YAKUBU & ASSOCIATES CHAMBER

ADVOCATES, NOTARIES PUBLIC AND COMMISSIONERS FOR OATHS

COMMUNICATION POLICY

JANUARY 2015

1.0 Overview

Communication is an important aspect not only in everyday life but in business as well. Communication may be in various forms including

a) Face to face conversation
b) Telephone
c) Email
d) Text messaging

2.0 Purpose

The purpose of communication should be to help others and to facilitate the smooth operation of our business.

3.0 Objectives

1. Ensure material information is disclosed in a timely, consistent, and appropriate manner. Provide guidelines for the broad dissemination of material information pursuant to all applicable legal requirements.

2. Prevent the improper use or premature disclosure of confidential material information.

3. Provide direction for all YAC personnel in the appropriate treatment of material, confidential, general, and routine Firm information.

4. The Firm has an obligation to ensure that all information material to the business and affairs of the Firm is disclosed to the public in an appropriate manner. This policy will assist the Firm in satisfying the objectives above, and in assigning responsibility for the implementation and oversight of these policies and procedures.

4.0 Scope

a) Courtesy, friendliness, and a spirit of helpfulness are important and guide the Firm's dealings with employees and customers.

b) Differences of opinion should be handled privately and discreetly.

c) Gossip and backbiting are to be avoided. Communicate directly with the person or persons involved to resolve differences.

d) Conservative criticism that which will improve business by clarifying or instructing should be welcomed when delivered with respect and tact.

e) Destructive criticism that which is designed to harm business or another person is not to be practiced.

f) Employees should strive to maintain a civil work atmosphere at all times and refrain from shouting, yelling, using vulgarities or swearing at co-workers or customers.

5.0 Our Standards

The standard of YAC is a work environment free from disparaging remarks about religion, ethnicity, sexual preferences, appearance and other non-work related matters. Each employee has the responsibility to foster an understanding of others' differences in order to create an environment where those differences contribute to a better organization.

Inappropriate remarks based on any of the following are not tolerated and such behavior will result in immediate termination of employment: race, religion, ethnic origin, physical attributes, mental or physical disability, color, ancestry, marital status, pregnancy, medical condition, citizenship and/or age.

Inappropriate remarks include those that treat a group of people in a uniform way, assign a behavior in a disparaging way, imply inferiority of a group, are supposedly funny at someone else's expense, and/or cause embarrassment or distress to others based on comments about a particular group of people.

6.0 The Policy

6.1 Disclosure of Information

The Firm is committed to timely, accurate, and complete disclosure of material information in an appropriate manner. The Firm recognises that it must meet the disclosure expectations of external stakeholders and the continuous disclosure obligations prescribed by securities legislation.

In the normal course of business, the Firm will make all financial information filings as required. This includes, but is not limited to, quarterly and annual financial statements, annual reports, and news releases. The Firm considers these documents material information.

It is important to ensure that selective disclosure of material information does not occur. Thus, up to such time as it is broadly disclosed to the investing public, material information will be considered confidential material information.

Material information includes both material changes and material facts.

6.2 Confidential Material Information

Confidential material information of the Firm is subject to strict confidentiality restrictions and care must be taken to ensure the information is used only to further the approved business purposes of the Firm. Access to confidential material information is restricted to authorized persons who should be aware of their confidentiality obligations and who have signed confidentiality agreements where required by the Firm.

Wherever practical, confidential material information should:

I. be identified as such;

II. be stored in locked cabinets to which access is restricted;

III. be removed promptly from meeting rooms at the conclusion of meetings;

IV. be subject to secure limited access of electronically stored computer information;

V. *not* be discussed in places where the discussion may be overheard; and

VI. *Not* be copied unnecessarily or discarded where others can easily retrieve it.

6.3 Material Changes

Material changes in the business should be immediately disclosed by the Firm once the change has occurred. Material changes initiated by the Firm are considered to have 'occurred' once the decision has been made to implement them, regardless of Board of Advisors' approval, if the Firm thinks it is probable that the Board of Advisors will approve implementation. This includes any and all significant Firm changes that potentially impact the perceived or real value of the Firm, such as purchases or modification of major assets and future plans for service development.

A Firm may delay disclosure of a material change and to keep it confidential temporarily where immediate release of the information would be unduly detrimental to that Firm's interests.

The Managing Counsel is the appropriate authority on whether or not information constitutes a material change. Prior to withholding disclosure of a material change, the Managing Counsel will consult the advisory for concurrence, and to ensure that the administrative requirements are met.

Material changes will be broadly disclosed by way of a news release. Unfavourable news will be disclosed just as promptly and completely as favourable news. The news release will contain enough detail to enable the media and investors to understand the substance and importance of the change being disclosed.

When a material change occurs, a material change report will be filed as soon as practicable.

Until such time as public disclosure is complete, in order to prevent selective disclosure, material changes will be considered confidential material information.

6.4 Material Facts

If the Firm chooses to disclose a material fact, it will be broadly disclosed.

Until such time as public disclosure is complete, in order to prevent selective disclosure, material facts will be considered confidential material information.

6.5 Materiality Determinations

There is no simple standard or test for determining materiality of information. When assessing whether any particular matter should be disclosed, a number of factors need to be considered, including the nature of the information and prevailing market conditions.

7.0 Media Relations, Public Comments, and Designated Spokesperson(s)

7.1 Media Relations

All media relations activities are coordinated by the advisory board.

Unless otherwise authorised by the Managing Counsel media-relations activities and media interviews are restricted to the Managing counsel or an appointed representative. The Managing Counsel is the primary spokesperson for the Firm on all matters. In specific circumstances, the following exceptions are made:

I. In addition to the Managing Counsel, a person will be designated as the principal respondent to all media enquiries.

II. Employees/Managers responsible for processing requests may communicate with media applicants about administrative matters related to their requests; and

III. From time-to-time, Senior Officers and/or other subject-matter experts may be called upon to speak to the media regarding specific areas of responsibility or subject matter. These opportunities will be pre-arranged in consultation with the Managing Counsel.

IV. Unless in conflict with the business requirements of the Firm, media deadlines are to be respected wherever possible

V. YAC personnel, who are not authorized to serve as spokespersons, will not respond on behalf of the Firm to any enquiry from, or initiate communication with, the media.

VI. All media enquiries must be referred to the Managing Counsel as soon as possible for follow up by a designated spokesperson.

7.2 Roles and Responsibilities of the Designated Spokesperson

The designated spokesperson has a duty to speak truthfully and openly to the best of his/her knowledge regarding the Firm, subject to the disclosure restrictions as discussed in the previous section.

7.3 Public Comments at Industry Conferences

YAC personnel, who are invited to make speeches or presentations about YAC to industry groups, conferences, or public meetings, as a part of their normal area of responsibility, should receive the approval of the Managing Counsel prior to accepting such invitations.

Should such an opportunity be pursued, the roles and responsibilities of the designated spokesperson stipulated above will apply.

7.4 Public Statements of Personal Opinion

YAC personnel should refrain from making public statements of personal opinion regarding the Firm and from presenting a personal opinion regarding YAC as a fact.

7.5 Duty of Loyalty

Common law imposes on all employees, the fiduciary duties of confidentiality and loyalty to one's employer, obligating employees not to compete with their employer, and prohibiting them from disclosing or using their employer's confidential material information to the employer's detriment.

In the broadest sense, the Firm extends this responsibility to each and every person employed by the Firm, and requires all employees to act with good faith, honesty, and loyalty, and to avoid placing their own personal interests above those of the Firm. For more information, please see YAC Code of Conduct and Ethics.

8.0 Release of Information

8.1 Principles of Material Information Disclosure

When releasing material information, the Firm will adhere to the following:

I. where a determination has been made to disclose material information (as described in section 4.1 of this policy), such material information will immediately be broadly disclosed to the public via news releases;

II. Disclosure must include any information the omission of which would make the rest of the disclosure misleading (half-truths can be misleading);

III. Unfavourable material information must be disclosed as promptly and completely as favourable information;

IV. Disclosure on the Firm's website does not by itself constitute adequate disclosure of material information;

V. No selective disclosure. Confidential material information must not be disclosed to selected individuals (for example, in an interview with an analyst or in a telephone conversation with a significant investor); and

VI. Disclosure must be corrected if the Firm subsequently learns that earlier disclosure by the Firm contained a material error at the time it was given.

8.2 Unintentional Selective Disclosure

If confidential material information has been inadvertently disclosed to an analyst or any other person not bound by a confidentiality obligation, such information must be broadly disclosed immediately via news release. Upon becoming aware of an unintentional selective disclosure, YAC advisory board is required to advise the Managing Counsel of the circumstances.

8.3 News Releases

News releases containing material information will be issued as soon as practicable via a news service that provides national distribution. In addition, the news release will be transmitted to major and local media (as appropriate) nationwide, as well as being posted on the Firm's website.

8.4 Routine Information Requests

Enquiries from the public for general and routine information can be answered by the appropriate employee/Manager if the information requested is contained in records/publications previously released for public distribution.

Enquiries from the public cannot be answered if the enquiry is regarding Firm activities that constitute confidential material information. If such an enquiry is made, the employee/Manager will respectfully decline the request as containing confidential or proprietary information.

8.5 The Use of Forecasts and Other Forward-Looking Information

The use of forecasts and/or other forward-looking information should only be released with caution. All forward-looking information must contain a statement that the information is forward-looking, a description of the factors that may cause actual results to differ materially from the forward-looking information, all material assumptions and appropriate risk disclosure, and cautionary language. Release of such forecasts and forward-looking information must first be approved by Managing Counsel.

There has to be an analysis that includes some degree of prediction or projection, for example discussion of known trends or uncertainties that are reasonably likely to affect the Firm's business have to be discussed. Forward-looking statements may be considered misleading when they are unreasonably optimistic or aggressive, or lack objectivity, or are not adequately explained.

8.6 Responding to Rumours

In general, no comment will be made in response to rumours or speculation regarding the Firm. However, certain exceptions may be made under the direction of the Managing Counsel.

8.7 Electronic Communication and the Corporate Website

All communications, including electronic communications, must comply with securities laws. This includes email, the internet, and the intranet. Proper precautions should be taken when using electronic communications to discuss confidential material information.

The Finance Manager is responsible for monitoring financial information on the Firm's website. Any financial information on the Firm's website will include a notice that advises the reader that the information posted was accurate at the time of posting, but may be superseded by subsequent events. All financial information posted on the website, including text and audiovisual material, will show the date that such material was prepared or posted. Financial information posted on the website will be kept current.

Any links from the Firm's website to a third party website should, if appropriate, include a notice that advises the reader that he or she is leaving the Firm's website and that the Firm is not responsible for the contents of the other site.

Disclosure on the Firm's website does not by itself constitute adequate public disclosure of information that is considered material information. Any disclosures of previously confidential material information on the Firm's website must be preceded by a news release.

8.8 Internet Discussion Forums, Chat Rooms, Bulletin Boards, and Electronic Mail

Due to the immediacy of electronic information, YAC personnel are discouraged from participating in discussions about the Firm on internet discussion forums, chat rooms, or bulletin boards. YAC personnel may not, at any time, discuss confidential material information. Posting on official YAC social media forums by YAC personnel is restricted to authorized Marketing, Customer Care, and Operations & Security Centre employees. The content of such postings must adhere to guidelines set from time-to-time by the Vice President responsible for Marketing.

9.0 Reporting Significant Events

9.1 Legal Actions, Deaths, and Unusual Incidents

The Managing Counsel and other Senior Officers of the Firm must be immediately informed of all deaths and unusual incidents involving the Firm. The Managing Counsel or designated personnel must be immediately informed of all legal actions involving the Firm.

9.2 Information to the Board of Advisors

Information to the Board of Advisors, as a whole or to individual Board members, must be disseminated through or with the approval of the Managing Counsel's office.

10.0 Investor Relations

All investor relations activities are coordinated by the investor relations representative, the Managing Counsel. Investor relations activities are generally limited to the Managing Counsel and Finance Department.

Opportunities for other YAC personnel to speak to investors should be pre-arranged in consultation with the Managing Counsel.

11.0 Consequences for Non-Compliance with this Policy

YAC personnel will be advised of this policy and its importance.

YAC personnel are responsible for consulting, understanding, and complying with this policy. There is no circumstance in which any law or regulation should be disregarded in the conduct of the Firm's business.

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment with the Firm. The violation of this policy may also violate certain laws. If the Firm discovers that laws have been violated by YAC personnel, it may refer the matter to the appropriate authorities, which could lead to penalties, fines, or imprisonment.

12.0 Annual Review of Policy

YAC Disclosure Committee will review and update, if necessary, this policy on an annual basis or as needed to ensure compliance with changing regulatory requirements.