PROFESSIONAL FIGHTERS LEAGUE

ANTI-DOPING POLICY

Effective January 1, 2022
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This Professional Fighters League Anti-Doping Policy ("Anti-Doping Policy" or "PFL ADP") is designed to assist organizations with protecting the health and safety of their Athletes, and to protect Athletes’ rights to compete on a level playing field.

This Anti-Doping Policy and accompanying policies are modeled on the World Anti-Doping Code (the “Code”) and World Anti-Doping Agency (“WADA”) International Standards and, except as provided otherwise, should be interpreted and applied in a manner consistent with the Code and WADA International Standards. This Anti-Doping Policy incorporates by reference the PFL Whereabouts Policy, the PFL Arbitration Procedures, the PFL TUE Policy, the PFL Prohibited List, and WADA International Standards and Technical Documents. When there is a conflict, the PFL policies control.

This Anti-Doping Policy consists of sport rules governing the conditions under which Competitions are conducted. It is distinct in nature from criminal and civil laws and is not intended to be subject to or limited by any national requirements and legal standards applicable to criminal or civil proceedings. When reviewing the facts and the law of any given case, all judicial or other adjudicating bodies should be aware of and respect the distinct nature of this Anti-Doping Policy and the fact that the Code upon which it is based represents the consensus of a broad spectrum of stakeholders around the world as to what is necessary to protect and ensure fair sport. Organizations may delegate all or any part of their responsibilities and authority under this Program to the United States Anti-Doping Agency ("USADA"), other Anti-Doping Organizations, or other third-party providers of anti-doping services. References to PFL in this Program shall include USADA, other Anti-Doping Organizations, or third-party anti-doping service providers to which PFL has made a delegation.

This Anti-Doping Policy shall apply to PFL and its officials, employees, and independent contractors, and each Participant in a Competition. It also applies to the following: Athletes, Athlete Support Personnel, and other Persons, each of whom has agreed to be bound by this Anti-Doping Policy, and to have submitted to the authority of USADA to enforce this Anti-Doping Policy and to have submitted to the jurisdiction of the hearing panel specified in Article 8 to hear and determine cases brought under this Anti-Doping Policy. More specifically, this Anti-Doping Policy shall apply to:

A. All Athletes under contract with PFL, under PFL jurisdiction, or a member of PFL, from the effective date of their contract, jurisdiction, membership, or announcement of their intent to enter a Competition (whichever is earlier) until the earlier of the conclusion of their contract, jurisdiction, membership, or such time as they or PFL give notice to USADA in writing of their retirement from Competition; and

B. All Athlete Support Personnel who are directly working with, treating, or assisting an Athlete in a Professional or Sport Related Capacity or who have been identified by an Athlete as an Athlete Support Person.

Any Athlete, Athlete Support Person, or other Person who commits an Anti-Doping Policy Violation while subject to this Anti-Doping Policy shall remain subject to this Anti-Doping Policy and to the Results Management authority of USADA for purposes of
Results Management and Consequences (to the extent applicable) after the relationship which originally gave rise to USADA’s authority has ceased.

ARTICLE 1: DEFINITION OF DOPING

Doping is defined as the occurrence of one or more of the Anti-Doping Policy Violations set forth in Article 2.1 through Article 2.11 of this Anti-Doping Policy.

ARTICLE 2: ANTI-DOPING POLICY VIOLATIONS

The purpose of Article 2 is to specify the circumstances and conduct which constitute Anti-Doping Policy Violations. Hearings in doping cases will proceed based on the assertion that one or more of these specific policies have been violated.

Athletes or other Persons subject to this Anti-Doping Policy shall be responsible for knowing what constitutes an Anti-Doping Policy Violation and the substances and methods which have been included on the Prohibited List.

The following constitute Anti-Doping Policy Violations:

2.1  Presence of a Prohibited Substance or its Metabolites or Markers in an Athlete’s Sample

2.1.1  It is the Athletes’ personal duty to ensure that no Prohibited Substance enters their bodies. Athletes are responsible for any Prohibited Substance or its Metabolites or Markers found to be present in their Samples. Accordingly, it is not necessary that intent, Fault, Negligence, or knowing Use on the Athlete’s part be demonstrated in order to establish an Anti-Doping Policy Violation under Article 2.1.

2.1.2  Sufficient proof of an Anti-Doping Policy Violation under Article 2.1 is established by any of the following: presence of a Prohibited Substance or its Metabolites or Markers in the Athlete’s A Sample where the Athlete waives analysis of the B Sample and the B Sample is not analyzed; or, where the Athlete’s B Sample is analyzed and the analysis of the Athlete’s B Sample confirms the presence of the Prohibited Substance or its Metabolites or Markers found in the Athlete’s A Sample; or in the conditions described in the WADA International Standard For Laboratories, where the Athlete’s A or B Sample is split into two parts and the analysis of the confirmation part of the split Sample confirms the presence of the Prohibited Substance or its Metabolites or Markers found in the first part of the split Sample or the Athlete waives analysis of the confirmation part of the split Sample.

2.1.3  Excepting those substances for which a Decision Limit or Decision Concentration Level is specifically identified in the Prohibited List or a Technical Document, the presence of any quantity of a Prohibited Substance or its Metabolites or Markers in an Athlete’s Sample shall constitute an Anti-Doping Policy Violation.
2.1.3.1 Solely for those Prohibited Substances for which a Decision Concentration Level is specifically identified in the Prohibited List, if the A Sample is below the applicable Decision Concentration Level, then such finding shall be treated as an Atypical Finding under this Anti-Doping Policy.

2.1.3.2 Solely for those Prohibited Substances for which a Decision Concentration Level is specifically identified in the Prohibited List, if both of the Athlete’s A and B Samples are reported by a WADA-accredited laboratory at or above the applicable Decision Concentration Level, then the Athlete shall not be permitted to challenge, in a hearing or otherwise, the WADA-accredited laboratory’s determination that the concentration was at or above the applicable Decision Concentration Level (provided that, this provision shall not limit the Athlete’s right to challenge, in a hearing or otherwise, whether the Prohibited Substance was present in the Athlete’s A and/or B Samples).

2.1.4 As an exception to the general rule of Article 2.1, the Prohibited List, International Standards, or Technical Documents may establish special criteria for reporting or the evaluation of Prohibited Substances.

2.1.5 In the event an Athlete, who becomes subject to the PFL ADP, voluntarily and immediately discloses to USADA, prior to testing by USADA, the Use or Attempted Use of a substance or method that is prohibited at all times on the Prohibited List, then the presence or evidence of Use of such disclosed substance or method in an Athlete’s Sample, shall not be considered an Anti-Doping Policy Violation if it is determined by USADA to have resulted from Use of the Prohibited Substance or Prohibited Method prior to the Athlete becoming subject to the PFL ADP.

2.2 Use or Attempted Use by an Athlete of a Prohibited Substance or a Prohibited Method

2.2.1 It is the Athletes’ personal duty to ensure that no Prohibited Substance enters their bodies and that no Prohibited Method is Used. Accordingly, it is not necessary that intent, Fault, Negligence, or knowing Use on the Athlete’s part be demonstrated to establish an Anti-Doping Policy Violation for Use of a Prohibited Substance or a Prohibited Method.

2.2.2 The success or failure of the Use or Attempted Use of a Prohibited Substance or Prohibited Method is not material. It is sufficient that the Prohibited Substance or Prohibited Method was Used or Attempted to be Used for an Anti-Doping Policy Violation to be committed.

2.3 Evading, Refusing or Failing to Submit to Sample Collection

Evading Sample collection; or refusing or failing to submit to Sample collection without compelling justification after notification by a duly authorized Person.

2.4 Whereabouts Failures

Any combination of three Whereabouts Failures within a twelve-month period as defined in the PFL Whereabouts Policy by an Athlete.
2.5 Tampering or Attempted Tampering with any part of Doping Control by an Athlete or Other Person

Intentional conduct which subverts the Doping Control process but which would not otherwise be included in the definition of Prohibited Methods. Without limitation, Tampering shall include the following:

2.5.1 Offering or accepting a bribe to perform or fail to perform an act, preventing the collection of a Sample, affecting or making impossible the analysis of a Sample, falsifying documents submitted to the Anti-Doping Organization or Therapeutic Use Exemption (“TUE”) committee or hearing panel, procuring false testimony from witnesses, committing any other fraudulent act upon the Anti-Doping Organization or hearing body to affect Results Management or the imposition of Consequences, and any other similar intentional interference or Attempted interference with any aspect of Doping Control.

2.5.2 Absent a compelling justification, the failure to disclose to USADA, prior to, or immediately upon, entering the PFL Registered Testing Pool (and prior to any Sample collection), the Use, Attempted Use, or Possession within the previous one year of (a) clomiphene, (b) a Non-Specified Method, or (c) a Non-Specified Substance prohibited at all times by the Prohibited List. The past Use, Attempted Use, or Possession of a Prohibited Substance or Prohibited Method shall not constitute an Anti-Doping Policy Violation if disclosed in accordance with this Article. However, the admission of such conduct shall subject the Athlete to the notice period requirements outlined in Article 5.7.4, and unless the Athlete’s Use of the substance or method in question was pursuant to a valid medical prescription documented in medical records, such conduct may also be considered in sanctioning or counted as a violation for purposes of Article 10.7 if the Athlete subsequently commits an Anti-Doping Policy Violation.

2.6 Possession of a Prohibited Substance or a Prohibited Method

2.6.1 Possession by an Athlete In-Competition of any Prohibited Substance or any Prohibited Method, or Possession by an Athlete Out-of-Competition of any Prohibited Substance or any Prohibited Method which is prohibited Out-of-Competition unless the Athlete establishes that the Possession is consistent with a TUE granted in accordance with Article 4.4 or other acceptable justification.

2.6.2 Possession by an Athlete Support Person In-Competition of any Prohibited Substance or any Prohibited Method, or Possession by an Athlete Support Person Out-of-Competition of any Prohibited Substance or any Prohibited Method which is prohibited Out-of-Competition in connection with an Athlete, competition, or training, unless the Athlete Support Person establishes that the Possession is consistent with a TUE granted to an Athlete in accordance with Article 4.4 or other acceptable justification.

2.7 Trafficking or Attempted Trafficking in any Prohibited Substance or Prohibited Method
2.8 Administration or Attempted Administration to any Athlete, In-Competition of any Prohibited Substance or Prohibited Method, or Administration or Attempted Administration to any Athlete Out-of-Competition of any Prohibited Substance or any Prohibited Method that is prohibited Out-of-Competition.

2.9 Complicity or Attempted Complicity by an Athlete or Other Person

Assisting, encouraging, aiding, abetting, conspiring, covering up or any other type of intentional complicity or Attempted complicity involving (a) an Anti-Doping Policy Violation, Attempted Anti-Doping Policy Violation, or violation of Article 10.12.1 by another Person; or (b) conduct committed by an individual who is not subject to this Anti-Doping Policy, which would otherwise have constituted an Anti-Doping Policy Violation.

2.10 Prohibited Association

2.10.1 Association by an Athlete or other Person subject to the authority of an Anti-Doping Organization in a Professional or Sport Related Capacity with any Athlete Support Person who:

2.10.1.1 If subject to the authority of USADA or another Anti-Doping Organization, is serving a period of Ineligibility; or

2.10.1.2 If not subject to the authority of USADA or another Anti-Doping Organization, has been convicted or found in a criminal, disciplinary, or professional proceeding to have engaged in conduct which would have constituted a violation of this Anti-Doping Policy if this Anti-Doping Policy had been applicable to such Person. The disqualifying status of such Person shall be in force for the longer of six years from the criminal, disciplinary, or professional decision or the duration of the criminal, disciplinary, or professional sanction imposed; or

2.10.1.3 Is serving as a front or intermediary for an individual described in Article 2.10.1.1 or 2.10.1.2.

2.10.2 To establish a violation of Article 2.10, an Anti-Doping Organization must establish that the Athlete or other Person knew of the Athlete Support Person’s disqualifying status.

The burden shall be on the Athlete or other Person to establish that any association with an Athlete Support Person described in Article 2.10.1.1 or 2.10.1.2 is not in a Professional or Sport Related Capacity and/or that such association could not have been reasonably avoided.

2.11 Acts by an Athlete or Other Person to Discourage or Retaliate Against Reporting to Authorities

Where such conduct does not otherwise constitute a violation of Article 2.5:

2.11.1 Any act which threatens or seeks to intimidate another Person with the intent of discouraging the Person from the good-faith reporting of information that relates to an alleged Anti-Doping Policy Violation to USADA, another Anti-Doping Organization, law enforcement, regulatory
or professional disciplinary body, hearing body, or Person conducting an investigation for USADA or another Anti-Doping Organization.

2.11.2 Retaliation against a Person who, in good faith, has provided evidence or information that relates to an alleged Anti-Doping Policy Violation to USADA, another Anti-Doping Organization, law enforcement, regulatory or professional disciplinary body, hearing body, or Person conducting an investigation for USADA or another Anti-Doping Organization.

For purposes of Article 2.11, retaliation, threatening, and intimidation include an act taken against such Person either because the act lacks a good faith basis or is a disproportionate response.

ARTICLE 3: PROOF OF DOPING

3.1 Burdens and Standards of Proof

USADA shall have the burden of establishing that an Anti-Doping Policy Violation has occurred. The standard of proof shall be whether USADA has established an Anti-Doping Policy Violation to the comfortable satisfaction of the hearing panel bearing in mind the seriousness of the allegation which is made. This standard of proof in all cases is greater than a mere balance of probability but less than proof beyond a reasonable doubt.

Where this Anti-Doping Policy places the burden of proof upon the Athlete or other Person alleged to have committed an Anti-Doping Policy Violation to rebut a presumption or establish specified facts or circumstances, the standard of proof shall be by a balance of probability except as otherwise provided herein.

3.2. Methods of Establishing Facts and Presumptions

Facts related to Anti-Doping Policy Violations may be established by any reliable means, including admissions. The following rules of proof shall be applicable in doping cases:

3.2.1 Analytical methods or Decision Limits approved by WADA after consultation within the relevant scientific community and which have been the subject of peer review are presumed to be scientifically valid. Decision Concentration Levels set forth in the Prohibited List shall not be subject to challenge.

3.2.2 WADA-accredited laboratories, and other laboratories approved by WADA, are presumed to have conducted Sample analysis and custodial procedures in accordance with the International Standard for Laboratories. The Athlete or other Person may rebut this presumption by establishing that a departure from the International Standard for Laboratories occurred which could reasonably have caused the Adverse Analytical Finding. If the Athlete or other Person rebuts the preceding presumption by showing that a departure from the International Standard for Laboratories occurred which could reasonably have caused the Adverse Analytical Finding, then USADA shall have the burden to establish that such departure did not cause the Adverse Analytical Finding.

3.2.3 Departures from any other International Standard or other PFL policy or rule set forth in this Anti-Doping Policy shall not invalidate analytical
results or other evidence of an Anti-Doping Policy Violation, and shall not constitute a defense to an Anti-Doping Policy Violation; provided, however, if the Athlete or other Person establishes that a departure from another International Standard or other PFL policy or rule which could reasonably have caused an Anti-Doping Policy Violation based on an Adverse Analytical Finding or other Anti-Doping Policy Violation, then USADA shall have the burden to establish that such departure did not cause the Adverse Analytical Finding or the factual basis for the Anti-Doping Policy Violation.

3.2.4 The facts established by a decision of a court or professional disciplinary tribunal of competent jurisdiction which is not the subject of a pending appeal shall be irrebuttable evidence against the Athlete or other Person to whom the decision pertained of those facts unless the Athlete or other Person establishes that the decision violated principles of natural justice.

3.2.5 The hearing panel in a hearing on an Anti-Doping Policy Violation may draw a reasoned inference adverse to the Athlete or other Person who is asserted to have committed an Anti-Doping Policy Violation based on the Athlete’s or other Person’s (1) refusal, after a written request made in a reasonable time in advance of the hearing, to appear at the hearing (either in person, telephonically, or virtually as directed by the hearing panel) and to answer questions from the hearing panel or USADA; (2) failure to respond to discovery requests authorized by the hearing panel; or (3) failure to participate or cooperate in any aspect of Doping Control, which by definition includes investigations by USADA.

ARTICLE 4: THE PROHIBITED LIST AND TUES

4.1 Incorporation of the Prohibited List

This Anti-Doping Policy incorporates by reference the Prohibited List, which is modeled on the WADA Prohibited List. All Athletes and other Persons shall be bound by the Prohibited List, and any revisions thereto, from the date they go into effect, without further formality. It is the responsibility of all Athletes and other Persons to familiarize themselves with the most up-to-date version of the Prohibited List and all revisions thereto.

4.2 Prohibited Substances and Prohibited Methods Identified on the Prohibited List

4.2.1 Prohibited Substances and Prohibited Methods

The Prohibited List shall identify those Prohibited Substances and Prohibited Methods which are prohibited as doping at all times (both In-Competition and Out-of-Competition) because of their potential to enhance performance in future Competitions or their masking potential, and those substances and methods which are prohibited In-Competition only. Prohibited Substances and Prohibited Methods may be included in the Prohibited List by general category (e.g., anabolic agents) or by specific reference to a particular substance or method.
4.2.2 Specified Substances or Specified Methods

For purposes of the application of Article 10, all Prohibited Substances shall be Specified Substances except as identified on the Prohibited List. No Prohibited Method shall be a Specified Method unless it is specifically identified as a Specified Method on the Prohibited List.

4.2.3 Substances of Abuse

For purposes of Applying Article 10, Substances of Abuse shall include those Prohibited Substances which are specifically identified as Substances of Abuse on the Prohibited List because they are frequently abused in society outside of the context of sport.

4.3 USADA’s Determination of the Prohibited List

USADA’s or WADA’s determination of the Prohibited Substances and Prohibited Methods that will be included on the Prohibited List, the classification of substances into categories on the Prohibited List, the classification of a substance as prohibited at all times or In-Competition only, the classification of a substance or method as a Specified Substance, a Specified Method, or a Substance of Abuse is final and shall not be subject to challenge by an Athlete or other Person including, but not limited to, any challenge based on an argument that the substance or method was not a masking agent or did not have the potential to enhance performance, represent a health risk, or violate the spirit of sport, which are the factors WADA considers in publishing its list.

4.4 Therapeutic Use Exemptions ("TUEs")

4.4.1 The presence of a Prohibited Substance or its Metabolites or Markers, and/or the Use or Attempted Use, Possession, or Administration or Attempted Administration of a Prohibited Substance or Prohibited Method, shall not be considered an Anti-Doping Policy Violation if it is consistent with the provisions of a TUE granted by USADA.

4.4.2 All Athletes Using or intending to Use a Prohibited Substance or Prohibited Method must seek a TUE from USADA or its designee pursuant to the PFL TUE Policy.

4.4.3 Any Athlete subject to PFL or USADA authority as provided in the scope of this Anti-Doping Policy who obtains a TUE from another Sport Organization or Anti-Doping Organization shall promptly provide USADA with a copy of the TUE and all documentation submitted in support of the TUE. USADA shall also have the right to request additional documentation and evaluation from the Athlete. USADA shall, within 21 days of USADA’s receipt of a request for a TUE, complete documentation supporting the TUE, and any additional information requested by USADA, notify the Athlete that it is either granting or denying the TUE.

4.4.4 Requests for TUEs should be submitted in accordance with the following timeline: (a) at least 21 days in advance of the Athlete’s intended Use of the prohibited medication or (b) as soon as practicable when the Athlete is scheduled to participate in a Competition. USADA will consider late filed or applications for retroactive TUEs.
4.4.5 Expiration, Cancellation, Withdrawal or Reversal of a TUE

4.4.5.1 A TUE granted pursuant to this Anti-Doping Policy: (a) shall expire automatically at the end of any term for which it was granted without the need for any further notice or other formality; (b) may be cancelled if the Athlete does not promptly comply with any requirements or conditions imposed by the TUE committee upon grant of the TUE; or (c) may be withdrawn by the TUE committee if it is subsequently determined that the criteria for grant of a TUE are not in fact met.

4.4.5.2 In such event, the Athlete shall not be subject to any Consequences based on their Use or Possession or Administration of the Prohibited Substance or Prohibited Method in question in accordance with the TUE prior to the effective date of expiry, cancellation, withdrawal, or reversal of the TUE. The review pursuant to Article 7.1 of any subsequent Adverse Analytical Finding shall include consideration of whether such finding is consistent with Use of the Prohibited Substance or Prohibited Method prior to that date, in which event no Anti-Doping Policy Violation shall be asserted.

4.4.6 Coordination with Sport Organizations

USADA and/or the PFL will attempt to coordinate TUE applications with applicable Sport Organizations. Athletes are on notice, however, that because USADA and PFL do not control decisions of other organizations to recognize a TUE or to grant their own TUEs, Athletes should not use any substance or method prohibited by another organization unless they are certain that the relevant TUE is in place. In addition, any Athlete who obtains a TUE from another Sport Organization or other Anti-Doping Organization, will still need to apply for a TUE with USADA.

4.4.7 Appeal of a TUE Application Denied by USADA

4.4.7.1 USADA’s denial of a TUE application may be appealed pursuant to the PFL Arbitration Procedures after exhaustion of the administrative review provided in the PFL TUE Policy.

4.4.7.2 A failure to render a decision within a reasonable amount of time (and in no case less than 21 days) on a properly submitted complete application for grant of a TUE shall be considered a denial of the application thus triggering the applicable rights of appeal.

ARTICLE 5: TESTING AND INVESTIGATIONS

5.1 Purpose of Testing and Investigations

Testing and investigations by USADA may be undertaken for any anti-doping purpose.

5.1.1 Testing shall be undertaken to obtain analytical evidence as to whether the Athlete has violated Article 2.1 (Presence of a Prohibited Substance or...
its Metabolites or Markers in an Athlete’s Sample) or Article 2.2 (Use or Attempted Use by an Athlete of a Prohibited Substance or a Prohibited Method) of this Anti-Doping Policy.

5.1.2 Test distribution planning, Testing, post-Testing activity and all related activities conducted by USADA shall be in conformity with the International Standard for Testing and Investigations. USADA shall determine the number and type of tests to be performed, in accordance with the criteria established by the International Standard for Testing and Investigations. Provisions of the International Standard for Testing and Investigations shall apply automatically in respect of all such Testing.

5.1.3 Investigations shall be undertaken for any purpose described in the International Standard for Testing and Investigations. This includes:

5.1.3.1 Atypical Findings, Atypical Passport Findings and Adverse Passport Findings, in accordance with Articles 7.2 and 7.3, gathering intelligence or evidence (including, in particular, analytical evidence) to determine whether an Anti-Doping Policy Violation has occurred under Article 2.1 and/or Article 2.2; and

5.1.3.2 Other indications of potential Anti-Doping Policy Violations, in accordance with Articles 7.4 and 7.5, gathering intelligence or evidence (including, in particular, non-analytical evidence) in order to determine whether an Anti-Doping Policy Violation has occurred under any of Articles 2.2 to 2.11.

5.1.4 USADA may obtain, assess, and process anti-doping intelligence from all available sources, to inform the development of an effective, intelligent, and proportionate test distribution plan, to plan Target Testing, to form the basis of an investigation into a possible Anti-Doping Policy Violation(s) and/or to bring cases based on evidence of the violation of anti-doping rules.

5.2 Authority to conduct Testing

5.2.1 USADA shall have In-Competition and Out-of-Competition Testing authority over all the Athletes identified in this Anti-Doping Policy (under the heading “Scope and Application of the Policy”).

5.2.2 USADA may require any Athlete over whom it has Testing authority (including any Athlete serving a period of Ineligibility) to provide a Sample at any time and at any place.

5.3 Competition Testing

5.3.1 Unless otherwise required by a Sport Organization with regulatory authority, In-Competition Samples shall be initiated and directed by USADA or its designee.

5.4 Test Distribution Planning

Consistent with the International Standard for Testing and Investigations, USADA shall develop and implement an effective, intelligent, and proportionate test distribution plan, including consideration of types of Testing, types of Samples collected, and types of Sample analysis.
5.5 Coordination of Testing

USADA may coordinate Testing with other Anti-Doping Organizations or Sport Organizations conducting Testing of the same Athletes.

5.6 Athlete Whereabouts Information

Athletes shall provide their Whereabouts information to USADA as required by the PFL Whereabouts Policy.

5.7 Notice Requirements for New Athletes and Former Athletes Returning to Competition

5.7.1 An Athlete who has not previously been subject to this Anti-Doping Policy may not compete in a Competition until they have made themselves available for Testing for a minimum period of one month prior to their first Competition. Athletes who qualify for inclusion in the PFL Registered Testing Pool must be in the PFL Registered Testing Pool for a minimum period of one month prior to their first Competition. Where the conditions of Article 5.7.6 are satisfied, this provision shall not prevent a new Athlete from participating in a Competition less than one month after being subject to this Anti-Doping Policy.

5.7.2 An Athlete who ceases to be subject to this Anti-Doping Policy due to termination, cancellation, or expiration of the Athlete’s contract with PFL may not resume competing in Competitions until they are again subject to the Anti-Doping Policy and have made themselves available for Testing for a period of one month before returning to competition. Where the conditions of Article 5.7.6 are satisfied, this provision shall not prevent a new Athlete from participating in a Competition less than one month after being subject to this Anti-Doping Policy.

5.7.3 An Athlete who gives written notice of retirement to USADA or if PFL gives written notice of an Athlete’s retirement to USADA, the Athlete may not resume competing in Competitions until PFL has given USADA written notice of the Athlete’s intent to resume competing and confirmation the Athlete has agreed to subject themselves to this Anti-Doping Policy and the Athlete has made themselves available for Testing for a period of six to twelve months, based on USADA’s sole discretion, before returning to Competition and provided a minimum of two negative Samples before returning to Competition.

The PFL may grant an exemption to this notice requirement in exceptional circumstances or where the application of the rule would be manifestly unfair to an Athlete provided that the Athlete must still provide two negative Samples before returning to Competition.

5.7.4 A new or returning Athlete who admits or has an established and verifiable history of the Use, Attempted Use, or Possession of (a) clomiphene, (b) a Non-Specified Method, or (c) a Non-Specified Substance prohibited at all times in accordance with the Prohibited List while the Athlete was not subject to an Anti-Doping Policy, shall comply with the other provisions in Article 5 and shall not be permitted to compete in Competitions until at least six months after the Athlete’s last established Use, and in USADA’s
sole discretion, the Athlete may also be required to provide a minimum of two negative Samples before being cleared for competition.

This provision shall not apply in situations in which (a) the Athlete’s Use of the Prohibited Substance or Method was pursuant to a valid TUE or (b) USADA subsequently grants the Athlete a TUE for the Prohibited Substance or Method.

5.7.5 If an Athlete retires from Competition while subject to a period of Ineligibility, the Athlete shall not resume competing in Competitions or competitions approved or sanctioned by a Sports Organization until the Athlete has given six to twelve months, determined in USADA’s sole discretion, prior written notice (or notice equivalent to the period of Ineligibility remaining as of the date the Athlete retired, if that period was longer than the period USADA determines) to PFL and the Athlete has made themselves available for Testing throughout the notice period.

Similarly, if an Athlete was retired at the time a period of Ineligibility was imposed, then the Athlete’s sanction shall be tolled until such time as they provide written notice of their return from retirement to PFL and make themselves available for Testing as described in the paragraph above.

5.7.6 The one-month notice period requirement for an Athlete subject to Articles 5.7.1 and 5.7.2 shall be waived automatically where they are named to a Competition as a replacement for an Athlete who was withdrawn from the Competition due to loss of eligibility, injury, or other event not reasonably foreseeable to PFL.

ARTICLE 6: ANALYSIS OF SAMPLES

Samples shall be analyzed in accordance with the following principles:

6.1 Use of Accredited, Approved Laboratories, and Other Laboratories

For purposes of directly establishing an Adverse Analytical Finding under Article 2.1, Samples shall be analyzed only in WADA-accredited laboratories or laboratories otherwise approved by WADA. The choice of the WADA-accredited or WADA-approved laboratory used for the Sample analysis shall be determined exclusively by USADA.

6.1.1 As provided in Article 3.2, facts related to Anti-Doping Policy Violations may be established by any reliable means. This would include, for example, reliable laboratory or other forensic testing conducted outside of WADA-accredited or approved laboratories.

6.2 Purpose of Analysis of Samples

Samples and related analytical data or Doping Control information shall be analyzed to detect Prohibited Substances and Prohibited Methods identified on the Prohibited List and other substances as may be directed by WADA pursuant to the Monitoring Program described in Article 4.5 of the Code; or to assist USADA in assessing relevant parameters in an Athlete’s urine, blood, or other matrix, including DNA or genomic profiling; or for any other legitimate anti-doping purpose. Samples may be collected and stored for future analysis.
6.3  Research on Samples

Samples, related analytical data, and Doping Control information may be used for anti-doping research purposes, although no Sample may be used for research without the Athlete’s written consent. Samples and related analytical data or Doping Control information used for research purposes shall first be processed in such a manner as to prevent Samples and related analytical data or Doping Control information being traced back to a particular Athlete. Any research involving Samples and related analytical data or Doping Control information shall adhere to the principles set out in Article 19 of the Code.

6.4  Standards for Sample Analysis and Reporting

Laboratories shall analyze Samples and report results in conformity with the International Standard for Laboratories.

6.4.1  Laboratories at their own initiative and expense may analyze Samples for Prohibited Substances or Prohibited Methods not specified by USADA. Results from any such analysis shall be reported to USADA and have the same validity and consequence as any other analytical result.

6.5  Further Analysis of Samples

Any Sample may be stored and subject to further analysis by USADA at any time before both the A and B Sample analytical results (or A Sample result where B Sample analysis has been waived or will not be performed) have been communicated by USADA to the Athlete as the asserted basis for an Anti-Doping Policy Violation. Samples may be stored and subjected to further analysis for the purpose of Article 6.2 at any time exclusively at the discretion of USADA. Further analysis of Samples shall conform to the requirements of the International Standard for Laboratories.

6.6  Split of A or B Sample

Where USADA and/or a WADA-accredited laboratory (with approval from USADA) wishes to split an A or B Sample for the purpose of using the first part of the split Sample for an A Sample analysis and the second part of the split Sample for confirmation, then the procedures set forth in the for Laboratories shall be followed.

6.7  Sample Ownership

All Samples collected by USADA shall be the property of USADA but shall only be used for anti-doping purposes and/or as outlined in this Anti-Doping Policy.

ARTICLE 7: RESULTS MANAGEMENT

USADA or its designee shall have exclusive Results Management authority for any Anti-Doping Policy Violation asserted under this Anti-Doping Policy.

7.1  Results Management for Tests Initiated by USADA

Results Management for tests initiated by USADA or its designee shall proceed as set forth below:

7.1.1 The results from all analyses must be sent to USADA in secure form, in a report signed by an authorized representative of the laboratory. All communication must be conducted confidentially.
7.1.2 Upon receipt of an **Adverse Analytical Finding**, USADA shall conduct a review to determine whether: (a) the **Adverse Analytical Finding** is consistent with a TUE that has been or will be granted as provided in the **PFL TUE Policy**, or (b) there is any apparent departure from the **International Standard for Testing and Investigations** or **International Standard for Laboratories** that caused the **Adverse Analytical Finding**.

7.1.3 If the initial review of an **Adverse Analytical Finding** under Article 7.1.2 does not reveal an applicable TUE or entitlement to a TUE, as provided in the **PFL TUE Policy**, or departure that caused the **Adverse Analytical Finding**, or is below the **Decision Concentration Level** and will therefore be administered by USADA as an **Atypical Finding**, USADA shall promptly give written notice to the Athlete, PFL, and may also give notice to a Sports Organization, if applicable. Notice shall include the information described in Article 14.1.3, as well as: (a) the **Adverse Analytical Finding**; (b) the Anti-Doping Policy violated; (c) the Athlete’s right to promptly request the analysis of the B Sample or, failing such request, that the B Sample analysis may be deemed irrevocably waived; (d) the opportunity for the Athlete and/or the Athlete’s representative to attend the B Sample opening and analysis if such analysis is requested; and (e) any **Provisional Suspension** imposed. If USADA decides not to bring forward the **Adverse Analytical Finding** as an Anti-Doping Policy Violation, it shall so notify the Athlete. Upon receipt of the complete A Sample documentation package from the laboratory, USADA shall provide the complete A Sample documentation package to the Athlete containing all information required by the **International Standard for Laboratories**, unless the Athlete’s case has been resolved by agreement between USADA and the Athlete.

7.1.4 Where requested by the Athlete or USADA, arrangements shall be made for Testing the B Sample within the time period specified in the **International Standard for Laboratories**, or such longer time as may be reasonably required under the circumstances without undue delay. An Athlete may accept the A Sample analytical results by waiving the B Sample analysis. If waived by the Athlete, USADA may nonetheless elect to proceed with the B Sample analysis.

7.1.5 The Athlete and/or their representative shall be allowed to be present at the analysis of the B Sample, which shall take place within the time period specified in the **International Standard for Laboratories**, or such longer time as may be reasonably required under the circumstances without undue delay. Also, a representative of USADA shall be allowed to be present.

7.1.6 If the B Sample proves negative, then, unless USADA takes the case forward as an Anti-Doping Policy Violation under Article 2.2, the entire Test shall be considered negative, and the Athlete and PFL shall be so informed.

7.1.7 If a **Prohibited Substance** or the **Use of a Prohibited Method** is identified in the B Sample (i.e., if the B Sample analysis confirms the presence of a **Prohibited Substance** or **Prohibited Method** in the Sample), and the WADA-accredited laboratory reports the concentration is at or above the **Decision Concentration Level** (if applicable), or the B
Sample analysis is not requested or is waived, the Athlete shall be given a notice of charge that includes: (a) the Anti-Doping Policy Violation asserted; (b) the basis of that assertion; (c) the additional information set forth in Article 14.1.3; (d) the Consequences that USADA will seek to impose; (e) the Athlete’s right, within ten days of the notice of charge, to request a hearing; and (f) that, if the Athlete does not request a hearing within ten days, the Consequences will be imposed immediately. If not already provided to Athlete, once received by USADA, USADA shall promptly provide the Athlete with copies of the complete A and B Sample laboratory documentation packages that include all information required by the International Standard for Laboratories. USADA shall not be required to provide B Sample documentation if the Athlete waives analysis of their B Sample.

7.1.8 Written notice to an Athlete or other Person, for all purposes of this Anti-Doping Policy, shall be effective when delivered by overnight mail to the Athlete or other Person’s most recent mailing address on file with USADA or on file with PFL’s legal department or by email to the Athlete or other Person’s most recent email address on file with USADA or on file with PFL’s legal department. Actual notice may be accomplished by any other means. Written notice shall be equally as effective as actual notice.

7.1.9 When a reported Adverse Analytical Finding is at a concentration below the Decision Concentration Level set forth in the Prohibited List, the Sample shall be reviewed by USADA as an Atypical Finding. USADA may establish that such Atypical Finding is an Anti-Doping Policy Violation if, and only if, USADA establishes that the Athlete intentionally Used or actually knew they Used such Prohibited Substance or Prohibited Method, or recklessly disregarded an obvious risk that such Athlete was Using a Prohibited Substance or Prohibited Method. In the case of a Substance of Abuse reported below an applicable Decision Concentration Level, USADA must establish that the Athlete intentionally Used the Prohibited Substance for performance-enhancing purposes.

7.2 Review of Atypical Findings

7.2.1 As provided in the International Standard for Laboratories, in some circumstances, laboratories are directed to report the presence of Prohibited Substances, which may also be produced endogenously, as Atypical Findings, i.e., as findings that are subject to further investigation.

7.2.2 Upon receipt of an Atypical Finding, USADA shall conduct a review to determine whether: (a) an applicable TUE has been granted or will be granted as provided in the PFL TUE Policy, or (b) there is any apparent departure from the International Standard for Testing and Investigations or International Standard for Laboratories that caused the Atypical Finding.

7.2.3 If the review of an Atypical Finding under Article 7.2.2 reveals an applicable TUE or a departure from the International Standard for Testing and Investigations or the International Standard for Laboratories
that caused the *Atypical Finding*, the entire test shall be considered negative for purposes of Article 2.1 and the *Athlete* shall be so informed.

7.2.4 If that review does not reveal an applicable TUE or a departure from the *International Standard for Testing* and Investigations or the *International Standard for Laboratories* that caused the *Atypical Finding*, USADA shall conduct the required investigation or cause it to be conducted. After the investigation is completed, if the *Atypical Finding* will be brought forward as an *Adverse Analytical Finding*, the *Athlete* shall be notified in accordance with Article 7.1.3.

7.2.5 USADA will not provide notice of an *Atypical Finding* until it has completed its investigation and has decided whether it will bring the *Atypical Finding* forward as an *Adverse Analytical Finding* unless one of the following circumstances exists:

7.2.5.1 If USADA determines the B Sample should be analyzed prior to the conclusion of its investigation, it may conduct the B Sample analysis after giving notice to the Athlete, with such notice to include a description of the *Atypical Finding* and the opportunity for the *Athlete* and/or the *Athlete’s* representative to attend the B Sample opening and analysis.

7.2.5.2 If USADA is asked to disclose any pending *Atypical Findings* or test results for an Athlete by a *Sports Organization* that has jurisdiction over the *Athlete* at the time of Sample collection or has jurisdiction over such *Athlete* with respect to a disciplinary or licensing hearing with the *Athlete* that is contemplated, scheduled, or pending an investigation for which the test results or pending *Atypical Finding(s)* are relevant, USADA may so advise the *Sports Organization* after first providing notice to the *Athlete* and PFL.

7.3 **Review of Atypical Passport Findings and Adverse Passport Findings**

USADA may provide *Athlete Biological Passport* information to and receive *Athlete Biological Passport* information from other Anti-Doping Organizations or *Sports Organizations*. Review of *Atypical Passport Findings* and *Adverse Passport Findings* shall take place as provided in the *International Standard for Results Management* and *International Standard* for Laboratories applied mutatis mutandis under the PFL ADP operating outside of ADAMS. At such time as USADA is satisfied that an Anti-Doping Policy Violation has occurred, it shall promptly give a notice of charge to the *Athlete*, as provided in Article 7.1.7, as applicable.

7.4 **Review of Whereabouts Failures**

USADA shall review potential *Whereabouts Failures*, as defined in the PFL *Whereabouts Policy*. At such time as USADA is satisfied that an Article 2.4 Anti-Doping Policy Violation has occurred, it shall promptly give a notice of charge to the *Athlete*, providing information identified in Article 7.1.7, as applicable.
7.5 Review of Other Potential Anti-Doping Policy Violations Not Covered by Articles 7.1 - 7.4

USADA shall conduct any follow-up investigation required into any potential Anti-Doping Policy Violation not covered by Articles 7.1-7.4. At such time as USADA is satisfied that an Anti-Doping Policy Violation has occurred, it shall promptly give a notice of charge to the Athlete or other Person, providing information identified in Article 7.1.7, as applicable.

7.6 Identification of Prior Anti-Doping Policy Violations

Before giving an Athlete or other Person a notice of charge of an asserted Anti-Doping Policy Violation as provided above, USADA shall attempt to determine whether any prior Anti-Doping Policy Violation exists.

7.7 Provisional Suspensions

7.7.1 Optional Provisional Suspension

USADA may impose a Provisional Suspension on an Athlete or other Person against whom an Anti-Doping Policy Violation is asserted at any time after the review and notification described in Article 7.1 and prior to the final hearing as described in Article 8.

7.7.2 Where a Provisional Suspension is imposed pursuant to Article 7.7.1, the Athlete or other Person shall be given either: (a) an opportunity for a Provisional Hearing either before or on a timely basis after imposition of the Provisional Suspension; or (b) an opportunity for an expedited final hearing in accordance with Article 8 on a timely basis after imposition of the Provisional Suspension.

7.7.2.1 Provisional Hearings shall be conducted by a single Arbitrator and heard via conference call within the time frame specified by USADA. The sole issue to be determined by the Arbitrator at such a hearing will be whether USADA’s decision that a Provisional Suspension should be imposed shall be upheld.

7.7.2.2 USADA’s decision to impose a Provisional Suspension shall be upheld if probable cause exists for USADA to proceed with a charge of an Anti-Doping Policy Violation against the Athlete. It shall not be necessary, however, for any B Sample analysis to have been completed to establish probable cause.

7.7.2.3 The Provisional Suspension may also be lifted if the Athlete demonstrates to USADA or to the Arbitrator that their violation is likely to have resulted from the Use of a Contaminated Product or the violation involves a Substance of Abuse and the Athlete establishes entitlement to a reduced period of ineligibility under Article 10.5.3.

7.7.3 If a Provisional Suspension is imposed based on an A Sample Adverse Analytical Finding and subsequent analysis of the B Sample does not confirm the A Sample analysis, then the Athlete shall not be subject to any further Provisional Suspension on account of a violation of Article 2.1.
7.7.4 In all cases where an Athlete or other Person has been notified of an Anti-Doping Policy Violation but a Provisional Suspension has not been imposed on them, the Athlete or other Person shall be offered the opportunity to accept a Provisional Suspension voluntarily pending the resolution of the matter.

7.8. Resolution without a Hearing

7.8.1 An Athlete or other Person against whom an Anti-Doping Policy Violation is asserted may admit that violation at any time, waive a hearing, and accept the Consequences that have been offered by USADA.

7.8.2 Alternatively, if the Athlete or other Person against whom an Anti-Doping Policy Violation is asserted fails to dispute that assertion within the deadline specified in the notice of charge sent by USADA asserting the violation, then they shall be deemed to have admitted the violation, to have waived a hearing, and to have accepted the Consequences that have been offered by USADA.

7.8.3 In cases where Article 7.8.1 or Article 7.8.2 applies, a hearing before a hearing panel shall not be required. Instead USADA shall promptly issue a written decision confirming the commission of the Anti-Doping Policy Violation and the Consequences imposed as a result and setting out the reasons for any period of Ineligibility imposed. USADA shall Publicly Disclose the violation in accordance with Article 14.3.2.

7.9 Retirement or Termination

If an Athlete retires or ceases to be under contract or jurisdiction with PFL while USADA is conducting Results Management, including the investigation of any Atypical Finding or Atypical Passport Finding or potential non-analytical violation, USADA retains jurisdiction to complete the Results Management process. If an Athlete retires or ceases to be under contract or jurisdiction with PFL before any Results Management process has begun, and USADA had Results Management authority over the Athlete at the time the Athlete committed an Anti-Doping Policy Violation, USADA has authority to conduct Results Management with respect to that Anti-Doping Policy Violation. If USADA had Results Management authority over Athlete Support Personnel or another Person at the time they committed an Anti-Doping Policy Violation, USADA has authority to conduct Results Management in respect of that Anti-Doping Policy Violation.

ARTICLE 8: RIGHT TO A FAIR HEARING

8.1 Hearing

Any Athlete or other Person who is asserted to have committed an Anti-Doping Policy Violation shall have a right to a fair hearing before an impartial and independent arbitrator as provided in the PFL Arbitration Procedures. Decisions rendered pursuant to the PFL Arbitration Procedures shall be final and binding and shall not be subject to appeal.

8.2 Waiver of Hearing

The right to a hearing may be waived either expressly or by the Athlete’s or other Person’s failure to challenge USADA’s assertion that an Anti-Doping Policy Violation has occurred within the specific period provided in the PFL ADP.
ARTICLE 10: SANCTIONS ON INDIVIDUALS

10.1 Disqualification of Results for an Anti-Doping Policy Violation in Connection with a Competition

An Anti-Doping Policy Violation occurring during, or in connection with, a Competition may, upon the decision of PFL, lead to Disqualification of all of the Athlete’s results obtained in that Competition with all Consequences, including, without limitation, forfeiture of title, ranking, purse, or other compensation, except as provided in Article 10.1.1.

Factors to be included in considering whether to Disqualify an Athlete’s results might include, for example, the seriousness of the Athlete’s Anti-Doping Policy Violation and the Athlete’s degree of Fault.

10.1.1 If the Athlete establishes that they bear No Fault or Negligence for the violation, at the discretion of PFL, the Athlete’s results in the Competition shall not be Disqualified unless the Athlete’s results were likely to have been affected by the Athlete’s Anti-Doping Policy Violation.

10.2 Ineligibility for Presence, Use or Attempted Use, or Possession of a Prohibited Substance or Prohibited Method

The period of Ineligibility for a violation of Articles 2.1, 2.2, or 2.6 shall be as follows, subject to potential elimination, reduction, or suspension pursuant to Articles 10.4, 10.5, or 10.6 or potential increase in the period of Ineligibility under Article 10.2.3:

10.2.1 The period of Ineligibility shall be two years where the Anti-Doping Policy Violation involves a Non-Specified Substance or Non-Specified Method.

10.2.2 The period of Ineligibility shall be one year where the Anti-Doping Policy Violation involves a Specified Substance or Specified Method.

10.2.3 The period of Ineligibility may be increased up to an additional two years where Aggravating Circumstances are present based on the nature of the Aggravating Circumstances.

10.3 Ineligibility for Other Anti-Doping Policy Violations

The period of Ineligibility for Anti-Doping Policy Violations other than as provided in Article 10.2 shall be as follows, unless Article 10.6 is applicable:

10.3.1 For violations of Article 2.3 or Article 2.5, the period of Ineligibility shall be a minimum of two years up to four years.

10.3.2 For violations of Article 2.4, the period of Ineligibility shall be two years, subject to reduction down to a minimum of six months, depending on the Athlete’s degree of Fault. The flexibility between two years and six months of Ineligibility in this Article is not available to Athletes where a pattern of last-minute whereabouts changes or other conduct raises a serious suspicion that the Athlete was trying to avoid being available for Testing.
10.3.3 For violations of Article 2.7 or 2.8, the period of Ineligibility shall be a minimum of four years up to lifetime Ineligibility, depending on the seriousness of the violation. An Article 2.7 or Article 2.8 violation involving a Minor shall be considered a particularly serious violation and, if committed by Athlete Support Personnel for violations other than for Specified Substances, shall result in lifetime Ineligibility for the Athlete Support Personnel. In addition, violations of Article 2.7 or 2.8 which may also violate non-sporting laws and regulations, may be reported to the competent administrative, professional, or judicial authorities.

10.3.4 For violations of Article 2.9, the period of Ineligibility imposed shall be a minimum of two years, up to four years Ineligibility, depending on the seriousness of the violation.

10.3.5 For violations of Article 2.10, the period of Ineligibility shall be two years, subject to reduction down to a minimum of nine months, depending on the Athlete or other Person’s degree of Fault and other circumstances of the case.

10.3.6 For violations of Article 2.11, the period of Ineligibility shall be a minimum of two years, up to lifetime Ineligibility, depending on the seriousness of the violation by the Athlete or other Person.

10.4 No Violation Where There is No Fault or Negligence

10.4.1 If an Athlete or other Person establishes in an individual case that he or she bears No Fault or Negligence, then there shall be no violation of this Anti-Doping Policy, subject to the right of the PFL or a Sports Organization to disqualify results with resulting consequences.

10.4.2 Without limitation of other evidentiary methods, an Athlete shall bear No Fault or Negligence in an individual case where the Athlete, by Clear and Convincing evidence demonstrates that the cause of the Adverse Analytical Finding was due to a (i) Contaminated Product or (ii) Certified Supplement. In such a case, there will be no Anti-Doping Policy Violation based on the Adverse Analytical Finding and the Athlete will not be permitted to compete in a Competition until, based on follow-up testing, the Prohibited Substance is no longer present in the Athlete’s Samples (or below the applicable Decision Concentration Level for such Prohibited Substance, if any) or no appreciable performance advantage is obtained from the presence of the substance.

10.5 Reduction of the Period of Ineligibility based on degree of Fault

Reduction of sanctions for violations of Article 2.1, 2.2, or 2.6.

All reductions under Article 10.5 are mutually exclusive and not cumulative.

10.5.1 Specified Substances or Specified Methods

Where the Anti-Doping Policy Violation involves a Specified Substance, then the period of Ineligibility shall be, at a minimum, a reprimand and no period of Ineligibility, and at a maximum, the period of Ineligibility set forth in Article 10.2, depending on the Athlete’s or other Person’s degree
10.5.2 Contaminated Supplement

In cases where the Athlete or other Person can establish that the detected Prohibited Substance came from a Contaminated Supplement (that is not a Certified Supplement or Contaminated Product) then the period of Ineligibility shall be, at a minimum, a reprimand and no period of Ineligibility, and at a maximum, the period of Ineligibility set forth in Article 10.2, depending on the Athlete’s or other Person’s degree of Fault.

10.5.3 Substances of Abuse

Where an Anti-Doping Policy Violation arises from a Substance of Abuse, the otherwise applicable period of Ineligibility may be reduced, in USADA’s sole discretion, upon the Athlete establishing Use was unrelated to sport performance and fully and satisfactorily completing a substance abuse treatment program (or assessment if no treatment is recommended) approved by USADA.

To the extent that the Athlete does not complete such substance abuse treatment program in a full and satisfactory manner (which shall be determined by USADA in USADA’s sole discretion), the Athlete’s otherwise applicable period of Ineligibility shall be automatically imposed (subject to receiving credit under Article 10.11.3.1 for the time served by such Athlete in the substance abuse treatment program and/or Provisionally Suspended).

10.5.4 Other Anti-Doping Policy Violations

For Anti-Doping Policy Violations not previously described in Article 10.5, subject to further reduction or elimination as provided in Article 10.6, the otherwise applicable period of Ineligibility may be reduced based on the Athlete or other Person’s degree of Fault.

10.6 Elimination, Reduction, or Suspension of Period of Ineligibility or other Consequences for Reasons Other than Fault

10.6.1 Substantial Assistance in Discovering or Establishing Anti-Doping Policy Violations

USADA in its sole discretion may suspend all or part of the period of Ineligibility and other Consequences imposed in an individual case in which it has Results Management authority where the Athlete or other Person has provided Substantial Assistance to USADA or another Anti-Doping Organization, criminal authority, or professional disciplinary body which results in: (a) USADA or another Anti-Doping Organization discovering or bringing forward an Anti-Doping Policy Violation by another Person and the information provided by the Person providing Substantial Assistance is made available to USADA; (b) which results in a criminal or disciplinary body discovering or bringing forward a criminal offense or the breach of professional rules committed by another Person and the information provided by the Person providing Substantial Assistance is made available to USADA; (c) which results in WADA initiating a proceeding against a Signatory, WADA-accredited laboratory, or athlete passport.
management unit (as defined in the International Standard for Testing and Investigations) for non-compliance with the Code, International Standard or Technical Document; or (d) which results in a criminal or disciplinary body bringing forward a criminal offense or the breach of professional or sport rules arising out of a sport integrity violation other than doping.

The extent to which the otherwise applicable period of Ineligibility and other Consequences imposed may be suspended is in USADA’s sole discretion and shall be based on the seriousness of the Anti-Doping Policy Violation committed by the Athlete or other Person and the significance of the Substantial Assistance provided by the Athlete or other Person to the effort to eliminate doping in sport, non-compliance with this Anti-Doping Policy or the Code and/or sport integrity violations. If the Athlete or other Person fails to continue to cooperate and to provide the complete and credible Substantial Assistance upon which a suspension of the period of Ineligibility or other Consequences was based, USADA shall reinstate the original period of Ineligibility and other Consequences. This decision is within USADA’s sole discretion.

10.6.2 Admission of an Anti-Doping Policy Violation in the Absence of Other Evidence

Where an Athlete or other Person voluntarily admits the commission of an Anti-Doping Policy Violation before having received notice of a Sample collection which could establish an Anti-Doping Policy Violation (or, in the case of an Anti-Doping Policy Violation other than Article 2.1, before receiving first notice of the admitted violation pursuant to Article 7) and that admission is the only reliable evidence of the violation at the time of admission, then the period of Ineligibility may be reduced, but not below one-half of the period of Ineligibility otherwise applicable.

10.6.3 Full and Complete Cooperation

10.6.3.1 Where an Athlete or other Person, after being notified by USADA of a potential Anti-Doping Policy Violation that carries an asserted period of Ineligibility of two or more years, admits the Anti-Doping Policy Violation and accepts the asserted period of Ineligibility no later than 20 days after receiving notice of an Anti-Doping Policy Violation charge, the Athlete or other Person may, in USADA’s sole discretion, receive a four-month reduction in the period of Ineligibility asserted by USADA, provided that the Athlete or other Person, upon request of USADA, submits to an interview by USADA and provides a truthful account of the circumstances surrounding the violation.

10.6.3.2 Where an Athlete or other Person, after being notified by USADA of a potential Anti-Doping Policy Violation that carries an asserted period of Ineligibility of one year, admits the Anti-Doping Policy Violation and accepts the asserted period of Ineligibility no later than 20 days after receiving notice of an Anti-Doping Policy Violation charge, the Athlete or other Person may, in USADA’s sole discretion, receive a two-month reduction in the period of Ineligibility asserted by USADA, provided that the Athlete or
other Person, upon request of USADA, submits to an interview by USADA and provides a truthful account of the circumstances surrounding the violation.

10.6.4 Application of Multiple Grounds for Reduction of a Sanction

Where an Athlete or other Person establishes entitlement to reduction in sanction under more than one provision of Article 10.5 and 10.6, before applying any reduction or suspension under Article 10.6, the otherwise applicable period of Ineligibility shall be determined in accordance with Articles 10.2, 10.3, and 10.5.

10.7 Multiple Violations

10.7.1 For an Athlete or other Person’s second Anti-Doping Policy Violation, the period of Ineligibility shall be the lesser of:

(a) the period of Ineligibility applicable to the first violation plus the period of Ineligibility for the second violation, not taking into account any reduction under Article 10.6 for either violation; or

(b) twice the period of Ineligibility for the second violation, not taking into account any reduction under Article 10.6.

10.7.2 A third or greater Anti-Doping Policy Violation will result in a period of Ineligibility of a minimum of double the period of Ineligibility which would apply if it were a second violation up to lifetime Ineligibility.

10.7.3 The period of Ineligibility established in Articles 10.7.1 and 10.7.2 may then be further reduced by the application of Article 10.6.

10.7.4 Additional Policies for Certain Potential Multiple Violations

10.7.4.1 For purposes of imposing sanctions under Article 10.7, an Anti-Doping Policy Violation will only be considered a second violation if USADA can establish that the Athlete or other Person committed the second Anti-Doping Policy Violation after the Athlete or other Person received notice pursuant to Article 7, or after USADA made reasonable efforts to give notice of the first Anti-Doping Policy Violation. If USADA cannot establish this, the violations shall be considered together as one single first violation, and the sanction imposed shall be based on the violation that carries the more severe sanction.

10.7.4.2 If, after the imposition of a sanction for a first Anti-Doping Policy Violation, USADA discovers facts involving an Anti-Doping Policy Violation by the Athlete or other Person which occurred prior to notification regarding the first violation, then USADA shall impose an additional sanction based on the sanction that could have been imposed if the two violations had been adjudicated at the same time. Results in all Competitions dating back to the earlier Anti-Doping Policy Violation will be subject to
Disqualification as provided in Article 10.8.

10.7.4.3 Decisions made either before or after the effective date of this Anti-Doping Policy by another Sports Organization or Anti-Doping Organization, finding that an Athlete or other Person violated a rule involving Prohibited Substances or Prohibited Methods or committed an Anti-Doping Policy Violation may be considered in sanctioning or counted as a violation under this Article where the process was fair and the violation would also be a violation of this Anti-Doping Policy. Where such offense would not also constitute a violation under this Anti-Doping Policy, then the offense shall not count as a violation for purposes of Article 10.7.

10.7.5 Multiple Anti-Doping Policy Violations during Ten-Year Period

For purposes of Article 10.7, each Anti-Doping Policy Violation must take place within the same ten-year period to be considered multiple violations.

10.8 Disqualification of Results in Competitions Subsequent to Sample Collection or Commission of an Anti-Doping Policy Violation

In addition to the Disqualification of the results of a Competition under Article 10.1, all other competitive results of the Athlete obtained from the date an Anti-Doping Policy Violation occurred, through the commencement of any Provisional Suspension or Ineligibility period, may, unless fairness requires otherwise, be Disqualified by PFL with all of the resulting Consequences including, without limitation, forfeiture of any title, ranking, purse, or other compensation.

10.9 Allocation of Forfeited Compensation

Unless required otherwise, forfeited compensation shall, at PFL’s discretion, be applied to offset the costs of PFL’s Program or given to anti-doping research.

10.10 [INTENTIONALLY OMITTED]

10.11 Commencement of Ineligibility Period

Except as provided below, the period of Ineligibility shall start on the date of the final hearing decision providing for Ineligibility or, if the hearing is waived or there is no hearing, on the date Ineligibility is accepted or otherwise imposed.

10.11.1 Delays Not Attributable to the Athlete or other Person

Where there have been substantial delays in the hearing process or other aspects of Doping Control, and the Athlete or other Person can establish that such delays are not attributable to the Athlete or other Person, USADA may start the period of Ineligibility at an earlier date commencing as early as the date of Sample collection or the date on which another Anti-Doping Policy Violation last occurred. All Competition results achieved during the period of Ineligibility, including retroactive Ineligibility, may be Disqualified by PFL.

10.11.2 Timely Admission

Where the Athlete or other Person promptly (which, in all cases, for an Athlete means before the Athlete competes in a Competition again and
within ten days after charge) admits the Anti-Doping Policy Violation after being confronted with the Anti-Doping Policy Violation by USADA and agrees with USADA as to the appropriate resolution of the violation by signing an acceptance of sanction form, the period of Ineligibility may start as early as the date of Sample collection or the date on which another Anti-Doping Policy Violation last occurred.

10.11.3 Credit for Provisional Suspension or Period of Ineligibility Served

10.11.3.1 If a Provisional Suspension is imposed on, or voluntarily accepted by, an Athlete or other Person and that Provisional Suspension is respected, then the Athlete or other Person shall receive a credit for such period of Provisional Suspension against any period of Ineligibility which may ultimately be imposed. If the Athlete or other Person does not respect a Provisional Suspension, then the Athlete or other Person shall receive no credit for any period of Provisional Suspension served.

10.11.3.2 No credit against a period of Ineligibility shall be given for any time period before the effective date of the Provisional Suspension, or suspension by a Sports Organization, regardless of whether the Athlete elected not to compete or was suspended by a team.

10.12 Status during Ineligibility or Provisional Suspension

10.12.1 Prohibition against Participation during Ineligibility or Provisional Suspension

No Athlete or other Person who has been declared Ineligible or is subject to a Provisional Suspension may, during the period of Ineligibility or Provisional Suspension, participate in any capacity in a PFL Competition or activity (other than authorized anti-doping education or rehabilitation programs).

An Athlete subject to a period of Ineligibility shall remain subject to Testing and any requirement by USADA to provide whereabouts information.

10.12.2 Violation of the Prohibition of Participation during Ineligibility or Provisional Suspension

Where an Athlete or other Person who has been declared Ineligible violates the prohibition against participation during Ineligibility described in Article 10.12.1, the results of such participation shall be Disqualified and a new period of Ineligibility equal in length to the original period of Ineligibility shall be added to the end of the original period of Ineligibility. The new period of Ineligibility, including a reprimand and no period of Ineligibility, may be adjusted based on the Athlete or other Person’s degree of Fault and other circumstances of the case. The determination of whether an Athlete or other Person has violated the prohibition against participation, and whether an adjustment is appropriate, shall be made by USADA. This decision may be challenged under the PFL Arbitration Procedures.
An Athlete or other Person who violates the prohibition against participation during a Provisional Suspension described in Article 10.12.1 shall receive no credit for any period of Provisional Suspension served and the results of such participation shall be Disqualified.

Where an Athlete Support Person or other Person assists a Person in violating the prohibition against participation during Ineligibility or a Provisional Suspension, USADA shall impose sanctions for a violation of Article 2.9 for such assistance.

10.13 Automatic Publication of Sanction

A mandatory part of each sanction shall include automatic publication, as provided in Article 14.3.

ARTICLE 11: [INTENTIONALLY OMITTED]

ARTICLE 12: [INTENTIONALLY OMITTED]

ARTICLE 13: [INTENTIONALLY OMITTED]

ARTICLE 14: CONFIDENTIALITY AND REPORTING

14.1 Information Concerning Adverse Analytical Findings, Atypical Findings, and Other Asserted Anti-Doping Policy Violations

14.1.1 Notice of Anti-Doping Policy Violations to Athletes and other Persons.

Notice to Athletes or other Persons of Anti-Doping Policy Violations asserted against them shall occur as provided under Articles 7 and 14 of this Anti-Doping Policy.

14.1.2 Notice of Anti-Doping Policy Violations to Other Anti-Doping Organizations

Notice of the assertion of an Anti-Doping Policy Violation may be given to any relevant Sports Organization or Anti-Doping Organization, simultaneously with, or after, notice to the Athlete or other Person.

14.1.3 Content of an Anti-Doping Policy Violation Notice

Notification of an Anti-Doping Policy Violation under Article 2.1 shall include, at a minimum: the Athlete’s name and country, whether the violation was in connection with a particular Competition, whether the test was In-Competition or Out-of-Competition, the date of Sample collection, the analytical result reported by the laboratory, and other information as required by the International Standard for Testing and Investigations.

Notice of Anti-Doping Policy Violations other than under Article 2.1 shall include, at a minimum: the policy violated, the basis of the asserted violation, and whether the violation was in connection with a particular Competition.
The failure to properly identify the Competition[s], if any, with which a violation may be connected shall not invalidate the notice or affect the Disqualification of results under this Policy.

14.2 [INTENTIONALLY OMITTED]

14.3 Public Disclosure

14.3.1 The identity of any Athlete or other Person who is asserted by USADA to have committed an Anti-Doping Policy Violation, as well as the factual basis of the assertion, may be Publicly Disclosed by PFL or USADA after notice to the Athlete or other Person has been provided in accordance with Article 7.

14.3.2 No later than twenty days after a decision has been rendered in a hearing in accordance with Article 8 or the right to a hearing has been waived, or the assertion of an Anti-Doping Policy Violation has not been timely challenged, USADA shall Publicly Disclose the disposition of the matter, including the Anti-Doping Policy violated, the name of the Athlete or other Person committing the violation, the Prohibited Substance or Prohibited Method involved (if any), and the Consequences imposed. Publication shall include any reasoned award by an arbitrator finding an Anti-Doping Policy Violation.

14.3.3 In any case where it is determined, after a hearing, that the Athlete or other Person did not commit an Anti-Doping Policy Violation, the decision may, unless the Anti-Doping Policy Violation has previously been Publicly Disclosed, only be Publicly Disclosed with the consent of the Athlete or other Person who is the subject of the decision.

14.3.4 Publication shall be accomplished at a minimum by placing the required information on USADA’s anti-doping website for at least ten years after the conclusion of any period of Ineligibility.

14.3.5 Neither USADA, PFL, nor any WADA-accredited laboratory, or official of either, shall publicly comment on the specific facts of any pending case (as opposed to general description of process and science) except to respond proportionally to public comments attributed to the Athlete, other Person, or their representatives or a Sports Organization that also has jurisdiction over the Athlete or other Person’s alleged Anti-Doping Policy Violation.

14.3.6 The mandatory Public Disclosure required in Article 14.3.2 shall not be required where the Athlete or other Person who has been found to have committed an Anti-Doping Policy Violation is a Minor. Any optional Public Disclosure in a case involving a Minor shall be proportionate to the facts and circumstances of the case and in USADA’s sole discretion.

14.4 Statistical Reporting

USADA may publish general statistical reports of its Doping Control activities. USADA may also publish reports showing the name of any Athletes tested and the date of each Testing.

14.5 Data Privacy

14.5.1 Athletes and other Persons bound to this Anti-Doping Policy agree to the Processing, including collection, use, storage, and disclosure of Personal
Information by USADA, including but not limited to the disclosure of Personal Information to WADA, other anti-doping organizations, Sport Organizations, and third parties (as applicable) in accordance with the USADA Privacy Policy (https://www.usada.org/privacy-statement) and/or the privacy policy of the relevant Testing authority/Results Management authority.

14.5.2 Any Athlete who submits information including personal data to PFL, USADA, or any Person in accordance with this Anti-Doping Policy shall be deemed to have agreed, pursuant to applicable data protection laws and otherwise, that such information may be collected, processed, disclosed and used by PFL, USADA or such Person for the purposes of the implementation of this Anti-Doping Policy, in accordance with the policies described above and otherwise as required to implement this Anti-Doping Policy.

14.5.3 No data submitted or acquired as a result of any application for a TUE, Sample collection, or analysis or anti-doping investigation shall be considered medical information or health care information.

14.6 Sharing of Information in Connection with an Investigation

USADA may share confidential information with any Code Signatory Anti-Doping Organization, law enforcement, Sports Organization, or regulatory or governmental agency in connection with an investigation being conducted by USADA, law enforcement, Sports Organization, or that other Anti-Doping Organization in each case.

ARTICLE 15: APPLICATION AND RECOGNITION OF DECISIONS

15.1 Testing, hearing results, or other final adjudications of any other Sports Organization or other Anti-Doping Organization which are consistent with this Anti-Doping Policy and are within that party’s authority shall be recognized and respected by PFL.

15.2 It is the expectation of PFL, Athletes, Athlete Support Personnel, and other Persons subject to this Anti-Doping Policy that any decision of PFL or USADA regarding a violation of this Anti-Doping Policy will be recognized by all other Anti-Doping Organizations, Sports Organizations, and other promoters whose competitions are approved or licensed by Sports Organizations, which shall take all necessary action to render PFL’s or USADA’s decision effective.

ARTICLE 16: [INTENTIONALLY OMITTED]

ARTICLE 17: STATUTE OF LIMITATIONS

No Anti-Doping Policy Violation proceeding may be commenced against an Athlete or other Person unless they have been notified of the Anti-Doping Policy Violation as provided in Article 7, or notification has been reasonably attempted, within ten years from the date the violation is asserted to have occurred.
ARTICLE 18: EDUCATION

USADA shall plan, implement, evaluate and monitor information, education, and prevention programs for doping-free sport and shall support active participation by Athletes and Athlete Support Personnel in such programs.

ARTICLE 19: [INTENTIONALLY OMITTED]

ARTICLE 20: AMENDMENT AND INTERPRETATION OF THESE ANTI-DOPING POLICIES

20.1 This Anti-Doping Policy may be amended from time to time by agreement of PFL and USADA. Unless otherwise indicated, any amendments shall go into effect 30 days after publication on the USADA-PFL anti-doping website (www.usada.org/pfl).

20.2 This Anti-Doping Policy shall be interpreted as an independent and autonomous text and not by reference to existing law or statutes.

20.3 The headings used for the various Parts and Articles of this Anti-Doping Policy are for convenience only and shall not be deemed part of the substance of this Anti-Doping Policy or to affect in any way the language of the provisions to which they refer.

20.4 The Code, the comments annotating various provisions of the Code, and the International Standards may be used to interpret this Anti-Doping Policy, unless there is a conflict, in which case this Anti-Doping Policy shall prevail.

20.5 The PFL’s Program entered into full force and effect on July 11, 2023 (the “Program Start Date”). Except as provided in the “Scope and Application of the Policy” this Anti-Doping Policy shall not apply retroactively to matters pending before the Program Start Date; provided, however, that conduct disclosed pursuant to Article 2.5.2 and Anti-Doping Policy Violations established by other Anti-Doping Organizations or Sports Organizations prior to the Program Start Date may count as “first violations” or “second violations” for purposes of determining sanctions under Article 10 for violations taking place after the Program Start Date.

20.6 The official text of this Anti-Doping Policy shall be English. In the event of a conflict between the English and any other translation, the English version shall prevail.

ARTICLE 21: ADDITIONAL ROLES AND RESPONSIBILITIES OF ATHLETES AND OTHER PERSONS

21.1 Roles and Responsibilities of Athletes

21.1.1 To be knowledgeable of and comply with this Anti-Doping Policy.

21.1.2 To be available for Sample collection at all times.

21.1.3 To take responsibility, in the context of anti-doping, for what they ingest and Use.
21.1.4 To inform medical personnel of the Athlete’s obligation not to Use Prohibited Substances and Prohibited Methods and to take responsibility to make sure that any medical treatment received does not violate this Anti-Doping Policy.

21.1.5 To disclose to USADA any decision by a Sports Organization or any non-Signatory finding that the Athlete committed a doping violation within the previous ten years.

21.1.6 To cooperate with USADA’s investigation of one or more Anti-Doping Policy Violations, which includes but is not limited to sitting for an interview conducted by USADA. Failure by any Athlete to cooperate in-full with a USADA investigation of one or more Anti-Doping Policy Violations may result in a hearing panel making an adverse inference and a charge of misconduct under PFL’s Code of Conduct or other disciplinary rules.

21.2 Roles and Responsibilities of Athlete Support Personnel

21.2.1 To be knowledgeable of and comply with this Anti-Doping Policy.

21.2.2 To cooperate with the Athlete Testing Program.

21.2.3 To use his or her influence on Athlete values and behavior to foster positive anti-doping attitudes.

21.2.4 To disclose to USADA any decision by a Sport Organization or any non-Signatory finding that they committed a doping violation within the previous ten years.

21.2.5 To cooperate with USADA’s investigation of one or more Anti-Doping Policy Violations, which includes but is not limited to sitting for an interview conducted by USADA. Failure by any Athlete Support Personnel to cooperate in-full with a USADA investigation of one or more Anti-Doping Policy Violations may result in a hearing panel making an adverse inference and a charge of misconduct under PFL’s Code of Conduct or other disciplinary rules.

21.2.6 Athlete Support Personnel shall not Use or Possess any Prohibited Substance or Prohibited Method without valid justification. Use or Possession of a Prohibited Substance or Prohibited Method by Athlete Support Personnel without valid justification may result in a charge of misconduct under the PFL’s disciplinary rules.

ARTICLE 22: WAIVER AND RELEASE

As a condition of participating in or preparing for a Competition, having publicly announced their intent to enter a Competition, or working with an Athlete who is participating in or preparing for a Competition, Athletes, Athlete Support Personnel, and other Persons agree to release and hold harmless PFL, USADA, and their designees from any claim, demand, or cause of action, known or unknown, now or hereafter arising, including attorney’s fees, resulting from acts or omissions which occurred in good faith.
ARTICLE 23: TRANSITIONAL PROVISIONS

23.1 General Application of the 2024 Anti-Doping Policy

The 2024 Anti-Doping Policy shall apply in full as of March 25, 2024 (the “Effective Date”).

23.2 Non-Retroactive Unless Principles of Lex Mitior Applies

With respect to any Anti-Doping Policy Violation case which is pending as of the Effective Date and any Anti-Doping Policy Violation case brought after the Effective Date based on an Anti-Doping Policy Violation which occurred prior to the Effective Date, the case shall be governed by the substantive anti-doping rules in effect at the time the alleged Anti-Doping Policy Violation occurred unless the current rules would be more beneficial to the Athlete or other Person and the panel hearing the case determines that the circumstances of the case warrant the application of those rules.

23.3 Additional Anti-Doping Policy Amendments

Any additional Anti-Doping Policy Amendments shall go into effect as provided in Article 20.1.

APPENDIX 1: DEFINITIONS

**Administration**: Providing, supplying, supervising, facilitating, or otherwise participating in the Use or Attempted Use by another Person of a Prohibited Substance or Prohibited Method. However, this definition shall not include the actions of bona fide medical personnel involving a Prohibited Substance or Prohibited Method Used for genuine and legal therapeutic purposes or other acceptable justification and shall not include actions involving Prohibited Substances which are not prohibited in Out-of-Competition Testing unless the circumstances as a whole demonstrate that such Prohibited Substances are not intended for genuine and legal therapeutic purposes or are intended to enhance sport performance.

**Adverse Analytical Finding**: A report from a WADA-accredited laboratory or other WADA-approved laboratory that, consistent with the International Standard for Laboratories and related Technical Documents, establishes in a Sample the presence of a Prohibited Substance or its Metabolites or Markers (including elevated quantities of endogenous substances) or evidence of the Use of a Prohibited Method.

**Adverse Passport Finding**: A report identified as an Adverse Passport Finding as described in the applicable International Standards.

**Aggravating Circumstances**: Aggravating Circumstances exist where the Anti-Doping Policy Violation was intentional, the Anti-Doping Policy Violation had significant potential to enhance an Athlete’s Competition performance, and one of the following additional factors is present: the Athlete or other Person committed the Anti-Doping Policy Violation as part of a doping plan or scheme, either individually or involving a conspiracy or common enterprise to commit an Anti-Doping Policy Violation; a normal person would be likely to enjoy the performance-enhancing effects of the Anti-Doping Policy Violation(s) beyond the otherwise applicable period of Ineligibility; the Athlete or other Person Used or Possessed multiple Prohibited Substances or Prohibited Methods or Used or Possessed a Prohibited Substance or Prohibited Method on multiple occasions; or the Athlete or other Person engaged in deceptive or obstructing conduct to avoid the detection
or adjudication of an Anti-Doping Policy Violation.

**Anti-Doping Organization:** PFL, USADA, WADA, a Code Signatory, or other organization that is responsible for conducting an anti-doping program.

**Athlete:** Any Person who is a member of, has executed a Promotional Agreement with, or falls under the jurisdiction of the PFL to compete in a Competition. For purposes of Administration or Attempted Administration under Article 2.8, the term Athlete shall refer to both athletes that fall under the jurisdiction of this Anti-Doping Policy and athletes competing in amateur or professional mixed martial arts.

**Athlete Biological Passport:** The program and methods of gathering and collating data as described in the International Standard for Testing and Investigations and International Standard for Laboratories.

**Athlete Support Personnel:** Any Person directly working with, treating or assisting an Athlete in a Professional or Sport Related Capacity.

** Attempt:** Purposely engaging in conduct that constitutes a substantial step in a course of conduct planned to culminate in the commission of an Anti-Doping Policy Violation. Provided, however, there shall be no Anti-Doping Policy Violation based solely on an Attempt to commit a violation if the Person renounces the Attempt prior to it being discovered by a third party not involved in the Attempt.

**Atypical Finding:** A report from a WADA-accredited laboratory or other WADA-approved laboratory which requires further investigation as provided by the International Standard for Laboratories, related Technical Documents, or PFL Prohibited List prior to the determination of an Adverse Analytical Finding.

**Atypical Passport Finding:** A report described as an Atypical Passport Finding as described in the applicable International Standards.

**Bout:** A mixed martial arts contest or exhibition between two Athletes promoted or otherwise conducted by PFL.

**Certified Supplement:** See PFL Prohibited List.

**Code:** The World Anti-Doping Code.

**Competition or Event:** A contest, Bout(s), or exhibition promoted or otherwise conducted by the PFL.

**Consequences of Anti-Doping Policy Violations (“Consequences”):** An Athlete’s or other Person’s violation of an Anti-Doping Policy may result in one or more of the following: (a) Disqualification means the Athlete’s results in a particular Competition are invalidated, with all resulting including, without limitation, potential forfeiture of title, ranking, purse, or other compensation; (b) Ineligibility means the Athlete or other Person is barred on account of an Anti-Doping Policy Violation for a specified period of time from participating in connection with any Competition or competition as provided in Article 10.12.1; (c) Provisional Suspension means the Athlete or other Person is barred temporarily from participating in connection with any Competition or activity prior to the final decision at a hearing conducted under Article 8; (d) Financial Consequences means a financial sanction imposed for an Anti-Doping Policy Violation; and (e) Public Disclosure or Publicly...
**Disclose** means the dissemination or distribution of information to the general public.

**Contaminated Product:** A product (other than a supplement) that either (a) contains a *Prohibited Substance* due to environmental or other innocent contamination, such as the contamination of water, food, or prescription medication or (b) contains a *Prohibited Substance* that is not disclosed on the product label and all circumstances considered, a reasonable person using due care would not have suspected that there is a material risk that the product contains a *Prohibited Substance*.

**Contaminated Supplement:** A food supplement that contains a *Prohibited Substance* that is not disclosed on the product label or in information available in a reasonable Internet search.

**Decision Concentration Level:** As provided in the *PFL Prohibited List*, the *Decision Concentration Level* is the detected quantity of the *Prohibited Substance* below which a reported *Adverse Analytical Finding* shall be administered by *USADA* as an *Atypical Finding*.

**Disqualification:** See *Consequences of Anti-Doping Policy Violations* above.

**Doping Control:** All steps and processes from test distribution planning through to ultimate disposition of any hearing and the enforcement of *Consequences* including all steps and processes in between, including but not limited to *Testing*, investigations, whereabouts, *TUEs*, *Sample collection and handling*, laboratory analysis, *Results Management* and investigations or proceedings relating to violations of Article 10.12.

**Fault:** *Fault* is any breach of duty or any lack of care appropriate to a particular situation. Factors to be taken into consideration in assessing an *Athlete* or other *Person’s* degree of *Fault* include, for example, the *Athlete’s* or other *Person’s* experience, whether the *Athlete* or other *Person is a Minor*, special considerations such as impairment, the degree of risk that should have been perceived by the *Athlete*, and the level of care and investigation exercised by the *Athlete* in relation to what should have been the perceived level of risk. In assessing the *Athlete’s* or other *Person’s* degree of *Fault*, the circumstances considered must be specific and relevant to explain the *Athlete’s* or other *Person’s* departure from the expected standard of behavior. Thus, for example, the fact that the *Athlete* would lose the opportunity to earn large sums of money during a period of *Ineligibility*, or the fact that the *Athlete* only has a short time left in a career, or the timing of the sporting calendar, would not be relevant factors to be considered in reducing the period of *Ineligibility*. If the *Athlete* or other *Person* can establish that the violation was not intended to, and did not, enhance an *Athlete’s* performance, that factor may also be considered in assessing the *Athlete’s* or other *Person’s* degree of *Fault*.

**Financial Consequences:** See *Consequences of Anti-Doping Policy Violations*, above.

**Full and Complete Cooperation:** Where an *Athlete* demonstrates, as determined by *USADA* in its sole discretion, that they did not intend to commit the Anti-Doping Policy Violation to enhance their performance and has provided full, prompt, and truthful responses and information (in each case, in all material respects) to all reasonable inquiries and requests for information regarding the applicable subject matter, *Full and Complete Cooperation* shall in no case require an *Athlete* to, or consider whether an *Athlete* did, provide *Substantial Assistance*. 
**In-Competition:** For purposes of this Anti-Doping Policy, *In-competition* means the period commencing at noon on the day prior to the scheduled start of the *Event* during which the *Athlete* is scheduled to compete in a *Bout* and ending upon the completion of the post-*Bout Sample* collection. If a post-*Bout Sample* collection is not initiated by *USADA* within a reasonable time, which will not exceed one hour following an *Athlete’s* post-*Bout* medical clearance, then the *In-competition* period shall expire at that time.

**Ineligibility:** See *Consequences of Anti-Doping Policy Violations* above.

**International Standard:** A standard adopted by *WADA* in support of the *Code*. Compliance with an *International Standard* (as opposed to another alternative standard, practice, or procedure) shall be sufficient to conclude that the procedures addressed by the *International Standard* were performed properly. *International Standards* shall include any *Technical Documents* issued pursuant to the *International Standard*.

**Marker:** A compound, group of compounds, or biological variable(s) that indicates the *Use* of a *Prohibited Substance* or *Prohibited Method*.

**Metabolite:** Any substance produced by a biotransformation process.

**Minor:** A natural *Person* who has not reached the age of eighteen years.

**No Fault or Negligence:** The *Athlete* or other *Person* establishing that they did not know or suspect and could not reasonably have known or suspected even with the exercise of utmost caution, that they had *Used* or been administered the *Prohibited Substance* or *Prohibited Method* or otherwise violated an Anti-Doping Policy. Except in the case of a *Minor*, for any violation of Article 2.1, the *Athlete* must also establish how the *Prohibited Substance* entered their system.

**Non-Specified Method:** See Article 4.2.2.

**Non-Specified Substance:** See Article 4.2.2.

**Out-of-Competition:** Any period which is not *In-Competition*.

**Participant:** Any *Athlete* or *Athlete Support Person*.

**Person:** A natural *Person*, including but not limited to an *Athlete* or *Athlete Support Person*, or an organization or other entity.

**PFL Arbitration Procedures:** The procedures published by *USADA* that govern disputes under this Anti-Doping Policy.

**PFL Registered Testing Pool:** *PFL Registered Testing Pool* shall have the definition provided for in Section 2 of the *PFL Whereabouts Policy*.

**PFL TUE Policy:** The policy published by *USADA* that outlines the process and requirements for receiving a *TUE* under this Anti-Doping Policy.

**PFL Whereabouts Policy:** The policy published by *USADA* outlining *Athletes’* obligations with respect to filing whereabouts information with *USADA*.

**Possession:** The actual, physical *Possession*, or the constructive *Possession* (which shall be found only if the *Person* has exclusive control or intends to exercise control over the *Prohibited Substance* or *Prohibited Method* or the premises in which a *Prohibited Substance* or *Prohibited Method* exists); provided, however, that if the *Person* does
not have exclusive control over the Prohibited Substance or Prohibited Method or the premises in which a Prohibited Substance or Prohibited Method exists, constructive Possession shall only be found if the Person knew about the presence of the Prohibited Substance or Prohibited Method and intended to exercise control over it. Provided, however, there shall be no Anti-Doping Policy Violation based solely on Possession if, prior to receiving notification of any kind that the Person has committed an Anti-Doping Policy Violation, the Person has taken concrete action demonstrating that the Person never intended to have Possession and has renounced Possession by explicitly declaring it to an Anti-Doping Organization. Notwithstanding anything to the contrary in this definition, the purchase (including by any electronic or other means) of a Prohibited Substance or Prohibited Method constitutes Possession by the Person who makes the purchase.

Professional Fighters League or PFL: The Professional Fighters League and any entity to which PFL delegates responsibilities or authority under this Anti-Doping Policy, including, but not limited to, the United States Anti-Doping Agency (USADA).

Professional or Sport Related Capacity: Acting in a Professional or Sport Related Capacity shall include, without limitation, acting as a manager, coach, trainer, second, corner man, agent, official, medical or paramedical personnel. For purposes of this Anti-Doping Policy, it shall not include indirect or peripheral involvement in an Athlete’s training or acting as an Athlete’s training partner.

Program: The PFL anti-doping program described in this Anti-Doping Policy.

Prohibited List or PFL Prohibited List: The list published by USADA identifying the Prohibited Substances and Prohibited Methods under this Anti-Doping Policy.

Prohibited Method: Any method so described on the Prohibited List.

Prohibited Substance: Any substance, or class of substances, so described on the Prohibited List.

Promotional Agreement: A Promotional and Ancillary Rights Agreement or similar contractual relationship by and between PFL and an Athlete.

Provisional Hearing: For purposes of Article 7.7, an expedited abbreviated hearing occurring prior to a hearing under Article 8 that provides the Athlete with notice and an opportunity to be heard in either written or oral form.

Provisional Suspension: See Consequences of Anti-Doping Policy Violations above.

Publicly Disclose or Public Disclosure: See Consequences of Anti-Doping Policy Violations above.

Results Management: The process encompassing the timeframe between notification as per Article 7 of this Anti-Doping Policy, or in certain cases (e.g., Atypical Finding, Athlete Biological Passport, Whereabouts Failure) such pre-notification steps expressly provided for in Article 5 of the International Standard for Results Management, through the charge until the final resolution of the matter, including the end of the hearing process.

Sample or Specimen: Any biological material collected for the purposes of Doping Control.

Signatories: Those entities accepting the Code and agreeing to implement the Code.

Specified Method: See Article 4.2.2.
**Specified Substance:** See Article 4.2.2.

**Sports Organization:** Any organization that promotes sport or any regulatory body established or recognized by a state or other governmental entity with authority to regulate, approve, sanction, or license mixed martial arts competitions or the Participants in those competitions.

**Substance of Abuse:** A Prohibited Substance identified as a Substance of Abuse on the Prohibited List.

**Substantial Assistance:** For purposes of Article 10.6.1, a Person providing Substantial Assistance must: (1) fully disclose in a signed written statement all information they possess in relation to Anti-Doping Policy Violations, and (2) fully cooperate with the investigation and adjudication of any case related to that information, including, for example, presenting testimony at a hearing if requested to do so by USADA or a hearing panel. Further, the information provided must be credible and must comprise an important part of any case which is initiated or, if no case is initiated, must have provided a sufficient basis on which a case could have been brought.

**Tampering:** See Article 2.5.

**Target Testing:** Selection of specific Athletes for Testing based on criteria set forth in the International Standard for Testing and Investigations.

**Technical Document:** A document adopted and published by WADA from time to time containing mandatory technical requirements on specific anti-doping topics as set forth in an International Standard.

**Testing:** The parts of the Doping Control process involving test distribution planning, Sample collection, Sample handling, and Sample transport to the laboratory.

**Trafficking:** Selling, giving, transporting, sending, delivering, or distributing (or Possessing for any such purpose) a Prohibited Substance or Prohibited Method (either physically or by any electronic or other means) by an Athlete, Athlete Support Person, or any other Person subject to this Anti-Doping Policy to any third party; provided, however, this definition shall not include the actions of “bona fide” medical personnel involving a Prohibited Substance Used for genuine and legal therapeutic purposes or other acceptable justification, and shall not include actions involving Prohibited Substances which are not prohibited in Out-of-Competition Testing unless the circumstances as a whole demonstrate such Prohibited Substances are not intended for genuine and legal therapeutic purposes or are intended to enhance sport performance.

**TUE:** Therapeutic Use Exemption, as described in Article 4.4.

**USADA:** United States Anti-Doping Agency or any entity contracted by PFL to fulfill the responsibilities under this Anti-Doping Policy.

**Use:** The utilization, application, ingestion, injection or consumption by any means whatsoever of any Prohibited Substance or Prohibited Method.

**WADA:** The World Anti-Doping Agency.

**Whereabouts Failure:** The failure by any Athlete to comply with the PFL Whereabouts Policy by failing to timely, accurately, and completely provide required whereabouts information and/or for being unavailable for Testing due to inaccurate information provided on the whereabouts filing.