



## Living a legacy of trust

At USP, we are proud of the legacy of trust we have built over the last 200 years. We look to the future and our continued work to empower a healthier tomorrow.

### **In This Section:**

- ▶ Know our Code of Ethics
- ▶ Ask questions and report concerns

# Know our Code of Ethics

For 200 years, USP has played a critical role in the advancement of global health by protecting the quality of medicines. This role comes with responsibilities that have a direct impact on our day-to-day activities.

To meet our responsibilities and live up to our legacy of trust, we must maintain the highest standards of ethics and compliance, comply with all laws and must ensure that our work is always scientifically rigorous, independent, objective and transparent.

Maintaining strong ethics, integrity and trust is essential for USP to meet its mission. This is not always easy, which is why we have developed this updated Code of Ethics (“Code”) to help you navigate challenging situations. It is a statement of our principles and provides guidance for our conduct in the workplace and as part of the health community.

## Using our Code

While our Code is not intended to provide examples of every situation that may occur, it does provide the baseline standard of conduct for all employees, volunteers and representatives to follow. This helps ensure that everyone connected to our organization has the information they need to do what is expected of them.



In addition to the Code, we have other resources for more detailed and job-specific information: the *Rules of Business Practice for the Board of Trustees*, the *Rules and Procedures of the Council of Experts*, the *Rules and Procedures of the Council of the Convention*, the *Rules and Procedures of the Convention Governance Committee*, the USP Employee Handbook, the *Corporate Quality Manual* and our Standard Operating Procedures (“SOPs”). Links to some of these resources are included throughout the Code, where applicable. A complete list of all SOPs can be found on the USP Intranet. If you have any questions or need additional guidance you can always contact the Global Compliance and Ethics team or any of the other resources listed in this Code.

## ! Think it through – speak up

Failure to report a known violation of law or of USP policy is itself a violation of USP policy and could subject you to disciplinary action, up to and including termination.

Speak up, ask for help or discuss your situation with any of the resources listed on **page 33**. Working together we can find a path forward that is consistent with the law, this Code and our Core Values.

# Ask questions and report concerns

You have a responsibility to speak up if you have a question or if you know or suspect that there has been a violation of the law, our Code, Core Values, the USP Employee Handbook, the *Corporate Quality Manual*, SOPs, the *Rules of Business Practice for the Board of Trustees*, the *Rules and Procedures of the Council of Experts*, the *Rules and Procedures of the Council of the Convention* or the *Rules and Procedures of the Convention Governance Committee*.

**Remember: An issue cannot be addressed unless it is brought to someone's attention.**

## Getting help

In most cases, your supervisor should be your first point of contact. He or she is likely to be in the best position to understand your question or concern and take the appropriate action. Your supervisor, in turn, has a mandatory responsibility to report all potential illegal or unethical behavior for further investigation.

However, if you're uncomfortable speaking with your supervisor, your supervisor is unable to answer your question, is the source of the concern or if you have already shared a concern and believe it's not being addressed, you have these additional options:

- ▶ Talk to any member of the leadership team.
- ▶ Contact Human Resources.
- ▶ Contact Global Legal Affairs.
- ▶ Contact Global Compliance and Ethics at [compliance@usp.org](mailto:compliance@usp.org).
- ▶ At any time you may contact the Helpline:
  - ▶ Call, from the United States and Canada: **1-866-492-3365**, access numbers from other countries and international dialing instructions are located at [usp.ethicspoint.com](http://usp.ethicspoint.com).
  - ▶ Online: Complete the reporting form located at [usp.ethicspoint.com](http://usp.ethicspoint.com).

“We stand for what is right and we will speak up when something is wrong.”





## Zero tolerance for retaliation

USP will not tolerate retaliation against anyone who reports a problem in good faith, nor will we tolerate retaliation against anyone who participates in an investigation. If you believe you have been retaliated against or have witnessed retaliation, report the situation to any of the resources listed in this Code. Reporting “in good faith” means that you had reason to believe a violation existed and are sincere in your attempt to provide honest and accurate information, even if the investigation determines there was no violation.



## Learn from the experience of your colleagues



## Using the USP Helpline

The Helpline is a confidential tool hosted by a third party that allows you to ask questions, seek guidance and report illegal conduct or suspected violations of the law, our Code, Core Values, the USP Employee Handbook, the *Corporate Quality Manual*, or SOPs, the *Rules of Business Practice for the Board of Trustees*, the *Rules and Procedures of the Council of Experts*, the *Rules and Procedures of the Council of the Convention* or the *Rules and Procedures of the Convention Governance Committee*.

You may use the USP Helpline 24 hours a day, 7 days a week. When you contact the Helpline the operator will listen, ask questions if necessary, and then write a

summary report. The summary will then be provided to USP for assessment and further action. USP will investigate all complaints of illegal or unethical behavior.

You can choose to call anonymously, unless restricted or prohibited by local law (for example in the European Union). Whether you call anonymously or not, it is important to provide as many details as possible (e.g., who, what, when, where). Failure to provide details may hinder USP from conducting a meaningful investigation.

Since USP may need additional information, you will be assigned a report number/PIN and asked to call back at a later date to answer any follow-up questions.