IMPORTANT INFORMATION FOR AUDITEE

API is committed to maintaining the highest standard of professionalism and integrity among its employees and its contract auditors. As part of this commitment, all API employees and API auditors are responsible for carrying out their duties in a manner that reflects high ethical standards and that is consistent with API policy and applicable law.

API similarly requires you to act in a professional manner in accordance with high ethical standards and to comply with all licensing and program requirements at all times.

We ask that you please review the following guidelines:

• API auditors may not request or accept bribes or gifts. This means that you cannot offer them, and they may not demand from you, cash, entertainment, discounts, event tickets, or anything else of value. The only exception to this prohibition is that you may offer and auditors may accept from you meals of reasonable value during the course of an audit.

• If an API auditor asks you for a bribe or gift, you must report it to API.

• If you offer an API auditor a bribe or gift, the auditor must report it to API.

• During your API audit, you may not discuss future employment opportunities with your API auditor, or the possibility of your auditor consulting for you or for another facility.

• Your API auditor is not allowed to consult or otherwise contract with your facility for 24 months before or after an audit. If your auditor contacts you within 24 months of your audit about consulting work, you must report it to API. If you are assigned an auditor with whom you contracted in the past 24 months, you must inform API.

• API auditors and API employees are not permitted to recommend consultants to you. If you receive such a recommendation, you must report it to API.

• You may not pay your auditor directly for his or her lodging and travel expenses or for any other costs associated with your audit. All reimbursements for audit costs must go through API. You may provide ground transportation only to/from the airport, hotel and facility under audit.

• To make a report to API about the conduct of its employees or auditors, or if you have any questions about these guidelines, please (1) contact API’s Director of Program Integrity and Compliance Monitoring at compliance@api.org, (2) contact any other API staff member in person, by phone, or by email, or (3) submit complaints anonymously to API’s ethics reporting website at http://www.myapiethicspoint.org.