

**ASIS International
Code of Conduct
Standard Operating Procedure (SOP):
Complaint and Investigation**

This SOP outlines the process by which ASIS International will receive and review complaints made by one member against another member for an alleged violation of the ASIS Code of Conduct. Note that the Code of Ethics is aspirational and not subject to this standard operation procedure (SOP).

Bearing in mind that ASIS International is a private, not-for-profit professional membership organization with no law enforcement authority and no power or authority to compel anyone's cooperation or attendance at any hearing, and no power to subpoena, ASIS International members are encouraged to attempt to resolve a breach of the Code of Conduct with the parties involved before submitting a formal complaint to ASIS International so that it is attempted to be resolved without ASIS International intervention. Except as expressly set forth in the Code of Conduct, a complaint should only be submitted to ASIS International if the violation cannot be resolved informally, is dangerous in nature, or poses a risk to a person, ASIS International, or ASIS International's reputation.

Process

The complaining member (individual) is to send an email to the ASIS CEO and Chair, Ethical Standards Committee of ASIS International of the alleged violation of the Code of Conduct. The email shall be sent to ethics@asisonline.org.

ASIS International will not accept, process, or act upon anonymous complaints. All complaints must also include contact information for the person filing the complaint.

The complaint must include the name of the person against whom the complaint is being filed, with as much identifying information as is available, to include any witnesses, their names and contact information, if available. A complaint that does not identify the person against whom the complaint is being filed will not be accepted or processed.

The complaint must include a reasonably detailed description of the allegations being made with specific reference to the elements of the Code of Conduct alleged to have been violated.

The ASIS CEO and Chair, Ethical Standards Committee, in consultation with legal counsel, shall initially review the complaint and may dismiss the complaint outright. Other staff will be consulted as needed.

If the complaint is dismissed, an email will be sent to the complainant stating so, and the matter will be considered closed from an ASIS International perspective.

If the Chair, Ethical Standards Committee determines that the complaint has merit or deserves further inquiry, they will forward the complaint, together with any comments to the Ethical Standards Committee and select a committee member to serve as investigator. The complainant will be communicated with about the next steps.

The Ethical Standards Committee retains separate authority to investigate matters (separate and apart from matters that are initiated by a formal complaint), in which case the procedure proceeds according to the following steps.

The CEO and Chair, Ethical Standards Committee Chair will work with the Ethical Standards Committee within forty-five (45) business days to review the original complaint and any additional information provided. The complaint will be shared with the named member(s), unless it is determined that sharing the complaint itself would put the complainant(s) at risk, in which case the named member(s) will be notified of the nature of the alleged Code of Conduct violations. The accused will have the opportunity to present his, her or its own evidence to the investigator or Ethical Standards Committee.

If further investigation is warranted upon review of information presented to the investigator and the Ethical Standards Committee as named above, this will be communicated to both the complainant and the member(s) accused, and an assessment of the amount of time it will take to conduct an additional investigation will be communicated at that time.

ASIS International will make reasonable efforts to expedite any investigation, however, given the global and complex nature of ASIS International, the time needed will fluctuate based upon many varied factors.

Should additional investigation be required as determined by the Ethical Standards Committee, a third party "investigator" who is also a member in good standing of ASIS International may be retained to assist in the investigation. If possible, a PCI certified professional will be used. In addition, the investigator may be joined by up to five (5) ASIS International members who are not members of the Ethical Standards Committee, the Global Board of Directors, and/or the applicable Regional Board/Steering Committee. This group will be referred to as the "Ethics Task Force." The investigator will adhere to the agreed upon period in which to conduct their investigation.

The investigator will present their findings to the Ethics Task Force who will discuss and render a recommendation to the Ethical Standards Committee. The Ethical Standards Committee will determine if there is a breach of the Code of Conduct or other actionable misconduct that has occurred.

The ASIS CEO will participate in all proceedings but will not have a vote.

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The Ethical Standards Committee Chair will communicate the findings of the complaint(s) to the complainant and the subject of the complaint.

Confidentiality by the participants must be maintained for all investigations, deliberations and proceedings and may not be discussed or divulged to third parties. This does not preclude ASIS International from making a public statement about the situation after it has been investigated.

After receiving the final decision of Ethical Standards Committee, any party aggrieved by the decision may petition the ASIS International Global Board of Directors (or the Board's designee for the purpose) for a review of the proceedings and decision.

However, the decision whether to accept the petition or not and whether to review the case further or not shall be entirely within the sound discretion of the ASIS International Global Board of Directors and there can be no appeal from the final decision.

If the petition is accepted, the Global Board will establish its own review process, in cooperation and consultation with the CEO of ASIS and the Ethical Standards Committee Chair. This process will be transparent and move as reasonably quickly as possible.

Any decisions rendered by the Global Board of Directors, or their designee, are considered final.