

 Living a legacy of trust

Advancing quality and maintaining trust

We remain true to the principles that have made us a trusted and respected standards-setting organization for 200 years.

In This Section:

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- ▶ Follow our quality management system
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Maintain our reputation for scientific integrity

To maintain our reputation as a leading standards-setting organization, USP has established processes that are open, rigorous, science-based and include robust conflict of interest management. Each of us involved in standards-setting activities must all follow the highest ethical standards in full compliance with all federal and state laws and regulations and our SOPs.

Any employee found to have intentionally submitted false or misleading information in support of a USP business activity puts our reputation at risk and will be subject to disciplinary measures, up to and including termination.

What's my role?

- ▶ Always be honest and thorough when reporting results.
- ▶ Never tolerate acts of plagiarism, falsification, fabrication of data or other forms of scientific misconduct.
 - ▶ Disclose and appropriately manage conflicts of interest and do not participate in any relationship or activity that could influence or appear to influence our ability to remain independent and objective.

- ▶ If you suspect a potential violation of our policies related to standards-setting activities or a problem involving our processes, immediately report the matter to any of the resources listed in this Code.



Learn from the experience of your colleagues



Our impact and achievements depend on the rigorous evaluation of scientific data, collaboration, transparency and the honest reporting of results.



Disclosures, official statements and interpretations

The precise wording of our publications may have legal implications so the language must stand on its own and must be equally available to all in the health community.

It is therefore important that employees, volunteers and representatives do not provide official after-the-fact interpretations to one party, thereby placing other parties at a possible disadvantage. In addition, we may not provide an official opinion as to whether a particular article does or does not

comply with compendial requirements, except as part of an established USP verification or other conformity assessment program that is conducted separately from, and independent of, USP's standards-setting activities.

We provide disclosures of information and records regarding our standards-setting activities while respecting the rights of individuals to privacy, the protection of confidential information and consistent with our need to facilitate internal deliberations that are candid and thorough.

Follow our quality management system

To ensure the trust others have placed in us, each of us must do our part to help maintain a rigorous quality management system to continuously monitor, improve and measure the quality and impact of our products and services.

What's my role?

- ▶ Remember that you are responsible for the quality of the work you produce.
- ▶ Read, understand and comply with the *USP Corporate Quality Manual* and all SOPs that apply to your work.
- ▶ If you are concerned that there may be a problem with our quality management systems or if you suspect that a violation of our quality management system may have occurred, immediately contact any of the resources listed in this Code.



Learn from the experience of your colleagues



We have a passion for quality.



Ensure accurate recordkeeping and disclosures

We create timely, honest and accurate business records, following our established processes and controls.

Employees involved in reporting and disclosures to federal, state and local governments or to entities retained by them, have special responsibilities in this area, but all of us contribute to the process of accurately recording scientific and business results and maintaining accurate records. Each of us has a responsibility to ensure that the information that we record is full, fair, accurate, timely and understandable.



What's my role?

- ▶ Create accurate, complete and timely statements and records as required by your organizational role.
- ▶ Ensure that all records including general business, accounting, financial, scientific and standards-setting, meet generally accepted accounting principles and all other applicable regulatory or industry standards.
- ▶ Check that our records are clear, complete and supported by documents that explain the nature of any expenditure or event.
- ▶ If there is any doubt about the accuracy of a statement or record, do not make the statement, create the record or represent it to be accurate.
- ▶ Never pressure others or manipulate or mislead outside auditors or regulators who are involved in reviewing USP's records, systems and internal controls.



Learn from the experience of your colleagues



Records management and litigation hold orders

Business records must be retained as long as needed for business purposes, or longer if required by law or USP's records retention policies. Documents should only be destroyed in accordance with our records retention policy and never in response to or in anticipation of an investigation, lawsuit or audit.

If you receive a litigation hold order you must not alter or discard any relevant information. Contact Global Legal Affairs if there is any doubt about the appropriateness of record alterations or destruction.

Protect confidential and private information

In the course of doing our work, we may have access to confidential information related to USP's operations as well as information entrusted to us by third parties. We must keep such information confidential and protect it from loss, misuse or inappropriate disclosure.

In addition to confidential information, we may have access to private or personal information about employees, volunteers and others. Privacy laws cover how we collect, store, use, share, transfer and dispose of such information, and we comply with those laws everywhere we operate.

Privacy laws vary but under these laws private or personal information includes information that can be used to identify a specific person, such as a name, personal address, personal phone number, photo, birth date, performance history, educational background, driver's license number, banking or payroll information, government-issued identification information, sexual orientation, medical condition or history, union membership or other similar personal information.

What's my role?

- ▶ Understand the types of information you handle and ensure all appropriate processes for handling are followed.
- ▶ Promptly complete all security awareness training related to online and offline information and use lessons to protect private and confidential information.
- ▶ Always handle confidential information with care, follow the law and our policies and protect any personal information that is entrusted to you.
- ▶ Only share confidential information with those who need to know it and are able to keep it secure. Verify the right to disclose before sharing any confidential information.
- ▶ Limit the collection of personal information to what is strictly needed for our operations.
- ▶ If you learn that confidential information has been stolen, lost, released to an unauthorized person, or otherwise mishandled or if you receive confidential information by mistake report it to HR, IT and/or Global Legal Affairs.



Learn from the experience of your colleagues



Intellectual property

The work product that employees, volunteers and representatives of USP create for USP is the intellectual property (IP) of the organization. Our IP is critical to our business. We must protect it and make sure we follow authorization processes before sharing it with others. We also respect the IP of others and expect that they do the same.

Our IP includes inventions, discoveries, ideas, improvements, software programs, artwork and authored work. Volunteers and representatives must promptly disclose to USP, in writing, any such work and cooperate with our efforts to obtain intellectual property protection for USP. To ensure that USP receives the benefit of work done by representatives, it is essential that an appropriate agreement or release is in place before any work begins.

Use USP assets appropriately

We protect and use our resources with integrity and efficiency.

Limited personal use of USP assets is permitted but it may not interfere with your work performance or that of your colleagues, or be otherwise prohibited (e.g., personal use of resources on a donor-funded project is prohibited).

We trust individuals to exercise good judgment when using USP assets, including USP information. In case of any doubt, contact any of the resources listed in this Code with questions, or if you're unsure about what constitutes appropriate use.

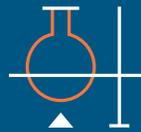
What's my role?

- ▶ Be careful when handling organization assets, including IP.
- ▶ Follow all company policies and practices that are designed to protect our networks, computers, programs and data from attack, damage or unauthorized access.
- ▶ Never use USP resources or information for personal, family or other business opportunities.
- ▶ Secure your office, workstation and equipment by locking items or completely shutting down systems.

- ▶ Report any equipment that is damaged, unsafe or in need of repair.
- ▶ Only use authorized software, devices and procedures.



Learn from the experience of your colleagues



USP assets include:

Physical – Facilities, lab equipment, Reference Standards, furniture and supplies

Information – Data, databases, reports, files, plans, records, intellectual property including trademarks and logos

Financial – Organizational funds including checks, credit cards, invoices and other records that serve a monetary purpose

Electronic – Computers, electronic storage devices, telephones, information systems, internet/intranet access, personal digital assistants, and other similar devices, systems and technology

We protect USP's resources as if they were our own.

! Insider trading

In the course of your work, you may receive confidential USP information about a USP donor, partner or product before it is publicly available to ordinary investors. Do not use this information for personal gain or share with others. It is not only unfair to other investors, it is also illegal.

Speak with one voice on behalf of USP

It is important that we speak with one clear and consistent voice when providing information to the public and the media. For this reason, only certain employees are authorized to speak publicly on behalf of USP.

What's my role?

- ▶ Unless you are authorized to do so, never give the impression that you are speaking on behalf of USP in any communication that may become public.
- ▶ If you receive an outside inquiry about USP, you should decline to comment, provide no information and immediately notify the Global Communications Department.
- ▶ If you are contacted by a regulatory agency or regulator, immediately notify Global Legal Affairs or Global Compliance and Ethics.



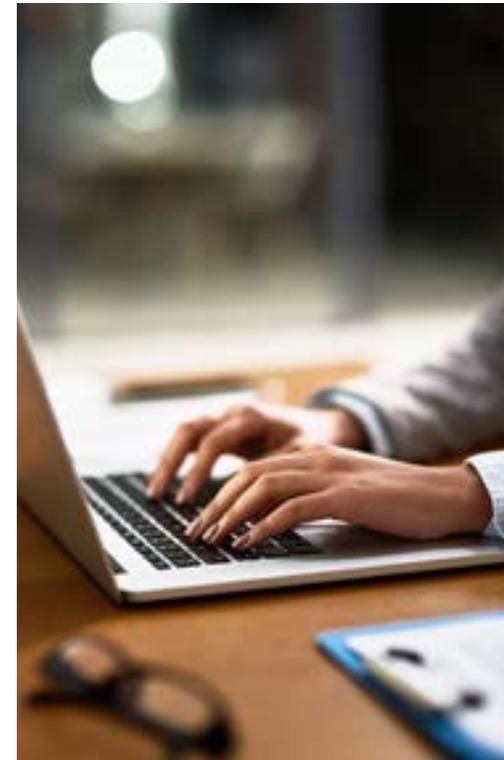
Learn from the experience of your colleagues

Think it through – social media

Social media is a great way to connect with colleagues, but always be careful when writing anything that might be published online. Practice common sense, and keep your electronic communications professional, factual and consistent with our values and policies.

- ▶ Although USP does not seek to restrict the personal use of social media, when engaging in social media on your own behalf, comply with all USP confidentiality requirements concerning the sharing of USP information.
- ▶ Be careful when listing USP as your employer on any social media site, with the understanding that your social media activity may have an impact on the public image and reputation of the organization.
- ▶ Take responsibility for what you post and never engage in activity online that would be unacceptable in person.

Think carefully before you hit the “send” button in an email or a text.



Manage political activity and contributions

We believe in the rights of our employees to participate in the political process, but if you choose to be politically active, do so as an individual citizen on your own time and at your own expense. Neither USP nor employees may use USP property, facilities or time to support a political cause or candidate.

Laws and regulations place numerous restrictions on the organization's role in political activities and funding. In accordance with applicable laws, we exercise our right and responsibility to make our position known on relevant policy issues to government leaders, when appropriate.

What's my role?

- ▶ Your political statements must be identified as yours and not USP's.
- ▶ Make sure that any political work you do is done on your own time and without the use of organization resources or funds.
- ▶ Never make political campaign contributions on behalf of USP, and do not engage in any political advocacy or "lobbying" activities on behalf of the organization without specific approval from Global External Affairs.

- ▶ Obtain permission from HR before accepting employment, consulting or service on the board of a customer, supplier or service provider.



Learn from the experience of your colleagues



We are always accountable for our actions.



Political solicitation and distribution of literature

It's important that we maintain an environment that is conducive to work and free from pressure from colleagues to participate in political initiatives that are not approved by USP.

Do not solicit others – in person, through our email or by distributing or posting written materials – related to political candidates or causes using USP resources.

