

A503 - A2LA CODE OF CONDUCT

Approved by the A2LA Board of Directors, April 6, 2009

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Leadership Letter

For more than 30 years, the American Association for Laboratory Accreditation (A2LA) has strived to meet and exceed the expectations of the many people it serves. Our continuous goal has been to establish credibility and maintain it through reputable customer service and dedication. The industry understands what A2LA stands for and where they can place their trust .

It has taken many years to establish the reputation that A2LA has today. We are recognized as leaders in the accreditation industry, and take pride in our high level of quality and customer service. We must uphold these expectations at all times in order to preserve our reputation. Should we falter now, there will be many others to take our place. It is important to keep in mind how fragile a reputation is and how quickly it can be destroyed if we fail the people we serve.

The Code of Conduct is the foundation and framework for how we should conduct ourselves at A2LA and how to extend that to the people we serve. The Code of Conduct provides guidance to see us through many situations that may arise in the workplace or in relation to the workplace. Due to the complexity of life, it must be understood that the code does not cover every potential situation that could occur. At these times, the employees are expected to use sound judgment in making ethical decisions with the same values and integrity that A2LA would use.

A2LA and the Board of Directors fully support the values and fundamentals of the Code of Conduct. We are responsible for upholding and continuously improving the content of the code to proactively meet internal and external demands.

The reputation that A2LA has built in the last few decades will continue to breakdown barriers with innovation and dedication. We will strive even during the weakest times because of our continued efforts to provide the best possible service and standards.

Sincerely,

Peter S. Unger
President & CEO

CREDO

As a third-party organization, A2LA serves both first parties (customers seeking accreditation) and second parties (clients of our customers and other stakeholders likely to be influenced, either directly or indirectly, by the quality of accredited results). A2LA believes that its primary responsibility is to deliver an impartial, independent and objective accreditation service that provides confidence in the validity of results produced by the accredited entities.

The success of our organization is dependent on the trust and credibility we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, exhibiting honesty and integrity, and reaching organization goals solely through honorable conduct. It is easy to say what we must do, but the proof will be seen in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for A2LA? Will it help create a working environment in which A2LA can succeed over the long term? Is the commitment we are making one that we can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by continuously working to build trust and credibility.

Whatever an employee’s contribution or whatever process they use, they must all seek continuous improvement. They must strive to be the best. In order to achieve continuous improvement in everything, they must as individuals continually improve their skill set. Hence, renewal of their individual skills must be accepted as a common responsibility among all involved in A2LA.

It is the responsibility of all employees to perform their work to the best of their ability. This commitment promotes efficiency and is an essential element of operating an organization in a quality, cost-effective manner.

A2LA employees are responsible to their fellow employees, members, contractors and volunteers—the people who work for it throughout the world. The dignity of individuals must be appropriately respected. Each person must be recognized for his or her merit. Employees must have a sense of security in their jobs. Compensation must be fair and adequate and working conditions must be clean, orderly and safe. A2LA must be mindful of ways to help its employees fulfill their family responsibilities. Everyone must feel free to make suggestions and complaints. There must be equal opportunity for employment, development and advancement for those qualified. A2LA must provide competent management and its actions must be just and ethical.

At A2LA, employees should feel comfortable to speak their minds. Management has the responsibility to encourage an open environment for their employees. All A2LA employees deserve to work in an environment where they are treated with dignity and respect. A2LA is committed to creating this environment because it brings out the full potential in each employee, which ultimately contributes directly to the success of our organization. A2LA has an established Whistleblower Policy, (A507 – A2LA Whistleblower Policy) which enables A2LA employees to report allegations of known or suspected improper activities (as defined in that policy) to A2LA without fear of retaliation.

A2LA is responsible to the community in which it lives and works and to the world community as well. A2LA must be good citizens. A2LA must encourage civic improvements and better

health and education. A2LA must maintain in good order the property it is privileged to use, protecting the environment and natural resources.

Its final responsibility is to its members who believe in, and contribute to, the public purpose of the A2LA. Ensuring the continued effectiveness of its public purpose requires careful use of all resources made available to the A2LA.

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PROFESSIONAL PRACTICE GUIDELINES

These *Professional Practice Guidelines* identify the general requirements imposed by law or prudent business principles and set certain standards of conduct to which A2LA expects each employee to adhere. It does not cover every conceivable subject, but employees should apply its underlying principles, using good judgment in all of their activities.

When in doubt as to how a particular section may apply, employees should feel free to contact their supervisor or Quality Manager or higher management as appropriate.

Subjects have been grouped under three categories: (1) Employees and Their Job at A2LA; (2) Conducting A2LA's Business; and (3) Employees on Their Own Time.

I. Employees and Their Job at A2LA

A. Professional Conduct of Employees

A2LA is an organization where personal and professional integrity is of utmost importance. All employees are expected to behave in accordance with the principles of this document, to accomplish work in a professional and business-like manner and to be courteous in dealings with all other employees, clients, volunteers, and business associates at all times.

B. Integrity and Other Performance Attributes

A2LA expects all employees to embrace the following personal attributes and behave accordingly in carrying out the work of A2LA:

- Integrity and honesty must be the hallmarks of any organization or person striving to consistently achieve and maintain the respect of its customers and stakeholders.
- A2LA must carry out the accreditation processes and render decisions in an impartial, independent, objective and fair manner.
- Applicants must be treated equitably and decisions must be factually based. Employees are expected to behave in a neutral and objective manner.
- Employees are expected to declare to their supervisor any actual or potential conflicts of interest and accept limits that may be imposed as a result.

In order to maintain the quality of service expected, A2LA has established a management system providing the foundation for a high quality of service. Employees are expected to seek continuous improvement in contributing to a world-class accreditation body. Employees are expected to strive to be the best.

In order to achieve continuous improvement in everything they do, employees must continually improve their skill set. Hence, renewal of individual skills must be accepted as a common responsibility among all employees and the A2LA as a whole. An employee exhibiting growth is one who:

- Asks people what to do to improve;

- Works on own learning and development;
- Recognizes and encourages innovative ideas;
- Seeks to improve the way processes are done today;
- Is dedicated to excellence as an individual and team member; and
- Remains positive and criticizes constructively.

A2LA maintains openness regarding the accreditation process while also being careful to maintain confidentiality of the applicants involved. All applicants are given detailed information regarding the steps of the process to obtain A2LA accreditation. Turnaround times, which all employees are expected to meet, are established. It is essential that A2LA achieves and maintains credibility with all its customers and stakeholders.

C. Employee Rights to Privacy

A2LA collects and maintains certain types of private information on employees, assessors and volunteers. This information may include, but is not limited to private facts such as an individual's home phone number, social security number, home address, salary history, medical information, and performance reviews. A2LA is committed to protecting the privacy of all individuals by holding private information in confidence and by not publicly disclosing private facts to anyone within A2LA, except those individuals with a legitimate need for the information.

Mail, e-mail and computer and telephone systems are intended mainly for business transactions and communications. Therefore, employees should have no expectation of privacy when using these systems.

Employees have the right to privacy for all personal property brought to A2LA, subject to the need to ensure safety of the workplace. This right to privacy does not however extend to A2LA-owned property, including workstations and offices. Employees often need to search such areas during employee absences for work-related issues, such as locating a client file. Searches of employee workplaces that are not related to work issues are prohibited.

A2LA shall not concern itself with the activities of employees outside of the workplace unless these activities have a detrimental effect upon job performance.

D. Equal Opportunity Employer

A2LA is committed to the provisions of equal employment opportunities to all qualified employees and applicants for employment without regard to race, color, religion, sex, age, national origin, disability, sexual orientation, marital status, or on any other basis prohibited by law. Employment decisions will be made on the basis of each applicant's job qualifications, experience and abilities.

This policy applies to all employment practices, including recruitment, hiring, evaluation, promotion, transfer, discipline, discharge and termination, as well as to all forms of employee compensation. This policy will be interpreted to permit reasonable accommodations be made for physical limitations and religious beliefs of otherwise qualified employees and applicants.

E. Harassment

All employees deserve a work place free from unlawful harassment and discrimination. A2LA will not tolerate any unlawful harassment committed by our employees, and expects that all employees and customers will be treated fairly and with dignity and respect. "Harassment" over

a wide spectrum of conduct includes unwanted sexual advances, sexual innuendo, unwanted physical contact, and racial epithets.

F. Substance Abuse

A2LA is committed to maintaining a safe and healthy workplace free from the influence of substance abuse. Selling alcohol or controlled substances, or being intoxicated or under the influence of controlled substances without medical authorization is prohibited. (This prohibition is not intended to prohibit offering alcohol to employees and customers at happy hours, holiday parties or similar gatherings.)

G. Proper Use of A2LA Resources

Organization resources, including time, material, equipment, and information, are provided for organizational business use. A2LA is committed to provide its employees with the latest, appropriate tools (resources) to enable them to perform their tasks in a timely, efficient and effective manner. A2LA resources are available to all staff 24 hours a day, 7 days a week. Occasional personal use is permissible as long as it does not affect job performance or cause a disruption in the workplace. These resources are not to be used for any illegal purposes. Employees shall get authorization from their supervisor before borrowing any A2LA property for personal use.

A2LA employees are expected to conduct themselves responsibly and to use good judgment to conserve organizational resources. Management is responsible for resources assigned to employees under their direct control and must resolve issues concerning their proper use.

In order to protect the interests of A2LA and our employees, A2LA reserves the right to monitor or review all data and information contained on an employee's organization issued computer or electronic device, telephone usage, or the use of the Internet. There is a zero tolerance policy for use of organizational resources to create, access, store, print, solicit, or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate in nature.

H. Management Commitment

Management is committed to demonstrating the importance of this Code of Conduct verbally and through their actions. In any organization, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Our commitment and actions set the tone and develop the culture.

To encourage adherence and understanding of the Code of Conduct, managers are responsible for promptly addressing ethical questions and concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider these questions or comments as threats or challenges to their authority, but rather as another encouraged form of communication in the workplace. Ethics dialogue should become a natural part of the workplace at A2LA.

II. Conducting A2LA's Business

A. Avoiding Misrepresentations

In the course of conducting business, A2LA employees have an obligation to avoid deliberate misrepresentations.

B. Organizational Conflicts of Interest

It is vital that A2LA accreditation services be impartial, objective and uninfluenced by the private interests of individuals acting for or on behalf of A2LA. We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. Accordingly any employee directly involved in actions relating to A2LA processes of accreditation shall avoid direct participation in A2LA actions which may involve an actual or apparent conflict of interest. If employees are asked to undertake any A2LA activity that is or could be interpreted as creating a conflict of interest, they are obliged by this policy to divulge the potential conflict of interest to appropriate staff, the Quality Manager, the President or the Chair of A2LA. The President and/or Chair of A2LA shall, as promptly as possible, employ all possible means to prevent or overcome any such actions that may conceivably be in violation of this policy.

Anti kickback and Bribery: No kickbacks, bribes, or other forms of remuneration or consideration shall be given to any person or organization in order to attract business. To accept kickbacks or bribes is a crime both morally and legally. It is the quickest and surest way to find one's way out of A2LA. Engaging in practices or using procedures that might conceal or facilitate bribery, kickbacks or any other illegal or improper payments, or which might support an inference of wrongdoing seriously jeopardizes important relationships and A2LA's contractual arrangements and may subject the A2LA or the employee to legal proceedings.

Receiving Gifts and Honoraria: Gifts of significant value (e.g., estimated at \$50.00 or more) or any honoraria given to employees for any reason (or no reason) such as providing a service or a speaking engagement because of their position with the A2LA are considered the property of A2LA.

Giving Gifts: Any payment, gift (see section 2.16 of the Employee Handbook), loan, donation, or reimbursement to a government employee (including elected officials) of money, property, services or anything of value, whether made directly or indirectly, and which might be considered as a payoff, bribe or other improper influence is expressly forbidden.

Entertainment: Certain reasonable expenditures are permitted to facilitate the conduct of business, including such things as:

- Meals or refreshments during the course of a meeting or activity which has a business purpose;
- Transportation or accommodations, but only in unusual circumstances (e.g., remote or inaccessible locations) for a specific trip;
- Honoraria and travel expense reimbursement if someone is speaking, as an individual to an identifiable group to whom his expertise and message are relevant.

Relations with Customers: All employees share an obligation to -

- Treat customers fairly and honestly at all times;
- Be responsive to their needs;
- Be prompt and accurate in all transactions with them;
- Constantly improve knowledge of A2LA and the accreditation business in order to answer questions intelligently; and
- Communicate in a courteous and helpful manner.

In dealing with customers, care shall be taken not to promise something A2LA cannot deliver. A2LA's relations with customers are based upon fairness. An example of this is preserving the equities, for example, between small customers and large customers when backlogged work prevents immediate response. Prioritizing such work must be carefully weighed against the importance and urgency of other work. Questions about what work to focus on first should be directed to one's supervisor.

Relationships with Government: Government may have a substantial impact on the goals, strategies and operations of the A2LA. It is A2LA's policy to develop and maintain good relationships and effective communication with all levels of government. However, contacts with government officials must never be conducted in a way that would be in violation of applicable laws and regulations or could cast doubts on A2LA's integrity.

Working relationships with legislators and government administrative employees for the purpose of legitimately influencing the formulation of law or regulations will be conducted according to the highest ethical standards and in the framework of mutual respect and arm's length dealing. Employees responsible for formulating or presenting A2LA's positions on public issues are expected to take into account any special concerns of A2LA and to balance them with the public interest. A2LA shall conform to all lobbying or representation requirements and rules of a 501c3 organization.

Employees may properly serve in consulting or advisory positions to governmental bodies where their expertise will contribute to government effectiveness. In such circumstances, or in the case of an employee who chooses to enter government service (either elective or appointed), an arm's length relationship between A2LA and the employee or former employee will be maintained. In addition, all parties should be alert to possible conflicts of interest.

Anyone working on government programs will inevitably meet government employees. There will be occasions when it would be natural to join with one or more of them for lunch, dinner, an athletic event or some other form of entertainment. This is not unethical; however, just remember that government employees are expected to pay their own way. It is unlawful for any officer or employee of the United States Government:

- To participate in a matter involving any firm with whom the individual is in negotiation or has an arrangement concerning future employment; and

- To represent A2LA after government employment in connection with any matter in which the individual participated personally and substantially while a government employee.

A2LA believes that all employees have an obligation to apply the same high standards of business and personal ethics in relations with representatives of foreign governments that are practiced in the United States. Even though governmental philosophies, customs and standards of conduct vary, honesty, integrity and fairness must always serve as the foundation of our dealings internationally.

In countries with a less stringent code of conduct than A2LA customarily follows, employees should continue to follow the more stringent code of conduct, subject to reasonable professional judgement.

In specific situations, employees should seek guidance in advance if possible.

C. Competing in the Field

Every employee has some responsibility for marketing A2LA services. The following principles shall be followed:

- Promotional materials related to A2LA shall be accurate, objective, and presented with high ethical standards;
- Confidential information regarding competing organizations shall not be used in an effort to gain a marketing advantage with clients;
- The spread of known false or misleading information about A2LA's competitors is forbidden.

Employees are expected to adhere to these marketing principles when dealing with clients either on the phone, during assessments, during public appearances or during any other exchange with individuals outside A2LA.

There are a number of accreditation bodies in the U.S. that are considered competing organizations to A2LA. In dealing with these competing organizations, A2LA is committed to conducting business in the highest professional manner at all times.

When there is a need to discuss sensitive information about other companies or competitors, employees shall present the information in the proper context and make it available only to other individuals who work for or represent A2LA who have a genuine need to know. If at all possible, the identity of the companies or individuals shall not be disclosed.

Proprietary information about competing organizations obtained during peer evaluations shall be maintained in confidence and shall never be publicly disclosed unless directed to do so in writing by the competing organization.

A2LA shall adhere to all competition laws intended to promote the free enterprise system by eliminating artificial restraints on competition. Careful adherence to the following four principles should allow employees to avoid the most common anti-competitive problems:

- Avoid all unnecessary formal and informal contact with competitors, their officers or employees that may lead to unlawful understandings or the appearance of unlawful understandings, such as fixing fees, dividing customers or territories, or restricting sales.
- Avoid forcing clients to buy unwanted services.
- Avoid any effort to unnecessarily restrict a client's own marketing activities.
- Avoid attempting to control any market by use of unfair practices.

D. Protecting Proprietary and other Confidential Information

Most of the information maintained by A2LA is considered proprietary and confidential. This information includes but is not limited to all technical, financial, personnel, client and business information that is sensitive, confidential, private or classified. Protecting this information is vital to A2LA's success and is the responsibility of all employees.

Employees shall respect the value of this proprietary information by maintaining strict confidentiality and not divulging any information to anyone who should not know. We will not disclose confidential and nonpublic information without valid business purpose and proper authorization.

If in doubt as to whether information should be divulged, err in favor of not divulging information and discuss the situation with a person in authority at A2LA. Examples of other ways to protect A2LA's proprietary information include:

- Placing sensitive documents, including client and personnel files, in a secure location;
- Not disclosing computer and e-mail passwords to other individuals;
- Obtaining written permission from an applicant or accredited organization before providing interested parties with non-public information related to that applicant or accredited organization;
- During assessments, not discussing situations that have occurred during assessment of other organizations;
- Not using confidential information obtained during or through employment with A2LA to further current or future outside employment or activities or for obtaining personal gain or profit.

Employees are required to enter into written confidentiality agreements confirming their understanding of A2LA's confidentiality policy of proprietary information. A2LA reserves the right to avail itself of all legal or equitable remedies to prevent impermissible use of confidential information or to recover damages incurred as a result of the impermissible use of confidential information.

E. Copyright and Trademarks

Violation of copyright law is theft of intellectual material. Just as A2LA would not send an employee to shoplift office supplies, it will not condone the making of illegal copies for company use. The safest course of action is to assume that all intellectual property is covered by copyright law and any reproduction is illegal unless permission has been explicitly given to do so by the owner/creator of the property. While there is a fair use doctrine that may apply to instances of reproduction for critical and/or educational use, it is very limited, and employees should familiarize themselves with the doctrine before using copyrighted materials. More information is provided at the United States Copyright Office WEB site, <http://www.loc.gov/copyright>. Any intellectual materials created by employees of A2LA during the course of performing work-related activities becomes the property of A2LA unless otherwise specified.

F. Health, Safety and Workplace Environment

Workplace safety is a responsibility of both the employer and employee. Unsafe conditions must be reported immediately to one's supervisor. Frequent use of computers as required of most employees at A2LA may result in Repetitive Strain Injury (RSI). Symptoms include stiffness, numbness, and/or burning in the hands and/or forearms. Severe cases can lead to permanent disability. As a preventative measure, employees are encouraged to take frequent breaks from typing, stretch and massage hands and arms, and observe a proper typing posture. A2LA considers RSI a serious health issue and encourages employees to report cases to one's supervisor. For further information and preventative measures visit <http://www.engr.unl.edu/ee/eeshop/rsi.html>.

The nature of accreditation requires that employees and assessors visit a variety of environments. All safety rules shall be followed during an assessment. However, additional caution and diligence must be exercised in unfamiliar environments. Assessors and employees should never enter a laboratory or observe testing without appropriate safety attire. You should never sacrifice safety in order to complete an assessment in a timely manner. Decisions on continuing an assessment shall rest with the lead assessor.

Most of the work conducted by A2LA employees requires significant concentration. At the same time, the workplace is designed to be open to foster communications. Employees are asked to respect the decorum of the workplace at all times and should not engage in activities during working hours that would disrupt the working environment for other employees. This includes, for example, conducting lengthy, loud or non-work related conversations near someone's workstation, discussing private issues loudly on the phone, or playing loud music. Common courtesy rules should be observed at all times.

G. Political Contributions and Activities

In accordance with federal law, A2LA shall not make any direct or indirect contribution of funds or other property of A2LA in connection with the election of any candidate for public or political office or any political party.

No employee can be directed, urged or forced to contribute to any specific political party, organization, cause or candidate.

A2LA funds may be made available to non-partisan activities but only with the express approval of the President and Board of Directors.

H. Corporate Image

A2LA's reputation and identity are among the association's most valuable assets. As part of maintaining and improving the corporate image nationally and internationally, A2LA believes in conducting business legally and ethically, and in sharing its success. All personnel, particularly those in management, are expected to conduct themselves in a manner that reflects positively on the association's image and identity, both internally and externally. No one should act in a way that adversely affects the reputation or image of A2LA with employees, customers, stakeholders, or the community at large.

I. Community Participation

A2LA strives to be a good corporate citizen in every community where it conducts business and shall comply with all applicable laws and regulations.

III. Employees on Their Own Time

A. Personal Conflicts of Interest

Every employee owes a duty of loyalty to A2LA and must act in the interest of A2LA at all times. It is important to avoid situations where employees (or their immediate family member) have an interest in any business or property or an obligation to any person that could affect, or appear to affect, their judgment in fulfilling their responsibilities. If employees are placed in a position where their business opportunities (or those of an immediate family member) conflict with those of A2LA, they should discuss the facts of the situation with their supervisor. Here are some situations in which conflict of interest could arise:

Close Family Members Working in Related Organizations: Special care should be taken to not disclose sensitive information to family members who work in organizations with a relationship with A2LA.

Outside Employment/Directorships: It is in all of our best interests that all employees devote their energies to their work for A2LA. Although A2LA encourages employees to engage in activities in their communities and in furtherance of their careers, professional or other outside employment while an employee could interfere with their ability to fulfill their professional responsibilities and may jeopardize their performance. Accordingly, prior to undertaking any outside employment activity, employees must discuss the activity with their supervisor.

Serving as a director or trustee of a non-profit/charitable organization is permitted, although employees should be sensitive to potential conflicts of interest or accepting a position that may compromise A2LA's independence. Approval by the President and/or Board of Directors is required prior to accepting a directorship with any for-profit organization.

Inside Information: Trading in securities on the basis of or while in possession of material, non-public information is strictly prohibited under the US security laws. Likewise, providing material non-public information so that a third party may trade in securities is prohibited. The term, "providing material non-public information" generally means any information which (1) is not yet publicly available and (2) would be considered significant by persons who are deciding whether to purchase or sell a particular security. Generally, information is no longer considered

“non-public” only after it has been publicly available for a sufficient time (at least 72 hours) to allow investors to react to the information.

Determining whether conflict of interest exists is not always easy to do. Employees are encouraged to seek advice from their managers when they have questions pertaining to conflict of interest.

B. Political Activities

Employees may not use A2LA time on premises to solicit contributions for any specific political party, organization cause or candidate. Employees may however participate personally in the political process, and contribute voluntarily to candidates or parties of their choice either directly or indirectly on their personal time. No employee in any position may use any influence to persuade another employee to make political contributions or to work for candidates, political organizations or issues. Moreover, no employee shall be compensated or reimbursed for any personal political contribution. No employee will be favored or penalized in his or her employment because of making or failing to make a political contribution or engaging in any legal political activity.

C. Charity

A2LA believes charitable contributions are a deeply personal matter. Decisions involving charitable contributions should be made privately and never have an impact on an employee’s standing in the company. However, A2LA in appropriate circumstances will participate in charitable activities in support of the community. Employees are not prohibited from soliciting other employees for charitable contributions and fund-raising events as long as it does not cause a disruption in the work environment. Employees should never feel harassed or intimidated by such activities, and supervisory personnel should carefully consider if solicitation of subordinates may be perceived by any subordinate as affecting unfairly the subordinate’s standing in the company, i.e., evaluation, promotion, workload, etc.

D. Public Service

A2LA encourages employees to be active in the civic life of their communities. However, employee participation in volunteer organizations is a personal matter and left to their discretion. A2LA shall not advocate participation in any volunteer activity nor use participation or lack thereof as a basis for any workplace decisions.

E. Reporting a Potential Violation

All personnel are responsible for conducting himself or herself according to legal and ethical standards. In addition, everyone has a responsibility to report in a timely fashion any violations of this A2LA Code of Conduct. Questions or concerns about any ethical or legal issue may be raised without concern for disciplinary action as long as they are made in good faith. Individuals will not be subject to reprisals for reporting or supplying information about potential violations, except in cases where those personnel are responsible for the violation. A2LA expects all personnel to fully cooperate in any investigation of a potential violation. If possible, all such reports will be held in confidence.

If an individual needs guidance on a legal or ethical question or has witnessed or has knowledge of an illegal or unethical activity, he or she should seek the counsel of his or her supervisor. If

approaching the supervisor is uncomfortable, or if the response is unsatisfactory, individuals should consult higher management, including the Quality Manager, COO or CEO or Chair of the Board Audit & Ethics Committee.

F. Investigations and Corrective Action

All reports of alleged violations will be investigated by A2LA, and will be treated confidentially to the extent consistent with A2LA interests and legal obligations. If the results of an investigation indicate that corrective action is required, A2LA will decide the appropriate steps to take, including measures involving the discipline or dismissal of personnel and possible legal proceedings. If appropriate, the investigation may be turned over to applicable outside authorities, and outside investigators may assist in the inquiry. As part of the closure process, results of an investigation may be shared with the initiator of the report.

It is A2LA's policy to cooperate fully with valid government investigations. While not likely, it is possible that A2LA personnel may be contacted by government officials conducting an investigation of the accreditation business. Individuals should be aware that such investigations may be complex, and, if contacted by an investigator, are encouraged to verify that A2LA is aware of the investigation.

G. Response and Discipline for Violations

Each employee is responsible for knowing and adhering to the values and standards set forth in this Code of Conduct. Persons who violate provisions outlined in this Code could be subject to appropriate disciplinary action, including termination. Persons who violate the laws and government regulations previously mentioned in this code could expose themselves and A2LA to substantial criminal fines, prison terms and civil damages. If we are concerned whether the requirements of the Code of Conduct are being met or are aware of violations of the code, we must contact the Quality Manager, COO or CEO or Chair of the Board Audit & Ethics Committee.

Employee Agreement

I have read and concur with A2LA's Code of Conduct for employees. I understand that I must comply with the expectations outlined within this Code of Conduct in performing my duties and activities on behalf of A2LA, and that failure to do so may result in disciplinary action or termination.

Printed name: _____

Signature: _____

Date: _____