



ELECTORAL COMMISSION

REPORT – 5 SEPTEMBER 2026

The Electoral Commission (the “ELC”), composed of Roberto Rivello (Chairman of the Constitutional Commission), Yolander Persaud (Chairwoman of the Ethics and Disciplinary Commission) and Allen Priest (Chairman of the Verification Commission), met remotely by means of online and electronic communications, considered and discussed the following agenda items, and unanimously adopted the following decisions.

I) COMPLAINTS REGARDING THE ELIGIBILITY OF THE CANDIDATES FOR THE FIDE PRESIDENTIAL TICKET

On 27 July 2026, the FIDE Electoral Commission approved the following list of valid candidacies for the Presidential ticket:

- Mr. Jan Henric Buettner and Mr. Malcolm Pein;
- Mr. Wadim Rosenstein and Mr. Gordon Tang Yigang;
- Mr. Timur Turlov and Mr. Anand Viswanathan;

specifying that it was a preliminary decision, based only on the candidates’ self-declarations, a cross-check between the submitted applications and nominations and the documents provided, and did not involve any more detailed assessment of their authenticity or formal correctness, and further noted that, in accordance with art. 21.9 of the Electoral Rules, “any complaint regarding the eligibility of a candidate for the position of President or Deputy President must be addressed to the Electoral Commission in writing within two weeks following the official announcement of the candidacies by the FIDE Offices on the FIDE web site”.

Following publication of the list on 28 July 2026, the Electoral Commission received cross-complaints from all candidates concerning the eligibility of other candidates.

Mr. Wadim Rosenstein submitted a "Formal complaint and request for disqualification - regarding the eligibility of Mr. Timur Turlov and request for immediate disqualification from the 2026 FIDE Presidential election".

Mr. Wadim Rosenstein disclosed to certain media his intention to file the complaint and its contents of this complaint, presumably with a press release written some days before the deadline, but he sent his complaint to the FIDE Secretariat only at 10.27 p.m. on the final permissible day (11 August 2026).

For the submission of candidacies (art. 21.5, 22.3, 24.2, 26.2), as well as for the submission of complaints regarding the right to vote (art. 3.6), Electoral Rules clearly specify not only the day, but also the hour of the deadline, 6.00 PM CET time. However, art. 21.9 is less explicit and provides that "any complaint regarding the eligibility of a candidate for the position of President or Deputy President must be addressed to the Electoral Commission in writing within two weeks following the official announcement of the candidacies by the FIDE Offices on the FIDE web site".

Art. 8.2 of the FIDE Charter prescribes that "when textual, systematic and teleological interpretation are not sufficient to give a solution to a specific case or issue, general principles of law can be applied". Interpretation by analogy is a widespread principle of interpretation, but it is not applicable in cases where it would result in specific effects that significantly impact the rights of individuals, such as in relation to substantive criminal law provisions, or, as in the present case, with respect to rules providing for forfeitures/peremptory terms. Therefore, the ELC considers that the 6:00 PM CET deadline established for the submission of candidacies does not extend to the submission of complaints regarding those candidacies. Accordingly, the complaint may be regarded as having been submitted in due time.

Before 6.00 PM on 11 August 2026, the FIDE Secretariat also received a complaint submitted by Mr. Jan Henric Buettner and Mr. Malcolm Pein, and a complaint by Mr. Timur Turlov and Mr. Anand Viswanathan.

After receiving these complaints, the ELC, through the FIDE Secretariat, informed the candidates against whom they were directed, sending them copies of the received documents, and set a deadline for the submission of observations or defences. An online meeting with the observers nominated by FIDE Continents was also organised, to inform them of the complaints received.

Mr. Wadim Rosenstein, as Respondent, requested an extension of the prescribed deadline for submitting his defence: the request was granted, extending the new deadline also to the other Respondents.

The complaints submitted respectively by Mr. Wadim Rosenstein and by Mr. Jan Henric Buettner and Mr. Malcolm Pein, concern not only the eligibility of Mr. Timur Turlov and Mr. Anand Viswanathan but also alleged violations of the Ethics and

Disciplinary Code; it is the same for the complaint submitted by Mr. Timur Turlov and Mr. Anand Viswanathan, which concerns both the eligibility of Mr. Wadim Rosenstein and alleged violations of the Ethics and Disciplinary Code.

On 28 August 2026, Mr. Timur Turlov and Mr. Anand Viswanathan submitted a different and new complaint against Mr Wadim Rosenstein and the German Chess Federation, regarding alleged electoral misconduct involving improper financial influence on the presidential election.

Before considering the merits of these complaints, it is necessary to clarify that the two categories of complaints, regarding eligibility criteria and alleged violations of the Code of Ethics, are legally distinct and differ in every respect: object, procedural rules, competence, deadline for their submission, deadline for the decision.

The relevant provisions are set out below (underlining added to certain passages and words deemed of greater relevance).

FIDE Charter:

- 26.6 The Ethics and Disciplinary Commission shall consider and decide on any alleged breach of FIDE Ethics and Disciplinary Code and impose a sanction or grant other measures as specified in the FIDE Ethics and Disciplinary Code, acting in accordance with the Ethics and Disciplinary Commission Procedural Rules;
- 26.7 The Ethics and Disciplinary Commission shall have jurisdiction over the conduct of FIDE officials, FIDE Honourable dignitaries, electoral candidates and FIDE employees;
- 28.2 All complaints arising from FIDE's elections ... including but not limited to the eligibility of candidates and the conduct of elections, must be brought before the Electoral Commission;
- 28.3 Any such complaint must be addressed to the Electoral Commission in writing within two weeks following the event which gives rise to the complaint. Any complaint regarding the eligibility of any candidate for the position of President or Deputy President must be addressed to the Electoral Commission in writing within two weeks following the official announcement of the candidatures by the FIDE Offices on the FIDE web site
- 28.4 The Electoral Commission is also competent to decide on all complaints or reports concerning alleged breaches of the FIDE Ethics and Disciplinary Code 31 by candidates to elective positions, if submitted in the two months before elections;
- 28.6 The Chairman of the Electoral Commission shall be the Chairman of the Constitutional Commission, except when the Electoral Commission decides on

cases of alleged violations of the FIDE Ethics and Disciplinary Code, then the Chairman of the Ethics and Disciplinary Commission shall preside.

FIDE Electoral Rules:

- Art. 4 Eligibility – Right to be voted and right to be elected”.
 - 4.1 Every person has the right to stand as a candidate in FIDE elections, but to be eligible for FIDE elections, a candidate must meet the following criteria:
 - the candidate must have reached the age of 18 no later than by the date of the meeting during which the election takes place;
 - the candidate must not be deprived of his or her civil rights, as an additional sanction related to the commission of a crime, as a result of an enforceable judgment of a national or international judicial authority;
 - the candidate must not have incurred any sanction of ineligibility, ban or exclusion from office, in relation to any violation of the FIDE Ethics and Disciplinary Code, following a final decision of the Ethics and Disciplinary Commission or of the Electoral Commission enforceable at the date of the meeting during which the election takes place;
 - the candidate must meet all the nominations and nominee requirements as set out by the FIDE Charter and by the FIDE Electoral Rules;
 - the candidate should be able to communicate effectively in the FIDE official working language”.
 - 4.4 All complaints regarding the eligibility of a candidate and the right to be voted and to be elected must be brought before and shall be decided by the Electoral Commission. All complaints must be addressed to the competent Commission, through the e-mail address office@fide.com, in writing, within two weeks following the event which gives rise to them. The Electoral Commission shall decide on these complaints in the shortest possible period, communicating a final decision no later than fifteen (15) days before the elections”.
- Art. 5 Candidacies
 - 5.1 Every person who intends to present his or her candidacy in FIDE elections shall submit an application form or personally to FIDE Offices or writing to the e-mail address office@fide.com.
 - 5.2 Each application form should include:
 - personal data of the candidate (first name, family name, place and date of birth, citizenship, residence and domicile, e-mail address, telephone number);
 - a declaration of the candidate regarding the following points: if enjoys civil rights in the state of citizenship or residence; if the candidate incurred

any measure or sanction in relation to any violation of the FIDE Charter and FIDE Ethics and Disciplinary Code or any other applicable regulations issued by FIDE organs; if incurred any measure or sanction in relation to any violation of regulations issued by a FIDE Member Federation; if incurred any measure or sanction in relation to any violation punished as a criminal offence at a national or international level; if there are reasons for a possible conflict of interest or incompatibility with the position for which the candidature is submitted and, if so, how intends to eliminate them if elected;

- a brief biography of the candidate, with an explanation as to how the candidate claims to satisfy the requirements for the position to which he or she is seeking election, including particulars of the experience, skills and qualities which the candidate would bring to the position if elected;
 - when requested, for the positions in the Verification Commission, Constitutional Commission and Ethics and Disciplinary Commission, a specific curriculum vitae regarding their background and expertise on the subjects that these Commissions deal with;
 - the nominations received from Member Federations, when requested;
 - a short statement -in the limits indicated in a form prepared by the FIDE Offices- aimed to present his or her candidacy, to be published in a dedicated page of the FIDE website, if the candidate expressly accepts and authorises the publication;
 - the signature of the candidate (also electronic signatures or even scanned signature on a pdf document can be considered valid, if there are no doubts about the origin and the attribution of the document).
- 5.3 The Electoral Commission, after a preliminary examination, may ask the candidate to integrate the application and/or to submit additional documents or more specific declarations.
 - 21.5 Candidacies for the Presidential ticket must reach FIDE Offices at the latest two months before the opening of the meeting of the General Assembly, by 6.00 PM, CET time.
 - 21.9 Any complaint regarding the eligibility of a candidate for the position of President or Deputy President must be addressed to the Electoral Commission in writing within two weeks following the official announcement of the candidacies by the FIDE Offices on the FIDE web site.

The distinction is clear, as is the interpretation of the majority of the relevant rules. There are no doubts that:

- the complaints regarding the eligibility of a candidate concern the verification of whether there exist the conditions listed in art. 4.1 of the Electoral Rules, if those criteria are not satisfied, the candidacy must be considered as not valid and the candidate loses the right to be voted and to be elected. The Electoral Commission is exclusively competent to evaluate such complaints, with the recognition that they must be submitted within two weeks following the official announcement of the candidacies. The Electoral Commission shall communicate a final decision no later than fifteen (15) days before the elections. In these cases, the complaint constitutes a source of information for the Electoral Commission, that triggers a procedure to review the legitimacy of the candidature. The procedural rules of the Ethics and Disciplinary Commission are not applicable: there are no “parties”, no second round of exchange of submissions, nor “hearings”. The ELC can require further information, but also in this event, such information would not constitute replies, but answers to a request for information.
- The complaints concerning alleged breaches of FIDE Ethics and Disciplinary Code concern conducts forbidden in the FIDE Ethics and Disciplinary Code. The Ethics and Disciplinary Commission is usually competent to decide on these complaints, including where the alleged conduct is attributable to electoral candidates in FIDE elections, following the Ethics and Disciplinary Commission Procedural Rules, with a preliminary evaluation of the admissibility of the complaint, procedural rights for the parties, second round of exchange of submissions, hearings and so on. Breaches of the FIDE Code of Ethics are punishable by the sanctions listed in art. 13 of the FIDE Code of Ethics. Among the “supplementary sanctions” the “ineligibility for an appropriate period (determined by the EDC up to a maximum of two terms)” is included. There are no deadlines for the submission of these complaints. Nor are there any time limits for the communication of the final decision.
- The Electoral Commission may as well have competence to decide on complaints on alleged breaches of FIDE Ethics and Disciplinary Code, but as an exception, and only in some very specific cases. In such cases, the Electoral Commission is chaired by the Chairperson of the Ethics and Disciplinary Commission, the Ethics and Disciplinary Commission Procedural Rules apply (when compatible with the different composition of the Commission), the complaints must be submitted within two weeks following the event which gives rise to the complaint, and no time limit applies to the Electoral Commission’s decision by the Electoral Commission.

Only regarding the identification of the specific cases for which, in the event of complaints concerning alleged breaches of the Code of Ethics, the Electoral Commission and not the Ethics Commission is competent, some differing interpretations might seem possible. In accordance with art. 8.2 of the FIDE Charter, as already mentioned above, “when textual, systematic and teleological interpretation are not sufficient to give a solution to a specific case or issue, general principles of law can be applied”.

Prior to this, it is necessary to recall the distinct competencies and purposes of the Ethics and Disciplinary Commission and of the Electoral Commission.

The Ethics and Disciplinary Commission is the body of sports “justice” of FIDE, serving as the sole organ with general competence in this regard. It applies procedural rules that allow the parties, in compliance with the principle of a fair trial, to fully present their defences and requests of evidence, and preview that the EDC hold hearings, examine witnesses, and conduct investigations, which may also be delegated to the EDC Fact-finding Committee, providing a first-instance decision, with the possibility of appeal, and a second-instance decision.

The Electoral Commission, on the other hand, has general competence over assessing the fulfilment of eligibility requirements and the right to vote and to be elected. In this respect, it must verify, *inter alia*, whether candidates and voters have been sanctioned by the Ethics and Disciplinary Commission with sanctions entailing ineligibility or the suspension of voting rights, and take such sanctions into account. Its decisions are final and non-appealable, and in reaching its decisions, it is not bound to follow specific procedural rules. The Electoral Commission is also competent to decide on all organisational aspects of the FIDE Elections during the 60-day period preceding the elections.

Both on the basis of a teleological interpretation criterion, which takes into account the underlying purpose of the rules, and a systematic criterion, considering the overall body of FIDE regulations, as well as in light of the general principle of law whereby special and exceptional rules derogating from general principles must be interpreted restrictively and not broadly, the Electoral Commission holds as follows:

- to establish the exceptional competence of the Electoral Commission in cases of alleged breaches of the Ethics and Disciplinary Code “arising from FIDE’s elections”, it is required not only that the complaint be lodged within the 60 days preceding the elections, but also that it exclusively concerns violations committed during that same period or, at the very least, discovered or brought to the knowledge of the complainant within that period and not prior;
- in such cases, the Electoral Commission shall assess whether it is possible to reach a decision prior to the date of the elections while respecting the parties'

rights of defence. Otherwise, it may only evaluate whether the conditions of admissibility of the complaint are met on a *prima facie/ictu oculi* basis (for instance, in the case of complaints that are untimely, or unrelated to conduct breaching the Code of Ethics, or manifestly devoid of evidence or merit), in order to prevent complaints intended solely to influence voters through manifestly unfounded assertions. Furthermore, the Electoral Commission may adopt any *interim* measures it deems necessary (such as ordering the cessation of a specific form of campaigning or prohibiting certain conduct, while refraining from declaring a candidate ineligible, as this would be equivalent to a definitive sanction or potentially invalidate the election in the event of a different final decision). As for the remainder, the Electoral Commission must refer the case to the Ethics and Disciplinary Commission, which can then process it in full compliance with its procedural rules and the rights of the parties, bearing in mind that among the possible sanctions that Ethics and Disciplinary Commission can decide to impose, the exclusion from office, including an elective office, is previewed.

I.1) Complaint submitted by Mr Rosenstein

The complaint submitted by Mr. Wadim Rosenstein exposes its legal basis and factual grounds as follows (being relatively short, the exact wording of the main part of the complaint can be quoted below in *italics*):

“LEGAL BASIS

This complaint is grounded in the following regulatory frameworks:

FIDE Electoral Rules (Article 5): Specifically, Article 5.2, which requires candidates to provide accurate information regarding their citizenship and a declaration that they enjoy full civil rights in their state of citizenship.

FIDE Charter (Article 2): Which establishes the principles of integrity, transparency, and good governance.

IOC Code of Ethics: Which FIDE, as a recognized International Federation, is bound to uphold, emphasizing the “integrity of qualifications” and the “duty of disclosure.”

General Principles of Sports Law: Including the principle of Lex Sportiva regarding the truthfulness of applications to hold high-ranking offices in international sports organizations.

FACTUAL GROUNDS FOR DISQUALIFICATION

1. Failure to Disclose Dual Citizenship (Violation of Article 5.2)

Mr. Timur Turlov, in his official application submitted to office@fide.com, declared only his citizenship of the Republic of Kazakhstan. However, evidence (see Attached Exhibit A) indicates that Mr. Turlov remains a citizen of the Russian Federation, as evidenced by (i) the Offer Terms of the 6% Coupon U.S.\$100,000,000 Bonds due 21 December 2026 issued by “Microfinance

Organization FREEDOM FINANCE Credit” LLP, a regulatory filing published on the Astana International Exchange, which formally identifies Mr. Turlov as guarantor and expressly describes him as “a citizen of the Russian Federation”, holding Russian Federation passport No. 758051553, issued on 5 June 2018 by the Ministry of Internal Affairs of the Russian Federation; and (ii) an official passport-status verification record confirming that the same Russian Federation international passport No. 758051553 remains recorded as active and valid until 5 June 2028 (see Exhibit A).

Failure of Disclosure: Article 5.2 of the FIDE Electoral Rules mandates that candidates declare their citizenship status. By omitting his Russian citizenship, Mr. Turlov provided false and/or incomplete information to the FIDE Electoral Commission.

Civil Rights Declaration: Furthermore, Mr. Turlov failed to declare whether he enjoys civil rights in the Russian Federation, a mandatory requirement under Article 5.2.

Legal Implication: The provision of false information in a candidate’s application is a fundamental breach of the electoral process. In international sports governance, the accuracy of an application form is a condition precedent to eligibility.

2. Failure to Disclose Personal Sanctions (Integrity and Reputational Breach)

Since October 2022, Mr. Timur Turlov has been officially included in the Ukrainian Sanctions List (Decree of the President of Ukraine No. 726/2022). These sanctions include the freezing of assets and restrictions on financial operations due to alleged ties to the Russian Federation’s military-industrial complex and financial systems.

Non-Disclosure: Mr. Turlov did not declare these sanctions in his application or subsequent communications with FIDE.

Integrity Conflict: The FIDE Charter and the IOC Code of Ethics require candidates to maintain a reputation that does not bring the sport into disrepute. Holding office while under international sanctions from a sovereign nation presents an existential risk to FIDE’s international standing, sponsorship agreements, and banking relationships.

3. Additional Undisclosed Integrity and Reputational Risks

In addition to the matters set out above, the Complainant has become aware of further material circumstances bearing on Mr. Turlov’s fitness for office which do not appear to have been disclosed to FIDE:

a. SEC Wells Notice: In March 2026, the U.S. Securities and Exchange Commission issued a Wells Notice to Freedom Holding Corp., its principal shareholder, and to Mr. Turlov personally in his capacity as Chief Executive Officer – the formal signal that SEC enforcement staff are considering the recommendation of civil proceedings against him (see Exhibit D).

b. Frozen Assets in the Russian Federation: In March 2024, the Nizhny Novgorod Arbitration Court ordered the freezing of approximately EUR 18.95 million and USD 2.05 millions of Mr. Turlov’s personal assets in connection with a claim brought by the Russian

Federation's state Deposit Insurance Agency; that order has since been upheld on appeal and on cassation (see Exhibit E).

While none of the foregoing constitutes a finding of wrongdoing, and Mr. Turlov denies wrongdoing in each instance, the Complainant submits that pending regulatory enforcement proceedings and unresolved judicial asset-freezing orders of this magnitude are precisely the category of information a candidate for the presidency of an international federation is obliged to disclose, and that the Electoral Commission is entitled to consider such matters in assessing a candidate's fitness for office and the institutional risk his candidacy may pose to FIDE's banking relationships and international standing”.

On those grounds, the Complainant:

“requests that the FIDE Electoral Commission:

1. Investigate the citizenship status of Mr. Timur Turlov, his status on the Ukrainian National Security and Defence Council sanctions list, and the additional undisclosed matters set out in Section III.3 above.

2. Declare the application of Mr. Timur Turlov to be in violation of Article 5.2 of the FIDE Electoral Rules due to the provision of false and incomplete information.

3. Disqualify Mr. Timur Turlov from the 2026 FIDE Presidential Election with immediate effect.

4. Refer this matter to the FIDE Ethics and Disciplinary Commission for a potential breach of the FIDE Code of Ethics”.

Gambit Disputes AG, on behalf of Mr. Timur Turlov and Mr. Anand Viswanathan, submitted a detailed response, which may be summarised as follows.

The response refutes all allegations raised by Mr. Rosenstein, contending that the complaint relies on false, unverified, and outdated information without supplying supporting evidence, and requests a full dismissal to confirm Mr. Turlov's eligibility for the 2026 FIDE presidential elections alongside joint-ticket partner Viswanathan Anand. Addressing citizenship allegations, the defence clarifies that Mr. Turlov formally renounced his Russian citizenship on 27 September 2022, surrendering all Russian passports, and currently holds sole citizenship with the Republic of Kazakhstan, rendering his candidate application disclosures accurate. Regarding Ukrainian national sanctions imposed in October 2022, the filing explains that these measures are unrelated to chess activities, apply strictly within Ukrainian territory, and do not constitute a criminal conviction, a FIDE disciplinary measure, or a ground for ineligibility under Article 4.1 or disclosure under Article 5.2 of the FIDE Electoral Rules. Furthermore, the submission clarifies that the U.S. SEC Wells Notice received by Freedom Holding Corp. and Mr. Turlov represents a preliminary regulatory staff recommendation rather than a formal charge, administrative decision, or established finding of wrongdoing. About claims regarding frozen assets, the defence documents that the Nizhny Novgorod

Arbitration Court fully lifted all interim measures against Mr. Turlov on 8 October 2025 following a settlement agreement. Lastly, the submission addresses the legal precedents cited in the complaint, demonstrating that the matter involved concerned fundamentally different factual and regulatory circumstances, none of which establish expanded disclosure obligations or general grounds for disqualification outside the explicit criteria set forth in the FIDE Electoral Rules.

As to the eligibility of Mr. Timur Turlov and Mr. Anand Viswanathan, this complaint must be rejected.

Conditions and criteria for eligibility are listed in art. 4.1 of the Electoral Rules. The Complainant does not even identify this article as the legal basis of the complaint, He relies on Article 5.2, but not all declarations listed in art. 5.2 correspond to conditions for eligibility ex art. 4.1.

The declaration “if enjoys civil rights in the state of citizenship or residence “, is linked to the condition that “the candidate must not be deprived of his or her civil rights, as an additional sanction related to the commission of a crime, as a result of an enforceable judgment of a national or international judicial authority”.

By contrast, the statement of the personal data of the candidate (first name, family name, place and date of birth, citizenship, residence and domicile, e-mail address, telephone number)”, as well as other declarations, as “if there are reasons for a possible conflict of interest or incompatibility”, are not linked to art. 4.1: they do not constitute conditions of eligibility;, but data of possible interest of the Member Federations and their Delegates, if missing, the Electoral Commission may “ask the candidate to integrate the application and/or to submit additional documents or more specific declarations”, and certainly cannot “disqualify” a candidate, a sanction that does not exist under the FIDE Rules.

The Complainant has adduced no evidence that Mr. Turlov does not enjoy civil rights in the state of citizenship or residence: “freezing of assets and restrictions on financial operations” following alleged decisions by both a Russian Arbitration Court and the Ukrainian Government are sanctions, but they have no effect on the civil rights of Mr. Turlov, The same holds true for the mention of the US Securities and Exchange Commission Wells Notice regarding Freedom Holding Corporation. As a corporation Freedom Holding is a separate legal entity form Mr. Turlov, and this action has no consequences on the civil rights of Mr. Turlov.

Mr. Turlov indicated in his submitted application that he is a citizen of the Republic of Kazakhstan: a fact that is true, not false and is undisputed. The alleged “failure of disclosure” to still have a double citizenship, of the Russian State, true or false, in any case has no consequences for the purposes of the eligibility criteria.

The documents submitted by Mr. Turlov seem to demonstrate that he is no longer a Russian citizen, so there is therefore no need to invite the candidate to integrate the submitted application form.

Finally, the complainant indicates that the Electoral Commission would have to evaluate “a candidate’s fitness for office and the institutional risk his candidacy”, considering that the candidate would have to “maintain a reputation that does not bring the sport into disrepute”: but these are political arguments that do not concern the criteria for eligibility that the Electoral Commission is competent to evaluate.

The complainant also requests to “refer this matter to the FIDE Ethics and Disciplinary Commission for a potential breach of the FIDE Code of Ethics”, on the basis of an alleged violation of “IOC Code of Ethics” and “General Principles of Sports Law”, without indicating which violation of the FIDE Code of Ethics is alleged against to Mr. Turlov.

The Ethics and Disciplinary Commission Chairperson would in any event have competence, or as a Member of the Electoral Commission or as a Member of the Ethics and Disciplinary Commission, to evaluate whether such a complaint is admissible. However, the Complainant has asked only to “refer this matter to the FIDE Ethics and Disciplinary Commission”, for competence or as an Electoral Commission report. Therefore, it is not requested nor necessary to evaluate the admissibility of the complaint, it is sufficient to indicate that this request is rejected, given that the Electoral Commission considers that there are not the conditions to report facts or to refer the complaint to the FIDE Ethics and Disciplinary Commission.

Furthermore, since they may be assessed in connection with decisions on other possible actions before the EDC, the Electoral Commission authorises the FIDE Secretariat to provide the Complainant with copies of the documents submitted by the Respondents, if requested.

I.2) COMPLAINT SUBMITTED BY MR. JAN HENRIC BUETTNER AND MR. MALCOLM PEIN

The complaint submitted by Mr Jan Henric Buettner and Mr Malcolm Pein is directed against “the Presidential Ticket of Mr Timur Turlov and Mr Viswanathan Anand”, citing three main grounds under Articles 4.4, 5.2, 12.4, 20.2, and 20.4 of the FIDE Electoral Rules, which may be summarised as follows.

On 11 March 2026, the Court of Arbitration for Sport (CAS) rendered its Award ordering the Chess Federation of Russia (RCF) to cease regulating chess activities in occupied Ukrainian territories, establishing that non-compliance within 90 days would trigger an automatic three-year suspension. On 10 June 2026, the FIDE Council

confirmed non-compliance and temporarily suspended the RCF's membership with immediate effect.

First, regarding the participation of an all-Russian Ural State Mining University (USMU) team in the FIDE World University Team Chess Championship 2026 in Kazakhstan. Despite the RCF's suspension, the wholly Russian USMU team won the championship and was publicly celebrated by the RCF as a Russian national sporting victory. The complainants argue this constitutes a potential circumvention of the CAS Award and FIDE Council decision, engaging Articles 11.4(f) and 11.4(g) of the FIDE Ethics & Disciplinary Code regarding failure to respect judicial decisions and improper relationships with a suspended national federation. Responsibility is questioned regarding Mr Turlov, as President of the host Kazakhstan Chess Federation and sponsor via Freedom Holding Corp., and Interim President Mr Viswanathan Anand, as part of the FIDE leadership authorising the event.

Second, regarding material information and candidate disclosures related to Freedom Holding Corp.. SEC filings show its subsidiaries provided services to OFAC, EU, or UK sanctioned individuals and entities during fiscal 2023. The complainants request an examination into whether Mr Turlov's candidate declarations under Article 5.2 properly disclosed his inclusion on the Ukrainian sanctions list, these sanctions-related corporate dealings, and potential reputational risks to FIDE under Articles 6.24 and 6.25(a) of the Ethics Code.

Third, regarding significant actual or potential conflicts of interest and the status of the International School Chess Federation (ISCF). Mr Turlov simultaneously serves as President of the Kazakhstan Chess Federation, CEO and controlling shareholder of major FIDE sponsor Freedom Holding Corp., and head of the ISCF. Public FIDE descriptions of the ISCF inconsistently alternate between an "Affiliated Organisation," a "subsidiary organization of FIDE," and a "key partner," while Kazakh registration records list it as an entity established on 10 February 2025 in Almaty. The complainants request an investigation into whether Mr Turlov declared these conflicts under Article 5.2 and whether ISCF or FIDE resources were improperly used to promote his campaign in violation of Article 9.8.

As requested reliefs, the Complainants urge the Electoral Commission to open an immediate investigation, review Mr Turlov's candidate declarations, clarify the legal and financial status of the ISCF, assess violations of FIDE codes, and exercise its authority under Article 20.2 to withdraw the Presidential Ticket of Mr Timur Turlov and Mr Viswanathan Anand from the 2026 FIDE Presidential election.

Gambit Disputes AG, on behalf of Mr. Timur Turlov and Mr. Anand Viswanathan, submitted observations in response and requested the complete dismissal of the complaint, arguing that it would represent a tactical effort by a competing ticket, fails to

establish a *prima facie* case of any ethical or regulatory violation, and inappropriately asks the Commission to launch an unsubstantiated investigation. Regarding allegations surrounding the participation of the Ural State Mining University team in the 2026 FIDE World University Team Chess Championship in Kazakhstan, the Respondent explains that the competition was governed by FIDE, which explicitly confirmed that the team competed as an independent university rather than under the Russian national chess federation, that cited IOC conditions were inapplicable or superseded, and that neither candidate played any personal role in team eligibility determinations. On disclosure obligations, the filing contends that Mr. Turlov fully complied with Article 5.2 of the FIDE Electoral Rules because Ukrainian national sanctions are not based on criminal convictions or FIDE disciplinary measures, do not restrict civil rights, and were already public knowledge, while SEC filings by Freedom Holding Corp. regarding brokerage services provided to sanctioned clients by subsidiaries involved no direct wrongdoing or sanctions violations by Mr. Turlov personally. Furthermore, the response points out that complainant Mr. Buettner failed to apply these same disclosure standards to himself by omitting potential commercial conflicts of interest regarding his private venture, Freestyle Chess, which holds substantial commercial agreements with FIDE. Finally, the Respondent refutes all conflict-of-interest claims, clarifying that Freedom Holding Corp.'s voluntary, non-profit chess sponsorships and Mr. Turlov's leadership in the International School Chess Federation—an independent FIDE-affiliated organization—align directly with FIDE's educational goals, confer no personal property or commercial benefits upon Mr. Turlov, and involved no unauthorised use of FIDE resources for campaign purposes.

As to the eligibility of Mr. Timur Turlov and Mr. Anand Viswanathan, the complaint must be rejected.

As already mentioned above, conditions and criteria for eligibility are listed in art. 4.1 of the Electoral Rules. The complainants do not mention which of these criteria would not be fulfilled. They mention art. 5.2, but not all declarations listed in art. 5.2 correspond to conditions for eligibility ex art. 4.1. Sanctions-related corporate dealings have not deprived Mr. Timur Turlov of his civil rights.

Potential reputational risks do not constitute grounds for ineligibility and amount to a political argument.

The express indication “if there are reasons for a possible conflict of interest or incompatibility with the position for which the candidature is submitted and, if so, how intends to eliminate them if elected”, if omitted, does not constitute a reason to exclude the eligibility, however, these constitute facts of potential interest for the Member Federations and their Delegates and the Electoral Commission may “ask the candidate

to integrate the application and/or to submit additional documents or more specific declarations”.

Mr. Turlov, with his response, acknowledged that he is President of the Kazakhstan Chess Federation, CEO of the Freedom Holding Corp., and head of the ISCF, while maintaining that, in his view, that they are not reasons for a possible conflict of interest or incompatibility. However, these declarations can be of possible interest of the Member Federations and their Delegates. Being already acknowledged by Mr. Turlov, the Electoral Commission, *ex officio*, decides that they must be inserted as a part of Mr Turlov’ application and made public.

“Potential” “reputational risks” to FIDE do not constitute a breach of Articles 6.24 and 6.25(a) of the Ethics and Disciplinary Code: under this aspect the complaint can be immediately dismissed as not admissible:

As regards the alleged violations of Articles 11.4(f) and 11.4(g) of the FIDE Ethics and Disciplinary Code, they concern conduct alleged to have occurred more than two months before elections, competence therefore lies with the Ethics and Disciplinary Commission.

The Electoral Commission authorises the FIDE Offices to communicate to the Complainants, who have already requested, copies of the observations or defences submitted by the Respondents. The Complainants will have the possibility to specify their complaint and requests before the Ethics and Disciplinary Commission.

I.3) FIRST COMPLAINT SUBMITTED BY MR. TIMUR TURLOV AND MR. ANAND VISWANATHAN

Legal counsel Gambit Disputes AG, acting on behalf of Mr Timur Turlov and Mr Viswanathan Anand, submitted a complaint regarding the eligibility of the Presidential Ticket of Mr Wadim Rosenstein and Mr Gordon Tang Yigang.

The complaint rests on two different pillars.

First, the Complainants challenge the validity of seven of the eight national federation nominations submitted in support of the Rosenstein-Tang Ticket, specifically those from Panama, Latvia, Mozambique, Sudan, Mongolia, Thailand, and Germany. They assert that these nominations lack mandatory resolutions, minutes, or proof of prior authorisation from the competent governance bodies mandated by their respective national statutes, violating Article 6.1 of the FIDE Electoral Rules. Consequently, the complainants argue that the ticket holds at most one valid nomination (Bolivia), failing both the quantitative threshold of five endorsements and the geographic requirement of representation from all four FIDE Continents under Article 21.7.

Second, the complaint details alleged material breaches of electoral campaign rules by Mr Rosenstein. It alleges premature campaigning starting as early as February and March 2026—months before the official 26 June 2026 start date—through social media posts, policy proposals, and financial offers targeting national federations. Furthermore, it accuses Mr Rosenstein of unfair campaign practices, including improper financial influence through promises to cover travel and accommodation expenses for European and Asian players, a promise of up to EUR 1 million annually for a ECU candidate's program, the inclusion of the Mongolian Chess Federation President in a high-profile WR Chess team, public defamatory allegations against FIDE officials and Mr Turlov, public demands for Mr Turlov's disqualification based on citizenship and sanctions, and misleading public statements regarding the ongoing operations and growth of his Russian commercial interests post-2022.

By way of relief, while noting that the Electoral Commission possesses the authority to withdraw candidates, the Complainants request “only” a full substantive review of the Rosenstein-Tang ticket's eligibility, fundings of campaign and ethical violations, an order for Mr Rosenstein to cease violating conduct and issue public corrections, a full financial disclosure of benefits provided to federations, and the imposition of a formal reprimand under Article 13.1 of the FIDE Ethics and Disciplinary Code to preserve genuine democratic competition.

Wilkinson Law filed a formal response to this complaint, on behalf of Respondents Wadim Rosenstein and Gordon Tang Yigang, arguing that the complaint would be entirely without merit and represents an attempt to disqualify the Rosenstein-Tang presidential ticket through procedural harassment and mischaracterization of legitimate activities. Regarding nomination validity, the respondents maintain that all eight national federation nominations fully comply with FIDE Electoral Rules, emphasizing that under principles of associative autonomy and *lex sportiva*, official signatures carry a presumption of validity without requiring extraneous internal board minutes. They reject allegations of premature campaigning and financial influence, asserting that Mr. Rosenstein's WR Chess initiatives, player travel sponsorships, and philanthropic contributions were long-standing, globally available, and distinct from vote solicitation or the official campaign timeline. Furthermore, the response defends Mr. Rosenstein's public statements as a legitimate, defensive rebuttal to systematic online smear campaigns. It dismisses claims regarding Mr. Rosenstein's private business operations and sanctions compliance as speculative diversions, labeling demands for financial audits, disclosures, or formal reprimands as ultra vires requests beyond the commission's jurisdiction.

As regards the eligibility of Mr Wadim Rosenstein and Mr Gordon Tang Yigang, the complaint must be rejected.

There is no doubt that, in accordance with art. 6.1 of the Electoral Rules, “the decision to submit the nomination must be approved by each Member Federation in accordance with the procedures established by their statutes”. However, no person holding an institutional role in the competent governance bodies of the Member Federations of Panama, Latvia, Mozambique, Sudan, Mongolia, Thailand, and Germany has raised any issue or doubt regarding the legitimacy of the nominations in favour of Mr Wadim Rosenstein and Mr Gordon Tang Yigang, and/or about a violation of their internal statutes, and in these cases the praxis of the Electoral Commission has always been to consider the existence of a presumption of validity of the nominations sent by the representatives of a Member Federation, and the absence of full proof of existing authorisations/resolutions does not constitute sufficient evidence of a violation of the internal procedures and of an irregularity of the nominations.

As regards the alleged breaches of the FIDE Code of Ethics, given that they regard conducts indicated as performed more than two months before elections, competence therefore lies with the Ethics and Disciplinary Commission.

The Electoral Commission authorises the FIDE Offices to communicate to the Complainants, if requested, copies of the observations or defences submitted by the Respondents. The Complainants will have the possibility to specify their complaint and requests before the Ethics and Disciplinary Commission.

I.4) SECOND COMPLAINT SUBMITTED BY MR. TIMUR TURLOV AND MR. ANAND VISWANATHAN

On 28 August 2026, Gambit Disputes AG, on behalf of Mr. Timur Turlov, filed a new complaint against Mr. Wadim Rosenstein and the German Chess Federation (DSB). The complaint alleges serious electoral misconduct, improper financial influence, and violations of FIDE regulations resulting from a major two-year sponsorship agreement entered into between Mr. Rosenstein's entity, WR Events, and the DSB—one of the largest sponsorship contracts in the DSB's history—announced on 19 August 2026, just five weeks prior to the presidential election scheduled for 26 September 2026 in Samarkand, Uzbekistan. The Complainant contends that this financial transaction creates an impermissible conflict and prohibited undue advantage under Articles 9.1 and 9.2 of the FIDE Electoral Rules, as the DSB previously appointed Mr. Rosenstein as its FIDE Delegate in May 2026, nominated the joint Rosenstein-Tang presidential ticket in July 2026, and holds voting rights in the upcoming election. Furthermore, the filing asserts that this substantial financial commitment interferes with voting freedom and amounts to unethical financial influence in violation of Articles 2.1, 2.4, 7.2, and 9.4 of the FIDE Electoral Rules, as well as severe breaches of the FIDE Ethics and Disciplinary

Code regarding integrity, undue benefits, bribery, and corruption under Articles 6.10, 6.12, 11.7(c), and 11.7(d). Citing the precedent set in FIDE Ethics Case No. 5/2018 concerning the Serbian Chess Federation, the Complainant requests expedited proceedings with a decision rendered prior to 10 September 2026, document production and witness cross-examinations, the formal exclusion of Mr. Rosenstein from the 2026 presidential candidate list and Congress proceedings, and appropriate sanctions or exclusion against the DSB to protect the integrity and transparency of the electoral process.

Mr. Wadim Rosenstein and the German Chess Federation requested until 11 September 2026 to submit their first defences: this request was not granted.

On 4 September 2026, Mr. Wadim Rosenstein and the German Chess Federation (DSB) filed a formal joint response to the FIDE Electoral Commission categorically rejecting all allegations of electoral misconduct, undue financial influence, bribery, and corruption raised in the complaint filed by rival candidate Timur Turlov on 28 August 2026. The respondents clarify that the two-year sponsorship agreement between WR Events and the DSB represents a standard, legitimate commercial partnership signed before the official electoral period began and taking effect on 1 October 2026, placing it entirely outside the restricted three-month electoral campaign window and operating independently of FIDE governance or voting behavior. They argue that the complainant's allegations stem from a misunderstanding regarding the contract's execution dates, which could have been resolved prior to filing, and contend that adopting the complainant's legal interpretation would inappropriately restrict corporate sponsorship and unfairly disqualify any commercial sponsor from seeking chess office. Furthermore, the respondents note the absence of any explicit *quid pro quo* or conditional trade-off regarding delegate status or nominations. Consequently, they request to dismiss the complaint in its entirety, confirm Mr. Rosenstein's full eligibility for the 2026 presidential election, declare both respondents fully compliant with all FIDE Electoral Rules and Ethics Codes, reject all requests for sanctions or exclusions.

This complaint does not concern the eligibility of Mr Rosenstein ex art. 4.1 of the Electoral Rules (if it would concern eligibility, in any case it would also be submitted after the prescribed deadline and therefore not admissible), nor the right to vote of the German Chess Federation ex art. 3 of the Electoral Rules, therefore the requests of a “formal exclusion of Mr. Rosenstein from the 2026 presidential candidate list” and of an exclusion of the German Chess Federation are not admissible.

The complaint concerns alleged breaches of the Code of Ethics and in that respect, it may be admissible. It has been submitted within two weeks following the event which gives rise to it and less than two months before the elections: the Electoral Commission could be competent to decide the case. However, from one side there is no sufficient

evidence that it regards violations discovered or brought to the knowledge of the Complainant within the 60 days preceding the elections and not prior, in addition, considering the requests submitted by both the Complainant (a decision rendered prior to 10 September 2026, after document production, a hearing and witness cross-examinations) and the Respondents (initial request of a deadline until the 11 September 2026 just to produce their first response), the Electoral Commission considers impossible to reach a decision prior to the date of the elections while respecting the parties' rights of defence. Therefore, the case, for both reasons, must be considered of competence of the Ethics and Disciplinary Commission. There are no requests, no reasons for the Electoral Commission to adopt any interim measure.

The Electoral Commission authorises the FIDE Offices to communicate to the Complainants, if requested, copies of the observations or defences submitted by the Respondents. The Complainants will have the possibility to specify their complaint and requests before the Ethics and Disciplinary Commission.

II) REQUEST “FOR URGENT INTERIM MEASURES” ABOUT BIDDING TIMETABLE

On 18 August 2026, candidates for FIDE President Jan Henric Buettner and Deputy President Malcolm Pein submitted a formal request for urgent *interim* measures and expedited determination regarding the bidding timetable for the 2028 and 2029 FIDE World Championships. The submission challenges the timing of the FIDE Events Commission's call for bids, which sets a preliminary indication deadline of 10 September 2026 and a formal bidding deadline of 25 September 2026 at 15:00 CET—just one day before the presidential election on 26–27 September 2026. Without alleging improper conduct or requesting the cancellation of the bidding process, the candidates seek a preventative suspension and post-election rescheduling of both deadlines to uphold institutional neutrality, protect voting federations and FIDE officials from potential or perceived conflict of interest, and align with electoral rules regarding equal treatment and non-abuse of FIDE resources. Specifically, the request asks the Electoral Commission to suspend the current deadlines until after the election, establish replacement timelines giving equal preparation time, prohibit private communications between FIDE representatives and member federations regarding bid prospects, maintain strictly confidential handling of any bids already received, request clarification from FIDE regarding the administrative necessity of the current schedule.

This request is only indirectly linked to the electoral procedures; it is not a complaint having as object alleged violations of the Code of Ethics and concerns matters that are

not included among the jurisdiction of the Electoral Commission. Therefore, this request cannot be examined by the Electoral Commission.

III) LOCATION OF THE FIDE CONGRESS

The Electoral Commission, which has competence to supervise, also *ex officio*, all aspects of the electoral process, received a copy of the “Master plan of the “Expo Center 1”, location of the Samarkand Chess Olympiads and FIDE Congress.

The plan appears to indicate that all three candidates to the Presidential tickets will have at their disposal an equal space of around 80 metres for their campaigning, and this is fully correct, but there would be others, even larger spaces, attributed to entities that could be referred to or connected to one or two of the candidates for the Presidential ticket.

The Electoral Commission has no full confirmation of this, nor of an intention to use these spaces for campaigning. However, the Electoral Commission must remind all candidates and to the organisers that, in accordance with art. 21.11 of the Electoral Rules, “in the location of the FIDE Congress and of the Chess Olympiads, Presidential candidates must have equal spaces and equal opportunities to present their programme and to distribute election materials, in an open and transparent way”.

IV) PRACTICAL SAFEGUARDS FOR BALLOT SECRECY

On 1 September 2026, Mr Jan Henric Buettner and Mr Malcolm Pein, acknowledging the Commission’s conclusions from its 27 July 2026 Report, request the Commission to inform all candidates and member federations of the specific operational measures it plans to implement inside the voting area, asking specifically to establish practical protections covering voter privacy while filling out ballot papers, prohibitions on photographing or recording completed ballots, restrictions on access and conduct within the polling area, and secure ballot handling protocols to guarantee that no voter faces pressure or is forced to produce proof of their vote.

The Electoral Commission fully agrees as to the primary importance of ensuring the safeguards described above, assures that, in collaboration with the organisers of the FIDE Congress, it will strive to adopt every useful measure in this regard.

The Electoral Commission will also organise a meeting, in Samarkand, a few days before the elections, to inform all candidates of the measures implemented to guarantee the free and unhindered exercise of the right to vote, polling station security and independent monitoring procedures.

5 September 2026

The Electoral Commission