



POLICY FOR SAMPLE RETENTION AND FURTHER ANALYSIS STRATEGY

INTERNATIONAL FEDERATION ICESTOCKSPORT (IFI)

Introduction and General Principles

In accordance with International Standard for Testing and Investigations (ISTI) Article 4.7.3, IFI has developed a sample retention and further analysis strategy.

The objective of this policy is to protect the rights of clean athletes by ensuring that new information or intelligence received, and new or improved analytical methodologies introduced since the initial analysis are utilized on samples retained during the 10-year statute of limitations in the World Anti-Doping Code (Code). The purpose of this policy is to maximize detection opportunities and achieve greater deterrence to those athletes who may consider doping.

All samples collected by IFI may be subject to retention and further analysis at the direction of IFI or the World Anti-Doping Agency (WADA), in accordance with the Code and/or International Standards (IS). In addition, as set out in Code Article 6.6, IFI may request permission from any other Anti-Doping Organization (ADO) with authority to test an athlete, to conduct analysis of a sample from that athlete stored by such ADO.

This policy shall be implemented for the purpose of analysis of samples as set out in Code Article 6.2. Furthermore, long-term storage and further analysis conditions shall comply with requirements set forth in the International Standard for Laboratories (ISL) Articles 5.3.11.3 and 5.3.6.3.

IFI has identified a specific amount dedicated to the implementation of this policy within its yearly anti-doping budget, and will advertise its sample retention plans in general terms in order to promote a message to athletes that doping may be detected long after the initial collection and analysis.

IFI's Anti-Doping Administrator is responsible for the implementation and follow-up of this policy and subsequent procedures.

Sample Retention Strategy

A minimum of 2 samples per year shall be selected for retention.

If a sample is selected for retention, the retention process is implemented in such form that it will be stored in the laboratory where the initial analysis took place or a combination of laboratory options depending on costs.

Only Urine type of samples will be used for retention.



IFI will take into account consultations with / from laboratories / Athlete Passport Management Unit (APMU) and its' service providers.

IFI will use as internal procedures for recording/maintaining the list of stored samples secure spreadsheets.

IFI shall retain all sample collection documentation in relation to its samples selected for retention, in compliance with the retention times set out in the International Standard for the Protection of Privacy and Personal Information (ISPPPI), so as to enable a further analysis at a later date.

Consideration for sample retention will be implemented on an ongoing basis and selection criteria may evolve depending on IFI's risk assessment, new intelligence received, new methods of detection, laboratories and APMU recommendations.

IFI's selection criteria for sample retention are:

1. Athlete's performance criteria

Where there is no specific intelligence, the following samples collected from athletes based on results/performance and IFI's determination of its highest risk sports/disciplines and participating nations:

- Medal winners/top finishers at World Championships/flagship events from those disciplines or nations identified as higher risk,
- Top finishers at World Championships in high risk disciplines.
- Medal winners in major/flagship events from those sports identified as higher risk.
- Out-of-competition samples from athletes within these criteria if the risk of doping has been determined as higher out-of-competition and these are samples where the detection of prohibited substances is most probable.

2. Intelligence-based criteria

- Samples collected from athletes meeting individual risk factors, as set out in ISTI Article 4.5.3, including any reliable information outcoming from IFI's whistleblower program, or that has been shared with IFI by a reliable third party.

3. Recommendations from laboratories and APMU in assisting [ADO] to identify any potential at risk athlete whom sample(s) could be usefully stored

This includes, without limitation:

- o Samples deemed suspicious by a laboratory while not having met the AAF or ATF criteria.



- Athlete's samples with suspicious Athlete Biological Passport (ABP) data (including samples collected from the same athlete at the same time as an ABP sample which the APMU or Expert Panel has determined as suspicious).
- Samples technical and analytical conditions (samples having sufficient volume to enable further analysis, chain of custody, risk that samples degrade over time, etc.).
- New detection methods to be introduced in the near future relevant to IFI's athletes, sports, disciplines.
- New intelligence regarding doping strategies that may have been carried out by applicable athletes.
- Samples that could be kept for reference DNA analysis.

4. Any other information made available to IFI

- IFI may consider any other information that could justify long-term storage.

Cooperation with other ADOs

As relevant, IFI will discuss its retention plan with other ADOs that may have jurisdiction over the same athlete and that may be also storing samples from the same athletes, to ensure that no more than the necessary number of samples are retained for the same athlete.

Further Analysis Strategy



Further analysis of samples shall be performed under the ISL, Technical Documents Letters, and Laboratories Guidelines in effect at the time the further analysis is performed.

1. Reviewing stored samples

In cooperation with laboratories and its APMU, IFI shall conduct a regular annual review of its stored samples and analysis already conducted, together with relating athletes' samples records available into ADAMS from tests conducted by IFI or any other ADO with testing authority, in order to identify opportunities to conduct further analysis.

In conducting this review, IFI shall also consider opportunities to conduct further analysis on samples from athletes over which it has testing authority, stored by other ADOs that initiated and directed that samples collection. IFI will also consider any other ADO's with authority to test the athlete that wishes to conduct further analysis on an IFI's stored sample.

For each stored sample, at the conclusion of the regular review based on the decision-making process described below, IFI shall decide to either:

- Discard it, or
- Keep it further stored (i.e., before the 10-year period ends), or
- Conduct a further analysis.

During the period between regular reviews, the opportunity to further analyze stored samples will be continuously monitored on ad-hoc basis (e.g., if a new analytical method and/or a new instrument with better sensitivity is available in a laboratory, ADAMS data monitoring, specific intelligence received about an athlete whom a sample is stored, need for reference DNA analysis in a manipulation case, etc.).

In any case, at the end of 10-year storage period, stored samples shall either be discarded or made anonymous and used for research as provided in the ISL.

2. Decision-making process

The decision on the outcomes of the above review, including whether to proceed with further analysis, shall be based, without limitation, on the following criteria:

- Athletes' current situation in their career path (e.g., age, active or retired, performance level);
- Intelligence received (e.g., from IFI's whistleblower program) and/or outcomes of investigations for a particular athlete;
- Upcoming major events in which athletes will participate;
- Timelines for statutes of limitation (including, for analysis closer to the end of the 10-year period, consideration for potential delays in the result management process (e.g., B sample analysis, athletes delaying the process, etc.);



- Intelligence received or research on doping trends and/or other factors;
- Availability of the sample's required documentation; and
- Recommendations by WADA-Accredited laboratories and or IFI's APMU, such as:
 - ABP data;
 - Newly available technologies, methodologies or significant improvements in either detection methods or sensitivity of equipment, for prohibited substance(s) or method(s) at high risk for IFI; and
 - Sample's technical and analytical conditions (sufficient sample volume, degradation over time, etc.).

3. Substances to be considered for further analysis:

IFI shall, as a matter of principle, conduct further analysis for substances and methods that were prohibited at the time of the sample collection, considering:

- Any analysis for specific prohibited substance(s) or method(s) not analyzed in the initial analysis, where such substance or method is at high risk for IFI;
- Analysis for any new detection or updated methods for a particular substance or method; and
- Retroactive analysis in connection with the ABP program.

In determining substance(s) or method(s) to be analyzed, IFI shall also decide which WADA-accredited laboratory will conduct the further analysis (e.g., if not all the laboratories have a new method available at the same time).

4. Outcomes of further analysis

Based on the results/outcomes of any further analysis, IFI may conduct a new review based on the above selection criteria for sample retention, and decide to re-seal and store that sample again (subject to the state of the sample, including but not limited to the volume being sufficient) for further analysis within the 10-year statute of limitations. A particular consideration will be given to any potential need for reference DNA analysis.

Policy Review

This policy as a whole shall be reviewed annually and adjusted as necessary depending on various factors including, but not limited to, re-evaluation of the doping risks in Icestocksport, intelligence received, new methods of detection, laboratories / APMU recommendations, IFI's budget, and any other relevant information obtained.