

ETHICS POLICY

DECEMBER 2014

YAKUBU & ASSOCIATES CHAMBER

ADVOCATES, NOTARIES PUBLIC AND COMMISSIONERS FOR OATHS

1.0 Overview

Yakubu and Associates Chamber is committed to protecting employees, partners, vendors and the firm from illegal or damaging actions by individuals, either knowingly or unknowingly. When addresses issues proactively and uses correct judgment, it will help set us apart from competitors. We will not tolerate any wrongdoing or impropriety at any time and will take the appropriate measures act quickly in correcting the issue if the ethical code is broken.

We are committed to conducting all of Yakubu and Associates Chamber affairs and activities with the highest standards of ethical conduct. All of us have an obligation to adhere to this policy and encourage others to do the same.

2.0 PURPOSE

YAC Ethics Policy reflects a high standards of business conduct representing what is the hallmark of our organization. Our Ethics Policy helps define our commitment to support a culture of openness, trust and integrity in all we do.

The Ethics Policy helps clarify our standard of conduct. It makes clear that Yakubu and Associates Chamber expects employees to understand the ethical considerations associated with their actions. Our Ethics Policy affirms our long standing commitment to not merely obey the law, but also to conduct our business with integrity and without deception.

The purpose for this ethics policy is to support a culture of openness, trust, and integrity in all American Heart Association management and business practices. A well understood ethics policy requires the participation and support of every YAC employee.

3.0 Scope

This policy applies to employees, contractors, consultants, interns, and other workers at YAC, including all personnel affiliated with third parties.

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4.0 The Policy

At YAC, we are dedicated to working with our employees, partners, vendors and Clients to provide the legal service. We are committed to conducting all of the YAC affairs and activities with the highest standards of ethical conduct. The YAC Code of Conduct in the Human Resources Policy Manual provides guidance for decisions and actions during our daily work.

We are committed to the responsible use of YAC assets; to provide accurate, complete and objective information; to respect the confidentiality of financial and other information; to act in good faith and exercise due care in all we do; to comply with all rules and regulations, and to proactively promote ethical behavior.

YAC's Ethics are built on the YAC's Guiding Values. As such, we acknowledge our individual responsibility to ensure our collective success by practicing and promoting the following values which reflect a shared view of how we want to operate and be seen by others.

4.1 Our Values

- a. Trust
- b. Professionalism
- c. Competence
- d. Creativity
- e. Integrity
- f. Confidentiality
- g. Responsibility
- h. Transparency
- i. Ownership
- j. Excellence
- k. Discipline
- l. Dedication
- m. Team work
- n. Shared Prosperity

4.2 Our People

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YAC is committed to provide a work environment that values diversity among its volunteers and employees. All Human Resource policies and activities are intended to create a respectful workplace where every individual has the opportunity to reach their highest potential.

Employees are provided opportunities regardless of race, color, national origin, religion, sex, sexual orientation, marital status, age, veteran status or disability. These policies apply to both applicants and employees in all phases of employment including, recruiting, hiring, placement, training, development, transfer, promotion, demotion, performance reviews, compensation, benefits and separation from employment.

We will evaluate how we are living up to our code of ethics by requesting feedback on a regular basis from our employees, volunteers and Clients. We will provide all of our stakeholders a mechanism to report unethical conduct. We will begin with employee orientation and regularly communicate all of these expectations to employees and volunteers.

YAC employees, contractors and suppliers are expected to report any practices or actions believed to be inappropriate to their supervisor, another YAC leader, the Human Resources department, or via the YAC ethics hotline.

4.3 Our Clients

We are dedicated to 100% Clients satisfaction. We are devoted to developing "Clients enthusiasm" and are passionate about exceeding Clients expectations. We dedicate ourselves to anticipating the changing needs of Clients and creating timely, innovative and superior programs, products and services.

4.4 Fraud

Fraud is defined as any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. The YAC Advisory Board and Senior

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Management have adopted a "no fraud tolerance" attitude. In addition to the Advisory Board, management and staff at all levels of YAC have the responsibility for preventing, detecting and reporting fraud.

In addition to the definition of fraud set out above, this policy covers any dishonest or fraudulent act, including but not limited to:

- a) Misappropriation of funds, securities, supplies or other assets
- b) Impropriety in the handling or reporting of money or financial transactions
- c) Profiteering as a result of insider knowledge of firm plans or activities
- d) Disclosing confidential and proprietary information to outside parties
- e) Intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to procure an advantage, benefit or gain
- f) Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to YAC, unless pursuant to the Acceptance of Gifts Policy
- g) Destruction, removal, or unauthorised use of records, furniture, fixtures, and equipment.
- h) Any similar or related irregularity.

Each member of management will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. An employee, volunteer, consultant, vendor, contractor, or outside agency doing business with YAC shall immediately report any irregularity that is detected or suspected, as instructed below under 'Reporting Ethics Violations.' Any employee or person who suspects or reports dishonest or fraudulent activity shall not attempt to personally conduct investigations or interviews related to any suspected fraudulent act. Investigations will be coordinated by the relevant committee.

a) Conflict of Interest

Our firm will conduct thorough conflict of interest checks before taking new clients or service providers.

b) Association's Property and Information

Employees and volunteers are expected to protect the YAC's property at all times; including cash, equipment, records, employee, and Clients information. This also requires employees and volunteers to maintain confidentiality regarding YAC records, and employee and Clients information.

c) Non - Discrimination Policy

It is YAC policy that the volunteer membership and staff structures and all programs and activities of YAC, its Affiliates and components shall be designed and conducted without regard to race, religion, national origin, sex, age, disability or other non-merit criteria.

d) Reporting Violations

If you have questions or concerns about compliance with any of the policies listed above, or are unsure about what is the "right thing" to do, we strongly encourage you to first talk with your supervisor, program leader, another YAC Leader or the Human Resources department. If for any reason you are uncomfortable talking to any of these individuals, contact the YAC ethics committee to report your concerns.

No director, trustee, officer, employee or volunteer who in good faith reports an action or suspected action taken by or within YAC that is illegal, fraudulent, or in violation of any adopted policy will suffer intimidation, harassment, discrimination or other retaliation.

YAC treats complaints about and reports of possible discrimination seriously and investigates them as required by our procedures and any applicable laws.

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The Code of Ethics maintains that you must: Place the integrity of the profession and the interests of clients above your own interests. Act with integrity, competence, and respect. Maintain and develop your professional competence. The Standards of Professional Conduct cover:

- a) Professionalism and integrity
- b) Duties to clients and employers
- c) Conflicts of interest and your responsibilities

It is your duty as an employee and a duty to the client to; at all times portray the required standards of professionalism, integrity, respect and honesty. Code of ethics include but are not limited to the following:

- a) Act with integrity, competence, diligence, respect and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the profession, and other participants.
- b) Place the integrity of the profession and the interests of clients above our own personal interests.
- c) Use reasonable care and exercise independent professional judgment when conducting duties, and engaging in other professional activities.
- d) Practice and encourage others to practice in a professional and ethical manner that will reflect credit on themselves and the profession.
- e) Promote the integrity and viability of the legal profession for the ultimate benefit of society.
- f) Maintain and improve professional competence and strive to maintain and improve the competence of other professionals.

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- g) Strive for excellence in all aspects of our profession by performing consistently at or above acceptable industry standards.
- h) Commit to increase professional growth and knowledge, to attend educational programs and to personally contribute to expertise
- i) Provide truthful and accurate information with respect to the performance of duties. Use a written contract clearly stating all charges, services, products, performance expectations and other essential information.
- j) Maintain industry accepted standards of safety and sanitation.
- k) Protect the public against fraud and unfair practices, and promote all practices which bring respect and credit to the profession.