

**Hong Kong, China Tennis Association**  
**Code of Conduct**  
**(Revised as of May 21, 2024)**

The Hong Kong, China Tennis Association (“HKCTA” or “the Association”) is fully committed to the principle of honesty, integrity and fair play in the conduct of its business, including selection of athletes for competitions, management of coaches and umpires, administration of membership and general administration, such as procurement and staff administration. In addition, the Association seek to protect the privacy, health, safety and well-being of all stakeholders who participate in the activities of the Association, including those activities delivered by affiliated individuals, organizations and clubs, or are otherwise involved in the Association’s affairs.

**I. Personal Conduct of Agents**

To uphold public trust and protect public interest, it is important for all Council and Committee Members to handle the Association’s business in a just and impartial manner so that the Association’s reputation will not be tarnished by dishonesty, impropriety or corruption. To this end, the Code of Conduct sets out the standard of behaviour expected of all Council Members and Committee Members. This Code also sets out the basic standard of conduct expected of full time and part time employees as well as consultants of the Association and any of its subsidiaries (collectively, “staff members”), and our policy on acceptance of advantage and conflict of interest in connection with one’s official duties.

**Bribery, Illegal Gifts and Other Advantages**

*Prevention of Bribery Ordinance*

1. Any Agents, defined to be Council Members, Committee Members, staff members of the Association and its subsidiaries, soliciting or accepting an advantage as a reward or inducement for doing any act or showing favor in connection with his/her duties without the prior written permission of the Association, may have committed an offence under the Prevention of Bribery Ordinance (Cap 201, Laws of Hong Kong) (“PBO”). All Agents are expected to be in full compliance with applicable laws, including PBO, at all times.
2. In addition to the requirements under the PBO, any Agents involved in the selection of and purchase from suppliers and contractors should avoid misuse of authority and not engage in situations which could interfere, or appear to interfere, with their ability to make free and independent decisions regarding purchases and procurement.
3. It is also an offence under the PBO for any staff member to use any document containing false information with the intent to deceive his/her principal. Staff members should therefore ensure, to the best of their knowledge, that any record, receipt, account or other document they submit to the Association gives a true representation of the events or transactions reported in the document.
4. “Advantage” shall have the meanings defined in the PBO from time to time, and such term is currently defined in the PBO to include:

- a. any gift, loan, fee, reward, or commission consisting of money or of any valuable security or of other property of any description;
- b. any office, employment or contract;
- c. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d. any other service, or favor, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted;
- e. the exercise or forbearance from the exercise of any right or any power or duty and
- f. any offer, undertaking or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs (a), (b), (c), (d) and (e).

### ***Soliciting and Accepting Advantages***

5. It is the policy of the Association to prohibit its Agents to solicit or accept any advantage, except those mentioned under paragraphs 6 and 10, from any members, suppliers, athletes, parents, coaches or other persons in connection with the Agents' obligations and duties as Agent and/or the Association's business.

### ***Acceptance of Advantages***

#### **Staff Members**

6. Staff members may only accept but not solicit the following advantages when offered on a voluntarily basis:
  - a. advertising or promotional gifts or souvenirs of a nominal value;
  - b. gift or lucky money given during festive occasions and the value does not exceed HK\$500;
  - c. discounts or other special offers from any person or company, on terms and conditions applicable to other customers generally;
  - d. gifts or souvenirs presented to the staff member acting on behalf of the Association in official functions.

No staff member shall, in his/her private capacity, accept any advantage from a subordinate.

7. Gifts or souvenirs in paragraph 6(d) are deemed as offered to the Association, and should only be retained by the staff member with the express permission from the Chief Executive Officer ("CEO") or the Chief Operating Officer ("COO") of the HKCTA. Staff member wishes to accept any other advantages not listed in paragraph 6 should specify the item in Form C when seeking permission from the CEO or the COO.

#### **Council and Committee Members**

8. Council and Committee Members may only accept advantages if :

the advantages fall into the following categories:

- a. advertising or promotional gifts or souvenirs of a nominal value;
  - b. gift or lucky money given during festive occasions and the value does not exceed HK\$500;
  - c. discounts or other special offers from any person or company, on terms and conditions applicable to other customers generally;
  - d. gifts or souvenirs presented to the staff member acting on behalf of the Association in official functions
9. Council and Committee Members shall not misuse their official capacity as such to gain benefit for themselves or others, or render favor to any person/organization (other than the Association).
10. Council or Committee Members should declare all gifts/souvenirs received in their official capacity by filling out the Gifts Declaration Form (Form B) and only accept gifts/souvenirs allowed under Clause 8 above, and should forward the gifts/souvenirs to the Executive Committee for disposal in the following manner:
- e. If the gift/souvenir is of perishable nature (e.g. food or drink, etc.), it may be shared among Council or Committee Members and staff on a suitable occasion, or donated to another charitable organization;
  - f. If the gift/souvenir is a useful item, it may be donated to and retained and used by the Association, or donated to another charitable organization;
  - g. If the gift/souvenir to Council or Committee Members is donated to the Association and is suitable for display (e.g. a painting, vase, etc), it may be displayed at appropriate locations of the Association's office or premises;
  - h. If the gift/souvenir has a value below HK\$1,000, it may be donated as a prize in functions organized by the Association.
  - i. If the gift/souvenir is a personal item with a value below HK\$500, such as a plaque or pen inscribed with the name of the recipient, it may be retained by the recipient.
  - j. If the gift/souvenir is distributed to all participants in public activities, such as a ball pen, file folder or key clasp, etc, it may be retained by the recipient

In case of doubt, the recipient should refer the matter to the COO of the HKCTA for advice and instructions.

### ***Offering Advantages***

11. Under no circumstances may an Agent offer advantages (as defined in the PBO) to any person or organization for the purpose of influencing such person or organization, or any public official, whether directly or indirectly, in conducting the Association's business, in breach of the PBO.

### **Handling of Conflict of Interest Situations**

12. Conflict of interest situations arise when the private interests of Agents compete or conflict with the interests of the Association. Such situations at best can lead to divided loyalty and at worst can result in corruption or other questionable practices.

Private interests includes both financial and personal interests of the Agents and those of his/her connections including family and other relations, personal friends, the clubs and societies to which he/she belongs, companies in which he/she or his/her immediate family members hold a voting power of 10 percent or more or he/she or his/her immediate family members serve as a director or senior management in the past 12 months, and any person to whom he/she owes a favor or obligated in any way.

13. Every Agent of the Association should take it as his/her personal responsibility to avoid engaging in situations that may lead to or involve in conflict of interest. He/she should at all times ensure that his/her dealings with members, suppliers, contractors or other related personnel do not place him/her in position of obligation that may lead to a conflict of interest. In cases where an Agent, his/her immediate family, and/or companies in which such Agent, or his/her immediate family members control 10% or more of the voting powers, or in which such Agent or his/her immediate family serve as a director or senior management, might have engaged considered engaged in business, investments or activities that might have existing or potential conflict with the Association interests, it is the responsibility of the Agent to make full disclosure in writing by filling out the Conflict of Interest Declaration Form (Form A or Form B, as applicable), and submitting to the Executive Committee, the CEO and the COO. Coaches hired by the HKCTA must make full disclosure of all of their private lesson engagements by filling out Form D. In the event where coaches, hitters or other independent contractors hired by the HKCTA for tennis training programs have family or other relationship with the players of the training programs, such coaches, hitters or independent contractors, as the case may be, must make full disclosure of such relationship to the HKCTA.

#### **Guidelines on Declaration of Interests by Council and Committee Members**

14. When Council or Committee Members have an actual, perceived or potential conflict of interest in any matter under consideration by the Association, he/she should, as soon as practicable after he/she becomes aware of it, make a declaration to the COO using a Form A. The basic principle to be observed is that Council or Committee Members' advice should be disinterested and impartial and it is the responsibility of each Council or Committee Member to judge and decide if the situation warrants a declaration, and to seek a ruling from the Executive Committee in case of doubt.
15. It is impossible to define or describe all the situations that would call for such a declaration, because each individual case differs, and because of the difficulty of catering for unusual and unforeseen circumstances. On the other hand, it is not intended that a Council or Committee Member should make a declaration of interest simply because the Council is considering a matter in which he/she has knowledge or experience.
16. Potential conflict of interest situations include, but are not limited to, the followings:
  - a. Pecuniary interests in a matter under consideration by the Council/Committee, held by either the Council or Committee Member or his/her family of the same household, or companies in which such Council or Committee Member or

- his/her immediate family members control 10% or more of the voting power, or in which such Council or Committee Member, or his/her immediate family members serve as a director or senior management in the past 12 months;
- b. A directorship, partnership, advisory or client relationship, employment or other significant connection with a company, firm, club, association, union or other organization which is connected with, or the subject of, a matter under consideration by the Council/Committee. For example, the Council/Committee Member is a partner in a company bidding for the Association's service contract;
  - c. Some friendships or acquaintances which might be so close as to warrant declaration in order to avoid the situations where an objective observer may believe that a Council or Committee Member's advice has been influenced by the closeness of the association. For example, one of the players under consideration for selection to a tournament is the son/daughter of the Council/Committee Member's close friend;
  - d. Member who, as a barrister, solicitor, accountant or other professional adviser, has personally or as a member of a company, advised or represented or had frequent dealings with any person or body connected with a matter being considered by the Council/Committee; and
  - e. Any interest likely to lead an objective observer to believe that the Council or Committee Member's advice may have been motivated by personal interest rather than a duty to give impartial advice.

#### **Declaration of Interests at Meetings**

- 17. If a Council or Committee Members has any direct personal or pecuniary interest in any matter under consideration by the Council, he/she must, as soon as practicable after he/she has become aware of it, disclose to the President/Chairman (or the Council/Committee) prior to the discussion of the item.
- 18. The President/Chairman (or the Council/Committee) shall decide whether the Member disclosing an interest may speak or vote on the matter, may remain in the meeting as an observer, or should withdraw from the meeting.
- 19. If the President/Chairman declares an interest in a matter under consideration, his/her presidency/chairmanship may be temporarily taken over by the Vice-President/Vice-Chairman, or a Member appointed by a majority of votes if the Vice President/Vice-Chairman is not present.
- 20. When a known direct pecuniary interest exists, the Secretary may withhold circulation of relevant papers to the Member concerned. Where a Member is in receipt of a paper for discussion which he/she knows presents a direct conflict of interest, he/she should immediately inform the Secretary and return the paper.
- 21. All cases of declaration of interests shall be recorded in the minutes of meeting.

#### **Guidelines on Managing Possible Conflict of Interest Arising from Council or Committee Members Bidding for Contracts of the Association**

22. When the need for a business contract, whether for the provision of goods or services, is discussed, Council or Committee Members should be asked at the outset to declare whether they or their immediate family or any companies associated with them are interested in bidding for the contract. The Council or Committee Members who have declared an interest to bid should not take part or be present at any subsequent discussions or meetings concerning the proposed contract, and should be prohibited from access to any information in relation to the contract (other than in the capacity of a bidder).
23. If the Council or Committee Members have not declared an interest to bid in the business contract on behalf of themselves, their immediate family or their associated companies pursuant to Clause 22 above, such Council or Committee Members, their immediate family and/or associated companies should not be allowed to bid and will be excluded from the bidding of such business contract.
24. When a Council or Committee Member (or his/her immediate family or a company associated with him/her) has expressed an interest to bid, the Association should ascertain whether any information relating to the contract has already come to the possession of the Council or Committee Member in the course of his/her duties as a Council or Committee Member. If so, such information should be made available to other bidders as well to ensure a level playing field.
25. If a Council or Committee Member (or his/her immediate family or a company associated with him/her) has put in a bid, care should be taken to ensure that he/she subsequently has no access to the submitted tender documents which may contain commercially sensitive information.
26. Bidders' identities should be anonymised before the evaluation of bids if a Council or Committee Member (or his/her immediate family or a company associated with him/her) is one of the bidders.
27. If a Council or Committee Member (or his/her immediate family or a company associated with him/her) is successful in bidding for the contract, he/she should withdraw from all discussions at the Council or Committee meetings relating to the contract, except when attending in the capacity of a supplier or a service-provider.
28. The fact of any Council or Committee Member (or his/her immediate family or a company associated with him/her) being awarded a business contract of the Association will be published in the Association's website and annual report for public information where practicable if the value of the business contract exceeds HK\$500,000.
29. For any award of business contract that does not involve a bidding/tendering process under the Procurement Policy of the Association where a Council or Committee Members (or his/her immediate family or a company associated with him/her) is considered as a potential supplier or service-provider, the relevant Council or Committee Member should not take part or be present at any discussions or meetings concerning the decision of awarding such proposed contract, and should be prohibited from access to any information in relation to such decision.

30. All Agents involved in the selection of suppliers or service-providers for the Association shall strictly comply with the Procurement Policy of the Association.

### **Guidelines on Declaration of Interests by Staff**

31. Staff members should avoid any conflict of interest situation (i.e. situation where their private interest conflicts with the interest of the Association) or the perception of such conflicts. They should not misuse their position or authority in the Association to pursue their own private interests. Private interest includes both financial and personal interests of the staff member and those of his/her connections including family and other relations, personal friends, the clubs and societies to which he/she belongs, companies in which he/she or his/her immediate family members hold a voting power of 10 percent or more or he/she or his/her immediate family members serve as a director or senior management in the past 12 months, and any person to whom he/she owes a favor or obligated in any way. When actual or potential conflict of interest arises, the staff member should make a declaration to the CEO and COO by filling out Form B. Failure to do so may give rise to criticism of favoritism, abuse of authority or even allegation of corruption.
32. Some common examples of conflict of interest situations are described below, but they are by no means exhaustive:
  - a. A staff member involved in a procurement process is closely related to or has beneficial interest in a supplier being considered by the Association;
  - b. One of the candidates under consideration in a recruitment or promotion exercise is a family member, a relative or a close personal friend of the staff member responsible for the exercise;
  - c. A staff member (full-time or part-time) undertaking part-time work with a contractor whom he/she is responsible for monitoring;
  - d. A coach (full-time or part time) participating in the team or player selection process exercises influence to benefit his or her students who engage such coach for private lessons.

### **Entertainment**

33. Although entertainment is an acceptable form of business and social behaviour, Agents should avoid accepting invitations to meals or entertainment that are excessive in nature or frequent, so as to avoid embarrassment or loss of objectivity when conducting the Association's business. In particular, Agents should not accept excessive or frequent entertainment from persons/organizations who/which have an interest in any matters under consideration by the Association, or which/whom they have official dealings, or from their subordinates to avoid placing themselves in a position of obligation to the offeror.

### **Confidentiality and Use of Proprietary Information**

34. Agents are not allowed at any time to disclose any confidential, proprietary or privileged information obtained or derived from their capacities as Agents to anybody outside the Association without prior written permission from the Council or misuse any such information. Those who have access to or in control of such

information should at all times ensure its security and prevent any abuse, unauthorized disclosure or misuse of the information. Such information may relate to all aspects of the Association's operation and strategies such as training of athletes, financial planning, personal data of member and athletes, etc. [Special care should be taken when handling any personal data to ensure compliance with the Personal Data (Privacy) Ordinance (Cap 486) and the Association's Data Privacy Policy.]

35. Agents shall not take advantage of, or let any person or organization benefit from, the confidential, proprietary or privileged information obtained in their capacity as Agents. Under no circumstances are they permitted to use the Association's proprietary information for their own private gains.

### **Misuse of the Association Assets and Resources**

36. Appropriation of the Association properties, including sports facilities by Agents for personal use or for resale is a crime of theft and renders the person concerned liable to disqualification/dismissal and prosecution.
37. Computers, computer files, the e-mail system, internet access and the software furnished to Agents and all information derived from the performance of such Agents' duties in their capacities are properties of the Association, and are to be used for business purpose of the Association only. They are not intended for personal use such as to communicate with friends or family. All proprietary information or files obtained or derived from the performance of Agents' duties should be uploaded to the central server of the Association. At the end of the engagement or employment of Agents, such Agents shall return to the Association all computers and proprietary information or files obtained or derived from such Agents' capacities.
38. The Association specifically prohibits the use of computers (including internet access) , e-mail or social media by Agents in ways that are disruptive, offensive or harmful to others, including sexually explicit messages, images and cartoons, ethnic slurs, racial comments, off-color jokes or anything that can be construed as harassment or disrespect or others, defames or slanders others, or otherwise harms another person or business. Agents must comply with the Social Media Policy below.
39. Staff members using WhatsApp, WeChat, instant messages or other external communications systems or platforms to communicate with external parties on the Association's businesses or matters shall save a copy of such communication on the central server of the Association.
40. Staff members may not access the internet to log onto any websites with contents that are for gambling purpose, pornographic or are sexually explicit in nature. Staff members may not use computers, the e-mail system or social media platform of the Association for preaching/solicitation purposes, or communications that are of politically sensitive or discriminatory in nature. E-mail, internet and social media access should be used in such a way that all transmissions, whether internal or external, are appropriate, ethical and lawful.



41. Illegal duplication of software, sharing of software, or acts of copyrights violations are strictly prohibited. Staff members should not access or attempt to access files that are not granted authority.
42. Computer, internet and e-mail usage may be monitored and it is possible that emails, messages and computer files be retrieved .
43. Staff members should immediately notify their supervisor or manager for any violations of the above provisions regarding misuse of the Association Assets and Resources and the Social Media Policy, and those found guilty of the offence will be subject to disciplinary action including termination of employment.
44. It will be the sole responsibility of the staff members for any infringement claims if such staff members use any software without appropriate license or authorisation.

### **Social Media Policy**

45. This Social Media Policy of the Association seeks to protect the privacy, health, safety and well-being of all stakeholders who participate in the activities of the Association, including those activities delivered by affiliated individuals, organizations and clubs. In addition, this Social Media Policy aims to ensure the Association's brand is represented in a positive light and to protect the intellectual property of the Association.
46. Stakeholders include Agents, contractors, players, parents and guardians of junior players, as well as sponsors and any affiliated individuals, organizations, clubs and companies.
47. Social Media refers to any interactive website or technology made available from time to time that enables a person to communicate and/or share content via internet. Social Media includes, but is not limited to:
  - (a) social networking sites (e.g. Facebook, Snapchat, Telegram, LinkedIn and Yammer);
  - (b) video and photo sharing platforms (e.g. YouTube, Instagram, TikTok, Xiaohongshu, Vimeo, Flickr and Pinterest)
  - (c) blogs, micro-blogging and activity stream sites (e.g. Tumblr, WordPress, Twitter, LIHKG and Reddit);
  - (d) online collaborative editing websites (e.g. Wikipedia, Google Docs);
  - (e) podcasting (e.g. iTunes, Spotify and SoundCloud);
  - (f) virtual communities;
  - (g) online dating apps;
  - (h) online gaming networks and platforms (e.g. Discord and Twitch);
  - (i) any other platform, application or forum which might be classified reasonably as social media as the term is generally understood; and
  - (j) any other forum available for public comment (including discussion boards, private web forums or review sites). This policy will continue to evolve as new technologies and more social networking tools become available.

48. As guiding principles:

- (a) All stakeholders have a responsibility to promote online e-safety and behave on Social Media with respect and integrity. Just as in the face-to-face world, any conduct in breach of the responsibilities and expectations set out in this Social Media Policy may jeopardize the Association's commitment to ensuring a safe, welcoming and inclusive environment, and cause harm to others. All stakeholders should comply with this Social Media Policy to strive to create the sort of community on Social Media that they want to work, live and engage with others.
- (b) In instances where stakeholders are unsure as to whether or not the content they wish to share on Social Media is appropriate, they shall seek advice from legal or other professional advisers before doing so, or in the interest of erring on the safe side, refrain from sharing the content.
- (c) The internet and Social Media is not anonymous. All stakeholders should assume that anything they post, create, link, write or say online and on Social Media can be traced back to them.
- (d) Due to the nature of Social Media, the boundaries between individual's professional and personal life can often be blurred online. All stakeholders must respect the Association, its events, activities, and other members of the tennis community and ensure the Association, its stakeholders, and/or the sport generally is/are not brought into disrepute.
- (e) All stakeholders should be diligent about protecting themselves and their privacy when engaging on Social Media. Accordingly, all stakeholders should report any harmful content on Social Media and/or breaches of this Social Media Policy, and check Social Media privacy settings.

49. Scope

- (a) This Social Media Policy protects all stakeholders including:
  - i. Agents;
  - ii. Player participants of HKSI, HKCTA NTS and ED training programs;
  - iii. Players competing in tournaments, competitions, and events conducted or hosted by HKCTA or its affiliates;
  - iv. Players representing HKCTA as an individual player or as part of a team; and
  - v. Spectators, parents and player support team.
- (b) Staff members will be required to pledge compliance with this Social Media Policy as part of employment contracts.
- (c) Players will be required to pledge compliance with this Social Media Policy through the appropriate Codes of Conduct.
- (d) Parents and players will receive professional development through parent/player information sessions.
- (e) Coaches and other staffs will receive professional development through formal orientation and induction sessions.

50. Compliance with the Social Media Policy.

- (a) When using Social Media, all stakeholders must not:

- i. post, create, share or link to content that is, or has the intention to be, threatening, illegal, aggressive, abusive, profane, obscene, intimidating, sexually explicit, hateful, racist, sexist, discriminatory or otherwise inappropriate;
  - ii. exploit platforms to harass, bully, abuse or threaten any other person, including HKCTA staff, players, officials or coaches of HKCTA;
  - iii. exploit platforms to seduce, groom or inappropriately engage with children;
  - iv. expose others to content that is offensive, inappropriate, obscene, insulting, provocative or hateful including in relation to HKCTA, its staff, players, officials or coaches of HKCTA;
  - v. impersonate or falsely represent any other person;
  - vi. post inaccurate, misleading, deceptive or fraudulent content;
  - vii. make defamatory comments or posts;
  - viii. post material that infringes the intellectual property rights of HKCTA or others or breaks any other law including privacy, defamation or harassment;
  - ix. post content that interferes with the conduct of any event run by HKCTA or with the roles and responsibilities of HKCTA;
  - x. post content that violates security measures instituted at HKCTA or content of contractual agreements to which HKCTA is a party;
  - xi. comment in a way that may harm the reputation of HKCTA or its stakeholders;
  - xii. use Social Media platforms as a forum for disputes or grievances on any matter related to HKCTA, its staff, players, officials or coaches;
  - xiii. use HKCTA or its brands to endorse or promote any product or service, opinion or cause;
  - xiv. use videos or images of others without express prior permission;
  - xv. bring HKCTA or the sport into disrepute or otherwise compromise the effectiveness of HKCTA; and/or
  - xvi. post or share any material that is a breach of any law or policies of HKCTA.
- (b) No stakeholder may speak on behalf of HKCTA on his/her personal social media posting without prior express permission of HKCTA.
  - (c) No stakeholder may post confidential or proprietary HKCTA information on a social media posting.
  - (d) No stakeholder may post the names of HKCTA, its sponsors, affiliated clubs, individuals, organizations, employees, vendors, or partners on a social media posting without express prior permission.
  - (e) No stakeholder may use HKCTA logos or trademarks on social media postings or reproduce HKCTA materials without obtaining written permission from the CEO of HKCTA.
  - (f) Agents and other key stakeholders governed by this Social Media Policy, must ensure the HKCTA brand is represented in a positive light and must not give the impression that personal Social Media accounts represent the explicit position of HKCTA, when posting content on these personal Social Media platforms. If a stakeholder chooses to identify himself or herself as affiliated with HKCTA in any manner on a social media posting, please understand that some readers may view such stakeholder as a spokesperson for HKCTA. Because of this possibility, such stakeholder shall state that the views expressed on his or her personal social media posting are his or her own and not those of the HKCTA.
  - (g) All HKCTA Social Media accounts will be managed by designated HKCTA staff who will be responsible for the official affiliation of HKCTA. All content posted

on social media platforms or their modification must be approved by the aforementioned staff.

- (h) Staff member managing Social Media accounts will be solely responsible for all content posted, and will ensure the currency and accuracy of all content.
- (i) Any copyrighted information where written reprint permission has not been obtained in advance cannot be posted on any HKCTA social media posting.
- (j) Agents and all other key stakeholders governed by this policy, must ensure the HKCTA brand is represented in a positive light, when sharing, or commenting on any official post or on any official HKCTA Social Media platform
- (k) Agents and all other key stakeholders governed by this policy, must not hide or disguise their affiliation with HKCTA.
- (l) If any Agent or other stakeholder is contacted by the media or press about his or her social media posting that relates to HKCTA or its business, such Agent or other stakeholder, as the case may be, shall consult with the HKCTA CEO before responding.
- (m) All Agents and other key stakeholders must be aware that HKCTA has the right to request the removal of content from any official social media accounts and from any personal account if it is deemed that the account or its submission pose a risk to the reputation of HKCTA or to that of one of the Agents or stakeholders.

51. Breach of this Social Media Policy and Disciplinary Action.

- (a) In circumstances of a breach of this Social Media Policy, HKCTA may:
  - i. make a necessary public comment such as a correction, clarification, contradiction or apology with regards to the breach;
  - ii. issue a formal warning to the personnel or parties responsible for the breach and insist that the content be removed and an apology be made to the affected individual/s or parties (if any);
  - iii. deal directly with any Social Media provider to remove any posted material that HKCTA considers to be in breach of this Social Media Policy;
  - iv. report the breach to the Police and/or relevant government agency; and/or
  - v. take any disciplinary action available to it under this Social Media Policy or other HKCTA policies
- (b) Staff members, if found guilty, may be issued a warning or any sanctions deemed appropriate by the HKCTA CEO, or designated representative, depending on the seriousness and severity of the violation.
- (c) All stakeholders must be aware that breaches of the HKCTA Social Media Policy may also entail civil liability and even criminal consequences.

**Loans**

52. Unless prior written approval is given by the CEO or COO of the Association, staff members should not grant or guarantee a loan to, or accept a loan from, any individual or organization having business dealings with the Association. There is,

however, no restriction on normal loans from banks or financial institutions made at the prevailing interest rates and terms.

### **Outside Employment & Part-time Jobs**

53. Full-time staff should not take up concurrent employment, either, part-time, regular or on a consulting basis, without the prior written approval of the Association. Applications for outside employment should be sent to the CEO and COO, and by filling out Form D.

### **Relations with Members and the Public - Fair and Open Competition**

54. The Association promotes fair and open competition and aims at developing and securing long-term relationship with the Hong Kong Sports Institute Limited and other national sports associations based on mutual trust.
55. Administrative procedures and selection of athletes (for competition and for trainings)/captains/coaches are carried out in a fair, open and transparent manner. It is of equal importance that the election of committee members be conducted in such similar manner. All Agents involved in the selection of athletes/captains/coaches shall comply with the Selection Policy of the Association.
56. The Players Development Committee under the Council will decide on the level or amount of remuneration or funding to be provided to players.

### **Serving Public Interest and Meeting Accountability Standards**

57. The operations of the Association and promotion of the sport of tennis shall be conducted in a manner of the highest ethical standards that will assure a good quality sports as well as the continued confidence of the public.

### **Service to Members and the Public**

58. The Association seeks to provide professional and efficient service to promote the sport of tennis and maintain the confidence of members, athletes and the public. The Association shall avoid misrepresentation, exaggeration and overstatement.

### **Relations with the Leisure and Cultural Services Department - True and Fair Accounting Policies and Practices**

59. It is the policy of the Association to maintain complete and accurate records and accounts. All accounting records, and the reports produced from them must be kept and presented in accordance with the Leisure and Cultural Services Department Funding Manual. The code of practice issued by the Department should be adhered to at all times.
60. The account books of the Association shall, in reasonable and accurate details, reflect the transaction and disposition of the Association's assets. Detailed guidelines as to accounting controls and financial reporting are available to the

concerned executive committee members, general members and employees of the Association.

61. It is the unequivocal position of the Association that no false, artificial or misleading statements or entries should be made in the Association's books, accounts, records, documents or financial statement. Any executive committee member or employee having information of any hidden fund or false entry in the Association's records should promptly report the matter to the President of the Association.

## **II. Policy on Selection, Training, Nomination and Remunerations of Athletes**

### **Health Safety and On-court Demeanor**

57. The Association is firmly committed to ensuring the health, safety and welfare of its athletes. The Association shall comply with all related laws and international guidelines and provide all athletes with good and safe conditions for competition concerning sports safety and training.
58. The Association will not tolerate any form of abuse, neglect, harassment, bullying, unlawful discrimination, vilification, victimisation, indecency or violence against any adult or child in connection with activities organized or businesses conducted by the Association, and such conduct is a breach of this code of conduct.
59. All players participating in the training programs of HKCTA must observe the rules and behavioral protocol instituted by coaches of the training programs, including those relating to attendance, sportsmanship and on-court demeanor. The Association will not tolerate any form of abuse, indecency, disrespect against HKCTA coaches and staff members by players or their parents or guardians. Parents and guardians of players shall not interrupt on-court tennis training sessions or tournaments.

### **Child Protection Policy**

60. The purpose of this Child Protection Policy is to protect the health, safety and well-being of children who participate in the activities of the Association, including those delivered by affiliated individuals, organizations and clubs. The Association takes seriously its responsibility to provide a safe environment for children under the age of 18 years, participating in tennis, and has a "zero tolerance" for Child Abuse. It also considers any form of Child Abuse; be it sexual, physical or emotional in nature, against a child, by a person involved in tennis, as a serious offence and such conduct will not be tolerated.
61. General Principles of the Child Protection Policy:
  - (a) All relevant persons of the organization have the obligation and responsibility to ensure the protection of children.

- (b) The Association has a “Mandatory Reporting” policy. Any person involved with the organization who witnesses an incident of child abuse or neglect, or is made aware of such an incident by a third party, MUST report the incident.
- (c) The mandatory report can be made to any member of HKCTA management or staff members. HKCTA recognizes the importance of reporting of such incidents to be immediate and without hesitation, and will act on any report made to HKCTA management or staff members.

62. Scope of the Child Protection Policy:

- (a) The Child Protection Policy protects all children:
  - i. Participating in tournaments, competitions, leagues, conducted, endorsed or approved by the HKCTA;
  - ii. Taking part in domestic or international tennis tours conducted, endorsed or approved by HKCTA;
  - iii. Training in HKCTA player development programs;
  - iv. Receiving private tennis lessons by full-time or part-time HKCTA coaches;
  - v. Participating in tournaments, competitions, leagues, or taking part in tennis tours, or receiving training or coaching from a HKCTA licensed coach.
- (b) The Child Protection Policy applies to:
  - i. Persons and administrators appointed or elected to boards of directors, Council or Committees (including sub-committees) of HKCTA, its subsidiaries and affiliated companies,
  - ii. Staff members of HKCTA (full-time and part-time),
  - iii. Contractors and service providers engaged by HKCTA,
  - iv. Officials appointed or selected by HKCTA in relation to players and/or teams which represent HKCTA including team management personnel such as team captains, coaches, managers, physiotherapists etc.
  - v. Tennis coaches (including assistant coaches) who are appointed and/or employed by HKCTA (whether paid or unpaid),
  - vi. Coaches hired by the HKCTA.
  - vii. Referees, umpires and other officials (e.g. lines persons) involved in the regulation of the game of tennis appointed by HKCTA,
  - viii. Tennis players who enter any tournament, competition, league activity or event (including camps and training sessions) which are conducted or endorsed by HKCTA,
  - ix. Any other person who is member of, or affiliated with HKCTA (including life members);
  - x. Any other person or entity (for example a parent/guardian, spectator or sponsor) who or which agrees, in writing, (whether on a ticket, entry form or otherwise) to be bound by this Child Protection Policy and/or Code of Conduct.

- (c) If an incident of Child Abuse is witnessed, or if information is received regarding an incident of Child Abuse, it MUST be reported to HKCTA (management or staff members), as per the “Mandatory Reporting” procedure.
  - i. Management or staff members receiving a report of Child Abuse MUST report immediately to the HKCTA CEO.
  - ii. Management or staff members making the report are to be aware that the incident MUST be reported to the HKCTA CEO.
  - iii. Management and staff members making the report are to be aware that the incident may involve the Police.
  
- (d) Complaints will be investigated, and retaliation towards the person filing the complaint will not be tolerated.

63. Definition of Child Abuse, Assault, Neglect.

- (a) A child is deemed as anyone under the age of 18 years. An adult is deemed as anyone 18 years or over.
- (b) Child Abuse can be sexual, physical or emotional in nature.
- (c) Child Abuse also includes the act of Neglect.
- (d) Child Abuse is any such act toward a child from an adult, or another child, or children.
- (e) Child Abuse can be a single incident or a pattern of abuse over an extended period of time.
- (f) Child Abuse may occur to any child, regardless of gender, and between a child and an adult of the same or opposite gender.
- (g) Incidents of Child Abuse are related to power in a relationship, i.e. the adult is always in a position of authority over a child.
- (h) Examples of Child Abuse.
  - i. Physical abuse by hurting a child or a child’s development (e.g. hitting, shaking or other physical harm; giving a child alcohol or drugs; or training that exceeds the child’s development or maturity);
  - ii. Sexual abuse by adults or other children where a child is encouraged or forced to watch or engage in sexual activity or where a child is subject to any other inappropriate conduct of a sexual nature (e.g. sexual intercourse, masturbation, oral sex, pornography including child pornography or inappropriate touching or conversations);
  - iii. Emotional abuse by ill-treating a child (e.g. humiliation, taunting, sarcasm, yelling, negative criticism, name calling, ignoring or placing unrealistic expectations on a child);
  - iv. Neglect (e.g. failing to give food, water, shelter or clothing or to protect a child from danger or foreseeable risk of harm or injury).
  - v. Social Media must not be used as a platform for Child Abuse, and therefore must not contain material which is, or has the potential to be, offensive,



aggressive, defamatory, threatening, discriminatory, obscene, profane, harassing, embarrassing, intimidating, sexually explicit, bullying, hateful, racist, sexist or otherwise inappropriate. The Social Media Policy of the Association shall be strictly observed.

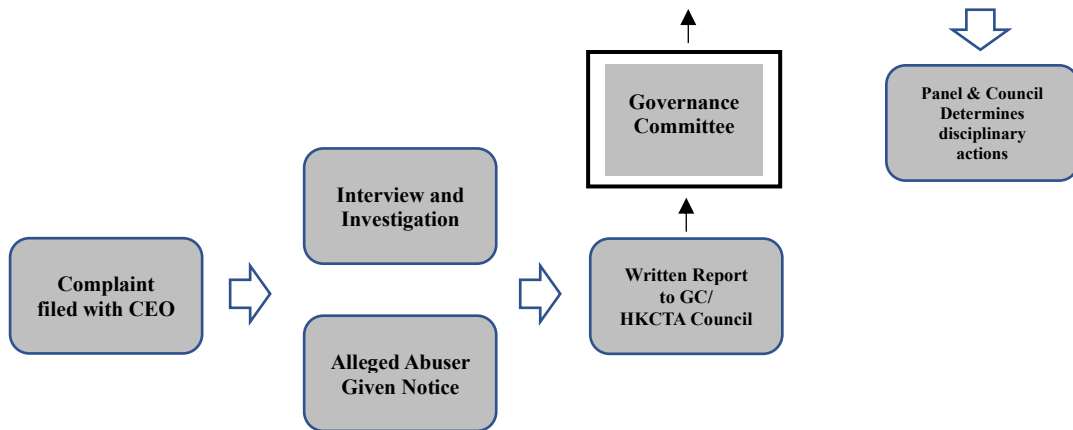
64. Child Abuse Reporting and Complaint Lodging Mechanism

Any incident, or suspected incident, of Child Abuse MUST be reported in the following manner:

- (a) The incident can be reported to any member of HKCTA management or staff members. The report can be written or verbal, however the reporter must recognize that the incident will be documented (in written form) during the reporting and investigation process.
- (b) The HKCTA management or staff member MUST report immediately to the HKCTA CEO and COO. Such report shall be presented in written form.
- (c) The HKCTA CEO will then be responsible for handling the complaint of Child Abuse. The complaint shall be treated with the utmost seriousness and shall generally be handled in accordance with flowchart below.

65. Formal Complaint Flowchart

Flowchart



66. Disciplinary Actions

- (a) An incident of Child Abuse will lead to disciplinary actions and may also entail civil liability and even criminal consequences.
- (b) HKCTA may report any incident relating to the violation of this Child Protection Policy to police or other regulatory authorities.
- (c) Any persons, if found guilty, may be issued a warning or any sanctions, including the termination of employment, commercial relationship or other affiliation deemed appropriate by the HKCTA .

## 67. Recruitment and Screening

Screening is an important element of Child Protection. Screenings should be conducted for existing and potential employees, volunteers, contractors, coaches or any other person with whom HKCTA might have a commercial, employment or other relationship (refer to paragraph 62(b)). Thorough screening requires:

- (a) Checking referees.
  - i. Including making verbal or written enquiries of the person's nominated referees (preferably at least two) as to the person's suitability for the role and their suitability for involvement with children under 18 years of age.
- (b) Interviewing the person.
  - i. Including questioning the person as to their suitability for the role and their suitability for involvement with children under 18 years of age.
- (c) Obtaining a Sexual Conviction Record.
  - i. As a mandatory component of screening and recruitment.
- (d) Obtaining other relevant police checks.
  - i. As a Sexual Conviction Record may not show up a record of physical abuse or neglect.

If the outcome of the screening process results in the discovery of relevant criminal history, including any offence involving violence, abuse or assault against a child, then:

- (a) Persons who are seeking appointment (whether full-time, part-time or otherwise) to work with children under 18 years of age, as coaches, team managers, tournament directors, officials and umpires (paid or unpaid), should not be appointed.
- (b) Persons seeking appointment to a role in which they are likely to have unsupervised contact with children under 18 years of age, should not be appointed.
- (c) In the case of an existing employee, subject to obtaining appropriate legal advice beforehand, the appointment of the person should be ended.

## **Sportsmanship**

68. All athletes, regardless of whether receiving emoluments or not, should perform at their best when representing the Association or Hong Kong, China to compete in local as well as international sports games. Anyone failing to do so will be disciplined or disqualified from joining the sports games.

## **Acceptance of Illegal Advantages**

69. It is an offence for athletes to influence the result of a sports game upon accepting illegal advantages. This is an act against the spirit of sportsmanship and would tarnish the reputation of the Association as well as the sport of tennis. The Association shall not tolerate such misconduct and shall report the matter to the ICAC or other appropriate authorities.

### **Drug Abuse**

70. Rules governing international sports competitions restrict the misuse and abuse of drugs by athletes to affect their performance in competitions. These doping regulations include those of the International Tennis Federation, Association of Tennis Professionals, Women's Tennis Association, International Olympic Committee, Olympic Council of Asia and World Anti-Doping Agency. The Association strictly adheres to these rules and any athlete who contravenes such rules would be subject to disciplinary actions.

## **III. Employment Practice**

### **Occupational Health and Safety**

71. The Association is firmly committed to ensuring the health, safety and welfare of its employees. The Association shall comply with all occupational health and safety laws and provide all employees with good and safe conditions of working environment.

### **Equality of Employment Opportunity**

72. The Association recognizes that success of the Association depends on the full contribution of all employees.
73. The Association is dedicated to the achievement of equality of opportunity for all of its employees in relation to all personnel matters including recruitment, training, promotion, transfer, benefits, dismissal and, etc. without regard to race, creed, colour, religion, sex, sexual orientation, age, national origin or handicap status. All employees will be treated as individuals solely according to their abilities to meet job requirements.
74. The Association is committed to enhancing the diversity of workplace through recruitment, hiring, retention, training and professional development of a diverse group of employees. The Association also strives to maintain and promote an inclusive culture in which individual differences are respected and valued as qualities that strengthen the working environment and contribute to the Association's ability to promote and develop the growth of tennis at every level.

### **Sexual Harassment Policy**

75. Everyone has the right to be respected and equally treated. Sexual harassment is discriminatory and unlawful and the Association has zero tolerance for sexual harassment behavior. Sexual harassment is a breach to all relevant persons of the

organization and shall be subject to disciplinary action. All sexual harassment complaints should be thoroughly and fairly handled and investigated without delay in accordance with the Sexual Harassment Complaint Lodging Mechanism below.

76. This Sexual Harassment Policy may be reviewed and modified from time to time by HKCTA with reference to Hong Kong law and guidelines of the Equal Opportunities Commission.

77. Objectives and General Principles of the Sexual Harassment Policy

- (a) All relevant persons of the organization have the obligation and responsibility to prevent and eliminate sexual harassment.
- (b) Any person of the organization can lodge a complaint with the person in-charge of handling sexual harassment complaints if he/she witnesses any other person of the organization committing any sexual harassment act or being sexually harassed.
- (c) The objective of the Sexual Harassment Policy is to ensure all relevant persons of the organization (see “Scope” below), are able to work and receive training, participate in sports activities or provide/have access to service under a safe environment free of harassment.

78. Scope

- (a) The Sexual Harassment Policy applies to:
  - i. Persons and administrators appointed or elected to boards of directors, council or committees (including sub-committees) of HKCTA, its subsidiaries and affiliated companies,
  - ii. Staff members of HKCTA (full-time and part-time),
  - iii. Contractors and service providers engaged by HKCTA,
  - iv. Officials appointed or selected by HKCTA in relation to players and/or teams which represent HKCTA including team management personnel such as team captains, coaches, managers, physiotherapists etc.
  - v. Tennis coaches (including assistant coaches) who are appointed and/or employed by HKCTA (whether paid or unpaid),
  - vi. HKCTA Licensed Coaches.
  - vii. Referees, umpires and other officials (e.g. lines persons) involved in the regulation of the game of tennis appointed by HKCTA,
  - viii. Tennis players who enter any tournament, competition, league activity or event (including camps and training sessions) which are conducted or endorsed by HKCTA,
  - ix. Any other person who is member of, or affiliated with HKCTA (including life members);
  - x. Any other person or entity (for example a parent/guardian, spectator or sponsor) who or which agrees, in writing, (whether on a ticket, entry form or otherwise) to be bound by this Sexual Harassment Policy and/or Code of Conduct.

- (b) Complaints will be investigated, and retaliation towards the person filing the complaint will not be tolerated

#### 79. Definition of Sexual Harassment

- (a) Any unwelcome<sup>1</sup> sexual advances, or an unwelcome request for sexual favours or behaviour or conduct which is offensive, humiliating or intimidating, even if the act of the sexual harassment is not intentional.
- (b) Sexual harassment can be a single incident at place of work or study where there are actions, languages or pictures that are of a sexual nature which makes it hard for the person to do the work or pursue study. This is called a “sexually hostile or intimidating environment”.
- (c) Sexual harassment may occur to any person, regardless of gender, both between men and women as well as persons of the same gender.
- (d) Sexual harassment incidents are usually related to power relationship, i.e the powerful harasses the weak. It is also possible that a person weaker in power harasses a more powerful person.
- (e) Sexual harassment occurs when a person to induce or attempt to induce another person to sexually harass a third person by providing or offering to provide that person with any benefit, or subjecting or threatening to subject that person to any detriment.
- (f) Sexual harassment may occur to a person who may be the victim of a hostile environment where he or she is harassed in a pattern of incidents even if it may not be offensive to themselves.
- (g) Examples of Possible Sexual Harassment behaviors
  - i. Repeated attempts to make a date, despite being told “NO” each time;
  - ii. Comments with sexual innuendoes and suggestive or insulting sounds;
  - iii. Relentless humor and jokes about sex or gender in general;
  - iv. Sexual propositions or other pressure for sex;
  - v. Implied or overt threats for sex;
  - vi. Obscene gestures or inappropriate touching (e.g. patting, touching, kissing or pinching);
  - vii. Persistent phone calls or letters asking for a personal sexual relationship; and
  - viii. Displaying sexually obscene or suggestive photographs or literature.

#### 80. Sexual Harassment Complaint Lodging Mechanism

Once an act of sexual harassment occurred, any person affiliated with HKCTA, has the right to lodge a complaint. A complaint relating to sexual harassment can be filed in the

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<sup>1</sup> In general terms, “unwelcome” behaviour is behaviour that is uninvited and unwanted by the recipient(s) of the behaviour.

following manner:

- (a) The CEO or COO of HKCTA or his/her delegate (depending on whether the person reporting the complaint prefers a person of the same gender to attend the complaint) would be responsible for handling complaints relating to sexual harassment.
- (b) Complaints relating to sexual harassment can either be informal or formal, depending on whether an investigation is conducted into the case. The two approaches are both valid, and the exact approach to be adopted depends on the wish of the complainant:

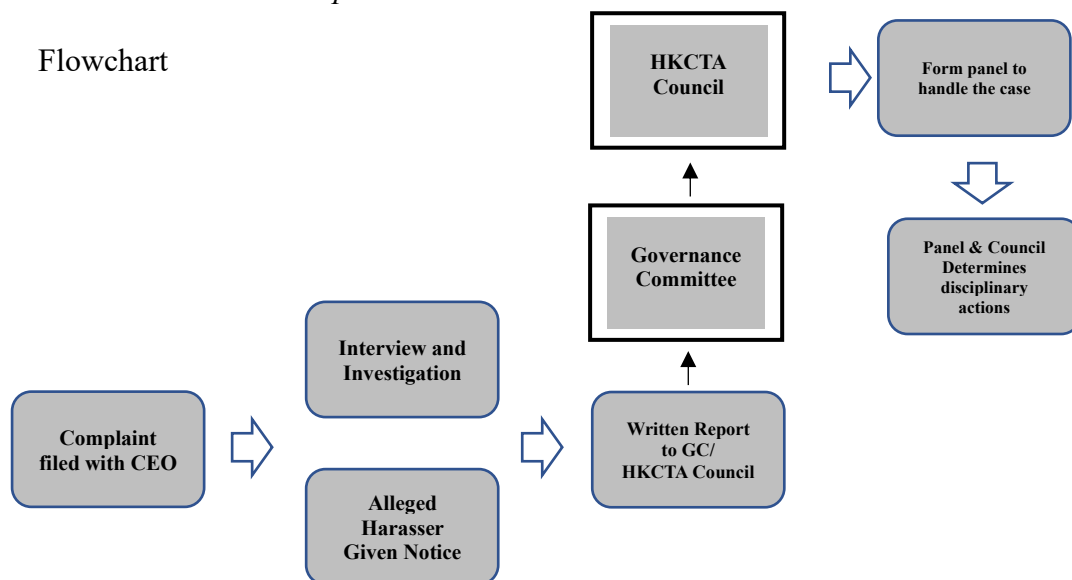
*i. Informal Complaint*

For relatively minor and one-off incident, and is made verbally.

- HKCTA shall inform the alleged harasser of his/her behavior is inappropriate, and demand stopping the act of alleged sexual harassment immediately;
- It does not involve a formal investigation; and
- If the person making the informal complaint is not satisfied with the outcome, he/she can lodge a formal complaint.

*ii. Formal Complaint*

Flowchart



The flowchart above is an illustration of the procedures for handling more incidents and repetitive incidents or an incident that involves a formal complaint. For these incidents:

- A formal complaint is made in written form. The CEO, COO or his/her delegate can assist in the preparation of a written complaint (the

complaint will include record of the incident, including dates, time, location witness (if any) and nature, and his/her response);

- It involves an investigation, and the process and findings of the investigation will be properly recorded with recommendations;
- The interviews and statements of both the complainant and the alleged harasser will be documented;
- The alleged harasser must be given notice of the offense, the details of the allegation; and has the right to respond to the allegation(s);
- A written report should be prepared to give an account of the investigation and disciplinary actions, and the considerations behind to both the complainant and the alleged harasser;
- The written report will be reviewed by the CEO and/or COO, and sent to the HKCTA Council.
- The HKCTA Council will decide whether further investigation is required and will form a panel to handle the complaint. (The panel should comprise of an almost equal number of members from both genders)
- The panel upon consultation with HKCTA Council, will determine the disciplinary actions, if any, accordingly;
- If the complainant or alleged harasser involves minors, he/she is entitled to be accompanied by his/her parent or guardian to attend the interviews. The relevant rules and possible disciplinary actions will be made known to the person and his/her parents;
- Arrangements should be made to avoid the complainant and the alleged harasser from getting into direct contact during the period of investigation; and
- If necessary support and counselling sessions can be offered to the complainant;
- Duties of the alleged harasser concerned may be suspended during the period of investigation;
- All complaints should be handled promptly without unnecessary delay. All information and records related to a sexual harassment complaint shall be handled discreetly and kept confidential, and only be disclosed to relevant persons on a need to-know basis;
- The complainant and the witnesses should be protected against victimization for making or being involved in the complaint;

- If a case proceeds to conciliation, the mutually agreed settlement terms should be documented in an agreement and signed by both parties; and
- If one party does not accept the investigation outcome or the sanctions imposed, an appeal can be made through the HKCTA Council.

#### 81. Disciplinary Actions

- (a) Sexual harassment will lead to disciplinary actions and may also entail civil liability and even criminal consequences.
- (b) Individuals or parties if found guilty may be issued a warning or any sanctions deemed appropriate by the HKCTA Council, including but not limited to the termination of employment, engagement, commercial or other relationship, depending on the seriousness and severity of the violation; and
- (c) For serious cases, the complaint will be filed with the Equal Opportunity Commission and/or reported to the police.

#### **Individuality**

82. The dignity and individuality of each employee will be respected and the privacy and confidentiality of employee records will be safeguarded.

#### **Communication**

83. Employees shall be kept informed of the Association matters affecting them including the Association goals, directions and performances. Channels for open communication that foster an atmosphere of mutual trust and respect between the Association and employees always exist. If an employee wishes to discuss any matter about the Association, he/she may speak to his supervisor or any higher level of management.

#### **Development and Remunerations**

84. The Association shall provide an open, challenging and involving environment for all employees. The Association aims to provide opportunities for the development of the skills of employees to the fullest extent possible within the constraints of the Association.
85. The Association's pay structures shall aim at rewarding individuals' abilities and personal performance.

#### **Policy and Practice on Alcoholism and Drug Dependence**

86. The Association prohibits the use and abuse of alcohol and illegal drugs during the working hours or at the Association's facilities. Possession or sale of illegal drugs by Agents at the Association shall be reported immediately to the Police.

### **IV. Responsibilities to the Community**



## **Environment Policy**

87. Care for the environment is one of the Association's main concerns. The Association, in handling its business, will comply with present laws and regulations concerning environmental policy and conduct its business in a responsible manner without creating risks to human health or the environment.

## **Support for Community Activities**

88. The Association encourages executive committee members, general members and employees to participate in community and civic affairs. As regards participation in political activities, it is entirely personal and voluntary.

## **Anti-Money Laundering/Policy and Practice on Donations**

### ***Anti-Money Laundering***

89. The Association and all Agents shall strictly comply with the Anti-Money Laundering Policy of the Association in accepting, handling and processing sponsorships, donations or any other form of funds.

### ***Charitable Donations***

90. The Association supports charitable organizations and encourages executive committee members, general members and employees to contribute to charities and/or organize fund-raising events.

### ***Political Donations***

91. The Association shall not make any illegal or improper payment or contribution to any public official, person or entity with a political background for the purpose of seeking improper advantages.

## **VII. Monitoring of Compliance and the Means of Enforcement**

### **Understanding and Compliance of the Code of Conduct**

92. It is the personal responsibility of every Agent to understand and comply with the Code of Conduct.
93. Executive members and managers should also in their day-to day supervision ensure that all Agents of the Association understand well and comply with the standards and requirements stipulated in the Code of Conduct. Problems encountered in enforcement as well as comments or suggestions for improvement of the Code of Conduct should be channeled to the CEO and the COO responsible for overall coordination and monitoring of the implementation of the Code of Conduct for consideration and actions.

94. The CEO and/or COO may consult the Executive Committee which has the ultimate responsibility for administering matters relating to the Code of Conduct.

### **Violation of the Code of Conduct**

95. The Association shall not tolerate any illegal or unethical acts. Anyone violating the Code of Conduct will be disciplined. The Association may impose one or more of the following sanctions:
  - a. impose a warning;
  - b. termination of employment;
  - c. termination of roles within the Association;
  - d. in the case of a coach, suspend or cancel the coach's accreditation or affiliation with the Association for a period or indefinitely;
  - e. expel the Agent from membership of the Association; and
  - f. in the case of a player or the parent or guardian of such player, expel the player from the relevant training program of the Association.

In cases of suspected corruption or other forms of criminality, a report will be made to the ICAC or appropriate authorities.

### **Complaints**

96. Channels of complaints are open to all, including Executive Committee members, general members, athletes, employees, suppliers and contractors of the Association and the general public.
97. Complaints can be sent directly to the CEO and/or COO of the HKCTA for receiving and investigating complaints. He/she shall answer directly to the Council for impartial and efficient handling of complaints received.

The CEO and the COO, with the support of the Executive Committee, may conduct an investigation into the alleged breach of the code of conduct. The investigation process conducted by the CEO and the COO may include any one or more of the following steps: (a) requesting a written response from the complainant, the relevant Agents and any other parties related to the matter; (b) collecting witness statements; (c) conducting interviews; and/or (d) collecting any other information, which may include video footage, photos, recordings etc. that the CEO or COO deems necessary.

If the alleged breach of code of conduct is of serious nature based on the investigation, the CEO and/or COO shall consult the Executive Committee regarding the imposition of the appropriate sanction measures.

98. The Association shall consider all complaints impartially and efficiently. Unlawful or unethical conduct will be investigated promptly.
99. All information received shall be kept confidential.

### **Acknowledgment**

By signing on the line below, I acknowledge that I have read, understand and agree to comply with the foregoing Code of Conduct. I understand that, if I do not comply with the Code of Conduct, I may be subject to discipline, including discharge from employment. I may also be subject to legal action against me for damages or indemnification.

### **Review of Code**

This code was updated on May 16, 2024 and will be reviewed and updated from time to time.

**Form A**  
**Hong Kong, China Tennis Association, and its subsidiary**  
**Conflict of Interest Declaration Form – Council and Committee Members**

**Name:** \_\_\_\_\_

**Capacity**  
**in**  
**HKCTA:** \_\_\_\_\_

**Introduction**

It is a declared policy of HKCTA that members of the Council and its Committees must timely and fairly declare any private, professional or commercial interest that could or may conflict with the interests of HKCTA. These interests can be direct or indirect, monetary or non-monetary, which may reasonably be perceived to have an influence on the Council or Committee members' exercise of a sound and fair judgment on HKCTA's affairs.

All Council and Committee members should carefully review and familiarize himself / herself with:

- (i) the relevant provisions in HKCTA's constitution and Code of Conduct about conflicts of interest;
- (ii) guidelines from time to time published by HKCTA on declaration of interests; and
- (iii) the Best Practice Reference for Governance for National Sports Association issued by the Corruption Prevention Department of the ICAC.

Copies of these documents can be obtained from HKCTA on request.

As a general reminder, the consequences for failing to declare an interest which leads to a perception of personal gain (whether monetary or non-monetary) could be dire, hence all members of the Council and the Committees should be vigilant against falling foul of the requirements.

This Declaration Form serves to facilitate the making of declarations on certain more common conflict areas in the context of HKCTA, and emphasis should be made that these areas are not meant to be exhaustive. Considerations should be given to the specific circumstances in individual cases.

Moreover, this Declaration Form is intended to be used for those conflicts that are more of an ongoing nature, such that once a declaration is made with this form, the relevant Council and Committee members would not be required to repeat the same declarations at every meeting. However, conflicts could arise with regard to a specific agenda item at a meeting, and ad hoc and specific declarations on top of those declared by way of this Declaration Form may therefore be required. In case of doubt as to whether particular circumstances may give rise to a conflict, Council and Committee members should make a declaration or seek a ruling from the chairman of the Council / relevant Committee.

Once a declaration is made with this Declaration Form, the relevant Council / Committee member should take the initiative to update HKCTA and the Council / relevant Committee promptly when there is a change in the declared information.

<p>1. Are you , any of your immediate family members (defined to be members of the same household), any company in which you, or your immediate family members control 10% or more of the voting powers, or in which you or your immediate family serve as a director or senior management, a professional promoter or professional referee of any tennis tournament? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>2. Are you or any of your immediate family members a director, senior management or shareholder of a company that is a supplier of tennis-related goods? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>3. Are you or any of your immediate family members (defined to be members of the same household), a professional journalist or commentator? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>4. Are you or any of your immediate family members (defined to be members of the same household) a professional tennis player or a professional tennis coach? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>

<p>5. Are you or any members of your immediate family members (defined to be members of the same household) (i) enrolled in any tennis programs of HKCTA; or (ii) a tennis player which participates in tournaments organized by HKCTA? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>6. Are you or any member of your immediate family members a director, senior management or shareholder that control 10 percent or more of voting power of a company that is a supplier or contractor to HKCTA, any of its players or, as far as you are aware, any of its player's immediate family members or related companies? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>7. Are you or any member of your immediate family members a director, senior management or shareholder that control 10 percent or more of voting power of a company that is a sponsor to HKCTA or any of its players? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>8. Are you a league member of any member club of HKCTA? If yes, please provide details.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>

9. Please disclose details of any other interests you may have which conflict or may conflict, directly or indirectly, with your capacity as a member of the Council or Committee of HKCTA.	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

**Signature:** \_\_\_\_\_

**Date:**

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**Part B – Acknowledgement**

To :

**Acknowledgement of Declaration**

The information contained in your declaration form of \_\_\_\_\_ is noted. It has been decided that:-

- You may continue to speak and vote on the matter as described in Part A, provided that there is no change in the information declared above.
- You may continue to speak but should not vote on the matter as described in Part A, provided that there is no change in the information declared above.
- You may remain in the meeting as an observer on the matter as described in Part A, provided that there is no change in the information declared above.
- You should withdraw from the meeting and immediately return to the secretary any documents regarding the matter sent to you earlier.
- Others (please specify) : \_\_\_\_\_

**By**

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**Name:**

**HKCTA Council**

**Date:**



**Form B**  
**Hong Kong, China Tennis Association**  
**Conflict of Interest Declaration Form – Employees and Independent Contractors**  
**(including staff members, full time and part time coaches and hitters)**

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Part A – Declaration**

I would like to report the following existing/potential conflict of interest situation arising during

the discharge of my official duties :-

<b>1. Persons/companies with whom/which I have official dealings, family or other relationship</b>
<b>2. My relationship with the persons/companies</b>
<b>3. Relationship of the persons/companies with the Association (e.g. supplier, players under training programs, etc)</b>
<b>4. Brief description of my duties which involved the persons/companies (e.g. handling of tender exercise)</b>

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**Part B – Acknowledgement**

To :

The information contained in your declaration form of \_\_\_\_ is noted. It has been decided that :-

- You should refrain from performing or getting involved in performing the work, as described in Part A, which may give rise to a conflict.
- You may continue to handle the work as described in Part A, provided that there is no change in the information declared above.
- Others (please specify) : \_\_\_\_\_

\_\_\_\_\_  
**Chief Executive Officer**

**Date:**

**Form C**  
**Hong Kong, China Tennis Association**  
**Gifts Declaration Form – Council/Committee Members and Employees**

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Description of Offeror (Name & Title of Offeror):**

\_\_\_\_\_

**Company:** \_\_\_\_\_

**Relationship (Business/Personal):**

\_\_\_\_\_

**Occasion on which the Gift was/is to be Received:**

\_\_\_\_\_

**Description & (Assessed) value of the Gift:**

\_\_\_\_\_

**Suggested Method of Disposal:**

**Remark**

Retain by the Recipient

Retain for Display/ as a Souvenir in the  
Office

Share among the Office

Reserve as Lucky Draw Prize at a Staff  
Function

Donate to another Charitable Organization

Return to Offeror

Others (please specify) :

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

---

(Name)

(Date)

---

**Completed by HKCTA Chief Executive Officer or Chief Operating Officer**

To:

The recommended method of disposal is **\*approved/not approved.**

\* The gift(s) concerned should be disposed of by way of :

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(Date)

*\* Please delete as appropriate*

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**Form D**  
**Hong Kong, China Tennis Association**  
**Outside Employment Declaration Form – Employees and Independent Contractors**  
**(including staff members, full time and part time coaches and hitters)**

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

<b>Employer/Self employed:</b>	
<b>Nature of Work:</b>	
<b>No. of Hours per week</b>	
<b>Other Details (if any)</b>	

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

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I approve/ do not approve your outside employment

\_\_\_\_\_

Hong Kong, China Tennis Association will comply with the Olympic Charter, the IOC Code of Ethics, Articles of Association of the Sports Federation & Olympic Committee and Constitution of the Asian Tennis Federation.