



POLICY FOR GATHERING ANTI-DOPING INTELLIGENCE

INTERNATIONAL FEDERATION ICESTOCKSPORT (IFI)

Introduction and Scope

This policy describes IFI's procedures for gathering and assessing information and intelligence in accordance with Article 11 of the International Standard for Testing and Investigations (ISTI).

Responsibilities

IFI's Vice-President for Legal Affairs is responsible for the implementation and follow-up of this policy and subsequent procedures.

IFI's policy for handling anti-doping intelligence

1. Security and Confidentiality

IFI's Vice-President for Legal Affairs is bound by a confidentiality agreement in relation to his/her responsibilities under this policy and ensures that all intelligence received is kept confidential. Any disclosure to other IFI's staff and officers shall be on a strict need-to-know basis only and any person who receives such information shall maintain its strict confidentiality.

2. Storage of information

IFI's Vice-President for Legal Affairs shall ensure that the collected information and IFI's operational data are handled securely and separately from any other IFI's department or databases, through the following appropriate means:

- ❖ Encrypted / password protected databases, spreadsheets or forms, links analysis software, specific IT equipment;
- ❖ Locked storage room or cabinet, safe box. Specifically, all physical evidence (e.g. documents, photos, products, discarded medical equipment, etc.) will be identified, assessed and recorded.



3. Protection of the sources of intelligence

Within IFI's scope, Vice-President for Legal Affairs ensures the protection of the sources of intelligence as deemed appropriate. When proceeding with intelligence sharing or dissemination, no identity shall be disclosed without prior consent of the source.

4. Risk of leaks or inadvertent disclosure

In accordance with point 1. above, Vice-President for Legal Affairs ensures the minimization of the risk of leaks and inadvertent disclosure of intelligence captured. However, should this occur, Vice-President for Legal Affairs shall promptly evaluate the nature of the leak disclosure, the possible negative consequences, and take remediation measures as appropriate. IFI shall keep a record of the facts relating to the leak or disclosure, its effects and remedial actions taken.

5. Shared information

Where intelligence is shared with IFI by other parties such as health, law enforcement agencies, sports organization, other Anti-Doping Organizations, etc., Vice-President for Legal Affairs will confirm in writing to such other parties that all intelligence received is processed, used and disclosed according to the procedures set out in points 1, 2 and 3, and only for legitimate anti-doping purposes.

Where intelligence is shared by IFI with other parties, IFI will require the same written confirmation from such other parties.

IFI will use secure communication tools when transferring any confidential information to external parties.

Gathering, assessment and use of anti-doping information (intelligence)

1. Information sources and whistleblowers reporting tools

Internal or "closed" sources (where access is restricted) include: ADAMS, Athlete Passport Management Unit (APMU), other ADOs, WADA, laboratories, law enforcement, health agencies, sample collections agencies' Doping Control Officers (DCO), chaperones, whistleblowers reports (e.g., confidential reporting by Athletes or Athlete Support Personnel), IFI's Medical/Anti-Doping officers, Code "Substantial Assistance" provision, etc.

External or "open" sources (publicly available information) include: Internet, traditional and social media, research and academic publications, sports news and forums, etc.

A dedicated e-mail address (integrity@icestock.sport) and IFI's website specific platform.



2. Collation and assessment

Vice-President for Legal Affairs first evaluates the reliability of the source, then assesses the accuracy of the information itself.

3. Processing and outcomes

Taking into account the evaluation and assessment above, and other relevant factors indicating potential risks of doping, such as those identified in the IFI's risk assessment, Vice-President for Legal Affairs determines follow-up action(s) such as:

- i. conducting target testing,
- ii. conducting further investigation on a particular case,
- iii. establishing trends or patterns for reviewing the Test Distribution Plan, and/or,
- iv. creating files to be referred for future investigations.

Where appropriate, sharing information with other parties such as law enforcement or other ADOs with jurisdiction can be considered, with Vice-President for Legal Affairs ensuring that at least the similar requirements as per point 4 "Shared Information" above are fulfilled by the other party.

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