

## **IV. EMPLOYEE CODE OF CONDUCT (created 02/25/1999, rev. 04/01/2014))**

### Philosophy

To enable YAP to conduct their business effectively and to promote confidence in the integrity of their leadership, board members, employees, vendors, and contractors, the highest standards of ethical principles must be maintained. The underlying principles of this Code are based on the premise that all leaders, board members, employees, vendors, and contractors must avoid situations in which their personal activities or relationships could create, or appear to create a conflict of interest, or make it difficult to objectively carry out job responsibilities or act in the best interest of YAP

The spirit of this Code is to preserve and protect the integrity and independence of all decisions affecting YAP made by its leaders, board members, employees, vendors, and contractors so that the interests of YAP and not that of any individual prevail. The mere appearance of a conflict or a breach of confidence can be just as detrimental as an actual conflict or breach, and may result in irreparable damage to YAP and its reputation.

### Relationships

#### Definitions

A. Co-worker relationships, nepotism or working with or for family members, hiring friends and acquaintances, supplier, vendor, and referral authority relationships.

- Honest and Ethical Conduct – YAP expects and requires ethical behavior from every employee. You are expected to act in the best interests of the company. Further, you must engage in and promote honest and ethical conduct, including handling actual or apparent conflicts of interest in an ethical manner while acting with honesty and integrity.
- In order to reduce potential conflicts of interest, applicants will not be considered for employment in a position in which they would be supervised by or work directly for a family relative, spouse, or domestic partner.
- Employees defined as “leadership” within YAP, shall not influence and encourage the hiring of a family member for a position within the organization. At no time, shall a leader influence the application or hiring of a family member or taint the interviewing and hiring process.
- When an employee’s responsibilities include working with business partners, suppliers, vendors, or competitors, particular care should be taken to ensure that business decisions are free from any actual or perceived conflict of interest.
- The YAP employees who have a personal or family relationship with employees of a business partner, supplier, vendor, or competitor should not become involved in the business decisions that involve YAP and the other company if that individual can benefit, either directly or indirectly, from the other company's business with YAP.
- Employees shall not conduct any business on behalf of YAP with a supplier or vendor when the employee has a personal or family relationship with any individual who is a principal, officer or representative of that supplier or vendor without first disclosing that relationship to the Chief Executive Officer, or Chief Compliance Officer.

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Conflict of Interest

Definitions

- A. Persons in a position of trust- include members of the Board of Directors, YAP employees including officers, and anyone receiving income from YAP, and volunteers.
- B. Conflict of Interest- means a conflict, or appearance of a conflict, between the private interests and the official responsibilities of any person in a position of trust at YAP
- All employees, Board members, vendors, and contractors shall adhere to the Conflict of Interest Policy and Procedures as provided in the Personnel Policy Manual.
  - No person in a position of trust shall pay, offer to pay, or agree to pay, either directly or indirectly, any fee, commission, compensation, gift, gratuity, or any other thing of value of any kind to any referring authority official or employee in order to influence the decision of that referring authority. Nothing, however, in this YAP Code of Conduct shall prohibit a person in a position of trust from either purchasing a meal for anyone or distributing YAP promotional materials unless such a meal or promotional material would violate another's code of conduct (about which the YAP person in a position of trust has been informed).
  - No person in a position of trust shall use any forms, client or other confidential information, copied materials or other business information from YAP while working in a position outside of YAP, or while seeking unemployment or other financial benefits.
  - No person in a position of trust who is currently employed with YAP shall begin a youth or human services program that might compete with YAP while employed with YAP.
  - No person in a position of trust who leaves YAP shall begin a youth or human services program that might compete with YAP for at least one year from the last date of employment with YAP.
  - No person in a position of trust who leaves YAP shall contact any YAP referring authority to solicit referrals for at least one year from the last date of employment with YAP unless the new employer has an existing relationship with the referring authority.
  - Any person in a position of trust who is currently employed with YAP or who leaves YAP shall develop or create relationships with YAP's referral authority, children and families, and public with the sole purpose of YAP's business and mission.
  - No person shall use YAP equipment, office space, YAP staff, and office supplies for the purpose of their work for another organization where they may be employed.

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- Any senior management employee who receives a full time salary from YAP shall disclose to the CEO when they receive compensation for work performed for an organization other than YAP.

Professionalism

Definitions

- A. All of Youth Advocate Programs Inc. (YAP) employee's actions must be conducted in accordance with federal, state, and local laws, professional standards, applicable federally funded health care program regulations, contractual agreements and policies, implemented with honesty, fairness and integrity. Professionalism requires specialized knowledge, skill, appropriate decision making, and judgment.
- B. All employees, Board members, Vendors, and Contractors will;
- Report all actual hours worked in an honest manner.
  - Accurately and honestly represent YAP and should not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.
  - Project a positive attitude in the work environment.
  - Not threaten or cause physical harm to a coworker, supervisor, subordinate, child, and child's family.
  - Understand personal policies grievance procedures, special incident procedures, and all applicable governmental regulations and service contracts.
  - Follow direction issued by supervisors pertaining to work assignments, or assisting on special projects that have been assigned.
  - Demonstrate the ability to communicate appropriately through verbal and written communication.
  - Not utilize derogatory or belittling language when referring to the race, religion, color, sex, national origin, economic status, sexual preference, or disability of co workers, supervisors, subordinates, children or their families.
  - Maintain current licensure and credentials pertaining to the specified job qualifications required for the position.
  - Refrain from any negative public statements that tend to reflect poorly upon YAP.
  - Maintain the confidentiality of all persons served by YAP in accordance with State and/or Federal law.

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- Report any and all incidents of child abuse or any suspected incidents of child abuse required by state and/or federal law.
- Act as role models both on the job and in the community at large.
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- Maintain appropriate professional boundaries with persons served and their families.
- Adhere to the YAP “Integrity Compliance Plan” and ensure attendance at the annual training.
- Report any suspected fraud, abuse, or misconduct.
- Report any convictions in local, state, or federal court while employed by YAP or any disbarment, exclusion, or ineligibility determination for participation in federal and state healthcare programs.
- Treat all persons served with dignity and respect by honoring the client bill of rights.
- Not take children and their families to your home or involve them in your personal life.
- Not carry or have in their personal possession, including in their vehicle, a gun while working with our youth and families"

Overall Financial and Organizational Fiscal Responsibility

Definition

The Chief Financial Officer, the Corporate Controller, the leadership of each region responsible for fiscal management, and all professionals in a finance, accounting, treasury, tax, actuarial, audit or investor relations role in YAP shall adhere to this section specifically in addition to the general specifications set forth by the YAP Code of Conduct.

Every employee involved in financial management in the YAP enterprise shall:

- Act honestly and ethically, avoid or resolve actual or apparent conflicts of interest in personal and professional relationships, and promptly disclose any material transaction or relationship that reasonably could be expected to give rise to such a conflict of interest.
- Promote and provide appropriate disclosures to stakeholders that present fairly the information therein (e.g., accurately, completely, objectively, relevantly, timely and understandably), in accordance with applicable laws, rules and regulations.

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- Comply with applicable laws, rules and regulations of federal, state, foreign and local governments, and private and public regulatory agencies.
- Adhere to, and, where applicable, monitor and improve, YAP's processes to maintain effective internal control over financial reporting.
- Act in good faith, responsibly, with due care, competence and diligence, using considerate, professional, independent judgment, and seek at all times to present all reasonably available material information on a timely basis to management and others in accordance with YAP policies.

A. Billing

- Any employee or vendor who knowingly makes false or inaccurate claims; bills for service not rendered, bills for non-medically necessary services, inappropriately codes billings, submits bills not in accordance with referral authority contracts, or submits duplicate billings shall be disciplined in accordance with YAP Personnel Policies and the Integrity Compliance Plan.

B. Procurement, purchasing, and bidding.

- All procurement and purchasing should comply with the guidance of the Office of Management Budget (OMB) circular A-122.
- All purchasing of services and products meeting or exceeding a minimum of \$5,000 (individual billing or total cost) shall go through a competitive bid process. A reasonable process for the selection of vendor shall be applied including consistent application, adequate documentation, and demonstrated prudence.

C. Financial reporting.

- The presentation of all financial reports and documents shall adhere to all legal, regulatory, fiscal, and Generally Accepted Accounting Principles (GAAP).
- All financial reports shall be reviewed and accepted by Senior Management and the Board of Directors on a regular and consistent basis.

D. Receipts submission.

- All receipts shall be submitted for reimbursement in accordance with YAP reimbursement policy including the clearly stated business reason.
- All employees and departments shall strictly adhere to the reimbursement policy including, but not limited to, submitting receipts for advance payments within 2 weeks of the date of submission of the check request.

E. Mileage recording and reimbursements.

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- All employees submitting for mileage reimbursement shall ensure that the miles requested for reimbursement are strictly business related. For all annual mileage cap increase requests, the employee will submit documented evidence to support the increase.

F. Payroll and Timesheets

- All supervisors are expected to ensure appropriate and accurate timesheets and payroll documents are submitted by their employees.

Only the Board of Directors or the Audit Committee may waive provisions of this Code for the Chief Executive Officer, the Chief Financial Officer, or the Corporate Controller and any such waiver shall be promptly disclosed in accordance with applicable laws, rules and regulations.

Communication and Information Technology

Definition

All employees, Board members, vendors, and contractors are expected to adhere to the Communication and Information Technology Policy and Procedure.

- A. Use of telephone mobile phones and blackberries and other technological devices for YAP business purposes. Personal use of technological devices will be limited to necessary communication and will be time limited to lunch hours or breaks.
- B. Use of the YAP internet for non-business research or browsing only during lunch hours or breaks.
  - Protect the privacy and confidentiality of all YAP, Inc technology including not disclosing login names or passwords of self to anyone. Passwords will only be changed by the employee.
  - Protect the confidentiality and security of all electronic communication.
    - Use only YAP, Inc communication devices to exchange YAP, Inc information.
    - Not monitor, intercept or “hack” into communications of other employees, referring authorities, or other third parties.
    - Use only our own password or login names.
    - Always disclose that we are the sender of a communication.
    - Use only software installed by YAP, Inc IT staff or authorized by the Chief Information officer and approved by the systems administrator.
    - Not deliberately propagate any viruses, worms, Trojan horses, or trap door program codes.
    - Not use YAP equipment to participate in any chat room or news group.
      - Exercise caution and professionalism when transmitting any confidential information via email or internet.

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- Transmit confidential information only to a recipient authorized to receive the information.
- Limit cell phone and blackberry communications to non-confidential topics.
- Not leave confidential or sensitive information in voice mails.
- Not connect non-YAP technological palmtops, electronic notebooks, etc. to YAP systems.
- Understand that any electronic communications is permanent and may be used in the future.
- Use only YAP electronic communication equipment to exchange confidential information with clients, RA's, schools, or any other recipient.
- Agree to follow the laws and regulations of the United States or regulations of the United States or any other nation, or state, city, county or local jurisdiction.
- Agree to cooperate with law enforcement agencies in any investigation regarding the legal use of equipment.
- Agree to report any unauthorized or inappropriate use of any electronic equipment.
- Agree not to use any YAP property, logo's, and proprietary information; to design, and operate any public domain websites without the express written permission of the Chief Information Officer.