

Union des Associations Européennes de Football ("UEFA")

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*To the attention of Mr Theodore Theodoridis, UEFA General Secretary**With copy to Mr Mattias Grafström, FIFA General Secretary*

21 November 2025

Request for UEFA Recognition of the Unify League

Dear Theo,

On December 17, 2024, A22 Sports Management ("A22") submitted a letter requesting official recognition by UEFA of the Unify League, our proposal for new pan-European club football competitions (the "Recognition Letter"). This submission and proposal was fully consistent with the Court of Justice of the European Union ("CJEU") ruling of December 21, 2023 which found that UEFA operates as a dominant monopoly and that its statutes and practices with respect to the pre-authorization of cross-border club competitions are in breach of European Union competition law. The CJEU, later joined by Commercial Court 17 of Madrid in mid-2024, required UEFA to amend its statutes to open the market to third-party organizers such as A22.

In the months following the submission of the Recognition Letter, A22 has engaged in extensive negotiations with UEFA to seek common ground and to avoid further legal conflict. Despite our substantial concessions, an agreement has not been reached. Accordingly, we hereby reiterate our request for official UEFA recognition of our proposal (as modified to reflect the aforementioned negotiations) at the earliest possible date and in any event no later than 8 weeks from the date of this letter.

The 2025 Negotiations

As you well know, between March and September of this year we engaged in good faith negotiations with UEFA (the "2025 Negotiations"). During this time, we compromised on numerous issues in order to materially narrow the gap between what we can sensibly accept (given our objectives) and the current structure of existing UEFA club competitions. We did this to deliver a jointly agreed solution that would provide substantial benefits for fans, players and clubs. During

this 7-month period we focused on a reduced and very targeted set of key objectives which have been at the foundation of our activities since 2021. They are:

Improved Format – Incorporate changes to the current pan-European club competitions to increase fan interest and engagement by consistently delivering competitive, high-stakes matches throughout the full competition, not just in the latter stages.

Adoption of Unify Platform – Deliver live matches to the home via the Unify platform, a dedicated direct-to-fan streaming service majority owned and controlled by clubs. Unify would dramatically improve the fan viewing experience by combining best-in-class video technology with world class football. It will also make fan access to televised matches more affordable by offering both free and subscription packages while providing clubs with the essential data needed to strengthen direct fan engagement and communication.

Modernized Governance – Modify the current governance structure to definitively include the voices of participating clubs and players. The current governance system leaves formal decision making as to format and many other critical matters solely to the UEFA Executive Committee. This is no longer sustainable, in particular as the historical UEFA monopoly prevents alternative options from emerging. This stands in sharp contrast to domestic leagues where participating clubs jointly determine their own strategies and policies.

The modifications to the current UEFA system we proposed during the 2025 Negotiations were conveyed to you on numerous occasions. It is appropriate to present them here in summary form.

Format Modifications – We proposed no modifications to the existing UEFA club competitions qualification process and the three-level structure of the tournament, (i.e. Champions League, Europa League and Conference League). The only change proposed was to split the 36 participating clubs in the League Phase of the Champions League into two groups of 18 (based largely on UEFA ranking). Clubs would play only within their groups during the Group Stage, and the best performers would continue to the Knockout Stage or the Playoff Round as the case may be. All participating clubs would continue to have the chance to win the competition. This would lead to greater competitiveness and match quality during the initial stage of the competition which represents 75% of matches played.

Governance Modifications – Our approach left unchanged 100% of the current governance infrastructure, including EFC (formerly ECA) and the UEFA decision making bodies. Decisions with respect to format, revenue distribution and other matters would continue to be made as they are currently, i.e. via the advisory bodies of the EFC and the decision-making bodies of UEFA. Added to this governance structure would be a League Board of Directors made up of a majority of participating clubs, with additional seats for player representatives, UEFA and EFC. This Board would have the right to veto decisions regarding changes to format, revenue distribution, and decisions impacting commercial and

sporting aspects of the competition. Further, to improve transparency in disciplinary processes related to financial sustainability or other issues, the League Board would appoint three independent advisors to participate in relevant UEFA proceedings involving clubs above a certain revenue threshold.

Critically, the result of these proposed modifications is shared (but nonetheless substantive) governance between clubs, players and UEFA as opposed to the sole governance for clubs we had historically sought since April, 2021.

Live Match Distribution Modifications – Our proposal included the launch and utilization of the Unify streaming platform as noted above.

The concepts we put forth during the 2025 Negotiations contained many compelling elements for UEFA and the football community at large. Each of the three key objectives noted above would be achieved with substantial benefits for fans, players and clubs. Further since much of the existing governance and format structure was left in place, the modifications were minimally disruptive. Sadly, despite these benefits UEFA continues to reject our approach for cooperative solutions.

Audiencia Provincial Ruling

We note that on October 29, 2025 the Audiencia Provincial (the Court of Appeal), delivered its decisions with respect to UEFA's appeal against the judgment of Commercial Court 17 of Madrid issued in May 2024. The Audiencia Provincial rejected UEFA's appeal confirming in the strongest terms the ruling rendered by Commercial Court 17.

To date, three different European courts including the EU's highest court have issued consistent rulings that leave no room for doubt: UEFA's abuse of its dominant monopoly position cannot stand, and its exclusionary practices must cease.

Despite this clarity, UEFA continues to maintain statutes which are contrary to EU law (as documented in Appendix C). Incredibly, UEFA implemented its most recent non-compliant rules in June 2024, six months after the CJEU ruling in December 2023.

As a result, UEFA is now exposed to substantial damage claims from injured parties including clubs, players and A22.

Revisions to the December 2024 Recognition Letter

The competition structure in the Recognition Letter of December 2024, has been modified herein to be consistent with the 2025 Negotiations held with UEFA. Specifically, we have incorporated the existing UEFA annual qualification process and adopted a modified version of the current "Swiss Model" tournament format in which the 36 clubs participating in the competitions are split into two groups of 18. As an example, in the Unify Star League the groups would be divided as follows:

- Group A: the Star League champion, the champions of the top six domestic leagues (as determined by the UEFA Country Coefficient) plus the 11 clubs with the highest UEFA Club Coefficient from within the remaining qualified clubs (18 clubs in total).
- Group B: the remaining 18 qualified clubs.

During the Group Stage, clubs will play within their groups with the top performing clubs progressing to the Knockout Stage or Playoff Round as the case may be.

Participating clubs in the Gold and Blue Leagues will be similarly divided into two groups, in this case using only the UEFA Club Coefficient. Please see a detailed discussion of the format and calendar of the proposed competitions in Appendix A.

The Unify League will be governed by a Board of Governors comprised of 20 members: 14 from participating clubs, 3 player representatives and 3 representatives from UEFA/FIFA.

Next Steps

Pursuant to the CJEU ruling (and the rulings of other relevant Courts), the process for third party organizers to obtain official UEFA recognition for new pan-European club competitions must be expeditious to not unduly deprive them of market access. At this stage, UEFA is well versed in our proposal since the Recognition Letter was submitted ten months ago and was followed by the 7 month period of the 2025 Negotiations. Further, by modifying our proposal with critical elements of those negotiations, the annual qualification process and format we propose substantially reflects UEFA's existing club competitions. Finally, as documented in Appendix B, you will note that we have incorporated into our proposal the current UEFA Regulations on Anti-Doping, Equipment, Disciplinary, Medical, Fair Play, Safety and Security, and Stadium Infrastructure.

In this context, our request for an 8-week approval period from the date of this letter is reasonable and consistent with CJEU directives.

Yours sincerely,

Bernd Reichart

CEO – A22 Sports Management, S.L.

APPENDICES

Appendix A – Competition Format Detailed Description

IFAB

The Unify League men's and women's competitions will all be played in accordance with the IFAB Laws of the Game.

Unify League Men's Competitions

The Unify League will be comprised of three men's competitions, the Star League, Gold League and Blue League. Each competition will feature 36 clubs, as in the current UEFA Club Competitions. Qualification will be the same as the existing UEFA Club Competitions process and based on annual performance in domestic leagues. Clubs from all eligible UEFA National Associations will be able to qualify.

The 36 clubs which qualify to the Group Stage of the Star League will be separated into two groups of 18:

- Group A: the Star League champion, the champions of the top six domestic leagues (as determined by the UEFA Country Coefficient) plus the 11 clubs with the highest UEFA Club Coefficient from within the remaining qualified clubs (18 in total).
- Group B: the remaining 18 qualified clubs.

The 36 clubs which qualify for the Gold and Blue Leagues respectively, will be similarly split into two groups of 18 based only on the UEFA Club Coefficient i.e. the 18 qualified clubs with the highest UEFA Club Coefficient in Group A, and the other 18 clubs in Group B.

Clubs will play 8 matches in the Group Stage, 4 home and 4 away, against 8 different opponents in their group. Of these 8 matches, 4 will be against clubs in Pot 1 (top 9 clubs in each Group by UEFA Club Coefficient) and 4 will be against clubs in Pot 2. The opponents that each club faces will be determined through a random draw. Each Group will have its own table and qualification to subsequent rounds will be determined by performance during the Group Stage.

As per the December, 2024 Recognition Letter, the winner of each game will be awarded 3 points, in case of a draw each team will be awarded 1 point, and losers will receive 0 points. The sum of points obtained over the 8 Group Stage matches will determine each club's standing in its group. If two or more clubs have equal points upon completion of the Group Stage, the following criteria will be applied, in this order, as tie breakers:

- a) higher number of points obtained in the Group Stage matches played among the teams in question;
- b) superior goal difference from the Group Stage matches played among the teams in question;
- c) higher number of goals scored in the Group Stage matches played among the teams in question
- d) if, after having applied criteria a) to c), teams still have an equal ranking, criteria a) to c) are reapplied exclusively to the matches between the remaining teams to determine their final rankings. If this procedure does not lead to a decision, criteria e) to j) apply in the order given to the two or more teams still equal;
- e) superior goal difference in all Group Stage matches;
- f) higher number of goals scored in all Group Stage matches;
- g) higher number of away goals scored in all Group Stage matches;
- h) higher number of wins in all Group Stage matches;
- i) higher number of away wins in all Group Stage matches;
- j) lower disciplinary points total based only on yellow and red cards received by players and team officials in all Group Stage matches (red card = 3 points, yellow card = 1 point, expulsion for two yellow cards in one match = 3 points)

The Group Stage will be followed by the Playoff Round and subsequently the Knockout (“KO”) Stage, starting with the Round of 16.

Clubs in each of the Star, Gold and Blue Leagues will qualify for the Playoff Round and KO Stage as follows:

- Group A: the top 6 clubs (1st-6th) qualify directly for the Round of 16. The next highest performing 8 clubs in the league table (7th-14th) qualify for the Playoff Round.
- Group B: the top 2 clubs (1st-2nd) directly qualify for the round of 16. The next highest 8 clubs in the league table (3rd-10th) qualify for the Playoff Round.

The pairings in the Playoff Round and the Knockout Stage will be seeded. For the Playoff Round, clubs will be paired based on their positions at the end of the Group Stage to form four seeded pairs (clubs in positions 7 and 8, 9 and 10, 11 and 12, and 13 and 14 in Group A) and four unseeded pairs (positions 3 and 4, 5 and 6, 7 and 8, and 9 and 10 in Group B). The clubs in each seeded pair are drawn against the clubs in each unseeded pair such that:

Playoff	Seeded Pair <i>2nd leg at home</i>		Unseeded pair
Playoffs 1 and 2	7 th or 8 th in Group A	vs.	9 th or 10 th in Group B
Playoffs 3 and 4	9 th or 10 th in Group A	vs.	7 th or 8 th in Group B
Playoffs 5 and 6	11 th or 12 th in Group A	vs.	5 th or 6 th in Group B
Playoffs 7 and 8	13 th or 14 th in Group A	vs.	3 rd or 4 th in Group B

The fixtures for the Round of 16 are determined by means of a draw conducted in accordance with the following principles:

- The clubs are paired based on their positions at the end of the Group Stage to form four seeded pairs (clubs in positions 1 and 2, 3 and 4, and 5 and 6 of Group A and clubs in positions 1 and 2 in Group B).
- The clubs in each seeded pair are drawn into one of two positions in the Round of 16, against the relevant winner of the Playoff Round such that:

Round of 16	Seeded Pair <i>2nd leg at home</i>		Playoff Round Winner
Round of 16 1	1 st or 2 nd in Group A	vs.	Playoff 8
Round of 16 2		vs.	Playoff 7
Round of 16 3	3 rd or 4 th in Group A	vs.	Playoff 6
Round of 16 4		vs.	Playoff 5
Round of 16 5	5 th or 6 th in Group A	vs.	Playoff 4
Round of 16 6		vs.	Playoff 3
Round of 16 7	1 st or 2 nd in Group B	vs.	Playoff 2
Round of 16 8		vs.	Playoff 1

Quarter-Final pairings are defined as per the table below:

Playoff	Winner <i>2nd leg at home</i>		Winner
Quarter-Final 1	Round of 16 1	vs.	Round of 16 8
Quarter-Final 2	Round of 16 2	vs.	Round of 16 7
Quarter-Final 3	Round of 16 3	vs.	Round of 16 6
Quarter-Final 4	Round of 16 4	vs.	Round of 16 5

Semi-Final pairings are defined as per the table below

Playoff	Winner <i>2nd leg at home</i>		Winner
Semi-Final 1	Quarter-Final 1	vs.	Quarter-Final 4
Semi-Final 2	Quarter-Final 2	vs.	Quarter-Final 3

Playoff Round and KO Stage ties will be played home and away with the exception of the final which will be played on neutral ground. The club hosting the second leg of each Playoff Round and KO Stage pairing is indicated in the tables above.

This format applies to all three Unify League Competitions: the Star, Gold and Blue Leagues with the exception that the Group Stage of the Blue League will be composed of only 6 matches per team, as is the case today in the UEFA Conference League.

The remaining provisions outlined in our December 2024 Recognition Letter are kept unchanged.

Exhibit 1: Graphic Representation of Proposed Format

GROUP STAGE ALLOCATION – STAR LEAGUE

GROUP A



1 STAR LEAGUE CHAMPION

*6 CHAMPIONS OF TOP-6 DOMESTIC LEAGUES BY
UEFA COUNTRY COEFFICIENT*

*11 CLUBS WITH THE HIGHEST UEFA COEFFICIENT
OF REMAINING QUALIFIED CLUBS*

GROUP B



OTHER 18 CLUBS BY UEFA COEFFICIENT

GROUP STAGE ALLOCATION – GOLD LEAGUE & BLUE LEAGUE

GROUP ALLOCATION WILL BE BASED ON THE UEFA COEFFICIENT OF THE 36 PARTICIPATING CLUBS

GROUP A



TOP 18 CLUBS BY UEFA COEFFICIENT

GROUP B

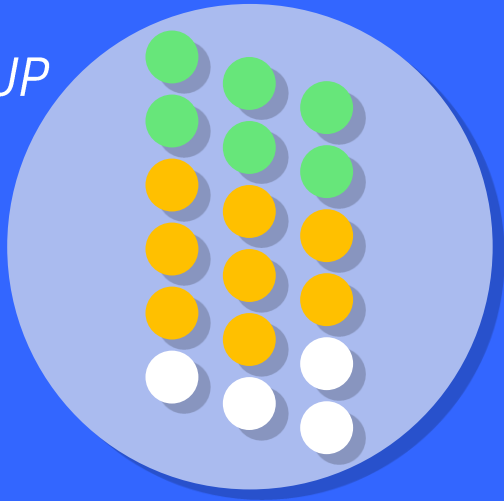


OTHER 18 CLUBS BY UEFA COEFFICIENT

PLAYOFF ROUND

36 CLUBS
2 GROUPS OF 18

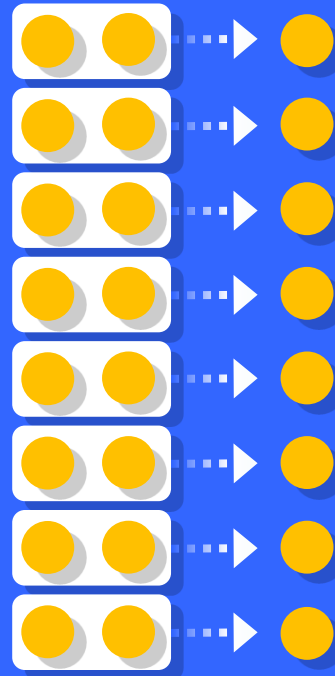
GROUP
A



GROUP
B



PLAYOFF ROUND
16 CLUBS



6 CLUBS

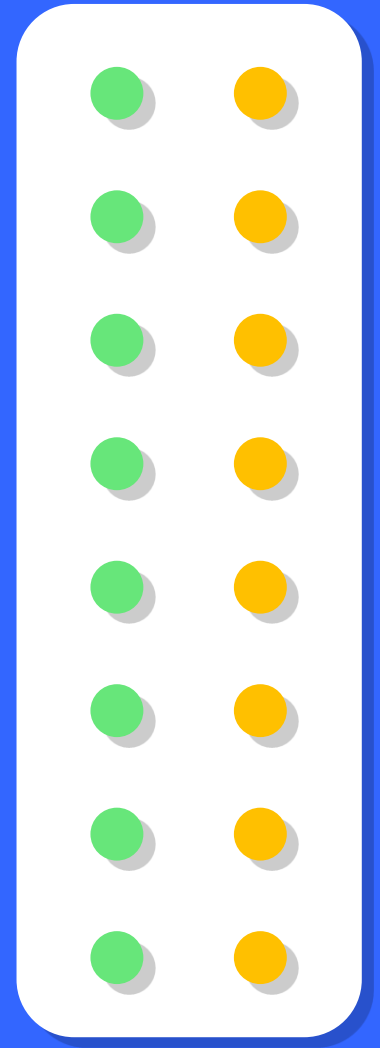
2 CLUBS

8 CLUBS

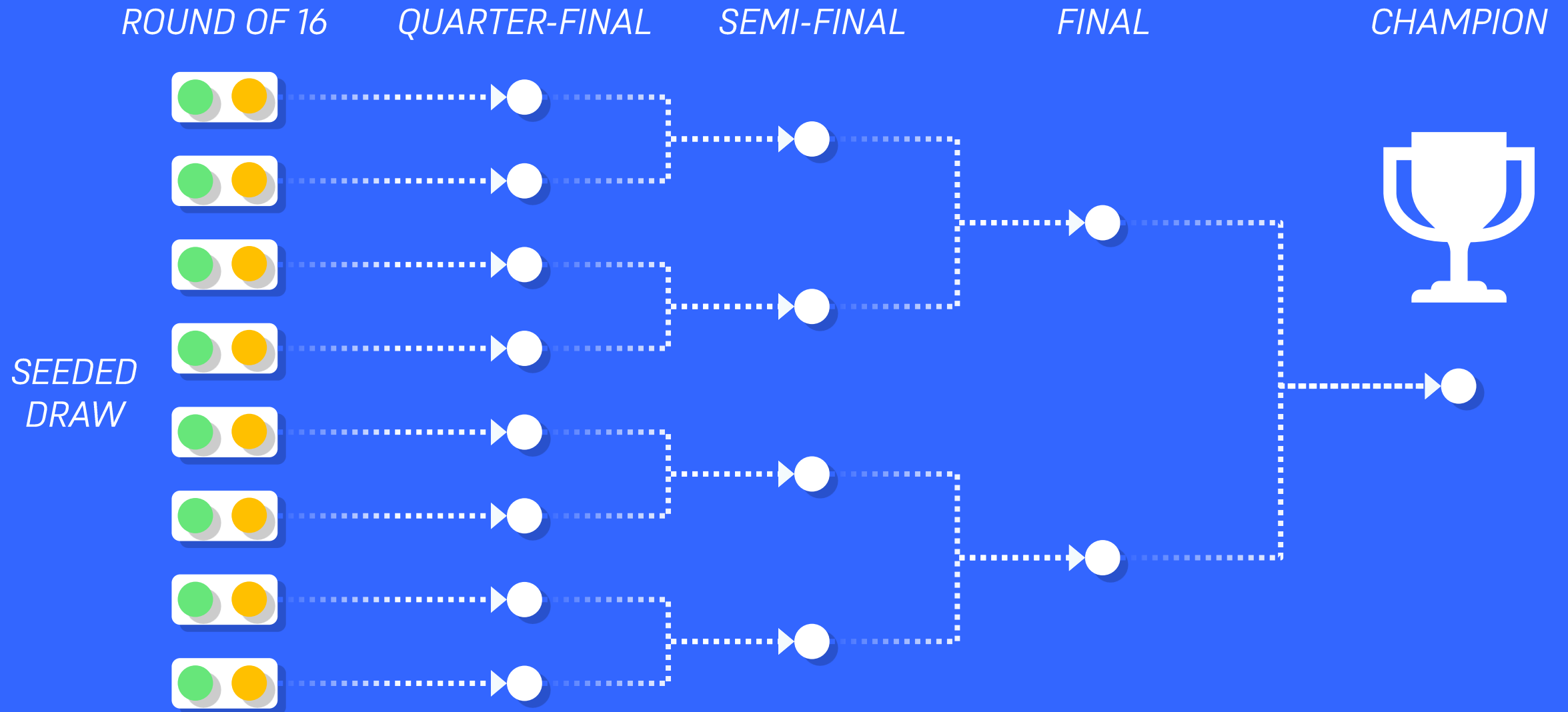
8 CLUBS

8 CLUBS

ROUND OF 16
16 CLUBS



KO STAGE



The calendar for the Unify League will be same as the calendar of current UEFA Club Competitions. Please see below for an illustrative calendar displaying the dates during which Unify League matches would take place.

	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu													
Jul	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31					
								SL Q1	SL Q1	OC Q1					SL Q1	SL Q1	OC Q1					SL Q2	SL Q2	OC Q2				SL Q2	SL Q2	OC Q2						
Aug		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31				
								SL Q3	SL Q3	OC Q3					SL Q3	SC F	OC Q3					SL PO	SL PO	OC PO				SL PO	SL PO	OC PO						
Sep	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30						
	Int	Int	Int	Int	Int	Int	Int	Int	Int							SL 1	SL 1	SL 1					GL 1	GL 1					SL 2							
Oct		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31				
		SL 2	OC 2					Int	Int	Int	Int	Int	Int	Int	Int							SL 3	SL 3	OC 3												
Nov																																				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30					
								SL 4	SL 4	OC 4						Int	Int	Int	Int	Int	Int	Int	Int					SL 5	SL 5	OC 5						
Dec	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31					
								SL 6	SL 6	OC 6							BL 6																			
Jan		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31				
																						SL 7	SL 7	GL 7				SL 8	SL 8	GL 8						
Feb																																				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28							
																						SL 9	SL 9	OC 9				SL 10	SL 10	OC 10						
Mar																																				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31				
																						SL 11	SL 11	OC 11				Int	Int	Int	Int	Int	Int	Int	Int	Int
Apr	1	2	3	4	5	6	7	8</																												

SC Unify Super Cup Final

Int International Break

29 Total Matchdays (including Qualifying and Finals)

Unify League Women's Competitions

The women's competitions will remain unchanged vis-à-vis the current UEFA women's club competitions.

The top competition – the Star League – will feature 18 clubs, while the Gold League will feature 16 clubs. Access to the Women's Star and Gold Leagues will be the same as the access for the current UEFA Women's Club Competitions.

In the Star League, the 18 qualified teams will play 6 matches, 3 home and 3 away in a Swiss-system League Phase:

- Clubs ranked 1st-4th in the League Phase will advance to the Quarter-finals
- Clubs ranked 5th-12th will qualify to a knockout Playoff Round
- The remaining six teams will be eliminated

In the Playoff Round, 8 teams will play a home and away tie to qualify to the Quarter-finals. From the Quarter-finals onwards, the competition will follow the existing format of home and away knockout rounds leading to the final staged at a neutral venue

The Gold League will be a straight knockout competition starting from the Round of 16.

The Round of 16, Quarter-finals, Semi-finals and Final will be home and away knockout rounds.

Appendix B – Additional Considerations

The Unify League and its participating clubs will comply with the following regulations as adopted by UEFA:

- UEFA Anti-Doping Regulations – Edition January 2021
- UEFA Equipment Regulations – Edition June 2024
- UEFA Disciplinary Regulations – Edition June 2024
- UEFA Medical Regulations – Edition January 2025
- UEFA Fair Play Regulations – Edition July 2015
- UEFA Safety and Security Regulations – Edition June 2019
- UEFA Stadium Infrastructure Regulations – Edition June 2025

Appendix C – UEFA/FIFA Pre-Authorization Statutes

With respect to UEFA/FIFA pre-authorization statutes for new cross-border club competitions, the CJEU directives are clear and concise:

- “... it is legitimate to subject the organization and conduct of international professional football competitions to common rules intended to guarantee the homogeneity and coordination of competitions within a calendar and are intended to adequately and effectively promote the holding of sporting competitions based on equal opportunities and merit.” (para 144 CJEU)
- Commercial Court 17 of Madrid similarly wrote: “The existence of rules for prior authorization and participation in competitions are legitimate when they aim to ensure homogeneity and coordination of competitions within a calendar and are intended to adequately and effectively promote the holding of sporting competitions based on equal opportunities and merit.” (page24 CC17Madrid)

Helpfully, the court rulings are very prescriptive. Pre-authorization rules, such as UEFA Statute Articles 49 and 51, may be considered legitimate only if they are properly and precisely defined in advance, applied to ensure that the new competitions comply with the set of conditions identified by both courts, i.e. new proposed competitions should align with the football calendar and adhere to broadly meritocratic principles, and simultaneously serve to control and limit the monopoly of UEFA. These restrictions are necessary and logical given the significant conflict of interest between UEFA’s combined role as both monopoly operator and gatekeeper of new entrants.

However, we note that neither UEFA nor FIFA currently have rules in place that comply with the Court’s directives. FIFA has no such rules, and the existing UEFA rules, (as detailed below) appear to deliberately conflict with the CJEU ruling. Nonetheless, the Unify League proposal fully aligns with the CJEU decision, and, consequently, would always comply with any future rules or statutes that may be introduced by UEFA or FIFA to the extent such rules or statutes themselves respect the CJEU’s requirements.

Comment on UEFA Authorization Rules Governing International Club Competitions – Edition 2024

When ESLCo/A22 initiated its competition law claim against UEFA and FIFA on April 21, 2021, UEFA had no rules outlining the process for approving new European competitions under Articles 49 and 51 of its Statutes. Since then, UEFA has introduced such rules, most recently in a document titled “UEFA Authorization Rules Governing International Club Competitions – Edition 2024”. These rules were adopted after the December 2023 CJEU ruling and, as such, should align with the Court’s directives. However, even a cursory review reveals that this is not the case. While a comprehensive, paragraph-by-paragraph analysis of the numerous ways the 2024 Rules fail to

meet the CJEU's requirements is beyond the scope of this submission, a single example is sufficient to demonstrate this non-compliance.

- ***“Article 7 – Sporting merit criteria (paragraph 4)***

“In order to protect the sporting merit of UEFA Champion Club Competitions, the good functioning of the international calendar as well as the health and safety of players, authorisation of an International Club Competition shall be subject to the following cumulative conditions **so that it shall not adversely affect the good functioning of UEFA Champion Club Competitions with respect to:**

(a) the participation of the following qualified clubs for determination of a champion club of Europe in each respective category:

(i) the club is qualified to play as the winner of the top domestic league championship; or

(ii) the club is qualified to play as runner-up or qualified through the top domestic league championship in accordance with UEFA’s association coefficient ranking; or

(iii) the club is qualified to play as the titleholder of the UEFA Champion Club Competition; or

(iv) the club is qualified to play as the titleholder of the UEFA Europa League;”

In simplified terms, this paragraph states that any club or promoter seeking to organize a new European club competition will only be officially recognized by UEFA if it doesn’t compete with **the existing UEFA Champions, Europa and Conference Leagues**. This is an obvious abuse of UEFA’s dominant, monopoly position and appears to intentionally defy the CJEU ruling which is in effect EU law.

In fact, the use of indeterminate legal concepts to define the conditions under which UEFA may deny authorisation for alternative competitions—specifically, as set out in Article 7 of the 2024 Rules, which states that: *"it shall not adversely affect the good functioning of UEFA Champion Club Competitions"*—demonstrates, once again, that UEFA seeks to subject the authorisation of such alternative competitions to its own subjective and abusive discretion. This approach entirely disregards the guarantees of transparency, objectivity, precision, non-discrimination, and proportionality required by the CJEU (para. 151 CJEU).

The CJEU has made clear that A22 and UEFA must be on equal footing when proposing and organising European competitions. Thereafter clubs are free to decide which tournament they want to play. Rules, procedures (or lack of procedures) favouring UEFA's own competitions versus those that might be proposed by A22 (or any other third party) are incompatible with EU law.