ANTI-DOPING POLICY

In Partnership with the Mohegan Tribe
Department of Athletic Regulation

PROFESSIONAL FIGHTERS LEAGUE

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PFL Anti-Doping Policy: MTDAR Authority Transition

Introduction: PFL Anti-Doping Policy and Authority Transition

The Professional Fighters League (PFL) Anti-Doping Policy serves as the foundation for ensuring fair play, protecting athlete health, and maintaining the integrity of professional mixed martial arts competition. The Policy defines the rights and obligations of all PFL participants—athletes, support personnel, officials, and contractors—regarding anti-doping activities, with strict adherence to international best practices and regulatory standards.

Significant in 2025, the authority for all anti-doping matters within PFL has transitioned from the United States Anti-Doping Agency (USADA) to the **Mohegan Tribe Department of Athletic Regulation (MTDAR)** as of September 1, 2025. MTDAR now serves as the sole and independent body responsible for the full spectrum of anti-doping operations, including:

- Planning and conducting athlete testing and sample collection
- Results management and administrative adjudication
- Review and issuance of Therapeutic Use Exemptions (TUEs)
- Impartial hearing procedures and sanction administration

MTDAR brings decades of experience in combat sports oversight and anti-doping enforcement, with certified inspectors and written protocols that ensure rigorous, professional, and fair drug testing for all PFL athletes.

About the Mohegan Tribe Department of Athletic Regulation (MTDAR)

MTDAR is a sovereign regulatory body responsible for overseeing athletic events hosted by the Mohegan Tribe, including high-profile boxing and mixed martial arts promotions. Known for its strict adherence to best practices in athlete welfare and competition fairness, MTDAR operates with full autonomy and transparency.

As PFL's official anti-doping administrator, MTDAR is responsible for:

- Coordinating and conducting both in-competition and out-of-competition drug testing
- Managing the chain of custody from collection to laboratory analysis

- Reporting results and ensuring athlete due process
- Providing quarterly compliance updates to PFL

The updated Policy categorically aligns with the **World Anti-Doping Agency (WADA) Prohibited List.** MTDAR's exclusive oversight guarantees continuity, transparency, and accountability in anti-doping affairs, preserving the credibility of PFL competition worldwide.

This Policy applies without exception to all individuals bound by PFL rules, ensuring uniform enforcement and educational outreach. Beginning September 1, 2025 all anti-doping processes, data protection measures, results, and communications are governed solely by MTDAR.

Scope, Application, and Definitions

The PFL Anti-Doping Policy applies to all PFL athletes, athlete support personnel (including coaches, medical staff, and managers), PFL officials, contractors, and any individual who accepts or is deemed to have accepted the anti-doping rules of the Professional Fighters League. By participating in PFL competitions or related activities, these individuals consent to be bound by, and comply with, all anti-doping obligations set out in this Policy.

The scope of the Policy covers all PFL-sanctioned competitions, training, and associated events worldwide. All actions, regulatory processes, and decision-making responsibilities under this Policy are now solely referenced to the Mohegan Tribe Department of Athletic Regulation (MTDAR), superseding all prior references to the United States Anti-Doping Agency (USADA).

The MTDAR Policy's definitions, rights, and sanctions maintain full alignment with global anti-doping norms, ensuring participation in a fair, compliant, and globally recognized system.

Article 1: Definition of Doping

Under the PFL Anti-Doping Policy, "doping" is defined as the occurrence of one or more anti-doping rule violations, reflecting terminology and provisions that align with global anti-doping standards. These violations encompass the use, attempted use, possession, trafficking, administration, and complicity related to prohibited substances or methods. The Mohegan Tribe Department of Athletic Regulation (MTDAR) is the **sole authority** empowered to interpret, enforce, and determine what constitutes doping within the PFL. This exclusive jurisdiction precludes external interpretation or enforcement, ensuring that all policy determinations, sanctions, and appeals are handled exclusively by MTDAR, with strict alignment to global anti-doping standards.

Article 2: Anti-Doping Policy Violations

The following conduct constitutes Anti-Doping Policy Violations under the exclusive authority of the Mohegan Tribe Department of Athletic Regulation (MTDAR). All Athletes and Athlete Support Personnel are accountable for strict compliance with these provisions. MTDAR holds full interpretive and enforcement jurisdiction regarding violations, notification, reporting, and sanctions.

- **Presence:** Presence of a Prohibited Substance, its metabolites, or markers in an Athlete's sample collected by MTDAR, regardless of intent or knowledge.
- **Use or Attempted Use:** Use or attempted use by an Athlete of any Prohibited Substance or Method, with or without intent. Success or failure of use is immaterial.
- **Evasion, Refusal, or Failure to Submit:** Evading, refusing, or failing (without compelling justification) to submit to sample collection when notified by MTDAR or its authorized agents, or failing to provide whereabouts information as required by MTDAR.
- **Tampering or Attempted Tampering:** Intentionally interfering or attempting to interfere with any part of the Doping Control process administered by MTDAR, including providing false information or procuring fraudulent documents.
- **Possession:** Possession of a Prohibited Substance or Method without valid TUE or proper justification, by an Athlete or Athlete Support Person, in- or out-of-competition.
- **Trafficking or Attempted Trafficking:** Selling, distributing, or facilitating the movement of Prohibited Substances or Methods.
- **Administration or Attempted Administration:** Administration, or attempted administration, of any Prohibited Substance or Method to an Athlete in- or out-of-competition.
- **Complicity or Attempted Complicity:** Assisting, encouraging, covering up, or conspiring to commit (or attempt) any Anti-Doping Policy Violation.
- **Retaliation or Discouragement of Reporting:** Acts by any person to retaliate against, threaten, or discourage reporting of suspected Anti-Doping Policy Violations to MTDAR or competent authorities.

MTDAR’s authority to enforce, interpret, and adjudicate these violations is final and binding on all PFL Athletes and support personnel.

Articles 3–5: Burdens of Proof, The Prohibited List, and Therapeutic Use Exemptions

Evidentiary Standards and Burdens of Proof

In proceedings before the Mohegan Tribe Department of Athletic Regulation (MTDAR), the burden to prove an Anti-Doping Policy Violation rests squarely with MTDAR. To sustain an allegation, MTDAR must present evidence that meets the "comfortable satisfaction" standard of the hearing panel—an evidentiary threshold more exacting than a mere balance of probabilities but less than beyond reasonable doubt. This nuanced standard takes into account the seriousness and gravity of anti-doping allegations.

Where the Anti-Doping Policy places the burden of proof upon the athlete, or other their representative, to establish specified facts or circumstances or to rebut a presumption, the standard of proof shall be by a balance of probability.

All facts relevant to anti-doping matters may be established by any reliable means, including but not limited to laboratory reports, witness testimony, documentary evidence, and admissions.

Analytical methodologies certified by the World Anti-Doping Agency (WADA) are presumed to be scientifically valid.

Concentration Levels for prohibited substances as set forth in the WADA Prohibited List shall not be subject to challenge.

Incorporation and Application of the WADA Prohibited List

The **WADA Prohibited List** is fully adopted into the PFL Anti-Doping Policy and governs the identification and classification of prohibited substances and methods. All categories—ranging from substances prohibited at all times, those banned in-competition only, specified substances subject to tailored sanctions, and substances of abuse—are enforced without deviation.

- Updates to the Prohibited List from WADA are immediately effective under PFL policy.
- Athletes and athlete support personnel are strictly responsible for compliance, regardless of knowledge or intent.

Athletes are personally responsible for knowing what substances they are using—including prescription medications and supplements.

Check Your Medications:

Use the **Global Drug Reference Online (Global DRO)** tool to verify whether a substance is permitted in sport.

Therapeutic Use Exemptions (TUEs)

Athletes requiring the use of a prohibited substance or method for genuine medical reasons must apply for a TUE directly to MTDAR as specified in the PFL TUE Policy. The application process mandates submission of detailed medical documentation and justification. MTDAR reviews each application independently, recognizing TUEs from other organizations only in alignment with WADA criteria. Lapsed, expired, or unrecognized TUEs result in strict liability for the athlete, unless promptly remedied. Athletes are entitled to a formal appeal process regarding TUE denials, adjudicated under PFL Arbitration Procedures.

Articles 6–9: Testing, Whereabouts, Investigations, and Sample Handling

MTDAR's Authority and Testing Strategies

The Mohegan Tribe Department of Athletic Regulation (MTDAR) is vested with exclusive authority over all anti-doping testing within the Professional Fighters League (PFL), encompassing both **in-competition** and **out-of-competition** periods. MTDAR is responsible for the design and execution of a strategic, risk-based Test Distribution Plan. Both **randomized testing** and **targeted testing** are applied to PFL athletes to detect and deter anti-doping rule violations.

- Random testing ensures unpredictability and broad coverage across the athlete population.
- Targeted testing is directed based on risk indicators, performance improvements, intelligence, and athlete-specific factors.

Registered Testing Pool and Whereabouts Requirements

MTDAR establishes and manages the **Registered Testing Pool (RTP)**, which includes all athletes who compete for the PFL or any of the PFL's international regional leagues (e.g., PFL Europe, PFL MENA, PFL Africa, etc.). Such athletes are required to timely, accurately, and completely provide all whereabouts information and such other reporting as may be requested by MTDAR.

Investigations and Intelligence Gathering

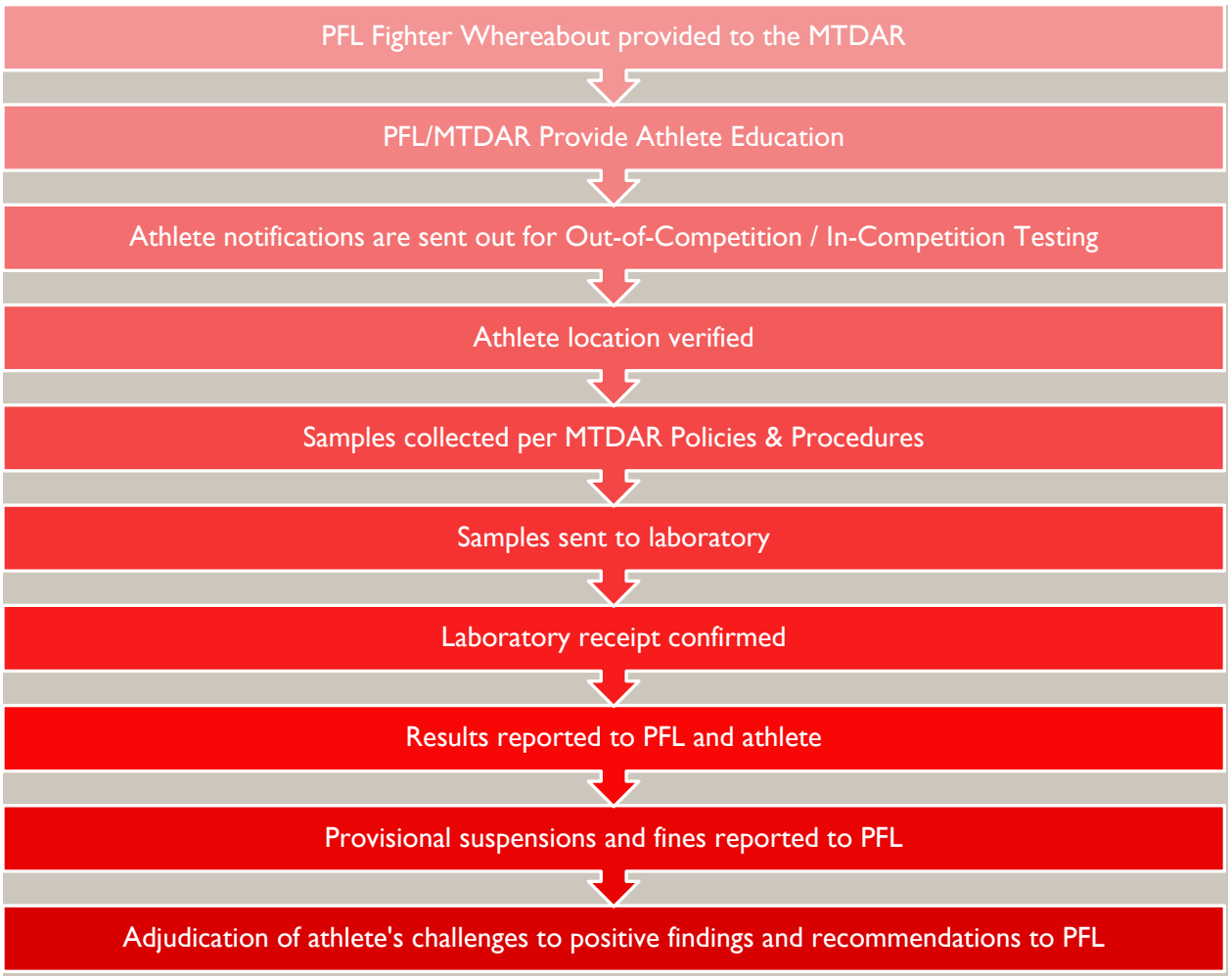
Anti-doping investigations may be triggered not only by test results but also by intelligence, tips, or suspicious behavior. MTDAR is empowered to receive, analyze,

and act upon anti-doping intelligence—including from law enforcement, event officials, or anonymous sources—to inform both testing selection and broader investigations.

Sample Collection, Laboratory Analysis, and Data Privacy

- Sample collection is conducted by MTDAR-trained Doping Control Inspectors aligning to WADA's International Standard for Testing ensuring athlete dignity and sample integrity.
- Collected samples are transported under chain-of-custody protocols to WADA-accredited laboratories, where analysis follows globally recognized standards.
- Data privacy is strictly maintained—athlete and sample information is processed solely for anti-doping or authorized research purposes, and never disclosed beyond policy requirements. Compliance with PFL data protection policy is mandatory.
- Athletes' rights during testing and data collection are protected, including access to information about procedures and entitlements to fair treatment at each stage.

MTDAR Chain of Custody:



Articles 10–11: Results Management, Notification, and Hearings

Results Management Procedures

The Mohegan Tribe Department of Athletic Regulation (MTDAR) is solely responsible for results management within the PFL's anti-doping program. Upon receipt of laboratory reports, MTDAR reviews all findings to determine the presence of *Adverse Analytical Findings (AAFs)*—which indicate the detection of a prohibited substance—or *Atypical Findings (ATFs)*—which require further investigation. Each case undergoes a rigorous preliminary review to assess whether the result may be explained by a valid Therapeutic Use Exemption (TUE), or if a potential departure from standard procedures occurred.

- **Formal Notification:** If an AAF or ATF is confirmed, MTDAR promptly issues written notification to the athlete and applicable parties. This includes details of the finding, the potential violation, and the athlete's rights and responsibilities.
- **Provisional Suspension:** In most cases, a provisional suspension is imposed pending completion of the hearing process, with clear notice provided to the athlete regarding the suspension's terms and potential consequences.
- **B Sample Rights:** Athletes have the explicit right to request the analysis of their B Sample. They are entitled to attend or have a representative present during this analysis, ensuring transparency.

Due Process and Hearings

All athletes are guaranteed the right to a fair and impartial hearing according to PFL Arbitration Procedures. Hearings are conducted by independent arbitrators to determine the presence of a violation and consider any mitigating or exculpatory factors. Athletes may present evidence, request witnesses, and obtain legal representation. MTDAR's adherence to due process and regulatory compliance underpins the legitimacy of all proceedings.

An athlete against whom an Anti-Doping Policy Violation is asserted may admit that violation at any time, waive the right to a hearing, and accept the sanctions placed offered by MTDAR.

If an athlete against whom an Anti-Doping Policy Violation is asserted fails to dispute that assertion within (7) seven business days or the deadline specified in the notice sent by MTDAR asserting the violation, then the athlete shall be deemed to have admitted the violation, waived a hearing, and accepted the sanctions offered by MTDAR.

Article 12-13: Sanctions and Consequences for Violations

Sanctions and Appeals

- **Disqualification of Results & Fines:** Athlete results obtained in the contest where an anti-doping violation occurred, upon decision of the PFL, lead to disqualification of the athlete's results and the imposition consequences which may include, without limitation, fines, forfeiture of titles, rankings, purse, win bonus, marketing fees, bonuses, or other compensation.
  - MTDAR may extend disqualification of results to prior contests if it is determined that fair competition has been undermined by the present violation.
- **Suspension From Competition:** A period during which an individual is barred from participating in any PFL or sport-related activity. The length a suspension shall be determined by MTDAR in its reasonable discretion taking into consideration the violation type and any aggravating circumstances (e.g., multiple substances, organized doping).
- **Additional Testing:** MTDAR may require additional testing be performed.
- **Reduction or Elimination of Sanctions:**
  - If the athlete establishes No fault or negligence in committing the Anti-Doping Policy violation, MTDAR may reduce the sanction in full at their discretion.
  - *Substantial Assistance:* Providing significant help that results in discovering or proving other anti-doping rule violations can result in a substantial reduction, at MTDAR's discretion.
  - *Prompt Admission:* Early, voluntary admission of a violation before official notice may reduce a sanction.
  - *Contaminated Products:* Sanctions may be lessened if inadvertent ingestion is proven.
- **Provisional Suspension:** Imposed pending the resolution of a case; violation of a provisional suspension leads to further sanctions and can nullify additional competitive results.

Additional Provisions

- **Requirements During Ineligibility:** Individuals are strictly forbidden from any sanctioned competition or activity during the period of ineligibility. Any breach results in new or extended bans and disqualification of results from the period in question.

- **Right of Appeal:** All MTDAR-sanctioned athletes are entitled to dispute any adverse findings and request B-sample testing. Appeals must be filed with MTDAR in writing within (7) seven business days.
- **Publication and Disclosure:** Final decisions, sanctions, and relevant facts are published by the MTDAR, typically on the approved regulatory databases, respecting privacy and in compliance with disclosure standards. Publication and disclosure of an Anti-Doping Policy violation occurs only after due process is complete.
- **Statistical Records:** MTDAR maintains official records of all violations, sanctions, and appeals. Anonymized statistics are periodically published to promote transparency and policy adherence.

Article 14: Confidentiality, Reporting, and Recognition

- **Confidentiality and Data Protection:** All drug testing results are handled with the utmost confidentiality. MTDAR and PFL work together to ensure that all testing is fair, accurate, and legally sound. MTDAR ensures strict confidentiality and secure handling of all personal and anti-doping information. Data collection, storage, access, and dissemination comply with data protection laws; disclosure is limited to authorized parties as deemed appropriate by the MTDAR and the PFL.
- **Reporting and Disclosure:** Publication of anti-doping violations, sanctions, and statistical summaries is managed solely by MTDAR. Only authorized individuals are notified, and no public disclosures will be made without due process. Non-identifiable, anonymized statistical data may be shared to support transparency and policy awareness.
- **Recognition of External Decisions:** MTDAR recognizes, upholds, and enforces anti-doping decisions (including sanctions and hearing outcomes) rendered by external bodies, provided they are consistent with PFL policy and internationally accepted standards.

Articles 15-17: Education, Amendments, Policy Interpretation, Roles and Waivers

Education and Outreach

The Mohegan Tribe Department of Athletic Regulation (MTDAR) is mandated to design, implement, and continually update all anti-doping education and outreach initiatives for the PFL community along with the appropriate PFL appointed staff. These programs include informational materials, and web-based modules tailored for athletes, support personnel, and other stakeholders, ensuring comprehensive understanding of prohibited

substances, testing protocols, rights, and responsibilities under the Policy. MTDAR's education efforts also promote awareness of changes to the WADA Prohibited List and reinforce values of clean sport and athlete health.

Policy Amendments and Interpretation

Amendments to the PFL Anti-Doping Policy may only be made jointly by PFL and MTDAR, with new provisions taking effect upon official publication. The official Policy language is English; if discrepancies arise in translation or interpretation, the English text prevails. Where interpretive questions are not answered herein, reference is made to the WADA Code and International Standards, except where expressly modified by this Policy.

Roles, Responsibilities, and Waiver of Claims

- All participants—including athletes, support staff, and officials—must cooperate fully with MTDAR on investigations, sample collection, TUE procedures, and all anti-doping obligations.
- Strict adherence to reporting, notification, and other regulatory requirements is a condition of participation.
- By engaging in PFL activities, all parties acknowledge and agree to release and hold harmless PFL and MTDAR for any claims arising from good-faith actions conducted pursuant to this Policy.

These articles establish a rigorous legal and procedural framework, ensuring MTDAR's ongoing governance and compliance with international anti-doping best practices.