

ASCP requires Directors, Officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ASCP, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

Directors, Officers, employees and volunteers are responsible for reporting suspected violations of ASCP's *Code of Conduct* or violations of laws or regulations governing ASCP's operations so that ASCP can promptly address inappropriate conduct and actions.

No Retaliation

It is contrary to ASCP values for anyone to retaliate against a Director, Officer, employee or volunteer who in good faith reports a violation of ASCP's *Code of Conduct*, or a suspected violation of law. Any person who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, volunteer duties, or membership as a Director or Officer.

Reporting Procedure

ASCP has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisors. If an employee is not comfortable speaking with his or her supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Director – Human Resources or the Chief Legal Officer. Supervisors in turn are required to report complaints or concerns about suspected ethical or legal violations in writing to the Director – Human Resources or the Chief Legal Officer, who will work together to ensure that reported complaints are investigated. Volunteers are likewise encouraged to share their questions, concerns, suggestions or complaints with the Chief Legal Officer or the Chief Executive Officer or may send an email including contact information to meetingspolicy@ascp.org.

Chief Legal Officer – Compliance Officer

In general, the Chief Legal Officer is responsible for ensuring that complaints about suspected violations of ASCP's *Code of Conduct* or illegal conduct are investigated and, if applicable, resolved. The Chief Legal Officer will advise the Chief Executive Officer of such complaints and their resolution and, if applicable, will report annually to the Audit Committee on compliance activity relating to reported accounting or alleged financial improprieties. If for conflict reasons the Chief Legal Officer cannot participate in the investigation of a complaint about suspected violations, then the Director – Human Resources will be responsible for ensuring that such complaints are investigated and, if applicable, resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Reporting allegations that prove not to be substantiated and that were made maliciously or knowing they were false is a serious disciplinary offense.

Handling of Reported Violations

The Chief Legal Officer or, if applicable, the Chief Executive Officer will notify persons who have submitted complaints and acknowledge receipt of the reported or suspected violations. Such reports will be promptly investigated and appropriate corrective action will be taken if warranted.