



**IIUSA
CODE OF CONDUCT
ENFORCEMENT PROCEDURE**

Adopted February 12, 2019

IIUSA is committed to its Code of Conduct. This procedure provides an avenue for raising good faith concerns related to violations of the Code of Conduct. This procedure allows those raising concerns (“Reporters”) to remain anonymous at their option. Concerns expressed anonymously will be investigated and consideration will be given to the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources. Malicious or knowingly false allegations may result in disciplinary action.

1. **Procedure.** Concerns related to violations of the Code of Conduct should be reported to: conduct@iiousa.org.
2. **Anonymity.** Reporters will have the ability to remain anonymous to those against whom a concern is expressed, if they choose. The information provided by a Reporter may be the basis of an internal and/or external investigation into the issue reported and anonymity will be protected to the extent possible. However, a Reporter’s identity may become known during the course of the investigation.
3. **Timing.** The earlier a concern is expressed, the easier it is for IIUSA to take action. You are encouraged to promptly report any potential violation of the Code of Conduct.
4. **Evidence.** Although a Reporter is not expected to prove the truth of an allegation, a Reporter will be expected to help demonstrate that there are sufficient grounds for concern.
5. **Initial Inquiries.** Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed-upon action without the need for an investigation. The action taken will depend upon the nature of the concern.
6. **Feedback to Reporter.** Reporters will be given the opportunity to receive follow-up on their concern:
 - acknowledging that the concern was received;
 - indicating how the matter will be dealt with;
 - giving an estimate of the time that it will take for a final response;
 - indicating whether initial inquiries have been made; and
 - indicating whether further investigations will follow and, if not, why not.
7. **Further Information.** The amount of contact between the Reporter and the investigator of the concern will depend upon the nature of the concern, the clarity of information provided, and whether the Reporter is accessible for follow-up. Further information may be sought from the Reporter.
8. **Outcome of an Investigation.** At the discretion of IIUSA and subject to legal and other constraints, the Reporter may be entitled to receive information about the outcome of an investigation.