

# ITA ETHICS & COMPLIANCE HOTLINE REPORTING POLICY



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# 1. PURPOSE

The International Testing Agency (“ITA”) is committed to the highest standards of ethical behaviour, integrity, impartiality in all of its activities.

The **ITA Ethics & Compliance Hotline** (“Hotline”) provides a secure, confidential and accessible mechanism for reporting any concerns relating to potential or suspected breaches of the [ITA Code of Ethics](#).

This Policy sets out:

- Scope of application of the Hotline;
- What may be reported;
- How reports are handled;
- How confidentiality, anonymity and non-retaliation are ensured;
- The responsibilities of individuals who use the Hotline.

# 2. SCOPE

The Hotline is **meant to be used exclusively for reporting potential violations of the ITA Code of Ethics**. It applies **only** to individuals defined as “Officials” under the ITA Code of Ethics, including:

- Members of the ITA Foundation Board and Committees;
- ITA employees;
- ITA Doping Control Officers (“DCOs”) (**NB: this refers solely to DCOs contracted directly by the ITA; it does not include DCOs engaged by private sample collection agencies or National Anti-Doping Organisations, even if they undertake missions on behalf of the ITA**);
- ITA consultants;
- ITA Therapeutic Use Exemption Committee (“TUEC”)’s members;
- Any other category defined as “Officials” in the ITA Code of Ethics.

The Hotline may also be used by anyone, including internal and external stakeholders, such as athletes, athlete support personnel, anti-doping organisations, event organisers, or members of the public.

**Its use is limited to reporting potential breaches of the ITA Code of Ethics by ITA Officials only.**

Please note that the ITA **cannot take direct action** in relation to reports involving individuals **outside the scope of the ITA Code of Ethics**. The ITA will act within its jurisdiction and, where appropriate, **may refer matters to the relevant entity** if authorised to do so.

For anti-doping misconduct such as suspected Anti-Doping Rule Violations (“ADRVs”), please use the [ITA REVEAL Reporting Platform](#). **Do not use the Hotline to report doping-related intelligence information.**

## 3. WHAT CAN BE REPORTED

Any suspected, attempted or actual breach of the ITA Code of Ethics, including without limitation:

### 3.1. Integrity, Independence & Impartiality

- Conflicts of interest;
- Integrity concern;
- Breach of neutrality.

### 3.2. Bribery, Corruption & Undue Advantages

- Improper offers, solicitation or acceptance of benefits;
- Attempts to influence ITA activities.

### 3.3. Abuse of Position & Professional Misconduct

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- Harassment (psychological, professional or sexual);
- Discrimination;
- Retaliation;
- Undue influence or external pressure;
- Misuse of confidential information;
- Abuse of authority.

### 3.4. Misuse of ITA Resources

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- Misappropriation of funds.

### 3.5. Any Other Breach of the ITA Code of Ethics

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- Interference in doping control activities;
- Breach of confidentiality of ITA information;
- Any other unethical misconduct by an Official.

## 4. REPORTING MECHANISM

All reports must be submitted through the ITA Ethics & Compliance Hotline, accessible via the ITA's website. The Hotline allows reporters to submit information:

- Securely;
- Confidentially;

- Anonymously (optional);
- With supporting documents.

The ITA does not require users to identify themselves. However, providing contact information may facilitate appropriate clarification and feedback.

## 5. HANDLING OF REPORTS

### 5.1. Initial Review

All Hotline submissions are received and reviewed confidentially by the ITA Regulatory Compliance Department, in accordance with the process described in the ITA Code of Ethics.

The ITA will endeavour to acknowledge receipt of the report within forty-eight (48) hours, whenever contact information is available.

The initial review determines:

- Whether the concern falls within the scope of the ITA Code of Ethics;
- Whether further information is needed;
- What next procedural step is appropriate;
- Whether other ITA departments or functions must be consulted or involved (e.g., HR, Legal, Finance, etc.), depending on the facts, individuals involved and type of conduct.

### 5.2. Next Steps

In line with the ITA Code of Ethics, depending on the nature of the matter, the case may:

- Be handled administratively within the ITA Administration; this may include operational, contractual or employment actions deemed appropriate under the circumstances based on the nature of the concern and applicable internal frameworks;

- Be escalated to the ITA Director General or Chair of the Foundation Board (where appropriate);
- Be referred to the independent **ITA Ethics Panel** where the ITA Code of Ethics so requires;
- Be closed at the preliminary stage where the information provided is insufficient to establish a reasonable basis for further action, despite reasonable attempts (if possible) to obtain clarification.

Reporters' identities, if provided, are never disclosed externally unless legally required, or with the consent of the reporter, and only after applying confidentiality safeguards or in the case of malicious reports (see Section 6.5).

### **5.3. Decision-Making**

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For breaches falling under its jurisdiction, the ITA Ethics Panel conducts an independent adjudication and may impose sanctions as defined in the ITA Code of Ethics. Where the matter is addressed directly by the ITA Administration, the ITA may take any appropriate administrative, contractual or operational action, such as employment measures, amendments or termination of contractual relationships, or other remedies permitted under the applicable framework as per its discretion.

### **5.4. Transfer of Information to Other Entities**

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In accordance with the ITA Code of Ethics and applicable laws, the ITA may be under the legal requirement or otherwise expected to disclose the information submitted through the Hotline to third parties, especially in cases beyond ITA's jurisdiction, including:

- The Anti-Doping Organisation ("ADO") responsible for the sport or event concerned;
- Other ADOs or sample collection agencies that are relevant for the processing and/or sanctioning process in relation to the information contained in the report;
- The World Anti-Doping Agency ("WADA");
- National and/or international law enforcement and/or public authorities having jurisdiction over the reported person(s) or fact(s); and/or
- Authorised service providers (for the purpose of providing specialist intelligence and/or investigations assistance).

When sharing a report with third parties, the ITA will take the necessary precautions in order

not to expose the reporter to any undue consequences. As a general rule, reports will be shared with certain details redacted or otherwise generalised so as not to expose sources and methods.

Information that could potentially identify a reporter will not be disclosed to third parties except where the reporter has given their consent to do so, or where such disclosure is required by legal obligation. To the extent possible and appropriate, the ITA will endeavour to inform the reporter of any necessary disclosure in advance of its occurrence.

Furthermore, information will not be shared with third parties who are the subject of allegations, unless required by legal obligation. This assessment is conducted by experts from the ITA Regulatory Compliance Department.

## 6. CONFIDENTIALITY, ANONYMITY AND PROTECTION

### 6.1. Confidentiality

All reports are handled under strict confidentiality. Access is limited to individuals with a need to know who require information to fulfil their responsibilities.

### 6.2. Anonymous Reporting

The Hotline allows fully anonymous submissions. However, the ITA encourages individuals to disclose their identity, as doing so facilitates a more accurate assessment of the reported facts and supports an efficient resolution of the case.

### 6.3. Identity Protection

If a reporter chooses to identify themselves, their identity will not be disclosed externally without:

- Their consent, or
- A legal obligation that makes disclosure necessary.

## 6.4. No Retaliation

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The ITA strictly prohibits retaliation against any individual who reports in good faith.

## 6.5. Good-Faith Reporting Requirement

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Knowingly false, malicious or abusive reports may lead to appropriate action including disciplinary measures under the ITA Code of Ethics, or other legal recourse as deemed necessary by the ITA.

In the unlikely event that the ITA establishes that a reporter has reported malicious or knowingly false information, the protections granted under this Policy will be lost. In this occurrence, when appropriate the ITA will disclose to relevant third parties (as outlined in Section 5.4) the identity of the reporter and other contextual information. This information will be shared as such to prevent third parties from pursuing false or misleading information.

The reporter agrees that they will not impersonate another person or entity when providing information to the ITA. This includes the use of names, personal data or other information (including without limitation phone numbers or email addresses) pertaining to other individuals or entities, aside from when these details are being provided as part of the information reported and it is stated or implied that such information pertains to other individuals and is not intended for impersonation purposes.

The reporter also agrees not to knowingly misstate or misrepresent facts when submitting a report or otherwise make any statement which the reporter knows, believes or should have reasonably known or believed not to be true, accurate and correct.

By submitting a report to the ITA, the reporter expressly confirms that the information contained therein is true, accurate and correct to the best of the reporter's knowledge and reasonable belief.

## 7. RESPONSIBILITIES OF REPORTERS

Individuals submitting reports are expected to:

- Act honestly and in good faith;
- Provide information to the best of their knowledge;
- Not use the Hotline for vexatious or retaliatory purposes.

## 8. DATA PROTECTION

The information provided through the hotline is processed in compliance with the [Ethics & Compliance Hotline Privacy Notice](#). Please refer to it for further details.

## 9. POLICY REVIEW

This Policy is version 1.0, adopted on 1 December 2025.

The Policy will be reviewed periodically to ensure continued compliance with legal requirements and best practices. Updated versions will be published on ITA's website.

# KEEPING SPORT REAL



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