

AMERICAN CANCER SOCIETY, INC. AND ITS AFFILIATED ENTITIES

**CODE OF ETHICS
AND
CONFLICT OF INTEREST POLICY**

(as of April 13, 2016)

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**CODE OF ETHICS AND CONFLICT OF INTEREST POLICY
AMERICAN CANCER SOCIETY, INC. AND ITS AFFILIATED ENTITIES**

Introduction and Applicability

The Code of Ethics and Conflict of Interest Policy (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. For policies specifically related to the preservation of the integrity of the Society’s peer reviewed extramural research grants and the policies that pertain to conflicts of interest in editorial review and health guidelines development, please contact the Society’s National Vice President for Extramural Research.

Conflicts of interest will arise in the normal course of conducting Society business. The Code is not designed to prohibit conflicts of interest, but to protect the Society when it is contemplating entering into a transaction or arrangement that might benefit the private interests of an associate or might result in a possible “excess benefit transaction”, as defined under the Internal Revenue Code of 1986, as amended. The Code is intended to supplement, but not replace, any applicable federal, state or local laws governing ethical conduct, or conflicts of interest applicable to nonprofit and charitable organizations.

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 Society Counsel when a reasonable doubt regarding an ethical or legal consideration arises.

The Conflict of Interest Disclosure Statement must be completed by all associates on at least an annual basis. Society Counsel will determine which individuals have a fiduciary obligation to the Society.

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 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.
- L. 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.
- M. Associates shall seek assistance if they have questions about the Code or face ethical dilemmas.
- N. Associates shall report violations or suspected violations of the Code.

II. Duty of Loyalty to the Society – Avoiding Abuses of Position and Conflicts of Interest

The Society is a nonprofit, tax-exempt organization. Maintenance of its tax-exempt status is critical both for its continued financial stability and for public support. The Society is subject to scrutiny by, and is held accountable to, governmental and regulatory authorities as well as the general public.

Consequently, there exists between the Society and its associates a fiduciary duty which carries with it a duty of loyalty. Associates have the responsibility of administering the affairs of the Society honestly and prudently and of exercising their best care, skill, and judgment for the sole benefit of the Society. Moreover, because of the Society's status as a public charity, every associate has an affirmative duty to act as a steward of the funds entrusted to the Society by its contributors.

Associates shall use the resources, property, and funds under the associate's control judiciously and in the best interest of the Society. Associates shall exercise good faith in all transactions, and they shall not use Society assets or resources, their positions with the Society, or knowledge gained as a result of their positions for their personal benefit or for the private pecuniary benefit of any other person or organization. The interests of the Society must be the first priority in all decisions and actions they undertake in connection with the Society.

No associate shall accept, solicit, or agree to accept, without prior approval of his or her supervisor or Society Counsel, any Gift (as defined in Part V) from which it might be reasonably inferred that such Gift was given or offered for the purpose of influencing the associate in the discharge of his or her duties. Vendor, grantee and partner selections must always be business or programmatic decisions based on merit by comparing and evaluating cost, quality, performance, and suitability. Decisions must not be influenced by any other factor, including Gifts, personal relationships or hospitality.

A. Parties With Whom Conflicts May Arise – A conflict of interest may arise in the relations of associates with any of the following third parties:

- Persons and firms supplying or *potentially* supplying goods and services to the Society (vendors and professionals), including, but not limited to:
 - Construction services.
 - Professional services, including accounting and legal services.
 - Contracts with individuals, including consultants and part time staff.
 - Contracts with *companies* providing non-professional services, such as marketing, research services, information technology, management consulting or other services, etc.
 - Persons and firms from whom the Society purchases or leases property and equipment.
 - Persons and firms with whom the Society is dealing or planning to deal in connection with the purchase or sale of real estate, securities, or other property.

- Persons or parties with a direct, material Financial Interest (as defined in Part V) in the outcome of Society programs, policies or positions.
- Purchasers of Society services.
- Donors, volunteers, and other supporters of the Society.
- Agencies, other nonprofits, and associations that affect the operations of, or partner with, the Society.
- Entities from whom the Society receives grants or to whom the Society provides grants.
- Tobacco Companies and their related entities.

B. Nature of Conflicting Interest - The following are examples of some common types of conflicting interests:

- A Business Relationship (as defined in Part V) or an association with any entity that deals with the Society of which an associate or an immediate family member is a partner or a controlling shareholder, executive officer, or has any other position with another entity that would reasonably cause the appearance of a conflict of interest.
- Receiving compensation for services with respect to individual transactions involving the Society and a third party.
- Using Society resources, time, personnel, equipment, supplies, or goodwill for any purpose other than Society-approved activities, programs, or purposes. (This includes circumstances leading to receipt of an Honorarium as defined in Part V.)
- Receiving allowances from the Society (other than incidental amounts incurred while traveling) if you are a director, volunteer, or officer of the Society.
- Receiving any Gift (as defined in Part V) from any of the third parties described in Section A which may give rise to the perception that the associate's independent judgment might be compromised.

C. Conflict of Interest Disclosure Procedures - The areas of conflicting interest listed in Section A, and the relationships in those areas that may give rise to conflicts, as listed in Sections B, are not exhaustive. Conflicts may arise in other areas or through other relationships. The Code does not prohibit transactions when a conflict of interest is present, but instead provides a framework for conflict transparency and management. If an associate believes that he or she may have a conflict of interest with the Society, he or she should assume that a conflict does exist and act accordingly. Any questions about potential conflicts should be directed to Society Counsel. ***Any potential conflict of interest should be disclosed at the earliest possible time.***

The fact that one of the interests described in Section A or B exists does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances, is necessarily adverse to the interests of the Society. However, it is the policy of the Society that the existence of any of the interests described in Section B must be disclosed before any transaction is consummated. Moreover, all disclosed conflicts shall be addressed in accordance with the procedures set forth below.

It shall be the continuing responsibility of associates to scrutinize their interests for potential conflicts and to immediately make any necessary disclosures. When a possible conflict arises, in addition to making the necessary disclosures, an associate should consider these questions:

- Is the transaction prudent, in good faith, and in the best interests of the Society?
- Would the Gift, Business Relationship, or Financial Interest affect any decision I will make for the Society?
- How would the transaction, Gift, Business Relationship, or Financial Interest look to someone outside of the Society, such as a donor, a public watchdog group, the state attorney general, the news media, or a Congressional Committee?
- How would the Gift, Business Relationship, or Financial Interest seem to others within the Society? Would they think it might affect how I do my job for the Society?

1. Initial Election to the Board of Directors

Prior to the initial election of any director, such director must complete, sign, and submit to Society Counsel a Conflict of Interest Disclosure Statement which identifies, to the best of the director's knowledge, any entity of which such director or an Affiliated Person (as defined in Part V) is an officer, director, trustee, member, owner (either as a sole proprietor or a partner), or employee, and with which the Society has a relationship, and any transaction or potential transaction in which the Society is a participant and in which the director might have a conflicting interest. Society Counsel shall submit the Disclosure Statements from all directors to the Chair of the Audit Committee on an annual basis.

2. Annual Statements

Each associate shall annually complete, sign, and submit to Society Counsel a Conflict of Interest Disclosure Statement which identifies, to the best of the associate's knowledge, any entity of which such associate or an Affiliated Person is an officer, director, trustee, member, owner (either as a sole proprietor or a partner), or employee, and with which the Society has a relationship, and any transaction or potential transaction in which the Society is a participant and in which the associate might have a conflicting interest.

3. Continuing Disclosure

Except for the special case of disclosure of a Gift or an Honorarium (as defined in Part V), whenever an actual or potential conflict of interest arises, an associate must complete, sign and submit a Conflict of Interest Disclosure Statement to Society Counsel. If the associate is a Disqualified Person (as defined in Part V) he or she must disclose all material facts about the conflict to the Audit Committee prior to engaging in the proposed transaction or arrangement.

4. Gifts or Honoraria

Gifts

Staff members must immediately report the receipt of an offer of any Gift exceeding \$75 to their supervisor, who must consider the circumstances of the Gift and either approve or deny its acceptance in writing. Supervisors may seek advice from Society Counsel.

Volunteers must immediately report the receipt of an offer of any Gift exceeding \$75 to Society Counsel. In each instance, a statement should be filed with Society Counsel who will review the circumstances to determine if the potential gift can be accepted. No gift in excess of \$75 in value may be accepted without the prior approval of Society Counsel.

In international situations where turning down a gift valued at more than \$75 would be culturally discourteous, the gift may be accepted on behalf of the Society, but must be immediately reported to Society Counsel.

Honoraria

Generally, any Honorarium received by a Society staff member or a volunteer who is representing the Society and/or acting in their official capacity should be remitted to the Society to avoid any appearance of a conflict of interest. If remittance is not possible, then the Honorarium should be politely declined. Any exception to this procedure must be approved in advance by Society Counsel. For additional information, staff members should refer to the Code of Ethics & Conflict of Interest Toolkit on the Office of Corporation Counsel's Legal for Me page located on Society Source.

D. Procedures for Reviewing Conflicting Interests

In general, once a transaction involving a conflicting interest is identified, the associate with the conflict shall not attempt to influence decision makers regarding the matter, and shall not participate in any discussion of the conflict or the transaction except to respond to information requests.

In the case of a proposed transaction involving a conflict of interest by a Disqualified Person, the Audit Committee shall review the situation and determine by a majority vote of disinterested directors whether the transaction is in the Society's best interest, whether it is fair and reasonable, and whether to move forward despite the conflicting interest. The minutes of the meeting of the Audit Committee shall reflect that the conflict of interest was

disclosed, that the interested person was not present during discussion on the matter and did not vote, and record the Committee's decision. If a transaction involving a conflict of interest by a Disqualified Person arises that must be addressed prior to the next regularly scheduled Audit Committee meeting, the Chair of the Committee shall review the situation, make a determination about whether the Society should move forward despite the conflicting interest, and report his or her decision to the Audit Committee at its next meeting.

In the case of a transaction involving a conflict of interest by a non-Disqualified Person, Society Counsel shall review the situation and determine whether it requires further review and approval by the Audit Committee. Society Counsel shall maintain a record of all transactions involving disclosed or discovered conflicts of interest involving non-Disqualified Persons and update the Audit Committee at each of its regularly scheduled meetings about how each was resolved.

- E. Violations of the Conflict of Interest Policy** - If Society Counsel or the Audit Committee have reasonable cause to believe an associate has failed to disclose an actual or possible conflict of interest, the associate shall be notified about such belief and afforded an opportunity to explain the alleged failure to disclose.

If, after reviewing the associate's response and after making further investigation as warranted by the circumstances, Society Counsel or the Audit Committee determines the associate has failed to disclose an actual or possible conflict of interest, it shall initiate appropriate disciplinary and corrective action.

- F. Conduct Not Prohibited by This Policy** - This policy is not intended to preclude or dissuade employees from engaging in legally protected activities under state or federal law, including the National Labor Relations Act, such as discussing wages, benefits or terms and conditions of employment, raising complaints about working conditions for their and their fellow employees' mutual aid or protection, or legally required activities.

III. Reporting Violations - Duties, Protections and Corrective Actions

- A. Each associate shall immediately report to his or her supervisor or Society Counsel 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. An associate who does not disclose a potential conflict of interest in accordance with Section II. C. is in violation of the Code. A failure to report a 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 (attached hereto as EXHIBIT A and incorporated herein by reference) establishes the protections against retaliatory actions for any reports of actions or suspected actions taken by or within the Society that is illegal, fraudulent or in violation of any adopted Society policy, including the Code. Moreover, the Society's independent hotline (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 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.
- C. When an associate completes the annual Conflict of Interest Disclosure Statement, he or she must complete all of the items on the questionnaire. Any intentional or reckless failure to disclose required information or the provision of information that is inaccurate or false in nature is a violation of the Code, and shall be subject to corrective action as described in this Section III. In addition, there is a continuing duty to disclose any conflict of interest that arises during the course of the year.

IV. Frequently Asked Questions

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

V. Definitions

A. Affiliated Persons:

Persons are termed "affiliated persons" include the following:

- a. your spouse, domestic partner, parents, grandparents, siblings, children, grandchildren, great grandchildren, and spouses of parents, grandparents, siblings, children, grandchildren and great grandchildren or anyone residing with you.
- b. any entity that deals with the Society of which:
 - you are a board member, partner, member or a controlling shareholder or executive officer; or
 - you have any other position, financial or otherwise, that would cause the appearance of a conflict of interest. Any question regarding a conflict of interest should be reviewed by Society Counsel or the Audit Committee for final resolution.
- c. any trust, estate, or other legal entity in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

B. Business Relationship:

Business relationships between two parties include any of the following:

- One person is employed by the other in a sole proprietorship or by an organization with which the other is associated as a trustee, director, officer, key employee, or greater-than-35% owner.
- One person is transacting business with the other (other than in the ordinary course of either party's business on the same terms as are generally offered to the public), directly or indirectly, in one or more contracts of sale, lease, license, loan, performance of services, or other transaction involving transfers of cash or property valued in excess of \$10,000 in the aggregate during the organization's tax year. Indirect transactions are transactions with an organization with which the one person is associated as a trustee, director, officer, key employee, or greater-than 35% owner. Such transactions do not include charitable contributions to tax-exempt organizations.
- The two persons are each a director, trustee, officer, or greater than 10% owner in the same business or investment entity (but not in the same tax-exempt organization).

Ownership is measured by stock ownership (either voting power or value) of a corporation, profits or capital interest in a partnership or limited liability company, membership interest in a nonprofit organization, or beneficial interest in a trust. Ownership includes indirect ownership (for example, ownership in an entity that has ownership in the entity in question); there may be ownership through multiple tiers of entities.

Privileged relationship exception. For purposes this definition, a "business relationship" does not include a relationship between an attorney and client, a medical professional (including psychologist) and patient, or a priest/clergy and penitent/communicant.

C. Disqualified Person:

A "disqualified person" is any person who is, or has been during a period beginning five (5) years from the date of a transaction between the Society and such person, in a position to exercise substantial influence over the affairs or finances of the Society. It is not necessary that the person actually exercise substantial influence, only that the person be in a position to do so.

Certain insiders, by definition, are Disqualified Persons, including directors, officers and key employees (e.g., senior executives).

Certain family members of a Disqualified Person and entities controlled by a Disqualified Person are also Disqualified Persons. For this purpose, the term control is defined as owning more than 35% of the voting power of a corporation, more than 35% of the beneficial interest in a trust, or more than 5% of a direct or indirect ownership interest of a partnership or professional corporation.

D. Financial Interest:

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Society has a transaction or arrangement;
- b. A compensation arrangement with the Society or with any entity or individual with which the Society has a transaction or arrangement; or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Society is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not nominal in value. Compensation does not include the reimbursement of reasonable expenses incurred in connection with the performance of Society duties.

E. Gift:

A “Gift” is any payment or other benefit given to a staff member or volunteer that is not in return for services because of their affiliation with the Society that is valued at \$75 or more. Gifts may come in a variety of forms, including presents, gratuities, loans, entertainment, favors, or other hospitality. A series of benefits received within a 12-month period that together are valued at \$75 or more is treated as a single Gift for purposes of this policy.

F. Honorarium:

An “Honorarium” is any payment or other benefit given to a staff member or volunteer in return for services because of their affiliation with the Society. Services include, but are not limited to, any speech given, article published, service on a review panel, or attendance at any conference, convention, meeting, social event, meal, or similar gathering. “Honorarium” does not include reimbursement of expenses for transportation, lodging, and meals in connection with a conference or similar event in which the staff member or volunteer renders services are more than merely perfunctory.

Questions related to the receipt of honoraria should be directed to Society Counsel.

G. Independent Voting Members:

A voting member of the Audit Committee is considered “independent” only if all three of the following circumstances applied at all times during the Society’s tax year.

- The member was not compensated as an officer or other employee of the Society or of a related organization¹; nor was the member compensated by an unrelated organization or individual for services provided to the Society or to a related

¹ For purposes of these criteria, a “related organization” is an organization (1) that controls or is controlled by the Society; (2) is controlled by the same persons that control the Society (i.e., shared directors and officers); or (3) that qualifies (or claims to qualify) as a “supporting organization” for the Society within meaning of Internal Revenue Code Section 509(a)(3).

organization, if such compensation is required to be reported in Part VII, Section A of the Society's Form 990.

- The member did not receive total compensation or other payments exceeding \$10,000 during the Society's tax year from the Society and/or any related organization as an independent contractor.
- Neither the member, nor any family member² of the member, was involved in a transaction with the Society (whether directly or indirectly through affiliation with another organization) that is required to be reported on Schedule L of the Form 990 for the Society's tax year, or in a transaction with a taxable or tax-exempt related organization (whether directly or indirectly through affiliation with another organization) of a type and amount that would be reportable on Schedule L Form 990 or 990EZ, if required to be filed by the related organization.

Transactions required to be reported on Schedule L include:

1. excess benefit transactions between you or an Affiliated Person and the Society;
2. loans from the Society to you or an Affiliated Person;
3. a Society grant which provided a direct benefit to you or an Affiliated Person;
and
4. any business transaction between the Society and you or an Affiliated Person.

Committee members who are associated with institutions that receive grants pursuant to the Society's various Independent Peer Review Committees and the Council for Extramural Grants will not be treated as failing to satisfy the above criteria on the basis of their relationship to the recipient institutions.

H. Society Counsel:

Society Counsel shall mean the General Counsel or his or her designees.

I. Tobacco Company:

"Tobacco Company" means any company that manufactures tobacco products and is commonly considered to be part of the tobacco industry, including subsidiaries and parent companies, and companies under common control with such company, as well as philanthropic foundations and other organizations closely linked with the tobacco industry.

² Family members include spouses, ancestors, brothers and sisters (whether whole or half blood), children (whether natural or adopted), grandchildren, great-grandchildren, and spouses of brothers, sisters, children, grandchildren and great-grandchildren.

EXHIBIT A

Whistleblower Protection Policy: Reporting Suspected Violations of Law or Misconduct

The American Cancer Society, Inc. and its affiliated entities (“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 the Society’s Code of Ethics and Conflict of Interest Policy (“the Code”).

Society 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 policy, including the Code, 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 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, Society Counsel, or anonymously by calling the Hotline at 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 protections of this policy extend to any employee who discloses information that the employee 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 employee who believes they have 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, Society Counsel, or anonymously by calling the Hotline at 800-539-7202.