

WHISTLEBLOWING

POLICY



U.S. Anti-Doping Agency

USADA WHISTLEBLOWING POLICY

Statement of Purpose

The U.S. Anti-Doping Agency (USADA) has adopted this whistleblowing policy in order to provide a clear understanding of USADA's approach toward whistleblowing and of how USADA handles instances of whistleblowing to assist potential whistleblowers. USADA regards whistleblowing - reporting information of ethical violations - as one of the most effective means of advancing the health and wellbeing of athletes in furtherance of the goal of ethical sport. USADA is fully committed to the well-being of whistleblowers and to making the whistleblowing process as safe, non-intrusive and positive as possible.

What is Whistleblowing?

Whistleblowing simply refers to providing USADA or any other appropriate authority information (or "tips") that may lead to the discovery of ethical violations or misconduct in sport, including anti-doping rule violations. For example, an athlete might have information about use of a prohibited substance by another or information concerning a coach or doctor that has encouraged the use of a banned substance.

Ethical violations and misconduct can be committed by, but is not limited to, athletes, athlete support personnel, sport officials, anti-doping organization staff, doping control officers, and laboratory staff.

Whistleblowing can be anonymous, safe and administratively easy, and can lead to significant advances in ethical sport.

If you are unsure about whether you are a whistleblower or whether your information should be reported, contact USADA.

Who can be a Whistleblower?

Importantly, whistleblowing does not require the whistleblower to have every relevant piece of information or verify that it is accurate or thorough in order to be valuable. Merely providing a "piece of the puzzle" can be extremely significant.

Whistleblowers can provide information to USADA through any of the following avenues:

- Play Clean Web Form Submission at the link <https://www.usada.org/resources/playclean/> (this submission can be anonymous);
- Text anonymous tips to 87232 ("USADA"), powered by [RealResponse](#):
 - If texting a tip from outside the United States, text +1 719-748-7232 (+1 719-74-USADA);
- Email to playclean@usada.org;
- Phone call to 1-877-Play Clean (1-877-752-9253) (you can leave a voicemail, your phone number will not be stored);
- Person-to-person call - if you request a return phone call using any of the above methods, we will call you back within 24 hours during the week and within 72 hours on a weekend (more than 90% of the time incoming calls are handled directly and immediately by USADA's investigative staff); or

- Face-to-face meetings can often be arranged depending on the circumstances.

All Play Clean Tips are considered confidential information and speaking to or otherwise communicating with USADA does not change the confidential status of the information provided or waive a whistleblower's right to remain anonymous throughout USADA's investigation of another person and any resulting disciplinary proceedings.

The World Anti-Doping Code (the "Code") permits anti-doping organizations to reduce, or in some circumstances eliminate the period of ineligibility or other consequences that would otherwise be imposed (or that have already been imposed) upon an athlete or other person for an anti-doping rule violation in the event the athlete or other person provides substantial assistance leading to the discovery or prosecution of anti-doping rule violations, criminal offenses or the breaches of professional rules committed by a person involved in sport. USADA will always investigate the possibility of a whistleblower receiving credit under these substantial assistance provisions in the Code.

What is the Rodchenkov Anti-Doping Act?

The Rodchenkov Anti-Doping Act of 2019 ("RADA") is United States Federal legislation designed to facilitate information sharing among organizations around the world to better expose networks of conspirators working against clean sport. RADA criminalizes persons involved in international doping fraud conspiracies and allows law enforcement organizations to collaborate with USADA on information related to potential doping violations. However, RADA does not criminalize athletes as their violations are handled through the Code. Whistleblowers who report information under RADA are also protected by Federal whistleblowing laws.

How are Whistleblowers Protected?

USADA is committed to the well-being of every whistleblower. You can report anonymously, and if you provide your name and contact information, we will protect this information from disclosure to the greatest extent permissible under the law, unless you give us your permission to disclose your identity.

USADA has extensive experience working with whistleblowers, protecting them and helping to make the whistleblowing process efficient, worthwhile and positive. USADA can facilitate access to resources that can assist a whistleblower during all phases of the process.

In addition, Article 2.11 of the Code, which USADA has incorporated into its anti-doping rules applicable to all members of U.S. national governing bodies, including all athletes, athlete support persons and others under USADA's jurisdiction, makes it an anti-doping rule violation to threaten or seek to intimidate a person with the intent of discouraging the person from good-faith reporting of information that relates to an anti-doping rule violation or non-compliance with the Code. Article 2.11 also makes it a rule violation to retaliate against a whistleblower. Violations of Article 2.11 are punishable for a minimum period of two years, up to a maximum of lifetime ineligibility, depending upon the seriousness of the retaliation. Therefore, anyone who discourages or retaliates against a whistleblower is subject to an anti-doping rule violation.



Whistleblowing – A History of Success at USADA

Any success that USADA has had in levelling the playing field, exposing instances of cheating and achieving fair outcomes, is significantly attributable to the courageous individuals who have come forward with information about anti-doping rule violations.

In 2021 alone, USADA received nearly 400 tips; 80 of the tips from whistleblowers led to a targeted test of an athlete identified in a whistleblower tip, with approximately 8 cases resulting from the target tests and tips. In all cases, whistleblower tips are evaluated based on established criteria and considered alongside other information to ensure that the Play Clean Tip line is not misused.

Additional examples of whistleblowing success stories include:

- The Eric Lira Investigation began with a whistleblower reporting to USADA a doping conspiracy in the run up to the 2021 Tokyo Olympics. The evidence uncovered several doping cases, including positive EPO and HgH doping tests for Blessing Okabare. Significant as well is that the evidence provided by the whistleblower enabled U.S. Law Enforcement to bring the first Rodchenkov Anti-Doping Act (RADA) case against Eric Lira, a Naturopathic therapist in El Paso, TX.
- The BALCO-Doping Scandal, involving several whistleblowers, which resulted in multiple investigations over a multi-year period, enabling USADA to bring cases against more than a dozen athletes and several coaches.
- The U.S. Postal Service Pro Cycling Team investigation in which more than a dozen whistleblowers provided detailed testimony that allowed USADA to make out cases against Armstrong and athlete support persons Johan Bruyneel (team director), Luis García del Moral (doctor), Michelle Ferrari (doctor), Pedro Celaya (doctor) and Pepe Marti (trainer). The willingness of these witnesses to come forward led to cases involving dozens of additional individuals, the reorganization of the leadership of the International Cycling Federation and a comprehensive review of doping in cycling by the Cycling Independent Reform Commission.

The cases mentioned above are just a few of the hundreds of examples through the years in which whistleblowers have come forward to USADA with information leading to successful target tests and establishing rule violations. In fact, USADA's success rate on targeted tests resulting from intelligence received from whistleblowers is more than 10 times higher than tests that are not based on whistleblower intelligence.

USADA's Commitment to Whistleblowers

USADA is committed to the whistleblowing experience being successful and positive. Therefore, as a whistleblower, you have USADA's commitment to:

- Communicate with you in a manner that is most comfortable for you and protects your anonymity if you request to be anonymous;
- Explore with you the possibility of providing assistance to you in the whistleblowing process. In the past, this has included:
 - Addressing personal security and safety concerns;
 - Seeking legal assistance for you;

- Immigration and asylum assistance;
 - Exploring the possibility of substantial assistance benefits under sports anti-doping rules;
 - Assistance with employment matters related to your status as a whistleblower; and
 - Reductions or eliminations of sanctions for athletes and others who have engaged in rule violations and provided substantial assistance to USADA as defined in the Code.
- Use the information you provide in a responsible and effective manner in pursuit of a just outcome that promotes clean sport and the health and wellbeing of athletes;
 - Get back to you within twenty-four (24) hours of your communication if during the week and within seventy-two (72) hours if your communication is received on the weekend. (i.e., after 4:00 p.m. Mountain Time in the United States on a Friday).¹
 - If you are a U.S. Athlete competing at an elite level of sport to inform you of the opportunity to consult with the USOPC Athlete Ombuds who can serve as a resource to you in the whistleblowing process and in connection with any rules violation or other sport related dispute in which you may be involved.

Retaliation against whistleblowers is not permitted under the Code, and in the event a whistleblower has been retaliated against, USADA will investigate possible remedies, including:

- Progressing a retaliation anti-doping rule violation for Acts by an Athlete or Other person to discourage or retaliate against reporting to Authorities (Article 2.11); and
- Whether there is recourse (either civil or criminal or both) with government authorities, including law enforcement.

As stated above, all Play Clean Tips are considered confidential information and speaking to or otherwise communicating with USADA does not change the confidential status of the information provided by a whistleblower or waive the whistleblower's right to remain anonymous throughout USADA's investigation of another person and any resulting disciplinary proceedings.

Any information obtained from, or received about, any whistleblower is confidential and shall be disclosed outside USADA only with the approval of USADA's CEO or General Counsel.

Additionally, you can expect that at all relevant times USADA will comply with the current version of the [USADA-Led Non-Analytical Investigations Principles](#) under the [USADA Protocol for Olympic and Paralympic Movement Testing](#), and that USADA will act in accordance with the current version of the [USADA-Initiated U.S. Athlete Interview Rights and Responsibilities](#).

Whistleblowing is one of the most effective means of ensuring that the anti-doping rules are enforced and protecting the future of sport. When you decide to blow the whistle and come to USADA, we are committed to supporting your whistleblowing efforts every step of the way.

¹ The response time could in rare circumstances be extended based on extenuating factors such as if you make your report during a period when the USADA office is closed for holidays. In most cases you will be able to speak with a USADA investigator within minutes of making a call to the USADA Play Clean line.