



POLICIES & PROCEDURES

Area: 1.A Leadership

SUBJECT: I-A-6 Procedures for Ethical Code of Conduct

Effective Date: May 20, 2025

Approved by: Jerry Saunders, Sr., CEO

Reviewed and approved by: Jerry Saunders, Sr. CEO **Issue/Revision Date:** May 18, 2026

Reviewed and revised on: September 15, 2026

To be reviewed: Annually

Approved by: APDS Board of Directors

POLICY:

It is the policy of Africentric Personal Development Shop that all full and part-time employees, contractors, interns, and volunteers are expected to perform their designated functions in a manner that reflects the highest standards of ethical behavior. In addition to the specific guidelines contained in the policy, professionals are expected to follow the ethical standards required by their specific licensing and certification boards. Violation Of guidelines within the Code of Ethical Conduct Policy can lead to disciplinary actions, including but not limited to, Suspensions or termination of employment.

PROCEDURES:

A. Business Practice

1. Africentric Personal Development Shop will utilize the Corporate Compliance Officer (CCO) to ensure that it conducts business in an ethical and legal manner and ensure that any business practices that are questionable are thoroughly investigated.
2. All financial, purchasing, personnel, facility development, and information technology practices shall comply with local, state, and federal law and guidelines.
3. All employees shall adhere to Africentric Personal Development Shop's policies and Procedures and Employee Handbook.

B. Marketing Practices

1. Africentric Personal Development Shop will conduct marketing practices honestly and factually.
2. Africentric Personal Development Shop will utilize clear and consistent methods of communicating information to consumers, family members, third-party entities, referral sources, and community members.

3. Africentric Personal Development Shop will not give money or other items to potential clients to persuade them to enter Africentric Personal Development Shop programs.

C. Contractual Relationships

1. The ethical standards contained in this Code of Ethical Conduct will apply to contractual relationships entered into by Africentric Personal Development Shop.
2. Contractors will protect any confidential information concerning the organization's system, employees, and consumers.

D. Conflicts of Interest

1. All Africentric Personal Development Shop employees shall conduct clinical and personal business in a manner that avoids potential, actual or perceived conflicts of interests.
 - i. Actual conflicts: a competing interest is currently influencing, or is very likely influencing, a decision.
 - ii. Potential conflicts: a competing interest exists but has not yet affected a decision.
 - iii. Perceived conflicts: others could reasonably conclude that a conflict exists, even if the individual believes their judgment is unaffected.
2. Africentric Personal Development Shop employees will not engage in outside professional mental health or substance abuse services that are incompatible, in competition with, or in conflict with job duties within the organization.
3. Staff shall not engage in any other employment or activity on the organization's premises, or during employment hours whether in person or virtual that affects his or her ability to perform his or her job duties.
4. Staff shall provide services to Africentric Personal Development Shop clients and partners EXCLUSIVELY in their employment capacity with APDS. Staff are absolutely and unequivocally barred from providing services to any APDS clients or partners in any other direct or indirect capacity, outside of APDS.
5. Staff shall not directly, indirectly or via a third party, solicit or accept referral fees or participate in fee splitting of any kind or nature.

6. Africentric Personal Development Shop will not accept gifts, favors or money, tangible or intangible, of any kind or nature, from a vendor who does or is trying to secure business with the organization.
7. Africentric Personal Development Shop will not provide preferential treatment of an individual or entity due to a personal relationship with someone in their organization.
8. Staff shall not access, transmit or utilize confidential information of persons being served or doing business with APDS for any personal or outside advantage or usage.

E. Use of Social Media

(Africentric Personal Development Shop's Policy and Procedures regarding the use of social media is found in 1.G.3.b Risk Management Use of Social Media Policy)

1. Acceptable forms of social media within Africentric Personal Development Shop include Facebook, Twitter, YouTube, blogs, message boards, Instagram, and LinkedIn. All additions or changes to any information listed in our forms of social media must be approved by the Director of Operations.
2. All social media updates will be coordinated with the support of the Director of Operations or an assigned designee.
3. All social media platforms usage and access will be monitored regularly by the administration and other designees as assigned.
4. Where necessary, the organization's Information Technology support team will assist in ensuring the necessary security, privacy, and software updates are properly in place.
5. Any identified inappropriate messaging that comes across Africentric Personal Development Shop social media sites should be brought to the Director of Operations' or the CEO's attention immediately upon discovery.
6. All pictures will be reviewed before being posted on social media to ensure client presence. Any pictures depicting persons served will only be posted with the written permission of persons served.
7. Africentric Personal Development Shop nor its volunteers, employees or subsidiaries are prohibited from utilizing any social media platform or outlet to maintain ongoing communication with current or former clients. APDS use of

social media is exclusively for official organizational communication, public education, community outreach, program promotion, and recruitment, in accordance with applicable confidentiality requirements.

8. Employees of APDS are prohibited from using their personal social media accounts to communicate with current or former clients of Africentric Personal Development Shop.
9. Staff may not discuss or disclose confidential and/or proprietary information via social media (or through any other means except with a signed release of information for that entity) to anyone, including, but not limited to, all entities and individuals that have a relationship with Africentric Personal Development Shop (i.e., through charterships/affiliations/partnerships, grants and contracts) or in any capacity of any kind or nature.
10. Africentric Personal Development Shop may at times use and review any social media platforms to conduct background checks during the hiring and vetting process, or for other personnel-related matters.

F. Service Delivery

1. Staff may accept an unsolicited gift of nominal value from a consumer, family member, or stakeholder only when refusal could reasonably harm the therapeutic relationship and the employee's supervisor approves acceptance. Cash, cash equivalents, and gifts of more than nominal value may not be accepted. Accepted gifts must be promptly disclosed to management and recorded in the organization's gift log.
2. Staff will not exchange money, or engage in any financial transactions of any kind with consumers, family members, or stakeholders of APDS
3. Staff will not solicit gratuities or gifts from consumers, family members, or stakeholders and will not accept cash, cash equivalents, or gifts of more than nominal value.
4. Staff will not conduct personal fundraising or fundraising on behalf of APDS unless the activity is approved and directed in writing by the Director of Operations.
5. Staff will not take, borrow, or remove organizational property or personal property not belonging to them from APDS premises without permission of the property owner. Staff will respect the personal property of persons served,

visitors, and other personnel, and make every effort to safeguard personal property appropriately.

6. Staff will maintain an exclusive professional relationship with people served by APDS and will establish and maintain appropriate boundaries with the persons they serve in all Africentric Personal Development Shop programs. This includes a ban on staff engaging in any personal, sexual, or business relationship with any client, consumer, partner or outside party doing business with APDS. Staff will immediately disclose any actual, potential, or perceived conflict under this policy to their supervisor.
 - i. Staff involved in a client's clinical care will not serve as a witness to, or participate in, a legal proceeding or legal document for that client unless required by law, subpoena, court order, or authorized organizational procedure.

G. Professional Responsibilities, Conduct, and Quality of Care

- i. All employees, contractors, interns, and volunteers of Africentric Personal Development Shop will conduct themselves in a professional, ethical, and moral manner.
2. Staff will respect the rights of our consumers. This includes the right of the consumer to make autonomous decisions and fully participate in every aspect of the service delivery process.
 - i. Africentric Personal Development Shop employees, contractors, interns, and volunteers will provide services in a manner that fully respects consumer confidentiality by demonstrating functional knowledge of applicable confidentiality policies and guidelines. Any actual, potential, or perceived violation of this policy or any policy in Section G must be reported immediately to their supervisor.
3. Africentric Personal Development Shop employees, contractors, interns, and volunteers will be fair and honest in their work.
 - i. As part of new employee orientation, staff will read the organization's Code of Ethical Conduct and demonstrate knowledge of its guidelines. Completion will be documented through a signed acknowledgment retained in the employee's personnel file.

- ii. Clinical staff will adhere to all professional codes of conduct and ethical standards applicable to their professional discipline and licensure.
- 4. Africentric Personal Development Shop will provide quality behavioral healthcare in a manner that is appropriate, determined to be necessary, efficient, and effective.
- 5. Direct service professionals will follow current ethical standards regarding communication with consumers and their representatives regarding services provided.
- 6. Africentric Personal Development Shop will inform consumers about alternatives and risks associated with the care they are seeking and obtain informed consent before any clinical intervention. The informed-consent process must be documented in the consumer's record using the organization's approved form or electronic acknowledgment.
- 7. Africentric Personal Development Shop recognizes consumers' right to make choices about their care, including the right to decline or refuse recommended care. The discussion and any refusal of recommended care must be documented in the consumer's record.
 - i. All employees, contractors, interns, and volunteers will receive applicable confidentiality guidelines during orientation and at least annually thereafter. Completion will be documented through a signed or electronic acknowledgment retained by Human Resources.

H. Human Resources

- 1. Africentric Personal Development Shop prohibits discrimination in any work-related decision on the basis of race, color, national origin, religion, sex, physical or mental disability, ancestry, marital status, age, sexual orientation, citizenship, or status as a covered veteran.
- 2. Africentric Personal Development Shop will make reasonable accommodations for the known physical or mental limitations of otherwise qualified individuals with disabilities, consistent with applicable law and organizational procedures.
 - i. Employees requesting accommodation should notify Human Resources or management and provide information reasonably necessary to evaluate the request, consistent with applicable law and organizational

procedures.

3. Africentric Personal Development Shop does not tolerate harassment or discrimination by anyone.
4. Any form of sexual harassment is prohibited.
5. Any form of workplace violence is prohibited.

I. Organizational Fundraising

Donor Solicitation

Funds will be solicited in a respectful manner and without pressure, from designated parties. Africentric Personal Development Shop regularly solicits donors. All third parties not directly affiliated with Africentric Personal Development Shop who wish to solicit funds on behalf of the organization must acquire written permission. Donor solicitation will use:

1. Annual appeal letter and/or social media
2. Special events
 - a. Corporate sponsorships
 - b. Individual ticket sales

Donor Confidentiality

Africentric Personal Development Shop is committed to respecting the privacy of donors. Africentric Personal Development Shop uses donors' information to understand their interests in its mission and to update them on the organization's plans and activities. It is shared with staff, board members, volunteers and consultants only on a "need-to-know" basis. The organization also assures donors that their names and addresses will not be shared with any third party unless permission has been granted.

Donation Procedures

All donations will be promptly documented, acknowledged, safeguarded, and deposited in accordance with the organization's cash-receipt, gift-acceptance, and financial-control procedures. Restricted gifts will be recorded and tracked according to the donor's written intent, and any unusual, noncash, conditional, or potentially burdensome gift will be referred to management for review before acceptance.

Valuing of Donations

Africentric Personal Development Shop shall promptly provide all donors with specific acknowledgments of charitable contributions. If the donor receives anything tangible or intangible in exchange for a donation, such as dinner or event admission, or any other benefit, the tax receipt shall clearly state what portion of the donation is tax deductible. Africentric Personal Development Shop communicates to donors that any in-kind values claimed for income tax purposes are the sole responsibility of the donor.

In addition to individual acknowledgments, donors will receive an annual summary of gifts for tax-record purposes, when applicable.

Use of Donations in Accordance with Donor Intent

Donor-restricted funds will be maintained in a designated account or accounting classification and tracked through gift accounting. Restricted donations and all related expenses must use the same project code so that the organization can demonstrate compliance with the donor's documented intent.

J. Necessity of Care

1. Africentric Personal Development Shop shall submit claims for payment to governmental, private, or individual payers for those services or items that are clinically necessary and appropriate.
2. When providing services, Africentric Personal Development Shop employees shall only provide those services that are consistent with generally accepted standards for treatment and are determined by the professional to be clinically necessary and appropriate.
3. Coding and documentation will be consistent with the standards and practices defined by the organization in its policy, procedures, and guidelines.

K. Coding, Billing, and Accounting

1. Africentric Personal Development Shop employees involved in coding, billing, documentation, and accounting for consumer care services for the purposes of governmental, private, or individual payers will comply with all applicable state and federal regulations and organizational policies and procedures.
2. Africentric Personal Development Shop will only bill for services rendered and shall seek the amount to which it is entitled.
3. Supporting clinical documentation will be prepared for all services rendered. A claim will not be submitted until complete, accurate, and timely supporting documentation is present.
4. All services must be accurately and completely coded and submitted to the appropriate payer in accordance with applicable regulations, laws, contracts, and organizational policies and procedures.
5. Billing and collections will be recorded in the appropriate accounts.

6. An accurate and timely billing structure and medical records system will ensure that Africentric Personal Development Shop effectively implements and complies with required policies and procedures.

L. Personal and Confidential Information

1. Africentric Personal Development Shop will protect personal and confidential information concerning the organization's system, employees, and consumers.
2. Africentric Personal Development Shop personnel shall not disclose confidential consumer information unless at the consumer's request with authorization for release of information and/or when authorized by law.
3. Confidential information will only be discussed with or disclosed to persons and entities outside the organization through the request of the consumer with authorization for release of information.
4. Consumers can request, and are entitled, to receive copies or summaries of their records as clarified in HIPAA and 42 CFR Part 2, with the exception of minors and consumers being treated for alcohol and drug abuse, who may be provided with copies of their record if it is judged appropriate by the provider charged with their care.
5. Africentric Personal Development Shop personnel will be familiar with all organizational policies and procedures regarding confidentiality.

M. Code of Conduct Procedures

1. All staff will receive a copy of the Code of Ethical Conduct, sign a form acknowledging their review and full understanding of the code, and return the form to be filed in the employee's personnel file.
2. To assure an awareness of ethical practices, reviews of the Code of Ethical Conduct and continued training will be conducted on an annual basis, and staff will be required to sign an acknowledgement of receipt and review of the Code of Ethical Conduct.

N. General Ethical Guidelines and Considerations

1. Africentric Personal Development Shop believes in the importance of ethical practices within the organization. Any employee who reports waste, fraud, abuse, or any other questionable practices will not be subject to reprisal by management of the organization. Employees are encouraged to report any

concerns or suspicions.

- i. Failure to comply with the Code of Ethical Conduct, or with any applicable state or federal law or regulation, will result in disciplinary action, including but not limited to reprimand, suspension, and/or termination of employment. The following violations of the Code of Ethical Conduct will result in immediate termination of employment: theft of funds or assets and/or physical, emotional, or sexual abuse of a client or employee.
2. Any reported or suspected violation of the Code of Ethical Conduct should be reported to the Corporate Compliance Officer (CCO) (for suspected incidents of waste, fraud, or ethical business violations) or Client Rights Officer (CRO) (for suspected incidents of abuse or other wrongdoings against clients) or assigned designee for thorough investigation. Should an employee feel uncomfortable going to the CCO or CRO, the employee should go to the Chief Executive Officer.
 - (1) All employees, volunteers, and contracted staff are responsible for reporting violations or suspected violations of the Code of Ethical Conduct. Concerns, violations, or suspected violations should be reported in writing within 24 hours of discovery.
 - (2) Once a report is received, the organization will begin its investigation within 72 hours, unless immediate action is required to protect health, safety, confidentiality, evidence, or organizational assets.

I have read the Africentric Personal Development Shop Policy and Procedures for Code of Ethical Conduct and will follow and abide by the provisions of the code.

Name: Employee / Volunteer/ Board Member

Signature of Employee/ Volunteer/ Board Member

Date

CONFLICT OF INTEREST DISCLOSURE STATEMENT

To the best of my knowledge,

☐ there exist ***no*** circumstances involving me or a member of my immediate family that may be construed as a conflict of interest within the meaning of the Policy.

☐ circumstances exist involving me or a member of my immediate family that may be construed as a conflict of interest within the meaning of the Policy as follows:

Name: Employee/ Volunteer/ Board Member

Signature of Employee/ Volunteer/ Board Member

Date

Signature of Witness

Date

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