

Cambridge Credit Counseling Corp. CODE OF ETHICS FOR EMPLOYEES

Introduction

Cambridge Credit Counseling Corp. (“Cambridge” or “the Organization”), a 501 (c)(3), not-for-profit organization provides debt counseling and financial education services to American individuals in a confidential and professional manner. We are committed to conducting our work in a legally and ethically appropriate manner with the highest level of honesty. This Code of Ethics (“the Code”) summarizes the standards that the Organization has adopted to guide employees on behaving with respect, honesty and decency toward everyone who contacts our service.

While covering a wide range of work practices and procedures, this Code cannot and does not cover every issue that may arise, or every situation in which ethical decisions must be made, but rather sets forth key guiding principles of work conduct that Cambridge expects of its Employees. Cambridge Credit Counseling Corp. employees pledge to:

1. Familiarize and adhere to all organization rules and policies
2. Avoid Conflicts of Interest
3. Comply with government laws, rules and regulations
4. Promptly report illegal or unethical behavior
5. Protect confidential information

Organization Rules and Policies

When hired, employees are given organization documentation (described as “New Hire Paperwork” and “Employee Handbook”). These documents explain in detail Cambridge’s rules and policies. Every employee of Cambridge Credit Counseling Corp. is required to familiarize themselves with the Organization’s policies and rules and to sign all corresponding documentation as a stipulation of employment.

Conflicts of Interest Policy

All employees have an obligation to act in the best interest of the Organization and the individuals we service, and should avoid any situation that presents an actual or potential conflict between their personal interests and the interests of Cambridge. A conflict of interest can occur when an employee’s private interest interferes, or appears to interfere, with the interests of the Organization as a whole. Employees should avoid any private interest that influences their ability to act in the interests of the Organization or that makes it difficult to perform their work objectively and effectively. Identifying actual or potential conflicts of interest may not always be clear-cut. The following are some possible examples:

- Obtaining any personal benefits or favors because of your position with the Organization.
- Accepting gifts, services, payments or other benefits (other than a gift of nominal value) from a competitor, supplier, or client of Cambridge Credit Counseling Corp. or any entity or organization to which Cambridge provides services or from which the Organization expects to solicit services.

- Lending to, borrowing from, or having a material interest in a competitor, supplier, or client of Cambridge, or any entity or organization with which Cambridge does, seeks or expects to do provide or solicit services.
- Knowingly competing with Cambridge or diverting a business opportunity from Cambridge.
- Obtaining or seeking to obtain any personal benefit from the use or disclosure of information that is confidential or proprietary to Cambridge, or from the use or disclosure of confidential or proprietary information about another entity acquired as a result of or in the course of your employment with Cambridge.
- Having a material interest directly or through a family member in a vendor, entity or organization with which Cambridge does, seeks or expects to provide or solicit services. For purposes of this Code, “family members” include an employee’s child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, any in-laws, and adoptive relationships.
- Using Cambridge assets for business or personal endeavors.
- Becoming involved in a personal/romantic relationship with an employee who is a subordinate to or a superior to you is an infringement of our nepotism policy. Please refer to Cambridge’s “Nepotism Policy” in the Employee Handbook for further details.
- Participating in outside employment for outside organizations if the employment interferes with your ability to fully and satisfactorily meet the requirements of your position with Cambridge, interferes with your ability to act conscientiously in Cambridge’s best interest, or requires you to utilize Cambridge’s proprietary or confidential procedures, plans or techniques.

Disclosure of Conflicts of Interest

Cambridge Credit Counseling Corp. requires that employees disclose any situations that would reasonably be expected to give rise to a conflict of interest. If an employee suspects that they have a conflict of interest, or something that others could reasonably perceive as a conflict of interest, the employee must report it to the Human Resources Department. The Human Resources Department will work with the President of the Organization and/or the Board of Directors to determine whether they have an actual conflict of interest and, if so, how best to address it.

Compliance with Government Laws, Rules and Regulations

A commitment to ethical conduct requires that employees comply with any government laws, rules and/or regulations. It is the duty of each employee to know, understand and comply with any laws, regulations, and rules that apply in his/her job. Violating the law can seriously damage the Organization’s reputation, subject the Organization to liability, and subject the employee to personal liability. Employees may seek advice from supervisors, managers or other appropriate personnel if they have questions regarding the laws, rules and regulations that apply to the Organization.

Promptly Report Illegal or Unethical Behavior

If an employee knows about or suspects misconduct, illegal activities, fraud, misuse of Organization assets or violations of Organization policies, he/she has a duty to promptly report their concerns. Employees should reference the Organization’s “Whistleblower Policy” for reporting instructions.

Protect Confidential Information

Much of the information this organization deals with is highly sensitive client and industry information. Each employee has a responsibility to hold confidential all information obtained from the Organization or the individuals to whom we provide services, except when disclosure is authorized or legally mandated. Using this organization's resources to obtain any person's confidential and personal information for any other purposes is a direct violation of this Code. Employees should reference the Organization's "Information and Security Plan" for specific details of this policy.

IMPORTANT! All employees of Cambridge Credit Counseling Corp. must read, understand, and agree to uphold this Code of Ethics as a condition of their employment. Employees who do not adhere to this Code of Ethics to the best of their ability will face immediate disciplinary action, up to and including termination of employment. Additionally, if employees are subject to an accreditation firm's policies they must also adhere to the Code of Ethics mandated by that firm and may have their certification delayed or revoked for failing to comply.

Cambridge Credit Counseling Corp.

Code of Ethics

ANNUAL CERTIFICATION

I, _____, (*please print*) being an employee of Cambridge Credit Counseling Corp., hereby acknowledge, affirm and certify that:

- (a) I have read and fully understand and agree with Cambridge’s Code of Ethics (*QAP42-063010.5*)
- (b) I will adhere to them to the best of my ability as a condition of my employment with Cambridge Credit Counseling Corp.
- (c) I confirm that I have not, to the best of my knowledge, violated this Code.
- (d) If I am unsure whether I have violated this Code, I will contact my Human Resources Manager to request a private conference to discuss my concerns.
- (e) I further understand that my failure to adhere to this Code to the best of my ability may result in immediate disciplinary action, up to and including termination of my employment.

I declare the following potential Conflicts of Interest:

Signature

Date