

## **Whistleblower Protection Policy: Reporting Suspected Violations of Law or Misconduct**

The American Cancer Society, Inc. and its affiliated entities (collectively, the “Society”) are committed to the highest standards of ethical, moral and legal business conduct where associates are free to raise good faith concerns regarding the Society’s business practices, specifically: (1) reporting suspected violations of federal, state or local laws or regulations on the part of the Society; (2) providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and (3) identifying potential violations of any adopted Society policies, including the Society’s Code of Ethics and the Society’s Conflict of Interest Policy.

This Whistleblower Protection Policy (this “Policy”) forbids any retaliatory action, including harassment, discrimination, intimidation, or in the case of employees, adverse employment consequences of any kind, to be taken against any individual who, in good faith, reports any action or suspected action taken by or within the Society that is illegal, fraudulent or in violation of any adopted Society policies, including the Code of Ethics or the Conflict of Interest Policy, or who in good faith complains about, or raises a claim or concern about, any type of harassment, retaliation or discrimination prohibited by applicable law or Society policy. Retaliation is also prohibited against individuals who are not themselves complainants, but who participate in good faith in an investigation. Any associate (as defined below) who engages in any form of retaliation will be subject to discipline, up to and including termination of employment or removal from a volunteer position. Associates who believe that they or someone they know are being, or have been, retaliated against should immediately report this to his or her supervisor, Chief Legal and Risk Officer, or anonymously by calling the Hotline at 1-800-539-7202. The Hotline is created for this purpose and is managed and staffed by an outside company in order to maintain the anonymity of the source. Associates may ensure complete anonymity when reporting a concern by simply not giving their names. The person who is the subject of a report of suspected violation may not be present at or participate in deliberations or votes relating to such report, although the person may provide information as background or answer questions prior to deliberations and voting.

The protections of this Policy extend to any associate who discloses information that the associate reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant. An associate who believes he or she has been retaliated against for such a disclosure may report this to the Inspector General of the Federal agency concerned, in addition to or instead of his or her supervisor, Chief Legal and Risk Officer, or anonymously by calling the Hotline at 1-800-539-7202.

Associates filing a complaint or reporting a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will result in appropriate disciplinary action, up to and including termination or volunteer disqualification.

This Policy must be distributed to all directors, officers, employees and to volunteers who provide substantial services to the Society (collectively, “associates”). The Audit Committee will oversee this Policy, and designates the Chief Legal and Risk Officer, under the direction of the Audit Committee, to implement this Policy on its behalf. Audit Committee members who are employees may not participate in any Audit Committee deliberations or voting relating to the administration of this Policy.