

AMERICAN CANCER SOCIETY, INC. AND ITS AFFILIATED ENTITIES

CODE OF ETHICS

(as of November 6, 2019)



**CODE OF ETHICS
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Introduction and Applicability

The Code of Ethics (the “Code”) of the American Cancer Society, Inc. and its affiliated entities (collectively, the “Society”) establishes the ethical standards for all staff and all individuals with a fiduciary obligation to the Society, including but not limited to, members of the Board of Directors (collectively referred to as “associates”). The purposes of the Code are to provide evidence of the Society’s commitment to the lawful and ethical conduct of its business, to promote lawful and ethical behavior by its associates, and to protect those who report violations of the Code consistent with the Society’s Whistleblower Protection Policy. The Code is intended to supplement, but not replace, any applicable federal, state or local laws governing ethical conduct applicable to nonprofit and charitable organizations.

The Code is built on the Society’s core values of integrity, compassion, courage, determination, and diversity. These core values are the heart of what the Society does and should inform and guide the actions that each associate should take in his or her words, actions, and decisions. It is every associate’s responsibility to discharge his or her duties in a manner that promotes and preserves public trust, proper stewardship, and confidence in the integrity of the Society. Associates must respect and comply with Society rules and regulations, observe high standards of conduct, and participate in establishing and maintaining such high standards. **Adverse consequences, including employee termination or removal of a volunteer from his or her position, can result from failure to comply with the Code.**

It is the duty of all associates to review and assess their conduct in light of the provisions of the Code. Each associate shall seek, either in writing or in person, the advice of his or her supervisor or the Society’s Chief Legal and Risk Officer or his or her designee (“Society Counsel”) when a reasonable doubt regarding an ethical or legal consideration arises.

I. Policies Governing Ethical Conduct

- A. Associates shall act honestly and ethically.
- B. Associates shall cooperate with all audits and investigations.
- C. Associates shall protect all Society resources and assets.
- D. Associates will perform their duties properly, diligently, and in an appropriately courteous manner.
- E. Consistent with the provisions of any applicable document retention policy, no associate shall falsify, destroy, mutilate, conceal, or fail to make required entries on any record within the associate's control, including the destruction of documents that are the subject of an investigation or a civil or criminal action to which the Society is a party.
- F. Associates with reporting responsibilities shall provide full, fair, accurate, timely, and understandable disclosure in all reports.
- G. No associate shall discriminate on the basis of race, color, religious creed, gender, national origin, age, physical ability, sexual orientation, marital status, or veteran status in the conduct of services for the Society.
- H. Associates shall comply with all Society conduct and behavior policies, including those prohibiting sexual or other unlawful harassment (e.g., workplace bullying).
- I. Associates who are attorneys, medical clinicians, certified public accountants, or members of other professional groups are bound by the appropriate professional duties and code of conduct of those roles.
- J. Associates shall comply with all federal, state and local laws, statutes and ordinances.
- K. Associates shall not promise, offer, pay, ask for, or accept anything of value to improperly influence decisions or actions and shall comply with all applicable anti-bribery and anti-corruption laws.
- L. Associates shall comply with all applicable anti-money laundering, anti-terrorist financing, and economic sanction laws. No associate shall have any dealings with any entities, organizations, or individuals that are listed on the Specifically Designated Nationals and Blocked Persons List maintained by the Office of Foreign Asset Control, Department of Treasury.
- M. Associates shall comply with all Society policies on confidentiality and privacy of information including in the area of social media. Associates shall not access or use confidential or proprietary information for reasons unrelated to Society business.
- N. Associates and other volunteers engaged in the extramural research grant program peer review process, editorial review, or in the establishment of the Society's guidelines related to health and nutrition shall abide by the Society's policies that govern ethical behavior and conflicts of interest in those areas.

- O. Associates shall seek assistance if they have questions about the Code or face ethical dilemmas.
- P. Associates shall deter wrongdoing and ensure accountability for adherence to the Code.
- Q. Associates shall report violations or suspected violations of the Code.

II. Reporting Violations - Duties, Protections and Corrective Actions

- A. Each associate shall immediately report to his or her supervisor or the Society Counsel any suspected violations of the Code, any federal, state or local law, or the attempt to induce a staff member or volunteer to violate the Code or any federal, state or local law. A failure to report a suspected violation is itself a violation of the Code. If anonymity is requested, the Society will not disclose the identity of the reporting individual except as needed to properly investigate the allegation, or unless legally required to do so.

The Society's Whistleblower Protection Policy establishes the protections against retaliatory actions for any reports of actions or suspected actions taken by or within the Society that are illegal, fraudulent or in violation of any adopted Society policies, including the Code. Moreover, the Society's independent hotline (1-800-539-7202) is a confidential resource dedicated solely to answering questions and concerns or reporting questionable activity related to financial internal controls, audit, prevention of illegal activity, accounting issues, and related matters. Associates may ensure complete anonymity when reporting a concern by simply not giving their names.

- B. An associate found to be in violation of the Code shall be subject to corrective actions taken by the appropriate level manager (for staff) or the Board of Directors (for board members and other volunteers). Such action may include further training and instruction regarding the provisions of the Code, taking steps to remediate any harm to the Society, fellow associates, or others, and disciplinary actions up to and including termination for staff or removal from the Board of Directors or applicable Society program for volunteers. Each violation will be assessed on an individual basis and the corrective action tailored to the specifics of that violation. When deciding what action is appropriate, consideration will be given to the flagrancy of the violation, the harm caused, whether the violation was intentional or unintentional, whether the associate voluntarily disclosed the violation, prior misconduct, the likelihood of future misconduct, the general circumstances surrounding the violation, and other considerations as appropriate.

III. Frequently Asked Questions

Society Counsel shall provide information about the application of this Code by maintaining a frequently asked questions site on the Society's intranet.