

WADA

Whistleblowing Program

POLICY AND PROCEDURE FOR REPORTING
MISCONDUCT

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Your leadership, courage and character are needed, more than ever, to protect the beauty of sport

In a perfect world, athletes, their entourage, and everybody else with an involvement and passion for sport would just focus on enjoying the beauty of sport, assured that everyone else would do his/her utmost to exemplify sportsmanship and fair play in the pursuit of excellence. Unfortunately, the world is not perfect and some people cheat. Sport reflects society with all its beauty and all its flaws. Along with sport corruption and match-fixing, the number and magnitude of recent doping cases have created an all-time-low level of trust in sport. This unprecedented situation calls for an unprecedented and urgent response.

Everyone in and around sport; namely athletes, their entourage, sport governing bodies, governments, national Anti-Doping Organizations, laboratories, WADA, and others, has a shared responsibility for creating and safeguarding a level playing field with a zero-tolerance culture of doping at its heart.

Keeping one's own house in order is a prerequisite for creating such a culture. It's been proven again and again, that quietly accepting suspected or known wrongdoings by others nurtures an unethical culture characterized by: a) clean athletes often ending up being the ones penalized in terms of lost winning opportunities; and/or b) athletes feeling pressured to dope against their ethics as a way to stay competitive with the potential for severe health risks.

With sports integrity at a crossroads, quietly accepting doping is not a viable way forward. On the contrary, it has been proven that one of the most powerful ways to create and maintain a zero-tolerance culture for doping across sports and countries is for clean athletes and others to speak up, and raise concerns in good faith when they have reason to believe that an athlete is, or athletes are, doping. Speaking out exemplifies the kind of leadership, courage, and character consistent with the spirit of sportsmanship and fair play.

WADA acknowledges the courage and conviction that it takes to come forward and raise concerns about others that are believed to be cheating. The Agency has taken great care in developing this *Whistleblowing Program Policy and Procedure for Reporting Misconduct* to outline what the Agency will provide in terms of: support, confidentiality, protection, and reward; as well as, the way to go about raising concerns and how they would be investigated by WADA. The Whistleblowing Program has been put in place to encourage athletes, administrators, and others, from across all sports and all countries, to raise concerns in good faith and on reasonable grounds of suspected doping. WADA will listen to all Whistleblower concerns; give them advice; keep them informed of the Agency's investigations; and support, protect, and reward them as appropriate along the way.

While athletes and others, for all sports and countries, are encouraged to report doping via WADA's Whistleblowing Program, we acknowledge and applaud the sports organizations, national Anti-Doping Organizations, and others that already offer such channels or are putting them in place. Should people feel more comfortable using one of the other channels, rather than this one that is being offered by WADA, we encourage them to do so. The important thing is for people to speak up against cheating in confidence. To all those that will come forward, WADA welcomes you and thanks you for demonstrating leadership, courage, and character. Together, we can protect the beauty of sport by creating and maintaining a zero-tolerance culture for doping.



Sir Craig Reedie
President



Olivier Niggli
Director General

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1. Introduction and Scope

In keeping with WADA's commitment to protect clean athletes, WADA has always encouraged anyone who becomes aware of, or suspects any breach of the World Anti-Doping Code (the "**Code**") to share this information with WADA.¹

WADA recognizes the value of whistleblowing in deterring and detecting anti-doping rule violations and recommends that national and international whistleblowing frameworks on doping be strengthened. Whistleblowers must be protected and provided with adequate support from WADA. Secure IT platforms are needed to encourage and enable all athletes and others to signal misconduct.

WADA is committed to encouraging a culture of sportsmanship, fair play, transparency and accountability, to protecting clean athletes, to maintaining the confidence of the public and sporting community, and to protecting its Signatories and their members. It is in the best interest of the anti-doping movement that concerns are raised through WADA or adequate alternative channels, such as international federations, national and regional *Anti-Doping Organizations* with reporting channels.

This Policy outlines how concerns about potential doping violations may be raised with the WADA Investigation Department in confidence, including rights and responsibilities of Whistleblowers and procedures for investigations of potential misconduct. At the same time, the Policy provides explanations and procedures to all *Signatories* to the Code, their member organizations, staff, volunteers, athletes, athlete support personnel, and other persons bound by the Code. The Policy promotes the disclosure of any information, because any single piece of information can be more helpful than it appears.

This Policy is not intended to replace *Anti-Doping Organizations'* or law enforcements' reporting structures such as those for criminal offences or professional violations. WADA intends to collaborate with these organizations to develop a strong whistleblowing network.

This Policy will be subject to regular review and assessment to ensure it continuously reflects and further defines evolving best practice, especially appreciating that the thinking on and application of whistleblowing channels are evolving quickly across sports and countries. WADA encourages feedback on the Policy and recommends stakeholders to consult its website, <https://www.wada-ama.org>, for the latest version.

¹ The provision on substantial assistance was implemented in the 2003 Code to encourage athletes or other persons facing a sanction for an anti-doping rule violation to provide information on third parties' violations in return for partial suspension of the otherwise applicable period of ineligibility. Further, in April 2015, WADA established a platform on its website to encourage and enable anyone who becomes aware of, or suspects any breach of the Code to report such concerns in confidence via a secure online platform.

1.1. Definitions specific to this Policy

For the purposes of this Policy and its provisions²:

1.1.1. Informant

An Informant is a person/entity making a Disclosure of an alleged Misconduct, or of information related to a potential Misconduct, to WADA.

1.1.2. Whistleblower

An Informant becomes a Whistleblower, as soon as WADA has granted the person/entity formal Whistleblower status and a Whistleblower Agreement has been signed by the Informant and WADA (see below 3).

1.1.3. Respondent

A Respondent is a person/entity against whom/which alleged Misconduct has been reported.

1.1.4. Misconduct

Misconduct constitutes any alleged anti-doping rule violation, any alleged Code non-compliance violation, or any act or omission that could undermine the fight against doping.

1.1.5. Disclosure

A Disclosure constitutes an Informant's formal act of reporting an alleged Misconduct of a Respondent through WADA's reporting channels.

2. Disclosure of an Alleged Misconduct

2.1. Who Can Make a Disclosure?

Any person or entity that detects, identifies, witnesses, or knows of, or has reasonable grounds for suspecting a Misconduct is encouraged to make a Disclosure through WADA's reporting channels as defined in article 2.3.

2.2. What Can Be Subject to a Disclosure?

Any Misconduct, as defined in point 1.1.4, can be subject to a Disclosure, regardless of whether a Respondent is perceived to have committed it in the past, to be currently engaged in it, or to have intention of engaging in it in the future.

Misconduct can be committed by, but not limited to, the following potential Respondents:

² All italicized terms shall refer to the defined terms found in the Code.

- *Athlete(s),*
- *Athlete Support Personnel,*
- *Doping Control Officer(s),*
- *WADA-accredited Laboratory staff,*
- *Anti-Doping Organizations staff,*
- *WADA staff,*
- *Government officials,*
- *Others (i.e. entourage, medical personnel, officials, sponsor staff and consultants).*

2.3. How Can a Disclosure be Made?

A Disclosure of an alleged Misconduct can be made through any of WADA's reporting channels if the Informant so wishes. However, the WADA Whistleblowing Program offers the possibility for the Informant to make a Disclosure to WADA through the following secure and encrypted website: <https://speakup.wada-ama.org> Alternatively, a secure mobile application is also available. Both channels for making a Disclosure are easy-to-use and offer step-by-step instructions in multiple languages.

2.4. Pre-Disclosure Advice

Prior to making a Disclosure, an Informant is advised to carefully read this Policy to understand her/his rights and responsibilities. Should (s)he wish to seek further advice prior to making a formal Disclosure of an alleged Misconduct, (s)he is welcome to:

- Make a phone call in English or French, in confidence, to WADA's Investigation Department on the following number: +1-514-904-8822, Working hours: 09.00-16.00 (Montreal Time) with voicemail, or
- Contact WADA's Investigation Department via email: whistleblower@wada-ama.org

Specific and detailed information on WADA's Investigation Department can be found on its website <https://www.wada-ama.org/investigations>

3. The Whistleblower

3.1. Whistleblower Status

While there is no obligation for an Informant to become a Whistleblower, Whistleblower Status offers additional rights to the Informant who wishes to further cooperate with WADA's Investigation Department.

Upon receipt of a Disclosure of an alleged Misconduct and initial assessment of the information provided by and/or evidence received from the Informant, the WADA Investigation Department makes a decision on whether or not to grant Whistleblower Status. The decision is based on, but not limited to an assessment along the lines of the following aspects:

- a) If the nature of the alleged Misconduct is within the Code or related to the Code,
- b) If the alleged Misconduct is or within the Code's statute of limitations,
- c) If the information provided is relevant or assists in the fight against doping in sport,
- d) If the Disclosure is made in good faith and on reasonable grounds,
- e) If it seems feasible to gather sufficient evidence during an investigation to conclude whether the Misconduct is substantiated or if there a reasonable chance of a resulting Code or anti-doping rule violation,
- f) If the information provided is precise enough,
- g) If the risk of the safety threat to the Informant or his/her family is greater than the significance of the information,
- h) If there is a risk that the confidentiality cannot be maintained and the investigations will entail revelation of the identity of the Informant/Whistleblower.

3.2. Whistleblower Agreement

As a prerequisite for the granted Whistleblower Status to enter into force, a Whistleblower Agreement between the Informant and WADA shall be signed.

The provisions of a Whistleblower Agreement are to outline: a) the rights and responsibilities of the Whistleblower (see below 4.2), b) the nature of applicable Whistleblower protection measures (see below 3.3), and c) the nature of applicable Whistleblower rewards (see below 3.4).

3.3. Whistleblower Protection Measures

3.3.1. Confidentiality and Protection of Identity

The Whistleblower will be given access to a secure and safe way of communicating with the WADA Investigation Department in confidence. Her/his identity will not be revealed to anyone beyond the dedicated WADA Investigation Department and Director General (see Article 1.2.4 of the Procedure) unless (s)he specifically gives express and written consent to do so, or in the unlikely event that it is required by law.

Evidence and information is safely stored with limited access by the WADA Investigation Department in strict accordance with Article 14.6 of the Code and the International Standard on the Protection of Privacy and Personal Information (the "**ISPPPI**").

3.3.2. External Legal Assistance

WADA may provide the Whistleblower with external legal assistance depending upon the specificities of his/her situation. If granted, WADA shall cover the costs of this assistance up to a reasonable amount.

3.3.3. Protection against Retaliation

WADA will not tolerate any retaliation against a Whistleblower, whether directly or indirectly, including dismissal, suspension and demotion, loss of opportunities, boycotts, punitive transfers, reductions in or deductions of wages, harassment or other punitive or discriminatory treatment.

Should a Respondent find out or guess the identity of the Whistleblower and should WADA reasonably believe that Respondent has engaged in an act of retaliation, WADA will pursue legal opportunities to sanction the act of retaliation and to halt and prevent further acts of retaliation, where appropriate, with the support of its reliable stakeholders and/or relevant law enforcement authorities using mainly the channel of INTERPOL. A prerequisite for receiving this protection is the Whistleblower giving consent for WADA to reveal her/his identity to the applicable authority (see 3.3.1 above).

3.3.4. Physical Protection

WADA cannot provide physical protection to a Whistleblower and her/his family. However, if circumstances reveal that a Whistleblower is in danger, WADA will assist, where appropriate, in raising and addressing this matter with the support of reliable stakeholders, and/or relevant law enforcement authorities using mainly the channel of INTERPOL. A prerequisite for receiving this protection is the Whistleblower giving consent for WADA to reveal her/his identity to the applicable authority (see 3.3.1 above).

3.4. Whistleblower Rewards

3.4.1. Substantial Assistance Benefits

When a Whistleblower is facing an anti-doping rules violation, (s)he might be eligible for substantial assistance benefits, as described in Article 10.6.1 of the Code.

3.4.2. Financial Assistance

WADA will, where appropriate and at its sole discretion, provide material and financial assistance as compensation for expenses, harm or loss as a direct result of the act of Disclosing an alleged Misconduct. In such cases, WADA has the discretion to assess evidence available and decide on the level of appropriate financial assistance accordingly.

3.4.3. Financial Reward

Upon her/his specific request, WADA may decide to grant a financial reward to a Whistleblower in appreciation of his/her support in aiding the fight against doping in sport. Such a request will only be considered upon conclusion of any investigation or disciplinary, criminal, professional or other proceedings in relation to an alleged Misconduct.

When considering a request for a financial reward, WADA will assess if the information provided by the Whistleblower is sufficient for an Anti-Doping Organization, a professional body, or a criminal authority to instigate proceedings against the Respondent or if it constitutes an extraordinary assistance to the fight against doping in sport. In the process of granting a financial reward, WADA also considers and decides at its sole discretion on disbursement and level of the reward, including the amount and means of disbursement. They will be fixed, taking into consideration factors such as: the quality of the information provided, the general assistance and behavior of the whistleblower throughout the process, the whistleblower's personal situation and the situation of his/her family.

Any financial reward provided is subject to confidentiality by all parties, in accordance with the Whistleblower Agreement.

4. Rights and Responsibilities

4.1. Informant

4.1.1. Rights

The Informant has the right to:

- Seek advice from WADA's Investigation Department before deciding on whether to make a formal Disclosure of an alleged Misconduct or not, in confidence that her/his identity will not be revealed to anyone beyond the WADA Investigation Department and the WADA Director General (see article 3.3.1), unless (s)he specifically gives express and written consent to do so or in the unlikely event that it is required by law. In the event an *Anti-Doping Organization* and/or Law Enforcement Agency handles the case instead of WADA, the WADA Investigation Department will disclose the Informant's identity to the applicable authority *only* with the express and written consent of the Informant. The express and written consent of the Informant will also be necessary in case the information shared by WADA may trigger the revelation of his/her identity.
- Make a formal Disclosure of an alleged Misconduct through the channels provided by WADA.
- Receive an acknowledgement of receipt, if possible.
- Receive prompt notification of the decision on whether or not Whistleblower status has been granted by WADA, including justification for the decision, appreciating that proper assessment of the information provided may take time in special cases.
- In certain cases, participate in the in-person interview with the Investigation Department at no cost to him/her.

4.1.2. Responsibilities

It is the responsibility of the Informant to:

- Make a Disclosure of an alleged Misconduct in good faith and on reasonable grounds.
- Refrain from taking any action or providing any information that he/she deems could put him/her and his/her family, or any third party, in danger and immediately inform WADA Investigation Department in case he/she or his or her family is in danger.
- Give accurate information to WADA's Investigation Department and, upon its request, consider providing any additional clarification or other information that may be needed.

4.2. Whistleblower

4.2.1. Rights

The Whistleblower has the right to:

- Enjoy the same rights as the ones granted to an Informant.

- Be offered Whistleblower protection measures and rewards provided by WADA (see 3.3 and 3.4 above).
- Seek advice from a designated WADA investigation officer on any concerns during the investigation process.
- Receive updates on how the investigation is progressing on a case by case basis, if appropriate.
- Be notified of the findings related to the Disclosure on an alleged Misconduct, when the WADA Investigation Department considers it appropriate, but in any case, not before the conclusion of the investigation.
- Be notified in due time of how WADA intends to publicly account for the nature and handling of the Disclosure of the alleged Misconduct upon conclusion of investigation and potential sanctioning of the Respondent.

4.2.2. Responsibilities

It is the responsibility of the Whistleblower to:

- Assume the same responsibilities as the ones applying to an Informant.
- Refrain from committing any anti-doping rule violations or any act or omission that could undermine or prejudice the ongoing investigation.
- Seek approval from WADA Investigation Department prior to undertaking any action related to or intervening in any way with the ongoing investigation.
- Cooperate with WADA in accordance with the Whistleblower Agreement, including giving interviews and testimony upon request.
- Maintain strict confidentiality at all times of the investigation in accordance with the Whistleblower Agreement signed with WADA. This obligation remains applicable after the investigation is completed as set out in the Whistleblower Agreement. A breach of confidentiality will immediately terminate the Agreement and Whistleblower will lose the rights listed in 4.2.1.

4.3. Respondent

Respondent shall be treated as innocent until proven guilty, including having his/her identity protected during an investigation of a Disclosure of an alleged Misconduct.

In case the investigation proves that the alleged Misconduct is substantiated, WADA's Investigation Department must notify the Respondent that the case is being forwarded to the applicable *Anti-Doping Organization* and may, if appropriate, be shared with law enforcement authorities, professional bodies and other relevant parties. This notification may be delayed if the authority to which the file has been transferred is willing to investigate the matter further.

4.4. WADA

4.4.1. Rights

WADA may, without limitation:

- Refer any information received from Informant/Whistleblower to an applicable *Anti-Doping Organization* and Law Enforcement Agency.
- Refer a Disclosure of an alleged Misconduct, including evidence, to relevant national and international law enforcement authorities in case of, including without limitation, harassment, threats, attempted bribery and assault. A disclosure of an alleged Misconduct that is identified as a potential criminal or professional violation during the course of an investigation (or after the formal investigation) may be referred to INTERPOL in the framework of the Memorandum of Understanding signed between WADA and INTERPOL, and/or to the relevant law enforcement authorities, professional bodies or other relevant parties.
- Refer a Disclosure of an alleged Misconduct to the applicable *Anti-Doping Organization* for sanctioning in accordance with the Code.
- Refer a Disclosure of an alleged Misconduct, which prove to have been made maliciously or knowingly to be false, to the applicable *Anti-Doping Organization* for sanctioning in accordance with article 2.5 of the Code.
- Seek additional communication with Whistleblowers, including physical interviews that will follow the same process as described in article 1.2 of the Procedure.
- End the investigation process and terminate the Whistleblower Agreement if deemed appropriate, notably- if the Whistleblower fails to fulfill his/her obligations under this Policy or the Whistleblower Agreement.

4.4.2. Responsibilities

WADA shall:

- Make adequate arrangements to ensure the effective implementation of this Policy, with a particular focus on respecting the rights of the parties to a Disclosure of an alleged Misconduct (see above 6.1-6.3), including protecting Informants and Whistleblowers (see above 3.2) and rewarding them (see above 3.3).
- Make this Policy and relevant procedures publicly available in multiple languages on its website.
- Ensure that the Investigation Department members are in good professional standing; that they are given adequate discretion, independence, resources and training to carry out their jobs effectively.
- Establish a secure and safe way of communicating with the Informant/Whistleblower.
- Ensure that any information provided by the Informant/Whistleblower, either electronic or physical in nature, is securely stored.

- Work towards further alignment and sharing of evolving good practices among alternative channels for whistleblowing on doping offered by *Anti-Doping Organizations* with a particular focus on ensuring the equity of Whistleblowers across sports and countries.
- Carry out information sessions for athletes and other relevant stakeholders to ensure that they know their rights and responsibilities regarding a Disclosure of an alleged Misconduct, as an integrated part of the activities listed in Article 18 of the Code.
- Disseminate information about this Policy, including encouraging all *Anti-Doping Organizations* that do not have a reporting channel in place, to link to <https://speakup.wada-ama.org> on the front page of their respective websites.
- Provide regularly a consolidated account of the nature of Disclosures of alleged Misconduct and how they have been dealt with to WADA's Executive Committee.
- Provide an assessment of the effectiveness of this Policy to WADA's Executive Committee at least once a year.
- Regularly further develop this Policy in close collaboration with all relevant stakeholders for it to continuously reflect and define evolving good practice across sports and countries in terms of adequateness and effectiveness.

5. Procedures and Sanctions

A Disclosure of an alleged misconduct will be received and reviewed by WADA's Investigation Department. The procedures for receiving and investigating a Disclosure, along with the procedures for granting Whistleblower Status, are enclosed in Appendix 1.

5.1. Means of Sanctioning a Substantiated Alleged Misconduct

A Respondent may be subject to the disciplinary procedures and sanctions of his/her *Anti-Doping Organization*. Such means include, but are not limited to, disqualification, ineligibility, fines, and repayment of forfeited prize money. WADA's Investigation Department may, if appropriate, refer the case to criminal authorities, professional bodies and other relevant parties.

5.2. Means of Sanctioning a Knowingly False Disclosure of an Alleged Misconduct

Any Disclosure of an alleged Misconduct, which proves to have been made maliciously or knowingly to be false, may constitute "tampering" in accordance with article 2.5 of the Code and will be sanctioned accordingly by the applicable *Anti-Doping Organization*. In such a case, the Whistleblower Agreement will be terminated immediately. The Informant/Whistleblower will also lose all rights outlined in this Policy and bring the investigation of his/her Disclosure of an alleged Misconduct to an end.

6. Privacy and Security

6.1. Privacy Rights

WADA is committed to respecting and upholding the privacy rights of Informants, Whistleblowers and Respondents. WADA will process data that it

receives pursuant to this Policy in accordance with the International Standard on the Protection of Privacy and Personal Information (the “**ISPPPI**” <https://www.wada-ama.org/sites/default/files/resources/files/WADA-2015-ISPPPI-Final-EN.pdf>) and applicable law.

6.2. Whistleblowing Submissions

The collection and processing of personal data through the Whistleblowing website and smart phone application will be governed by their respective privacy policies, which users will be invited to review before proceeding.

6.3. Data Protection Queries

Persons who have questions regarding privacy and security under this policy should contact the WADA Legal Department (rm@wada-ama.org).

APPENDIX 1 – Procedure

1. Assessment Process

1.1. WADA Investigation Department’s Confirmation Receipt

All information shall be received by the WADA Investigation Department through any of WADA’s reporting channels. An official Disclosure can be submitted to WADA through the following secure and encrypted website <https://speakup.wada-ama.org> and/or the smart phone application. This department is the sole and exclusive WADA Investigation Department having access to any detailed and identifiable information filed or received by Informant.

After having filed his/her Disclosure, the Informant shall receive an acknowledgement of receipt.

1.2. Assessment Process of Evidence Provided by Informants

1.2.1. Initial Assessment and Investigation

All information and/or evidence(s) provided by the Informants will be assessed by the Investigation Department to determine its degree of veracity and whether it falls or not within the scope of application of the Code.

Depending on the allegation, the Investigation Department will initially use internal and external intelligence platforms to assess the case: ADAMS, Athlete Biological Passport (ABP), open source, and intelligence already possessed by WADA.

The Investigation Department shall ensure that the confidentiality of the Informant is safeguarded at all times, unless the release of the confidentiality is authorized in writing by the Informant, or if the Informant breaches that confidentiality, or in the unlikely event that it is required by law.

The Investigation Department has full discretion as to how the investigation is conducted or when the investigation is to be terminated. The Investigation Department may also engage in its own fact-finding process, in addition to its communications with the Informant.

The investigation will require developing a trustful relationship with the Informant (first contact via the platform, then further contact(s) via phone or encrypted video conference, etc. before an in-person meeting).

At all stages of the process, all communication exchanges (emails, interviews on phone, encrypted video conference, in-person meetings, etc.) with the Informant shall be recorded and transcribed – completely or partially – in a written report.

1.2.2. Interview

In order to retrieve more information and evidence, the Investigation Department may request a secure interview with the Informant at no cost to the Informant.

Preferably, this interview shall take place, if feasible, in a safe and neutral place. The Investigation Department will make interpreters available where required.

Interviews will be audio recorded and transcribed. The audio recording may be made available to the Informant upon written request.

The Informant will be advised that he/she:

- Has the right not to incriminate himself or herself,
- Is not obliged to answer any question, or to provide any information or document,
- Is entitled to end the interview at any time.

Nevertheless, the Informant shall not be eligible to benefits referred to Code Articles 10.6.1. (Substantial Assistance) and 10.6.2 (Admission of an ADRV in the absence of other evidence) if she/he decides to use her/his rights to not self-incriminate, to not answer questions, or to not provide information or documents.

1.2.3. Additional Communications and Information Gathering

After the initial contact, the Investigation Department may engage in further secure communications with the Informant to clarify the information submitted and obtain additional information.

Any additional communications with the Informant may be recorded and transcribed as stated above in article 1.2.2.

The assessment may require time and until it is achieved, the Informant who provided information and/or evidence cannot be considered as a Whistleblower.

1.2.4. Whistleblower status

The Informant shall receive a message from the Investigation Department, informing him or her of the outcome of the assessment process, as outlined in Article 3 of the Policy.

If Whistleblower Status is not granted, the Informant will be notified accordingly and be advised that:

- The information provided by the Informant will be stored in a secure database and be analyzed for evidence of Misconduct, and/or may be shared with the applicable *Anti-Doping Organization* or law enforcement authority with the express and written consent of the Informant.
- He/she has a right to access all information initially provided and provide additional information.

In complex cases, the WADA Investigations Department can refer the decision of granting the status of Whistleblower to the WADA Director General.

2. Investigation

The WADA Investigation Department will conduct its investigation in cooperation with Whistleblower when necessary and provide a final investigation report to the WADA Director General.

Evidence, Storage of Evidence

Reliable and strong evidence is the cornerstone of the entire whistleblowing system. As set forth in Code Article 3.2, any kind of reliable means shall be accepted:

- Physical evidence (documents, photos, video, products and/or related packaging, discarded medical equipment, etc.),
- Audio,
- Testimony, etc.

Information collected will be retained in a secure environment, with limited access as defined in this Policy and in accordance with the ISPPPI. All physical evidences must be identified, assessed, recorded and annexed to the relevant procedure. All physical evidence must remain in a dedicated safe box (only dedicated to Whistleblower evidences) with very limited access.

3. Post-Investigation

WADA Director General will be informed of the decision of the Investigation Department at the end of the investigation. A report, including recommendations and references, will be drafted, signed and recorded.

The Disclosure of alleged Misconduct will then be forwarded to the applicable *Anti-Doping Organization* for prosecution and adjudication of the matter. WADA may, if appropriate, refer the case to law enforcement authorities, professional bodies and other relevant parties.