

Understanding Our Code

“We must perform all of our daily activities with the same excellence we require for our standards-setting activities and related programs.”



USP’s global activities affect many countries and are often subject to differing legal obligations, cultures, and business pressures. Making the right decision when faced with an ethical dilemma can be difficult in such circumstances, unless there is a consistent set of ethical standards for all to follow. The Code represents our shared values and expectations on ethical conduct. By consistently following these values, we ensure that our mission is carried out with integrity and that our employees, volunteers, and representatives are treated fairly and with respect.

The values in this Code are minimum standards that must be implemented whenever you carry out any USP activity. USP is committed to complying with all laws, so in instances where the local laws are more stringent than this Code, USP will always follow local laws. Our Code provides guidance on how to carry out our mission globally in compliance with the letter and spirit of applicable legal requirements, USP Core Values, and SOPs. We believe that our role as a leader in the standards-setting community is reflected in how we behave as employees, volunteers, and representatives of USP. This means that we must perform all of our daily activities with the same excellence we require for our standards-setting activities and related programs.

By consistently following these values, we ensure that our mission is carried out with integrity and that our employees, volunteers, and representatives are treated fairly and with respect.

We are committed to dealing with our representatives with integrity and expect them to hold themselves to equally high standards. The term representatives includes vendors, suppliers, consultants, and other third parties hired to act on behalf of USP.

The Code reflects this purpose and is intended to promote:

- Honest and ethical conduct
- Compliance with laws, rules, and regulations
- Independence, integrity, reputation, and credibility as a science-based standards-setting organization
- Commitment to further the mission of the organization rather than our own personal interests
- An environment of mutual respect for one another
- An environment where individuals can raise concerns or ask questions without fearing retaliation
- Prompt internal reporting of actual or potential violations of the law, the Code, and SOPs.

Our reputation is one of USP's most valuable assets and will always be critical to our ongoing success.

Scope

Our reputation is one of USP's most valuable assets and will always be critical to our ongoing success. To safeguard our reputation and our brand, we must hold ourselves to standards of behavior that go well beyond legal minimums. We therefore expect our employees, volunteers, and representatives to understand and model that philosophy every day. To help implement these values, you are expected to be familiar with the law, the Code, and SOPs that apply to your daily responsibilities at USP.

Examples throughout this document—highlighted in “Our Code in Action” sections—are designed to help you better understand and make the right decisions.

Implementing the Code of Ethics

This Code is intended to be a practical tool that you can refer to if you have questions or need guidance. It is further implemented through our rules and procedures, including the *Rules of Business Practice for the Board of Trustees*, the *Rules and Procedures of the Council of the Convention*, the *Rules and Procedures of the Council of Experts*, the *Employee Handbook*, the *Quality Manual*, and SOPs. In addition, the examples throughout this document—highlighted in “Our Code in Action” sections—are designed to help you better understand and make the right decisions when faced with questions about how to apply the Code.

Periodically, employees, volunteers, and representatives may be asked to provide a written certification that they have received, have read, and understand the Code and are not personally aware of (or have duly reported) any non-compliance. The Code certification is your pledge to live up to the law and our Code, and to promptly raise concerns about any situation you think may be a violation of law or our Code. Employees who violate the law, our Code, or our SOPs put themselves, their colleagues, and USP at risk and will be subject to disciplinary action up to and including termination of employment. Volunteers and representatives who violate the law or our Code put the integrity of USP at risk and their relationship with USP may be subject to review, up to and including termination.

Management Responsibilities

If you are responsible for managing employees at USP, you have a special responsibility to always lead with integrity. It is not enough for you to merely behave legally and ethically; you must also take affirmative steps to influence employees to do the same. This means that you must:

- Be a positive role model. We all know that actions speak louder than words, so let your actions demonstrate your belief that business goals never trump legal requirements, or our Code, Core Values, and SOPs.
 - Set the right tone from the top and inspire performance with integrity. Seek opportunities to talk about the importance of complying with our Core Values, the law, the Code and SOPs. Explain how our Code supports our mission and Core Values, and ensures our success.
 - Promptly and thoughtfully complete your own compliance training, and make sure your team members do the same.
 - Show leadership by following compliance processes.
 - Create an environment in which employees know they can ask questions or raise concerns without fear of reprisal.
- Be available to answer employee questions and listen to and address their concerns.
- Never retaliate against anyone who reports a good-faith concern or who cooperates with internal investigations or audits. Don't tolerate others who do.
- Promptly report behavior that you know is illegal or that violates the Code to GCE. Respond swiftly and appropriately to misconduct.

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- Never ask or pressure an employee to engage in conduct that is a violation of the law or the Code.
- Facilitate a collaborative and open environment.

Employee Responsibilities

As a USP employee, you are expected to comply with both the letter and the spirit of our Code. This means that you must:

- Understand and comply with the law, the Code, and SOPs that apply to your job.
- Seek guidance from resources at USP if you have questions or concerns about the appropriate nature of any conduct or decision.
- Cooperate fully in any investigation of suspected misconduct that may arise in the course of your employment.
- Promptly report any violation of the law, the Code, and SOPs as soon as you become aware of it.
- Treat employees, volunteers, and representatives respectfully and in a professional manner.
- Complete compliance training within allotted timelines.

Seek guidance from resources at USP if you have questions or concerns about the appropriate nature of any conduct or decision.

Volunteer Responsibilities

All volunteers, whether elected or appointed, are expected to adhere to the letter and the spirit of the law, Core Values, Code, and applicable SOPs in their governance or standards-setting activities. This will enable volunteers to support our governance activities and establish standards through processes that are science-based, credible, and unbiased.

Representative Responsibilities

USP is committed to integrity and high standards when dealing with representatives, and we expect all representatives doing business with or on behalf of USP to act with integrity and hold themselves to equally high standards. Representatives are expected to comply with the law and the values contained in the Code when acting on behalf of USP.

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Our Code in Action



What happens if I am faced with a situation where acting ethically conflicts with meeting USP SSP goals?

You must always engage in legal and ethical conduct no matter what the circumstances. USP's long-term success depends on our reputation. If you feel that there is a conflict between meeting a goal and acting ethically, you should discuss the matter with any of the resources listed in this Code so that steps can be taken to appropriately adjust the goal.