

Reporting Policy



“You are expected to speak up if you have a good-faith concern.”

Speaking Up

In addition to knowing the legal and ethical standards that apply to your position, you are expected to speak up if you have a good-faith concern regarding the following types of misconduct:

- Fraud or misuse of USP resources
- Violations of law or regulations
- Questionable or improper accounting or auditing matters
- Known or suspected instances of improper billing on a government contract or subcontract
- Failures to comply with the Code, *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 *Employee Handbook*, the *Quality Manual*, or SOPs

We ask that you report any alleged, suspected, or known misconduct to any of the resources provided in this Code, or anonymously through the USP Helpline (see Using the Helpline). 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. Every effort will be made to respond to your report within 10 business days. If an investigation is undertaken, it will be conducted promptly and thoroughly.

Anyone reporting potential misconduct must act in good faith and have reasonable grounds for believing the information disclosed. “Good faith” is an honest belief in performing your duty or obligation. Making allegations maliciously, recklessly, or with the knowledge that the allegations are false is a serious offense and may result in appropriate disciplinary measures.



The Code does not cover every situation that may arise and the Helpline and this Reporting Policy is primarily intended for reporting illegal or unethical conduct. If you have a question or concern related to strategic direction, management style, personnel grievance, or other management considerations we encourage you to consider first talking to your management chain, Human Resources, or other senior USP managers.

Investigations

When called for, investigations are handled on a case-by-case basis, depending on the nature of the alleged or suspected misconduct. In each case, USP will try to determine if misconduct has occurred, respond in a timely manner, and make corrections and/or recommendations, if required. No person will direct or conduct the investigation of a matter if he or she is a subject of the report, or if management deems that a potential conflict

of interest exists. Outside legal counsel, accountants, investigators, or other resources may be retained if necessary to conduct a full and complete investigation of the potential misconduct. Due process and appropriate protections will be afforded to those named or implicated in any investigations. Additional information about the receipt and handling of reports of misconduct may be found in the *Guidelines for Referral and Investigation of Reported Misconduct*. The results of all investigations, along with any recommended corrective action, will be reported to the Audit Committee of the Board of Trustees.

At times USP may require you to assist in the internal or external investigation of a violation of the law, Code, SOPs, or other misconduct. You are expected to cooperate with these requests. You may never interfere in an investigation, knowingly offer false information, or alter or destroy any relevant documents or information.

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Non-Retaliation Policy

At USP, our policy is to encourage and enable employees, volunteers, and representatives to report suspected or known misconduct of the type described in this Reporting Policy, for investigation and appropriate action. No one who submits a report in good faith will be subject to retaliation or, in the case of an employee, adverse employment consequences.

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Our policy also prohibits retaliation against any individual who assists in an investigation. Anyone who retaliates against someone who has reported in good faith, or who assists in an investigation, will be subject to appropriate disciplinary measures, up to and including termination.

Confidentiality of Reports

Reports of misconduct, the fact that an investigation has been initiated, as well as information gathered during an investigation are kept confidential to the extent possible, consistent with the need to complete an adequate investigation, provide appropriate due process to anyone accused of misconduct, protect witnesses, and implement any corrective action. If you report potential misconduct, a summary of your report may be shared with the subject of the report in order to provide that person with an opportunity to respond. In addition, the results of all investigations, along with any corrective action, will be reported to the Audit Committee of the Board of Trustees. USP will keep all investigative information confidential to the extent possible but may be required to disclose such information as a result of court orders, government inquiries, or other similar events.

Our Code in Action



What are examples of retaliation and acceptable conduct?

Retaliation can include:

- Identifying an employee as the person who made the report if that information was confidential
- Lowering or deducting pay
- Not promoting an employee because he or she reported a concern or cooperated in a compliance investigation
- Terminating an employee because he or she raised a concern

Retaliation does not include:

- Disciplining an employee for knowingly making a malicious or fraudulent accusation
- Asking an employee to do something already in his or her job description
- Continuing to manage performance after an employee reports a concern to the USP Helpline



1-866-492-3365

Using the Helpline

To report suspected or known misconduct using the Helpline:

- By telephone from the United States, call the Direct Dial Number at **1.866.492.3365**. International dialing instructions to reach the Direct Dial Number are located at www.usp.ethicspoint.com.
- Online, complete the reporting form located at www.usp.ethicspoint.com.

The Helpline is hosted by a third-party provider and operates globally 24 hours a day, 7 days a week, 365 days a year. You may submit a report

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via telephone or online in any language. When you file a report, the operator or online reporting system will gather the information and give you a reference number so that you may call back or log in to receive follow-up information or questions.

Anonymity of the Helpline

In most countries, you may make a call to the Helpline anonymously. USP does not track or record calls or online traffic to the Helpline. However, local laws in some countries, particularly in Europe, discourage anonymous reporting and restrict the scope of what may be reported through the Helpline to:

- Improper financial or audit concerns
- Fraud
- Violations of law

USP does not track or record calls or online traffic to the Helpline.

As noted above, it may be necessary to share a summary of your report (whether anonymous or not) with the person or persons accused of wrongdoing to provide them with an opportunity to respond. Therefore, if you choose to report anonymously, you should be careful not to include any identifying information in your report. If it is not possible to report without including identifying information, you should indicate that in your report, so the investigators may redact the identifying information from any report shared with the respondent(s). If you chose to report anonymously, it is important that you include sufficient details to allow USP to identify the time, place, and parties involved in the conduct so that appropriate action can be promptly taken.

WAYS TO SEEK HELP



IN-PERSON

Management, HR, GLA, GCE



PHONE

1-866-492-3365

U.S. and Canada only



EMAIL

compliance@usp.org



ONLINE

www.usp.ethicspoint.com



WWW.USP.ORG

USP-U.S. Rockville	USP-Brazil São Paulo	USP-Switzerland Basel	USP-India Hyderabad	USP-China Shanghai	USP-Ghana Accra	USP-Nigeria Lagos	USP-Ethiopia Addis Ababa	USP-Indonesia Jakarta	USP-Philippines Muntinlupa City
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