

TRANSGENDER POLICY

Generally

As a necessary pre-condition of eligibility to compete, any athlete who has completed or plans to initiate a gender transition, or identifies as gender non-conforming, including those in the process of taking hormones, must meet current IRONMAN requirements and the World Anti-Doping Agency ("WADA") criteria and shall consent to the disclosure of their clinical treatment to such person or persons as may be required to review for compliance in accordance with IRONMAN's Transgender Policy.

The request by an athlete to participate in any IRONMAN® or IRONMAN® 70.3® event (an "Event") must be made expressly by the athlete to the IRONMAN Global Medical Advisory Board no less than sixty (60) days prior to the race(s) in which the athlete wishes to compete.

Any athlete who competes in an Event without first complying with the requirements set forth in this policy shall be considered to have committed a breach of IRONMAN's Competition Rules which may result in disqualification from the applicable Event, suspension from multiple Events, and/or expulsion for life from all Events.

Compliance with Anti-Doping and Therapeutic Use Exemption Requirements

Any athlete requiring use of a substance or method prohibited by WADA as part of a medically supervised gender transition shall be required to obtain a Certificate of Approval for Therapeutic Use ("TUE") in accordance with IRONMAN's Anti-Doping Rules, Article 4.4. Athletes must seek a TUE from their National Anti-Doping Organization ("NADO") or Regional Anti-Doping Organization ("RADO"), as applicable, in accordance with the policies of those organizations. Nothing in this policy will excuse an athlete's failure to strictly comply with IRONMAN's Anti-Doping Rules.

Gender Transition Declaration and Submission

Athlete submissions in accordance with this Policy, and for the purpose of documenting compliance to establish eligibility, shall be made to the Chair of the IRONMAN Global Medical Advisory Board via IGMAB@ironman.com and shall include the following (collectively, the "Gender Transition Declaration"):

- 1. If the athlete is using any substance or method prohibited by WADA, they must provide a TUE issued in accordance with the WADA International Standard for TUE's and the TUE Physician Guidelines on transgender athletes.
- 2. Disclosure of their clinical treatment and all medical records, or such other additional information, as necessary to support the Gender Transition Declaration or as otherwise may be requested by the IRONMAN Global Medical Advisory Board, including:
 - a. Report by an appropriate treating physician providing care for the athlete including documentation of initiation of transition care
 - b. Demonstrated compliance with current IRONMAN participation requirements



- For an athlete formerly identified as male with intent to compete as female, sequential testosterone levels of less than 10 nMol/L for at least one year prior to competition
- ii. Maintenance of testosterone levels of less than 10 nMol/L throughout the period of eligibility
- iii. For an athlete formerly identified as female with intent to compete as male, no time restrictions exist, but compliance with the WADA International Standard for TUE's, timely TUE submission, and TUE approval, if necessary, is required
- 3. Production of identification documentation confirming the athlete's gender consistent with the category in which they intend to race.
- 4. A list of all Events the athlete is registered for, or intends to register or qualify for, in the upcoming 18 months.

Review of an Athlete's Gender Transition Declaration

The IRONMAN Global Medical Advisory Board will review the athlete's Gender Transition Declaration, including all the elements of the athlete's submission listed above. Once such initial review is complete, the IRONMAN Global Medical Advisory Board may require additional testing and/or medical records before it considers or makes a final decision in response to an athlete's submission.

Once an athlete's Gender Transition Declaration has been accepted by the IRONMAN Global Medical Advisory Board, the athlete's eligibility to participate in the requested gender category in accordance with this policy will be communicated to the athlete, the Vice President of Global Operations, the Head Referee, the Director of the Anti-Doping Program, and the Race Director for each Event for which the athlete has registered.

The accepted declaration cannot be changed, for racing and registration purposes, for a minimum of four (4) years. Continued eligibility will be conditional on meeting the criteria set forth in this Policy and may be monitored at random, through for-cause testing, or by request of the IRONMAN Global Medical Advisory Board for additional records pertaining to ongoing clinical treatment.

IRONMAN may, at its sole discretion, recognize decisions and adopt or revise policy pertaining to a transgender athlete's eligibility consistent with other federations or event organizers if the eligibility rules and policies of those bodies are otherwise consistent with the IRONMAN Competition Rules, including IRONMAN's Transgender Policy.

Athlete's Right to Appeal Decisions Under the Transgender Policies

An athlete whose Gender Transition Declaration has been rejected by IRONMAN may appeal such decision. Any appeal of decisions regarding eligibility resulting from this Policy shall be handled in accordance with Section 3.06 of IRONMAN's Competition Rules.



Challenges to the Gender Classification of an Athlete

A challenge to an athlete's eligibility to participate in a manner consistent with the athlete's registered gender category must be made by sending a confidential written request to the Chair of the IRONMAN Global Medical Advisory Board. That request will be reviewed by the IRONMAN Global Medical Advisory Board in such manner as it deems appropriate and in accordance with the IRONMAN Competition Rules. In the interest of confidentiality, the receipt of the challenge will be acknowledged, but no further information will be provided to the challenging party. IRONMAN may, at its sole discretion, also conduct a review and evaluation of any athlete's gender classification on its own initiative.

Confidentiality

The legitimate medical and privacy interests of transgender athletes will be preserved. Any discussion involving the gender identity of an athlete and any documentation supporting a gender transition will be kept confidential and on a need-to-know basis unless the athlete makes a specific request otherwise. IRONMAN may share confidential information with an athlete's NADO or RADO on a confidential basis as required.

IRONMAN will not retain any written documentation or test results that may be provided by the athlete in accordance with this policy beyond the period in which it is relevant to the athlete's status as an athlete registered for an Event.

For any additional questions or feedback related to this policy, please email Legal@ironman.com

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