

**AMERICAN ARABIC BENEVOLENT ASSOCIATION
PO BOX 320037
WEST ROXBURY, MA 02132**

CODE OF BUSINESS CONDUCT POLICY

The following policy is hereby adopted this _____ day of _____ 2006, which addresses the expectations for responsible conduct with and to all parties who work on behalf of the American Arabic Benevolent Association, Inc.

The American Arabic Benevolent Association and any AABA affiliated and/or controlled companies (hereinafter referred to as “AABA”) are subject to this approved Code of Business Conduct Policy.

1. Purpose and Scope

The purpose of this Code of Business Conduct is to provide guidance and a resource to help you make sound decisions in doing your job. All of us have a responsibility to establish and maintaining business relationships based on integrity with each other and the vendors in which we have an on-going relationship.

2. Applicability

The AABA’s expectations for responsible conduct are applicable to all parties who work on behalf of the AABA, including, but limited to, its employees, consultants, contractors, and/or representatives. The standards listed in this code are specifically directed at employees, though all other parties should conform to the spirit of these standards.

3. Policy

3.1 Limitations – This code of business conduct does not address every expectation or condition regarding proper and ethical business conduct. It does not substitute for company policies and procedures.

3.2 Individual Responsibilities – Individually we are a critical connection between the AABA and our business partners and the customers we serve. As AABA employees, we will conduct ourselves with integrity. This can be accomplished by meeting our responsibilities and the standards of the code.

3.3 As Individuals, We Will:

- a. Help the AABA meet its commitments to the Board of Directors
- b. Be respectful, cooperative, and helpful toward each other and our business partners, never acting in an abusive, obscene or disrespectful manner.

- c. Help safeguard AABA's reputation for integrity in our business dealings
- d. Not disparage or misrepresent the corporation or any AABA employee
- e. Take responsibility for our personal actions, honestly accounting for and reporting our activities.
- f. Know and comply with the AABA's code of business conduct, policies and procedures and applicable laws and regulations and how they apply to our work responsibilities.
- g. Seek assistance when we have questions about the AABA's code of business conduct or when faced with a challenging ethical situation.
- h. Raise any concerns or report potential or actual violations of the AABA's code of business conduct, as well as any policies and procedures the AABA may issue, or any laws and regulations
- i. Never act unethically, even if directed to do so by another person. We can never justify any unethical action by claiming we were instructed to do so.
- j. Never ask or require another person to act unethically or violate the company's code of business conduct or the law.
- k. Retain a copy of the AABA's code of business conduct for easy reference.
- l. Attend all required ethics and compliance education and training programs.
- m. Address any apparent conflict between the AABA's code of business conduct, policies and procedures, or applicable laws and regulations.

3.4 As Supervisors, We Will:

- a. Provide employees with information and advice regarding ethics and compliance matters.
- b. Consistently communicate and reinforce the AABA's code of business conduct and related policies and procedures to employees.
- c. Foster a work environment that encourages employees to act ethically and in compliance with the AABA's code of business conduct.
- d. Ensure that we maintain open communication and discussion with employees, encouraging them to ask questions and raise difficult issues.
- e. Properly delegate authority only to responsible employees.

- f. Demonstrate leadership by acting with respect and integrity

3.5 Resolving Ethics Questions – Resolving ethics questions helps us strengthen our connections with our business partners and each other. Sometimes we may encounter ethics questions that do not have easy answers and may require difficult judgment calls. Often, the following steps can help us resolve these questions:

a. Define the situation:

- i. Are you concerned about a possible violation of a law, regulation, or AABA policy?
- ii. Do you need guidance or clarification regarding AABA policy or other ethics matters?

b. Consult Resources

- i. Read through the AABA Code of Business Conduct
- ii. Company policies and procedures

c. Seek Help from Others

- i. Consult your Supervisor to help you:
 - 1. Think through your question.
 - 2. Identify relevant information resources.
 - 3. Determine your specific responsibilities regarding resolving your question.
 - 4. Raise the question with others who can also help address it.
- ii. Address your question with another Supervisor or the HR Chairperson.

3.6 Suspected Retaliation – If we believe we or others have been retaliated against for reporting suspected misconduct or for providing information, we should contact the HR Chairperson.

3.7 Involvement in Misconduct – Reporting a concern or instance of suspected misconduct does not absolve us of responsibility if we participated in or condoned the misconduct. However, our reporting the misconduct may be considered in determining our accountability for the misconduct.

4. Standards

This overview is intended to help us become familiar with the AABA’s standards contained in this code of business conduct – not to provide their specific requirements.

4.1 Connecting with Each Other – We will treat others with whom we interact on behalf of the company and our workplace with respect.

a. Non-Discrimination, Equal Opportunity and Diversity – We will not discriminate against others as specified in this code of business conduct or other AABA policies and will provide equal opportunity in employment and support a workplace that values diversity.

b. Harassment – We will not engage in any behaviors that are harassing, including sexual harassment or offensive comments or jokes, and will address and/or report any instances. *See also the AABA Sexual Harassment Policy*

c. Employee Privacy – We will respect others’ privacy, but recognize that our privacy at work is limited and subject to business needs.

d. Alcohol and Drug Use – We will abide by the AABA standards that restrict alcohol and drug use, including not working or reporting to work under the influence of alcohol, illegal drugs or controlled substances. *See also the AABA Alcohol / Drugs / Smoking Policy.*

e. Gambling – We will not engage in gambling, such as sports pools and raffles.

f. Health & Safety – We will follow healthy and safe business practices at work by recognizing that workplace violence, threat of violence or carrying weapons is not tolerated. *See also the AABA Workplace Security Policy.*

4.2 Connecting without Conflicts of Interests – We will ensure that our personal interests do not conflict or appear to conflict with our AABA responsibilities.

a. Financial Interests – We will ensure our financial interests do not create conflicts, including with respect to securities ownership, participation in financial offerings or acceptance of loans.

b. Personal Relationships – We will ensure our relations with family and friends do not interfere with our business responsibilities, such as conducting business with these parties and inappropriate reporting relationships, relationships with whom we do business with and will disclose these relationships when appropriate.

c. Political Activities – We will make certain that our personal political activities or contributions are separate from the AABA and avoid even the appearance that we are acting on the AABA’s behalf.

d. Endorsements, Testimonials and Personal Statements – We will ensure that any endorsements, testimonials, or statements we make for the AABA or ourselves do not conflict with our duty to the AABA. No endorsements, testimonials or statements on behalf of the AABA may be made without prior approval from your Supervisor.

e. Departing and Former Employees – We will avoid conflicts when contracting with, rehiring or purchasing from former employees.

4.3 Connecting with Company Assets – We are responsible for treating all corporate and other assets with respect and care.

a. Company Property – We will appropriately work with property belonging to the AABA, our business partners and others, including approved personal use of AABA property and ensure others do the same.

b. Company Benefits – We will only use company benefits for ourselves and other covered individuals, and provide accurate information as required. We will not misrepresent reasons for absence from work.

c. Company Funds – We will appropriately work with corporate funds, including protecting them and approving related transactions, seeking appropriate reimbursement for and receiving good value in exchange for them.

d. Company Information – We will appropriately work with information belonging to the AABA, our business partners or others, especially nonpublic (such as confidential or proprietary) information.

e. Integrity of Records – We will prepare, protect, correct and approve records so that they are accurate, truthful, complete and meet applicable standards, including records regarding work time and expenses.

f. Company Time – We will properly use and record company time and ensure others do so likewise, including time worked. We will not inappropriately use company time for personal use.

g. Corporate Identity and Reputation – We will protect the AABA's identity and reputation, such as through use of its logo and in external communications.

h. Sabotage and Espionage – We will safeguard all corporate assets, including computers and networks, from espionage and sabotage and provide access to them only as authorized.

i. Communications and Computer Systems – We will properly safeguard and work with communications and computer systems and related data to ensure their accuracy, integrity, safety, and confidentiality. *See also the AABA Communications & Technology Policy.*

4.4 Connecting with Customers – We want to sustain our customers' confidence in us and demonstrate we are worthy of their trust.

a. Privacy of Customer Information and Communications – We will properly work with and only provide authorized access to customer information or communications, and respect their privacy. *See also the AABA Communications & Technology Policy.*

4.5 Connecting with Suppliers/Vendors – We will show our suppliers/vendors that they are valued business partners and build relationships based on integrity and trust.

a. Working with Agents, External Consultants, Contractors and Other Representatives – We will ensure that our relations with these business partners meet our standards in hiring and working with suppliers/vendors.

b. Selecting Suppliers/Vendors – We will hire suppliers fairly, ensure they are properly certified, engage in relations without conflict and only make commitments we are prepared to honor.

c. Working with Current Suppliers/Vendors – We will only exchange appropriate business courtesies and other considerations with current and potential suppliers/vendors. We will treat Suppliers’/vendors’ information with care and according to our agreements.

4.6 Connecting through Business Courtesies – We will conduct business impartially and with the AABA’s best interests in mind, only exchange appropriate business courtesies according to acceptable company standards.

a. Gifts – We will only exchange non-monetary and generally modestly-valued gifts that promote goodwill with our suppliers/vendors and do not improperly influence others. We will accept only approved and widely available discounts.

b. Entertainment – We will only exchange appropriate, reasonable and business-related entertainment that is approved by the appropriate authority and not intended to improperly influence others, and we will reciprocate hospitality as appropriate.

c. Gratuities – We will never encourage, accept or exchange gratuities or payments for providing specific services.

5. Corrective Action and Discipline

Any employee who violates company standards may be disciplined up to and including dismissal, as well as be subject to civil and criminal charges. If misconduct occurs, the AABA is committed to taking prompt and responsive action to correct the situation and discipline responsible individuals.

Policy Adopted by the American Arabic Benevolent Association, Inc. Board of Directors:

SIGNED:

Kenneth J. Raffol – President

DATE

Camille Sarrouf, Sr., Esq - Clerk

DATE

Rosanne Solomon – Recording Secretary

DATE