conclusion on the absence of sustainable financing is totally wrong.

What is more, the IOC's statement about IBA's dependence on a state-owned sponsor is also incorrect, because total sponsorship revenues (from all sponsors, including Gazprom and Sting) for the current financial year are less than 50% (fifty percent) of the total. It shall be also noted that Gazprom sponsorship agreement expired on 31 December 2022 (see paragraph 2.7 below), and relevant income from this agreement was allocated only for the first part of the current financial year.

2.6 *With regard to the indebtedness, the FCIT debt (understood to be approximately CHF 19 million) is the only known liability still pending in 2022; this was expressly mentioned in the auditors' report on the financial statements ending on 30 June 2022, as presented during the IBA Ordinary Congress in Abu Dhabi in December 2022. The 2022-2023 budget only contains a provision for legal costs linked to the FCIT debt, but not for the actual amount of this potential claim.*

IBA Reply:

It must be mentioned that **NO PENDING LIABILITY OF IBA TOWARDS FCIT EXISTS or HAS EVER EXISTED**. IBA claims the IOC to refute this inaccurate statement, and avoid it in the future. Moreover, IBA reserves its rights against Mr De Keppeer and Ms Zappelli in case their inaccurate statement regarding FCIT will cause any damages to IBA.

We are surprised that how persistently the IOC persuades IBA to recognize so-called debt towards FCIT, in result of investments of FCIT to the IBA's subsidiary Boxing Marketing Arm SA (liquidated in 2019 due to bankruptcy) during CK Wu presidency.

According to the IOC, *"the FCIT debt (understood to be approximately CHF 19 million) is the only known liability still pending in 2022; this was expressly mentioned in the auditors' report on the financial statements ending on 30 June 2022"*

However, in reality IBA audited Statutory Accounts as of 30 June 2022 (**Exhibit 33: IBA Statutory Accounts on 30 June 2022**) says different:

"First Commitment International Trade (FCIT) has initiated a debt enforcement procedure on 30th September 2020 by having an order to pay served on IBA for CHF 18'991'229 + 5% interest since 10 December 2016, resulting in a total claim of around CHF 24'350'000 as of today. A further procedure was initiated in October 2022 to renew the claim and prevent its automatic closure.





IBA filed an objection to each order to pay and rejects this claim on the basis that IBA does not owe anything to FCIT. The rejected claim of CHF 18'991'229 actually relates to a loan between FCIT and BMA, which is now dissolved. Consequently no booking has been made into the accounts, however CHF 300'000 has been accrued in provision for potential legal costs."

IBA auditor received full report on FCIT matter and agreed with the position of IBA on absence of pending debt, therefore, no FCIT debt is reserved in the IBA accounts.

Considering strange lobbying of the FCIT's interests by the IOC and considering sensitive and confidential character of the information about FCIT, IBA will limit its response to the IOC with the following main arguments:

1. FCIT debt arose towards Boxing Marketing Arm SA (BMA), which was liquated in 2019 due to bankruptcy, and not towards IBA, whereas, IBA was not part of relevant agreements between FCIT and BMA;
 2. FCIT has lodged no claims against IBA since the bankruptcy of BMA;
 3. All debt enforcement procedures initiated by FCTI were objected by IBA in established order;
 4. There is no pending debt in the IBA audited Statutory Accounts.
- 2.7 *IBA's reliance on a contract with Gazprom puts its financial and overall independence in jeopardy. The Gazprom contract signed in April 2021 ended on 31 December 2022. During IBA's Ordinary Congress in December 2022, the extension of this contract was announced and approved. Contrary to what was announced during the Congress, IBA later informed the IOC that the Gazprom contract would not be renewed. This notwithstanding, Gazprom is still prominently featured as a "general partner" on IBA's website. All this contradictory information is another sign of IBA's lack of transparency and reliability.*

IBA Reply:

Due to Gazprom, IBA settled its debts, organized many competitions and helped a lot of National Federations and their athletes. Therefore, IBA can only thank Gazprom for its help to develop the boxing.

In fact, IBA does not share the position of some federations which have been receiving money from Gazprom for years (even after the events in Ukraine regarding the Crimea, Donetsk region and Luhansk region, which began in 2014), and which broke off all relations with Gazprom in one day, completely distanced themselves from this sponsor and ceased to fulfill their obligations under contracts. IBA cannot afford such attitude to its sponsors. On the other side, we understand how sensitive this matter can be for the National Federations.

Therefore, during IBA's Ordinary Congress in December 2022 the President asked opinion of the National Federations, and the absolute majority by acclamation agreed to extend the





contract with Gazprom. This is demonstration of the transparency and democracy in the IBA, because we ask our National Federations and listen their opinion.

However, this is true that as on today, Gazprom sponsorship agreement expired as of 31 December 2022, and has not been extended, as it was mentioned by IBA on 3 March 2023 (Exhibit 29: Letter from IBA to IOC on 3 March 2023).

Since 31 December 2022, Gazprom logo did not appear at the IBA events, however, on the website it has been displayed for some period a gesture of goodwill and as compensation for some services that were not provided due to objective circumstances. With that said, this period has come to an end and the Gazprom logo is no longer visible on the IBA main website page.

2.8 *One may conclude that IBA's cash position can only be expected to further decline if the expenditure is maintained at the current budget level and no additional sources of revenues are contracted for the period after June 2023. Due to the lack of information provided by IBA, there is no evidence of any other new contract providing cash revenues (Sting contract seems only to be value in kind) and serious doubt remains about IBA's financial sustainability and the diversification of its revenues.*

IBA Reply:

IBA keeps working on diversification of its incomes. In particular, we significantly increased our incomes from the licensing program, TV and marketing rights, and hosting the competitions.

As it was mentioned in paragraph 2.5, IBA income from sponsorship agreements constitutes less than 50% (fifty percent) of the total income, and we will continue our work to reduce our dependence on sponsors.

However, until the end of the current financial year we expect to conclude several commercial agreements which are currently being negotiating and therefore cannot be disclosed, to support our financial stability for the next financial years.

2.9 *Similarly, the financial statements as at 30 June 2022 and the budget do not allow to understand under which operating expenses the prize money to medallists of IBA's competitions, for the period 2021-2022, has been allocated to. As a consequence, it is not clear how the announced prize money for future IBA competitions for the period 2022-2023 will be funded.*

IBA Reply:

According to the updated Budget, presented to the Board of Directors on 25 March 2023 in New Delhi, it is planned to spend CHF 7,400,000 maximum for the prize money. IBA incomes covers these expenses.





In general, IBA policy in respect of the competitions is aimed to ensure that income from competition covers the costs of this competition, in particular, the costs for the prize money for the benefit of the boxers.

2.10 *It is thus telling that the auditors' report of IBA's yearly accounts as at 30 June 2022 draws the attention to the fact that the financial statements describe an uncertainty around operating as a going concern in the mid to long term. Indeed, the ability to continue operating for a period over 12 months (to 30 June 2023) is conditional upon the capacity of IBA to continue to find sources of revenues and whether the risk of a potential litigation materialises.*

IBA Reply:

IBA commentaries in paragraphs 2.1 – 2.9 shows that the IOC concerns in respect of the IBA financial situation is groundless, whereas, IBA has necessary resources to conduct its activity.

3. Integrity of refereeing and judging processes

3.1 *In 2019, the IOC noted that IBA had been unable to demonstrate a sustainable and fair management of the referees & judges processes (R&Js), which increased the lack of confidence that the athletes can have in fair competitions. As a consequence of the suspension of AIBA's recognition, the boxing qualifying and tournament at the Olympic Games Tokyo 2020 was organised by the IOC Boxing Task Force (BTF).*

IBA Reply:

We accept that the process in place pre 2019 for the selection of Technical Officials (refers to both ITOs and R&Js) was not acceptable in terms of the actual process. Indeed, since this time, AIBA took the initiative to suspend all Technical Officials (TOs) who took part in the 2016 Rio Olympic Games. Notably, we still had one or two officials still present, who have in fact been subject to further vetting by IBAs key partner in the integrity management space. We have since removed those officials from active engagement, whether that be during our events, or in an executive capacity.

AIBA/IBA had rightfully accepted the consequences due to the actions of those pre-2019, and the organization since that time has completely changed hands, to include the staff in the Head Office, up to Presidential level.

The Boxing Task Force (“**BTF**”) completed the taskings for the Olympic Games and has provided guidance to the IBA team since that time; we have been grateful for the input, particularly the requirement for the selection of TOs, with laid down respected criteria, and the random draw process applied. The timeframe application is key to all of this, but with rapid number of events, and the turnover of requirements, the Forecast of Events is often adjusted based on the availability of high-end TOs for our IBA owned and sanctioned events.





We manage this accordingly and have been fully appreciative of the reasons for open selection and the ability to use independent observers to oversee and to add comments. This has worked extremely well, and we continue to provide a robust system in place to this day.

Overall, the 'lessons learned' have been key to the development of the IBA selection process for all TOs in support of our major competitions. Without the interaction of the BTF, IBA would not be in the position it is today with a clear system in place.

3.2 *Following the boxing tournament at the Olympic Games Tokyo 2020 in 2021, the IOC was confident that IBA would be able to capitalise on the BTF's experience to set up its own R&Js processes for the IBA's World Men Boxing Championships in Belgrade (Nov. 2021). Following this competition and as part of the roadmap, the IOC Sports Department's team shared with IBA the necessary documentation and know how gained from the Tokyo 2020 BTF experience on the R&Js processes, based on a two-phase (pre-competition and competition) process. Additionally, a number of meetings, remote or in person, were held with IBA's team to provide support and enable IBA to ensure the integrity of its own processes.*

IBA Reply:

This has indeed been touched upon within paragraph 3.1 above. Since the Olympic Games 2020 (taking place in 2021), IBA has continued to develop in the area of TO selection, and those best practices that have been shared by the IOC Sports Department have been warmly received. The majority of those applications work well for IBA, but not all. Notably the turnover of events, and the availability of officials, often throws up issues when attempting to ensure complete continental parity. That said, McLaren Global Sports Solutions ("**MGSS**") have been working extremely hard in support of the IBA integrity work; we have now vetted approximately 250 (two hundred fifty) TOs since 2021, therefore providing an extended pool of officials as and when required, particularly for reserve support.

IBA is extremely appreciative of the support provided here by the IOC; we continue to enhance our selection criteria and the ability to ensure we have the very best outcomes ready for our championship events.

3.3 *As announced in the letter dated 23 February 2023, PwC was reappointed to assess IBA's major events, specifically the IBA's Women World Boxing Championships in New Delhi (March 2023). IBA initially agreed to cooperate and transmitted some documentation through the IOC. However, before transmitting the remaining documentation, IBA added new preconditions, including a request for PwC to sign a NDA, which was unacceptable as it would have prevented PwC from sharing its findings with the IOC. As a result, PwC was unable to gain access to the requested information, to attend IBA's competition in New Delhi and to fulfil its mission.*

IBA Reply:





As with the allegations concerning EY, IBA must and does dispute IOC's allegations concerning PwC.

As it occurred with EY, PwC (or IOC) did not identify any particular section of the Non-Disclosure Agreement provided by IBA that would hinder or prevent PwC from complying with its mandate. PwC (or IOC) also did not make any attempt to propose an alternative version with modifications and negotiate it (**Exhibit 34: Exchange of correspondence between IBA and PwC in March 2023**).

The only reply from IOC was:

"(...) Furthermore, IBA never asked PwC to sign any NDAs in the past, therefore, we fail to see any reasons for such new request. In addition, the terms of the NDA you have requested PwC to sign are so broad that they would effectively prevent PwC to carry out their mission."

The aforementioned statement can lead to interpret the IOC's response as implying that AIBA's past wrongdoings or negligence, which favored the IOC's leeway, are sufficient reason to maintain the same conduct and not change it regarding measures requested by IBA to protect its *know-how*, which is contrary to good governance management, which is what the IOC itself requires of us.

In this respect, we specifically refer to the quoted text from the NDA provided by IBA, which states (emphasis added):

"Confidential Information will be provided for the sole purpose of permitting PwC to perform all its duties in the framework of its activities entrusted by IOC according to the Mandate and Power of Attorney i.e. prepare a report which will be provided to IOC and IBA at the end of their work ("Report")."

Therefore, we can deduce that the NDA provided by IBA to PwC allowed the latter to fulfill its mandate, since the NDA explicitly stated that PwC would be given access to all the necessary information required to prepare the report.

Furthermore, it appears that PwC was not very cooperative in working with IBA. PwC did not propose any alternatives to the NDA nor, despite being asked by the Secretary General on 10 March 2023, furnished IBA with the previous audit reports on the IBA Women's World Championships 2022 in Istanbul, the Commonwealth Games 2022 in Birmingham and the IBA Men's World Boxing Championships in Serbia in 2021.

Moreover, it is worth noting that, at this stage and out of goodwill, IBA already expressed its willingness to cooperate by announcing it in the media. Additionally, in its correspondence with PwC, IBA included McLaren Independent Investigation Team (MIIT) to facilitate communication while on-site to prepare the report (**Exhibit 35: IBA Press release on 13 March 2023**).





Once again, IBA expresses its disappointment that the IOC did not reach out to us earlier to audit the two World Championships, which were scheduled back-to-back within a span of two months. Such an audit could have provided a more comprehensive understanding of IBA's event organization.

Given the points mentioned above, the allegations made by the IOC appear to be baseless and lack validity. It appears that these allegations are being used as another pretext to make a decision against IBA. Moreover, it is clear the conflict of interests of PwC in monitoring IBA events and obtaining its *know-how* being the organizer of the qualification of IOC. In particular, considering the appearance of the new rogue organization "World Boxing" that wants to replace IBA as world governing body of boxing and the rumors that IOC, although denied by the latter, is cooperating with such National Federations in creating parallel events and such association (Exhibit 13: Stuff Press release).

3.4 *Thus, the IOC was left with no choice but to draw its conclusions from publicly available information.*

IBA Reply:

Along with the letter of 27 March 2023, addressed by IBA to the IOC Executive Board (Exhibit 36: Letter from IBA to IOC on 27 March 2023), the Summary of Key Integrity Achievements prepared by Prof. McLaren and his team was provided (Exhibit 11: MGSS Key Achievements on 26 March 2023).

This document contains information about achievements of IBA in integrity area, improvements noted in relation to Competition Officials; describes R&J Daily Draw and R&J Continental Selection Process; explains new Bout Review Rule (Rule 20) and General Security and Accreditation Process; informs about cooperation of IBA with the MIIT. It also concludes, that "[t]he rigorous 'detect and protect' regime introduced and fully supported by IBA has significantly improved behaviours amongst officials".

What is more, the document informs that "[t]he MIIT remains open to share our working practices with the IOC, and/or their representatives, in relation to the due diligence and vetting of officials in any sport, but in particular IBA".

However, the IOC preferred to ignore it and to leave with self-choice to draw its conclusions from publicly available information.

3.5 *The review of the IBA's Rules which applied during the IBA Women World Boxing Championships in New Delhi (IND) is based on the a two-phase approach, pre-competition and competition phases.*

IBA Reply:

IBA continues to work hard in the development of the Technical and Competition Rules; this also has a significant and positive impact, particularly those rules that are applied to each of our events. Those pertaining to the IBA Women's World Championships were specific to the





Bout Review, which is a key piece of work that is ongoing. The Bout Review will be digitized for the World Championships in Tashkent, so therefore further updates will be required in respect of our rules. Again, continued professional development for everyone and taking the organization forward in a positive way.

- 3.6 *Regarding the pre-competition phase (IBA data on the pool of IBA's Boxing Officials, vetting of Boxing Officials, Technical Officials draw, competition appointment, learning & training and monitoring of Boxing Officials), no documents are available in the public domain and thus not accessible to all team delegations. Consequently, the assessment of these pre-competition phase was not possible and thus, the transparency of this part of the process remains questionable.*

IBA Reply:

IBA is absolutely content with the process, which follows a similar model to that of the IOC and the work that the BTF concluded for Tokyo. Note that restrictions apply here in terms of GDPR, but IBA would be keen to sit face to face with all respective documents and to talk through the process with an IOC representative or associated partner.

- 3.7 *Regarding the competition phase, a number of potential risks in the integrity of IBA's R&Js processes are apparent already from the analysis of the rules available in the public domain, which contain a number of inconsistencies and contradictions, in particular with regard to the R&Js draw, R&Js evaluation, bout review and competency of the Observer. Some examples listed below (non-exhaustive list) may lead to the reoccurrence of the same type of issues which AIBA faced during the Olympic Games Rio 2016.*

IBA Reply:

Point to note here, all of our Technical Officials have been exclusively vetted by McLaren Independent Investigation Group (MIIT) which is another layer of integrity provided on top of the system that the IOC has recommended. We have gone further in this space and are extremely proud of the work we have done here. Needless to say, whenever we rely on the 'human factor', questions can always be raised; when and where do we trust our people, who have indeed gone through a really thorough vetting regime.

- 3.7.1 *On site R&Js draw is a key element of the integrity of the competition process; extraordinary changes prior to the start of the competition may only be undertaken under certain pre-defined criteria. The IBA's rules allowed such extraordinary changes requests but without defining the criteria. As a consequence, the lack of pre-defined criteria could give the Draw Commissioner the opportunity to submit unjustified extraordinary change requests, influencing the R&Js draw sheet and potentially the outcome of the bout.*

IBA Reply:

In this regard, IBA has an extensive pre-defined criteria that is applied to the draw. Part of





those were transferred from Swiss Timing, with the remainder being extensively supported by onsite relationships, and further support from academics who understand many geo-political anxieties that may impact on relationships amongst the TOs. We understand the wider scoping requirements, as not all filters applied are generic to each event. Again, we highlight the point above in relation to the extensive pre-vetting requirements that are supported by McLaren Independent Investigation Group (MIIT) in ensuring that we have the right people within the field of play.

3.7.2 IBA's rules do not define the procedure to (re)allocate a new referee or judge in case of extraordinary change. As a consequence, the Draw Commissioner could be able to allocate the positions according to own preferences or other considerations that can potentially risk the integrity of the draw sheet and, as such, the outcome of the bout.

IBA Reply:

At what point do we allow human factor to influence the decisions made within the FOP? The process is clear, and SportData run an extremely robust process in support of the draw, and indeed the removal of any R&J due to extra ordinary reasons, continental parity, the number of bouts he or she has been part of prior, or any natural conflict of interest. This coupled with the oversight of a pre-vetted Draw Commissioner, supported by a second and third party, and signed off by the Technical Delegate, ensures that there a significant number of people involved, who are held in high regard, with a robust vetting check process behind them. Please note, that all changes are recorded, and reasons given as to why, especially where human factor is a key contributor.

3.7.3 IBA's rules do not provide a second Judge Evaluator or an Observer as a comparison for the Judge Evaluator's performance, as such comparison would minimize the risk of underperformance by the Judge Evaluator officiating on the bout; thus, this creates a risk of attempt to the objectivity and the independence of the evaluation of the judges.





IBA Reply:

All Evaluators and Observers are appointed on individual expertise and performance throughout the season. The events are not isolated, and only those who have performed exceptionally are appointed to the World Championships. We are also in a position to bring in 5 (five) evaluators and 3 (three) observers in order to minimize fatigue and any general lapse of concentration.

3.7.4 *Sanctions and suspensions for underperforming R&Js are essential for the efficiency of the process. There are no provisions in IBA's Rules regarding any measures in case of underperformance, at least in the Rules which are publicly available and accessible for all the athletes' team. This could question IBA's real willingness to set up a robust process and to effectively implement its rules.*

IBA Reply:

IBA has a firm sanction process in place, which is annotated within the respective evaluation forms and Rule 25 *per se*. Once a referee or judge is sanctioned, they are subject to removal from a session, or 2 (two) sessions, or indeed the whole event. The system is in place, but of course we always see different situations in every tournament. In relation to the Women's World Championships; we had an extra ordinary situation whereby the referee made a disastrous mistake by stopping a boxer through Referee Stops Contest. This decision was evaluated and agreed that this R&J should immediately not take part within the remainder of the tournament. The official was returned home, and the decision was communicated to all athletes as a matter of courtesy and indeed transparency. The respective R&J will now undergo a 12-month monitoring process, to be undertaken by the IBA R&J Committee. This is one example that demonstrates our willingness to ensure that we have adopted and adapted our sanctioning processes.

3.7.5 *The conditions under which a bout review could be initiated seem inconsistent as there are different rules (IBA Technical and Competitions Rules - Rule 20.2.1, Rule 20.4.3 and Rule 20.5.1) and there is no indication as to which rule applies in which case. This uncertainty and potential contradiction could pose a risk to the integrity of the bout review process as the rules and roles remain unclear and could be applied inconsistently by the respective boxing officials. Similarly, it is unclear what the consequences could be if the Observer and the Judge Evaluator disagree on a bout result.*

IBA Reply:

Regarding Rule 20 and the Bout Review 22; we have communicated the process out to all NFs, which has been received extremely well. The review remains work in progress, and we continue to develop and to re-word as we move forward. The system again has been improved for the IBA Men's World Championships took place in Tashkent towards the back end of April, early May 2023. Please refer to the Technical and Competition Rules that can be found located here. IBA continues to work hard with our respective key stakeholders. Notably SportData has commended the work we have done here; this organization also works alongside other International Federations. We have also received good feedback from Prof. McLaren, who





have been following this process for some time. We are content to share this report and its findings which are related particularly to the bout review. On a final note, with the comments regarding 'the consequences if the Observer and the Judge Evaluator disagree on a bout result' - the process here is quite simple, the result remains, with no change to the decision that was made by the 5 (five) judges.

3.7.6 *From the Rules it is neither part of the Referee Evaluator's (Rule 30.3) nor the Observer's duty (Rule 35.3) to score the bouts. Rule 20.2.3 defines that the bout review must be concluded within 5 minutes after its activation. Within such a short timeframe, it seems unlikely that the Referee Evaluator or the Observer would have time to re-watch the bout in order to individually score each round, before making their decision. As a consequence, there is a risk for the integrity of the bout's outcome if the Referee Evaluator or the Observer must decide on the outcome of the bout without having both previously scored each round during the bout (Rule 20.6.1) and without having had enough time to review the bout. Such sequence of rules in practice may allow two non-randomly appointed officials to overrule the collective score of the 5 randomly appointed judges.*

IBA Reply:

The rules have been significantly updated to reflect the scoring of both the Observer and Evaluators respectively; we continue in the 'work in progress' space as already alluded, and indeed looking forward to an even better product in Tashkent.

Regarding the 5-minute activation; the process for review works in real time, as the bout is occurring, so what happens on conclusion of the bout can be immediately decided. There is no requirement to re-watch the bout in this case. The same principle applies for the referee, if an incident occurs that would warrant a change of circumstance during the bout; this has also been refreshed in the Technical and Competition rules. More so the 5 (five) minutes is required to assess the decision regarding the referees' actions.

The beauty of the new bout review is that the decision is instant, therefore no requirement to take any result in to the 'back of house' to discuss the decision. In fact, this process that was in place previously opens up further opportunity to overrule a result, with more officials involved during this process.

Reply to Newly arisen aspects

- 1 *Following IOC's repeated concerns regarding IBA's capacity to execute a transparent and fair boxing qualification system (IOC letters to IBA dated 12 April 2022 and 10 May 2022), on 24 June 2022, the IOC Executive Board decided, in the interest of the athletes and the boxing community, that the boxing qualifying events and the boxing competitions at the Olympic Games Paris 2024 would not be run under the authority of IBA but the IOC. This decision, notified to IBA in a letter on the same date, was never contested. As a follow-up to this decision, the IOC determined the qualification process (letters dated 8 September 2022 and 6 December 2022), which IBA also did not contest.*





IBA Reply:

With regret, IBA admits that on 24 June 2022, the IOC unilaterally decided to conduct qualifying events and the boxing competitions at the Olympic Games Paris 2024 without participation of IBA, that itself created a problematic situation in boxing (Exhibit 8: Letter from IOC to IBA on 24 June 2022). Before 24 June 2022, and afterwards, IBA conducted a lot of successful events, which demonstrates a mistake of the IOC.

On the contrary, the IOC faces with significant problems with its qualifying events, in particular:

- African Games, being initial part of qualifyings, postponed until 2024 (**Exhibit 37: Press release on Insidethegames on 24 February 2023 (African Games)**);
- European Games, still being the part of qualifyings, will be held without Russian and Belarus athletes, despite the IOC approach to admit these athletes to compete at the Olympics in neutral status under several conditions applied (**Exhibit 38: Press release on Insidethegames on 4 April 2023 (European Games)**).

However, IBA is still ready to help the IOC and to provide its well-organized and well-structured competition system to the IOC as a part of the qualifying events.

2 *Despite the above, on 20 February 2023 IBA announced its own qualification system for the Olympic Games Paris 2024, which were completely different from the one previously published by the IOC. Such decision by IBA created confusion within the boxing community at large regarding the Olympic qualifications.*

IBA Reply:

IBA disagrees with this statement, because the IOC was not very clear on the whole qualification process. The IOC announced the events, but failed to properly inform boxers on quotas, categories, qualification for the multi-games events. For example, there are 350 quotas for the European Games, however it is not clear how many in each category. It goes the same for the Asian Games there are 8 male and 5 female categories, which is inconsistent with the Olympic categories of 7 and 6. Furthermore some events require qualification like the Pan-Am games and others do not. African Games were postponed giving further uncertainty in the whole qualification process. IBA took the decision to give some clarity to the process and believes that the two major events in 2023 (male and female WCH) should have been considered for the qualification period. Currently, IBA is fulfilling what was requested when the Olympic Qualifying System (“OQS”) was approved especially with the number of events and continental distribution of events equally in the world. IOC approved this OQS and then excluded IBA completely. There should have been at least consultation with the IBA even if BTF was appointed to run the official qualifications for Paris 2024.

IBA has also been concerned regarding the standard of the qualifying events, to include the recent announcement that both Russian and Belarusian athletes will no longer be allowed to





take part in the European Games. IBA remains open in support of all athletes, regardless of the political anxieties that we currently face in the world.

The OQS must be addressed, which has a continued impact on the boxers right now – lack of clarity or direction.

- 3 *Along the same lines, in a second letter to the boxing national federations dated 10 March 2023, pursuant to IBA's newly approved "IBA Technical & Competitions Rules", IBA reminded that the national federations, teams, individual boxers and competition officials are prohibited to participate in international competitions which are not owned, sanctioned or approved in advance by IBA, such as the Olympic Games Paris 2024.*

IBA Reply:

IBA is simply protecting their investment and know-how given that there has been no clarity on how the Paris 2024 Boxing Unit ("PBU") will select officials. The IOC surpassed IBA completely and contacted the officials without prior agreement of data sharing between the two entities (**Exhibit 39: Email from Paris 2024 Boxing Unit to IBA Officials on 15 March 2023**). There are real reasons for concern because of these breaches of GDPR and mutual respect as well as violation of the confidential agreement signed between the Parties in 2019, which was already referred to in Letter sent by IBA to IOC on 20 March 2023 (**Exhibit 41: First Letter from IBA to IOC on 20 March 2023**). A consultation with IBA would have solved this issue. The selection process of the IBA with additional vetting (exemplary and unique to the world of sport, but also very costly) has led us to establishing a very thorough database of track record and vetting on all officials. This is an IP of IBA and it cannot be used by whoever and whenever. These violations committed by IOC are really severe in a relationship between sport shareholders and IBA refers all its right in this respect.

As mentioned above, IBA should have been consulted in the first instance, prior to sending out any invitation for consideration letters to the Technical Officials. The point raised here is the issues pertaining to emails that have been sent directly to high-risk officials, along with those who were present in Rio. IBA has spent a lot of time working within the integrity space, working hard to manage all aspects in ensuring those who are assessed as high-risk, are completely removed from any form of competition. We pride ourselves on the work that we have completed here, only to be disappointed that officials have been asked to fill out a form for potential selection to Paris 2024 – this does not make any sense and goes completely against what the IOC asked IBA to do in the first instance; to remove all manipulation and corruption.

- 4 *These recent communications by IBA, are not only inconsistent with the IOC Executive Board's decision applicable to IBA but may even jeopardise the IOC's ability to organise the Olympic boxing tournament in Paris 2024 as provided in such decision.*





IBA Reply:

On 7 April 2023, IBA requested the IOC to specify which rules and decisions have been violated by IBA (Exhibit 16: Letter from IBA to IOC on 7 April 2023), however, no clear explanations were given by the IOC in its reply of 12 April 2023 (Exhibit 17: Letter from IOC to IBA on 12 April 2023).

At this moment there is still no understanding, which concrete the IOC Executive Board's decision IBA does not follow or respect.

IBA does not have intent to jeopardise the IOC's ability to organise the Olympic boxing tournament in Paris 2024, however, IBA being the international sports federation wishes to be heard and to be equally treated.

Only this year IBA offered many times to enter into dialogue, however, all these requests have been disrespectfully ignored:

- 3 March 2023: *"In order to redress the situation and in the context of the request by IOC for the above-mentioned documents, I would like to request an in-person meeting with the IOC Sports Director, Mr Kit McConnell, at his earliest convenience but not later than 10 March 2023 as I will be attending the IBA Women's World Championships in India. The IBA believes that in order to reinstate the boxing in Olympic family, our organizations shall closely work together on a daily basis rather than just to exchange written correspondence"* (Exhibit 29: Letter from IBA to IOC on 3 March 2023);
- 16 March 2023: *"In any case let me note that the constant exchange of letters does not render any substantial service to a solution but instead reinforces mistrust, suspicion and scepticism between the parties involved. If the IOC really wants a solution for the benefit of the athletes, the sport, and the Olympic Games product, this can only be achieved through live communications. That is why I am resubmitting my request for an immediate meeting where we will frankly discuss the points where there are issues and give the best possible solutions"* (Exhibit 40: Letter from IBA to IOC on 16 March 2023);
- 20 March 2023: *"Considering the information that has recently come to light, and the seriousness of the situation, we kindly ask that Prof. Richard McLaren (authorised by IBA) act as in intermediary for an in- person meeting given the severity of the situation. We thank you in advance for your understanding and Prof. McLaren will be in contact shortly to arrange an in-person meeting"* (Exhibit 41: First Letter from IBA to IOC on 20 March 2023);
- 20 March 2023: *"With that said, it would be in the best interest of all parties involved that you make yourself available for a call from Professor McLaren on 21 March 2023 and we request you to provide us with a formal reply to this letter sent today 20/3/2023 at 08.27 (Swiss time) , by 21 March 2023 23:59 CET"* (Exhibit 42: Second Letter from IBA to IOC on 20 March 2023);
- 27 March 2023: *"On numerous occasions, the IBA had requested Ms Zappelli and the IOC Sports Mr Kit McConnell to convene a meeting, have open discussions, or to liaise*





with our appointed mediator - Professor McLaren, unfortunately, all of them were rejected or remain unanswered until today” (Exhibit 36: Letter from IBA to IOC on 27 March 2023);

- 11 April 2023: *“I would like to propose an in-person meeting with you in mid-April at a convenient date and time to discuss a joint approach to finding a solution to the above” (Exhibit 43: Letter from IBA to IOC on 11 April 2023).*

IBA as the governing organization of boxing does not deserve such ignorance as Paris 2024 marks the 120th year of boxing’s participation in the Olympic Games.

We always showed the willingness to collaborate with the BTF/PBU/IOC in a fair way. However, the IOC has kept IBA in the dark very much since the announcement of 24 June 2022. IBA invested heavily in the development of the officials and new rules and regulations and naturally wants to protect its investment. IBA seeks acknowledgment of the extraordinary work done under the new management and requests a collaboration with the IOC/PBU for Paris in order to have the event run at the highest level. Without this collaboration IBA has no certainty that the standard of organization, execution and officiating will be good enough for our athletes and officials.

As a kind reminder to the IOC, IBA (AIBA at the time) received numerous complaints about the organization and officiating at the Tokyo 2020 OG. IBA got the blame for the shortcomings of this event even if there was no involvement of the federation, because it was not clear to stakeholders that a task force was running the sport of boxing at the Tokyo Games. We need to make sure this does not happen again in Paris and IBA has an input this time.

We have worked closely with the IOC Sports Department, discussing a number of ways forward, to exchange ideas, to understand the value of shared working and collaboration. We worked extremely closely with the final iteration of the OQS, until such time as the announcement was made that the IOC removed the opportunity for IBA to work alongside the IOC for Paris 2024. Very little dialogue, having spent months working together for the good and betterment of boxing, and all those who support the sport.

IBA continues to remain open and will be happy to support Paris 2024 should the IOC reopen the doors and allow the expertise already in place to support our athletes.

Conclusion

Considering all the above, we can conclude that IBA made significant progress within last years. There are still ongoing reforms and a lot of work to do to improve the boxing family’s culture, but withdrawal of the IBA’s full recognition by the IOC will be not justified, fair and legally correct decision.

We call on the IOC members to hear our arguments, note our progress and make a fair decision about the future of boxing.





Yours sincerely,

.....
Umar Kremlev
President
International Boxing Association (IBA)

.....
George Yerolimpos
Secretary General and CEO
International Boxing Association (IBA)

