



## GENDER POLICY

LPGA maintains this Gender Policy (“**Policy**”) to provide transgender athletes an avenue to membership and opportunity to participate in events, and in an effort to assure fair competition for all members and participants. This Policy is a living document and subject at all times to review and modification, including based on scientific or medical developments.

### Article I. POLICY APPLICATION

This Policy governs and applies to applicants for membership in LPGA Tour, Symetra Tour, LET, LETAS and LPGA Professionals, and non-member’s participation in their respective tournaments. Tournaments and membership are open only to female athletes, including transitioned female athletes. An applicant for membership or entry into a tournament that has undergone gender reassignment from male to female after puberty must identify herself during the application/entry process and provide proof of gender in accordance with this Policy. Failure to provide proof of gender when gender has been reassigned, and to comply with the process and procedures set forth in this Policy, may result in disqualification from eligibility for membership and/or entry into a tournament. If there is a genuine question as to the eligibility of any applicant, including via sponsor exemptions or qualifiers, the LPGA shall have the right, within its sole discretion, to require such athlete to substantiate her transitioned status in accordance with this Policy.

### Article II. ELIGIBILITY

Individuals who have undergone gender reassignment from male to female after puberty are eligible for membership and/or participation in tournaments, provided they comply with the eligibility requirements set forth below and provide certain documentation to LPGA (the suitability and acceptance of each as determined in LPGA’s sole discretion) in accordance with this Policy. Individuals who have undergone gender reassignment from male to female prior to puberty are not subject to these requirements:

The applicant must provide a written declaration, in a form satisfactory to LPGA, that her gender identity is female. Such declaration cannot be changed, for sporting purposes, for a minimum of four (4) years following the first date in which she participates in a tournament as a transgender athlete;

The applicant must have undergone gender reassignment surgery (i.e., a gonadectomy) prior to submitting an application for membership or entering the tournament; and

The applicant must have undergone, for at least one (1) year, appropriate hormonal therapy and maintained testosterone levels in a verifiable manner sufficient to minimize or negate gender-related advantages in sport competitions, as determined by LPGA in consultation with its medical advisor(s), and demonstrate that she is ready, willing and able to continue to maintain such levels for so long as she continues to compete in tournaments.

For the avoidance of doubt, applicants transitioning to male who either declare their gender identity to be male or commence hormone treatment for such purpose will not be eligible for membership or entry into a tournament.

### Article III. PROCEDURES & DOCUMENTATION FOR VERIFICATION OF GENDER

Each applicant that is subject to this Policy must comply with the terms and conditions of the Policy and related procedures. The LPGA medical advisors shall have the authority to take all appropriate measures necessary to verify the applicant’s compliance with this Policy. In addition to the LPGA medical advisors, the applicant shall be entitled to appoint one (1) medical specialist to participate in the review and verification process.

All required documentation must be submitted to the LPGA Chief Legal Officer, and received at LPGA Headquarters (100 International Golf Drive, Daytona Beach, Florida 32124, Attn: Chief Legal Officer) or via the submission method otherwise indicated by LPGA, concurrent with applicant’s application for membership (if applicable), and in no event later than forty-five (45) days prior to the Commitment Deadline of the first tournament in which the applicant intends to participate. The documentation, which will be reviewed by the medical advisor(s), must include the following:

- i. all clinic notes pertaining to gender reassignment;
- ii. all hospital records pertaining to surgical gonadectomy;
- iii. all office records documenting related follow-up treatment;
- iv. laboratory results supporting acceptable testosterone levels for a minimum of one (1) year prior to competition, and any other medical documentation requested regarding applicable hormonal therapy requirements; and
- v. an executed Authorization for Release of Medical Information waiver form allowing LPGA medical advisor(s) to contact all treating physicians

if deemed necessary.

If hospital or medical records have been purged or lost, or are otherwise unobtainable, a current physical examination performed by a physician experienced in reassignment surgery, a report from that physician, and the documentation referenced in (i) and (iii) above, will be considered and reviewed. LPGA reserves the right to request updated laboratory results to confirm acceptable testosterone levels prior to or following the completion of a tournament.

All reasonable transitioned status verification processes will be at the expense of the applicant.

#### Article IV. PROCEDURE FOR MEMBERS AND PLAYERS PREVIOUSLY APPROVED UNDER THIS POLICY

If eligibility for membership or entry in a tournament has been previously approved under this Policy, subsequent applications and/or entries may be accepted without the need to resubmit the documentation relating to the gender reassignment surgery required above. However, LPGA reserves the right to request, prior to or following completion of a tournament, updated laboratory results or other medical documentation to confirm that the player continues to meet acceptable testosterone levels for a sufficient period of time, as determined in LPGA's sole discretion in consultation with the LPGA medical advisors.

#### Article V. ADDITIONAL CONSIDERATIONS

If questions relating to a player's compliance with this Policy or concerns regarding fair competition arise, either prior to or after commencement of a tournament, or after a competition has been completed, LPGA may contact the player for verification, and request that appropriate documentation in accordance with this Policy. A player has seven (7) days after receipt of such a request within which to provide the required documentation to LPGA. If the tournament has commenced, a player may be permitted to continue in the tournament until a determination has been made on the player's eligibility in accordance with this Policy. If it is determined that the player should be disqualified, any award, prize and/or ranking arising from participation in the tournament shall be forfeited. Failure by the player to submit to transitioned status verification upon the request of LPGA shall immediately bar the player from participation in tournaments (and/or suspension of membership) until such time as the appropriate verification, in LPGA's sole discretion, is carried out in accordance with this Policy.

For the avoidance of doubt, the eligibility conditions for transgender athletes set out in this Policy operate without prejudice to all other eligibility requirements that are applicable to members and non-members (transgender or otherwise) under the respective Regulations, which must also be satisfied at all relevant times. Nothing in this Policy is intended to undermine or affect in any way any of the requirements of the LPGA Anti-Doping Protocol, and nothing in this Policy will be deemed to permit, excuse or justify non-compliance with such requirements, including (without limitation) any requirement to obtain a Therapeutic Use Exemption for the use of a Prohibited Substance, such as testosterone. A player receiving treatment involving a Prohibited Substance or method, as described in the LPGA Anti-Doping Protocol, should apply for a standard Therapeutic Use Exemption.

#### Article VI. RECIPROCIITY – MUTUAL RECOGNITION OF VERIFICATION AND PENALTIES

LPGA reserves the right to recognize or reject a decision regarding gender verification, and may recognize, modify or enforce a penalty or suspension, that is issued concerning a player that is subject to this Policy either by or on behalf of any other women's golf tours, sporting authorities or government authorities, to the extent that the gender policy of such entity is materially consistent with this Policy, as determined by LPGA in its sole discretion. Such other tours and authorities may include, without limitation, the USGA, The R&A, or PGA of America.

#### Article VII. CONFIDENTIALITY

All non-public information and documentation provided to LPGA, and results of any gender verification process conducted, pursuant to this Policy will be maintained in confidence pursuant to LPGA's standard privacy policy for participants and the notice for processing sensitive personal information below. If the individual wants LPGA to release to any third party, information confirming the player has followed the procedures of this Policy and was deemed eligible to play in a particular tournament, the player must execute LPGA's Authorization for Release of Information waiver form and provide a copy to the LPGA Chief Legal Officer.

LPGA expressly disclaims any ability to limit or prevent third party inquiries made directly to the player or to others. If a third party (other than those specified in this Policy), including media representatives, makes an inquiry with respect to a player's eligibility to play in a particular tournament, LPGA may respond that the player was deemed eligible or ineligible (as applicable) to compete.

Questions regarding the Policy, or related processes and procedures can be addressed to the LPGA Chief Legal Officer at (386) 274-6200.

#### Article VIII. PRIVACY NOTICE FOR PROCESSING SENSITIVE PERSONAL INFORMATION

In determining an applicant's eligibility under this Policy, LPGA may collect sensitive personal information ("SPI"), such as the physical or mental health information listed in Article III of this Policy. LPGA only collects SPI provided directly from the applicant to LPGA or from any treating physician

the applicant authorizes to provide such SPI to LPGA.

LPGA uses the SPI for (i) determining the applicant's eligibility pursuant to this Policy, (ii) verifying the player's continued eligibility pursuant to this Policy, (iii) monitoring, detecting and preventing violations of the Regulations; and (iv) if required in connection with potential / actual litigation or investigation concerning the LPGA or the respective Tours and/or tournaments.

LPGA will use the SPI because: (i) the applicant has given explicit consent, (ii) it is necessary in the administration of the Membership Agreement and/or Tournament Entry Agreement with the respective Tour or in order to take steps prior to becoming a member or entering a tournament; (iii) it is necessary for the establishment, exercise or defense of legal claims or (iv) the LPGA has a legitimate interest to (a) provide fair competition for all members and players, (b) ensure the effective processing of the applicant's application for membership and/or entry into a tournament (c) enforce the Regulations, (d) manage disputes and accidents and take legal advice; and/or (e) prevent fraud. Please contact LPGA for more information on these legitimate interests.

LPGA will not sell or otherwise disclose SPI, except as described here or as permitted or required by law. LPGA may share SPI with the following third parties for the purposes of administering this Policy, and/or for administrative, management and operational purposes: (i) to employees and companies that operate the respective Tours and tournaments, (ii) our suppliers, vendors and contractors such as LPGA medical advisors, testing providers and labs and external advisors (these parties are provided only with the minimum SPI needed to perform their functions, and are not permitted to process SPI for any other purposes unless required by law), (iii) courts, law enforcement authorities, other government bodies, regulators and competent authorities; (iv) where the applicant has given consent, in particular LPGA may share SPI with third parties the applicant wishes to involve in the evaluation of her eligibility and/or where the player has requested the information to be shared with a third party, such as another sanctioning body and/or federation.

LPGA will only retain the SPI for as long as necessary to fulfil the purposes for which it was collected. In general terms this means that the LPGA will retain the SPI for the duration of the players engagement with LPGA and/or the respective Tours. In accordance with LPGA's obligations under relevant law LPGA will provide the applicant with access to the SPI it holds and respects the applicant's rights to review, correct, and delete her data where appropriate. Access requests and any queries regarding the applicant's rights in relation to her personal information, including SPI, should be addressed to [Kourtney.Bigelow@LPGA.com](mailto:Kourtney.Bigelow@LPGA.com).