

National
Credit
Counseling
Bureau



2026 Code of Business Conduct and Ethics

NCCB's Code of Business Conduct and Ethics sets the standards we follow to act with integrity, protect client interests, and comply with the law.







Debt is not a sin. Hope is our work.



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MESSAGE

Dickson Ewemade



At the National Credit Counselling Bureau (NCCB), our mission is ambitious and deeply human. We aim to become the world's most ethical financial institution, supporting sustainable economic growth while understanding and uplifting entrepreneurs and individuals who have faced setbacks. This mission is powered by our greatest strength: our people.

Our Code of Business Conduct and Ethics captures more than 22 years of experience and insight. It is a practical guide designed to protect your well-being and help you contribute meaningfully to our culture, our clients, and our shared purpose.

Our culture is shaped not only by knowing what is right, but by choosing it consistently, even when it is difficult. That commitment builds trust and preserves the legacy we are proud to carry forward, grounded in integrity, respect, and accountability.

Debt is not a sin. It is often a bold step toward a better future. When that step slips and dreams stumble, NCCB is here. We do more than provide credit counselling. We stand beside people in their most vulnerable financial moments, helping them rise with dignity, rebuild stability, and move forward with confidence.

Every action we take, whether in guidance, service, or decision-making, must strengthen the trust placed in us. Upholding partnership, integrity, client service, and excellence is not just an expectation. It is a responsibility we share.

I am honored to walk this journey with you as we restore hope, rebuild futures, and set a higher standard for ethical financial stewardship.

A handwritten signature in black ink, appearing to be 'DE', written in a cursive style.

Dickson Ewemade
Executive Director, NCCB



Preface

This Code of Business Conduct and Ethics establishes the principles and standards that guide the National Credit Counseling Bureau in fulfilling its mission. It defines the ethical framework within which NCCB operates and outlines the expectations for professional conduct across the organization. The Code serves as a foundation for decision-making, accountability, and responsible service delivery.

As a credit counselling institution, NCCB operates in a space where trust, confidentiality, and impartiality are essential. Individuals and small enterprises turn to NCCB during periods of financial difficulty, placing confidence in the organization's guidance and integrity. This Code reinforces the obligation to act with fairness, objectivity, and respect in every interaction.

The standards outlined in this document are designed to protect clients, strengthen organizational credibility, and ensure compliance with applicable laws and regulations. By adhering to these principles, NCCB upholds its commitment to restoring confidence, rebuilding futures, and maintaining the highest standards of ethical conduct.

SECTION - I

Understanding NCCB

This section introduces the purpose, values, and responsibility of the National Credit Counselling Bureau. It explains who we serve, why we exist, and the principles that guide our work, providing a clear foundation for understanding NCCB's mission, culture, and ethical commitment.

- 1 National Credit Counselling Bureau
- 2 Core Values of National Credit Counselling Bureau
- 3 Our Team and Shared Responsibilities
- 4 Reporting Concerns and Seeking Guidance
- 5 Confidential Reporting and Non-Retaliation



Understanding NCCB

National Credit Counselling Bureau

Restoring Confidence, Rebuilding Futures

NCCB exists to help people regain financial stability through ethical guidance, practical support, and respectful service. This note sets a shared standard for every employee, because our daily choices shape the trust we earn and the futures we help rebuild.

The National Credit Counselling Bureau (NCCB) is built on a consumer-first commitment and a mission that is both ambitious and deeply human. We exist to serve individuals and entrepreneurs who have faced financial setbacks and to help them regain stability through ethical, practical, and compassionate guidance. This introduction is intended for every member of our team, whether you joined today or helped build NCCB over the years, because our culture is not something we inherit once. It is something we reinforce through our daily choices.



Our purpose is simple to state, yet meaningful to live. We aim to become the world's most ethical financial counseling institution by supporting sustainable economic stability and helping people recover from financial hardship with dignity. We do not judge. We listen, assess, educate, and guide. We respect every client's story, including the difficult decisions and unexpected events that brought them to us.

In the United States, debt management counseling is not only a valuable resource. It is also a required step for individuals who file for bankruptcy, including those whose debts are primarily business-related. This requirement reflects the responsibility and trust connected to our work. Many people who seek debt management counseling feel overwhelmed, uncertain, and vulnerable. Our role is to replace confusion with clarity and fear with a plan that is honest, realistic, and measurable.

Debt management counseling is a professional service designed to help consumers manage debt, improve financial literacy, and establish sustainable budgeting habits. At NCCB, the process often begins with an in-depth financial review. We evaluate household income and expenses, contingent liabilities, outstanding balances, medical bills, and other personal obligations. From there, we help clients build a realistic budget that protects essential needs while creating a responsible path forward. Education is central to our approach. We help identify spending gaps, strengthen money management skills, and encourage emergency savings so future stability is not dependent on high-interest credit cards.

When appropriate, a Debt Management Plan may be recommended for clients struggling with high-interest unsecured debt. Under such a plan, the client makes one monthly payment to NCCB, and NCCB distributes payments to participating creditors. A structured plan supports repayment discipline and progress within a defined timeframe, often three to four years. Participation may limit new credit use, and enrolled credit card accounts may need to be closed during the program period.

Every member of NCCB plays a role in delivering this mission. Our credibility is shaped by how we speak, listen, document, and act. Professionalism is not limited to job titles. It appears in accuracy, confidentiality, fairness, and follow-through. It is reflected in how we treat clients, how we support colleagues, and how we handle disagreement or pressure. Every action must strengthen the trust placed in us.

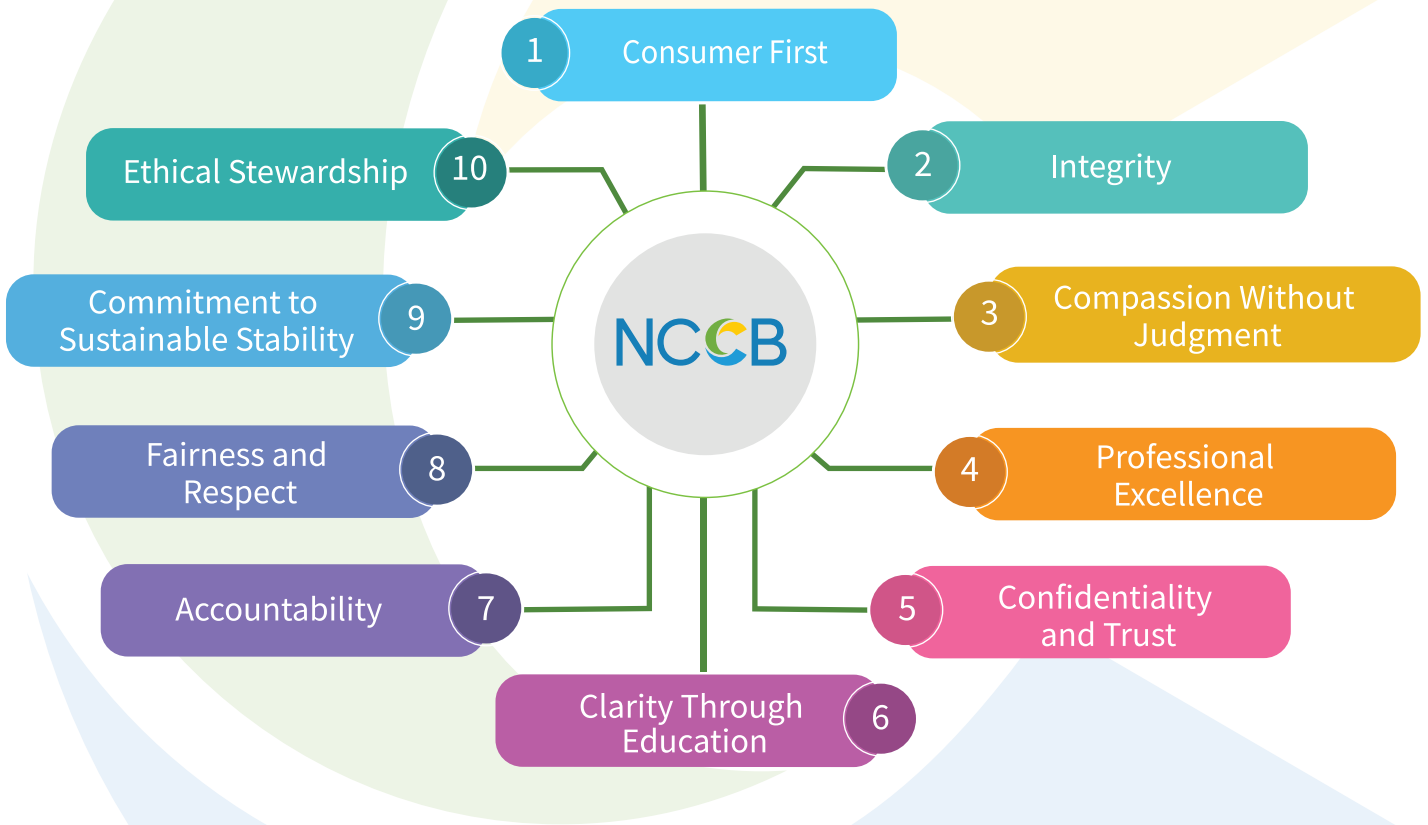
This is why our Code of Business Conduct and Ethics matters. It is more than a policy guide. It is our shared standard for how we make decisions, how we protect information, how we manage conflicts, and how we represent NCCB in every interaction. It ensures that our values are not only stated, but practiced consistently.

The spirit of NCCB is clear. We believe a financial setback does not define a person's worth or future. Our work is to help people stand again, rebuild stability, and move forward with confidence. That commitment belongs to all of us. Together, we protect our culture, strengthen our reputation, and deliver outcomes that reflect the highest standard of ethical financial stewardship.



Core Values of National Credit Counselling Bureau

NCCB's Core Values define how we serve, counsel, and protect every client with integrity, compassion, and professionalism. They guide our daily decisions and actions, ensuring we restore confidence and rebuild futures through ethical credit counselling.



NCCCB

1 Consumer First

We place the interests, dignity, and well-being of those we serve above all else. Every decision, recommendation, and action is guided by what is genuinely best for the client.

2 Integrity

We act with honesty, transparency, and ethical responsibility in all circumstances. Our guidance is unbiased, truthful, and free from personal or institutional gain.

3 Compassion Without Judgment

We recognize that financial hardship does not define a person's character or worth. We listen with empathy, treat every story with respect, and support clients without blame or prejudice.

4 Professional Excellence

We uphold high standards of accuracy, diligence, and accountability. Professionalism is reflected in how we communicate, document, follow through, and represent NCCB in every interaction.

5 Confidentiality and Trust

We protect personal and financial information with the highest level of care. Safeguarding confidentiality is fundamental to maintaining trust and credibility.

6 Clarity Through Education

We believe informed decisions lead to sustainable outcomes. Through education, financial review, and clear explanations, we replace confusion with understanding and fear with realistic plans.

7 Accountability

We take responsibility for our actions, decisions, and the quality of guidance we provide. Each team member is accountable for upholding NCCB's standards and values.

8 Fairness and Respect

We treat clients, colleagues, creditors, and partners with fairness and respect. We engage professionally, even under pressure or disagreement.

9 Commitment to Sustainable Stability

We focus on long-term financial stability rather than short-term solutions. Our guidance promotes responsible budgeting, disciplined repayment, and habits that support lasting resilience.

10 Ethical Stewardship

We understand the trust placed in NCCB and honor it through consistent ethical conduct. Our work reflects responsible financial guidance that strengthens individuals, families, and communities.

Ethical Standards for NCCB Credit Counsellors

An NCCB Credit Counsellor is entrusted with sensitive information and important decisions that affect a client's financial stability and dignity. The standards below define the professional conduct expected in every counselling engagement.

An NCCB Credit Counsellor



Our Team and Shared Responsibilities

At NCCB, our people are the foundation of everything we achieve. We are committed to a workplace that is safe, inclusive, and respectful, where every team member can do their best work and grow with confidence. We want each person to feel supported, valued, and empowered to reach their full potential.

Our strength comes from the diversity of our backgrounds, skills, and perspectives. We succeed when we work together with professionalism, openness, and mutual respect. By building a culture rooted in collaboration and accountability, we ensure that every voice matters and every contribution helps advance our mission.

NCCB sets clear expectations for a healthy and respectful workplace, including:

- Diversity and Inclusion
- Respect at Work and Zero Tolerance for Harassment
- Speak Up Protection and Non-Retaliation
- Professional Communication and Responsible Use
- Workplace Boundaries and Relationship Disclosure
- Leadership Expectations and Manager Accountability



Diversity and Inclusion

At NCCB, diversity strengthens our work and improves the way we serve. When people with different backgrounds, cultures, experiences, and perspectives come together, we become better listeners, better problem-solvers, and better advocates for the individuals and communities who rely on us.

We are committed to building a workplace where everyone feels respected, included, and able to contribute fully. Inclusion means creating an environment where people can speak openly, collaborate confidently, and bring their authentic selves to work without fear of bias or exclusion.

NCCB supports fair opportunities for growth and development at every level of the organization. Through thoughtful hiring, training, and workplace practices, we strive to widen representation, strengthen belonging, and ensure that every team member has the support needed to thrive.



Respect at Work and Zero Tolerance for Harassment

NCCB is committed to a workplace where every person feels safe, respected, and able to contribute fully. Discrimination, harassment, intimidation, bias, or prejudice has no place in our organization. We do not tolerate unfair treatment based on any protected characteristic under law or NCCB policy.

This standard applies to everyone connected with NCCB, including employees, clients, vendors, contractors, and visitors. It also applies in every setting where NCCB work occurs, including the workplace, off-site meetings, business travel, work-related events, and any communication connected to NCCB.

Discrimination and harassment can take many forms. It may be direct or subtle, intentional or careless, and can include inappropriate jokes, offensive remarks, unwanted behavior, or actions that create a hostile environment. Every team member is expected to uphold a culture of respect and to speak up promptly when misconduct is observed or experienced. Reporting concerns helps protect people, preserves trust, and strengthens NCCB's integrity.

Speak Up Protection and Non-Retaliation

At NCCB, speaking up is a responsibility and it must also be safe. Every team member is expected to report suspected legal, regulatory, or ethical concerns, including potential breaches of this Code and our Core Values. This expectation also includes reporting any behavior that appears to be retaliation.

NCCB strictly prohibits retaliation in any form against anyone who raises a concern, asks a question, or cooperates in an inquiry in good faith. This protection applies regardless of who the report involves. Retaliation undermines trust, harms our culture, and violates NCCB standards, and it will be addressed promptly and appropriately.



Professional Communication and Responsible Use

Clear communication is part of ethical service. Whether we are speaking, writing, emailing, texting, or posting online, NCCB communications must be professional, accurate, and respectful. Strong communication builds understanding and trust. Poor communication creates confusion and can expose individuals and NCCB to legal, compliance, and reputational risk.

All NCCB business communication must take place through approved NCCB systems. NCCB email, voicemail, and authorized messaging tools may be used for limited personal use when appropriate. However, personal email accounts and non-approved applications, such as WhatsApp, WeChat, or personal text messaging, must not be used for NCCB business communication beyond simple logistical coordination.

We respect that team members use social media and other personal platforms in their personal lives. At the same time, you must not post, comment on, or disclose NCCB confidential information, including client details or internal matters. You must also not present yourself as speaking on behalf of NCCB or provide financial advice. Keeping clear boundaries protects clients, protects NCCB, and protects you.



FAQ

What if a client contacts me on WhatsApp? Can I reply?

You may respond briefly to acknowledge the message and direct the client to an approved NCCB channel, such as your NCCB email or official phone line. Do not discuss client details or provide counselling guidance through WhatsApp unless Legal or Compliance specifically authorizes an exception.

I use social media frequently. Should I stop?

No. You may continue to use social media personally, but use good judgment and exercise discretion. Remember that your online activity can be shared beyond your intended audience, and it may affect NCCB's reputation. When in doubt, avoid commenting on NCCB, client matters, or financial topics that could be interpreted as advice.

Workplace Boundaries and Relationship Disclosure

NCCB is committed to a professional environment where trust, fairness, and objectivity are protected. Personal relationships must never interfere with professional judgment or create the appearance of favoritism, pressure, or bias. This is essential for protecting our colleagues, our clients, and the integrity of our counselling work.

Romantic, dating, or sexual relationships may create a real or perceived conflict of interest when they involve two NCCB employees or when they involve an employee and an external party connected to NCCB's work. To prevent misunderstandings and protect everyone involved, employees are required to disclose such relationships promptly to their manager, Employee Relations, or Compliance. This allows NCCB to apply appropriate safeguards, which may include reporting changes, supervision adjustments, or other conflict controls. Managers who become aware of such relationships must notify Employee Relations so the matter can be handled appropriately.

Relationships that require disclosure include current or recent romantic, dating, or sexual involvement with:

Another NCCB employee when either person is in the same division, when one person is in a senior leadership role, or when there is a reporting relationship, oversight responsibility, or potential business interaction that could affect objectivity.

An external business contact, including a client, a client's employee, a vendor, a regulator, or any individual or organization that provides services to or receives services from NCCB, where there is business interaction or the potential for such interaction.

Employees must also disclose these relationships upon joining NCCB if they already exist. Disclosure is not about judgment. It is about protecting professional integrity and ensuring that NCCB remains fair, ethical, and consistent in its conduct.



FAQ

What if I enter a relationship with someone in my division, but we are unlikely to work together?

You still must disclose it. Even without direct collaboration, being in the same division can create perceived conflicts or future overlap. Reporting the relationship early allows NCCB to prevent issues before they arise.

Leadership Expectations and Manager Accountability

Managers at NCCB are guardians of our culture. They are responsible not only for results, but also for how work is performed and how people are treated. This includes coaching and supporting team members, setting clear expectations, helping employees develop and meet goals, and providing timely, constructive feedback.

Managers also have a special duty to promote a workplace that is respectful, inclusive, and collaborative. They must ensure fair opportunities for all team members and respond promptly to concerns that could affect safety, trust, or performance. Most importantly, managers are expected to lead by example. In difficult moments, their conduct sets the tone for the entire team.

Every manager must demonstrate the standards in this Code and reinforce NCCB's Core Values through daily decisions, client interactions, and internal leadership. Accountability is not optional. It is part of the role.

FAQ

What if a direct report tells me about a possible Code violation?

Take the concern seriously and escalate it promptly to Compliance, Legal, or Employee Relations. Do not investigate the matter on your own, and do not promise outcomes. Your responsibility is to ensure the concern reaches the right channel for proper review.



Understanding NCCB

Raising Concerns and Reporting Incidents

At NCCB, we take every concern seriously. No matter how an issue is raised, it will be reviewed carefully, respectfully, and as confidentially as possible. If you become aware of any actual or potential breach of this Code, our Core Values, or any applicable laws, regulations, ethical standards, internal controls, auditing procedures, or NCCB policies, you are expected to report it promptly.

If you are unsure whether a situation is a violation, you should still speak up. Reporting concerns helps protect our clients, our colleagues, and NCCB's reputation. NCCB provides multiple ways to raise concerns in good faith, and retaliation is strictly prohibited.

How to Raise a Concern

You may contact your HR Manager, Compliance Manager, or the Legal Department at the National Credit Counselling Bureau.

+1 (214) 710-1234

Available from any phone worldwide

You may also raise a concern through NCCB's Business Integrity channels, either anonymously or with your name disclosed. These reporting options include a hotline and a secure web form, both operated by an independent third party trained to handle sensitive integrity matters confidentially. The channels are available 24 hours a day, seven days a week.



Confidential Reporting and Non-Retaliation

NCCB is committed to making it safe for every team member to speak up. If you report a concern in good faith, you will be treated with respect, and your report will be handled carefully and as confidentially as possible. Retaliation of any kind against anyone who raises a concern is strictly prohibited, regardless of who is involved.

Reporting concerns is part of your responsibility at NCCB. Failure to report suspected misconduct may result in disciplinary action, up to and including termination. Our goal is not to create fear, but to protect our clients, our colleagues, and the integrity of our work.

Your obligation to report does not limit your legal rights. You may also report conduct you believe violates the law to appropriate government agencies or regulators. NCCB supports transparency and accountability and is committed to compliance with all legal requirements.



FAQ

What to Report?

Report any suspected violation of this Code, our Core Values, or any applicable law, regulation, ethical standard, internal control, auditing procedure, or NCCB policy.

If a Concern Involves Senior Leadership?

You are still expected to report it. All reports are reviewed without bias and handled according to NCCB protocols. If you prefer, you may report anonymously. Retaliation is strictly prohibited, no matter who the concern involves.

SECTION - II

The Code

This section sets the ethical standards and professional expectations that guide conduct at the National Credit Counselling Bureau. It explains how we make decisions, protect client trust, uphold confidentiality, manage conflicts of interest, and comply with the law, so that every action reflects NCCB's consumer-first mission.

- 1 Organizational Integrity and Governance
- 2 Our Commitment to Clients
- 3 Community Impact and Responsible Citizenship
- 4 Accountability and Governance Provisions
- 5 Confidential Reporting of Concerns and Incidents
- 6 Code Interpretation and Legal Notice



Organizational Integrity and Governance

NCCB is built on a simple foundation: trust earned through integrity. Our reputation depends on how consistently we act with honesty, fairness, and responsibility. Every interaction, every record we create, and every decision we make reflects who we are as an organization and how seriously we take our role as a consumer-first credit counselling institution.

Our commitment to ethical conduct goes beyond meeting legal requirements. It is part of our identity and it shapes how we serve clients, work with partners, and support one another as colleagues. By living these standards every day, we protect the people who rely on us, strengthen our credibility, and sustain a culture of transparency and accountability.

NCCB maintains clear expectations and controls to support ethical conduct, including:

- Anti-Bribery and Anti-Corruption Standards
- Anti-Money Laundering and Financial Crime Prevention
- Sanctions Compliance and Restricted Parties
- Privacy, Confidentiality and Data Security
- Personal Financial Responsibility and Outside Business Activities
- Fair Competition and Antitrust Compliance
- No Conditional Services and Anti-Tying Standards
- Accurate Recordkeeping and Responsible Reporting
- NCCB Standards for Neutrality and Consumer Protection



Anti-Bribery and Anti-Corruption Standards

At NCCB, we are steadfast in our commitment to securing and retaining business based on merit and the quality of our performance. Bribery or corruption, whether initiated by our personnel, agents, vendors, or other business associates, is not tolerated under any circumstances.

Our personnel are strictly prohibited from offering anything of value improperly to gain or maintain business or any unfair business advantage. This prohibition extends to public officials, political candidates, employees or officials of state-owned enterprises, counterparts, clients, suppliers, agents, and any other individual with whom the firm conducts or anticipates conducting business. Furthermore, our personnel are prohibited from accepting bribes in any form.

The term "anything of value" encompasses not only obvious improper payments like cash bribes or kickbacks but also includes other forms of direct or indirect benefits such as inappropriate gifts, hospitality, travel, entertainment, charitable and political donations, and offers of employment or internships.

Certain activities, especially those involving interactions with government officials, pose a heightened risk of bribery and corruption. Therefore, prior approval is mandatory before providing anything of value to such individuals, known as "Restricted Recipients," which includes government employees, representatives of government agencies, public international organizations, state-owned enterprises, and public pension funds.

Moreover, our firm strictly prohibits facilitation payments and the utilization of third parties or intermediaries to facilitate improper payments. When engaging third parties, adherence to our established processes and procedures for due diligence and oversight is mandatory. Each individual is tasked with remaining vigilant regarding potential bribery issues and promptly escalating any concerns in accordance with the guidelines outlined in this Code.



FAQ

What if a client inquires about an internship for their child?

You can refer the resume to Human Resource Department of NCCB. However, you must refrain from any further involvement in the recruitment process.

What should I do if I witness a colleague discussing a transaction with an undisclosed third party?

Immediately escalate the issue to Legal or Compliance. All third parties involved in transactions, even if engaged or compensated by another party, must be fully disclosed for proper review.

Does the guidance on this page still apply if I'm not interacting with a Restricted Recipient?

Yes, our prohibition on bribery remains applicable regardless of the recipient. While there's a heightened focus on Restricted Recipients due to their higher bribery and corruption risk, our policies and relevant laws prohibit offering bribes or improper benefits to any individual.

Anti-Money Laundering and Financial Crime Prevention

NCCB is committed to preventing the use of our services to facilitate or conceal criminal activity, including the movement of illegal funds or the financing of terrorism. Protecting our clients, our organization, and the public requires strict compliance with all applicable anti-money laundering and financial crime laws and regulations.

To meet this responsibility, NCCB team members must follow all client identification and verification requirements, including “Know Your Customer” procedures where applicable. We must also remain alert to unusual behavior or suspicious activity that may indicate money laundering, terrorist financing, fraud, regulatory violations, or any activity that lacks a legitimate purpose or is inconsistent with a client’s known circumstances.

If something appears unusual, do not ignore it. Raise the concern promptly through the appropriate channels. You may contact Legal or Compliance, or use the reporting procedures outlined in this Code to seek guidance or submit a report.



FAQ

What if I am not sure whether a client’s behavior is suspicious?

When in doubt, escalate. It is better to ask a question early than to miss a potential issue. Failure to identify and report suspicious activity can have serious consequences.

May I tell a client that I am reporting their activity as suspicious?

No. Do not disclose or discuss a report with the client. Doing so may violate the law and may expose you and NCCB to legal or regulatory consequences.

Sanctions Compliance and Restricted Parties

NCCB is committed to complying fully with all applicable economic and trade sanctions issued by governments and regulatory authorities, including those of the United States and other jurisdictions where we operate. Sanctions can restrict the delivery of services to certain individuals, entities, governments, or regions. If you become aware of any activity that could involve a sanctioned party or a restricted jurisdiction, you must escalate the concern promptly to Compliance or Legal.

Sanctions risk can arise directly or indirectly. This includes situations where a client, a creditor, a vendor, or another party connected to our work may be acting on behalf of, owned by, controlled by, or associated with a sanctioned individual or entity. When there is heightened risk, or you are uncertain, do not proceed without guidance. Escalate the matter so NCCB can apply the appropriate review and safeguards.

FAQ

Do sanctions matter if I am not working directly with restricted countries or parties?

Yes. Sanctions risk can still arise through indirect relationships, such as third parties, affiliates, intermediaries, or beneficiaries connected to a client matter. If anything appears unclear or inconsistent, escalate to Compliance or Legal.

What if I do not see clear proof that a sanctioned party is involved?

Never remove, omit, or obscure relevant information to avoid review. If you suspect a sanctions concern, disclose what you know and escalate it. NCCB relies on accurate information and transparent reporting to meet legal requirements.



Privacy, Confidentiality and Data Security

NCCB handles sensitive personal and financial information every day. Protecting that information is essential to client trust and is required under the privacy and data protection laws that apply in the jurisdictions we serve. While legal definitions may vary, “personal data” generally includes any information that can identify an individual, such as a name, address, phone number, email address, or government identification number.

NCCB is committed to transparency and responsibility in how personal data is collected, used, stored, and shared. We follow applicable laws and internal policies that require appropriate security safeguards, limited access based on legitimate need, and clear procedures for responding to improper disclosure, loss, or unauthorized access. In many cases, individuals also have rights related to how their personal data is processed, corrected, or retained.

All employees, contractors, and agents must protect personal data, follow NCCB privacy policies, and report concerns immediately. If you suspect misuse, unauthorized access, or any privacy incident, escalate it promptly through the appropriate reporting channels. For guidance, contact Compliance or Legal.



Personal Financial Responsibility and Outside Business Activities

NCCB team members are expected to manage their personal financial affairs responsibly and in a way that protects the objectivity and integrity of our counselling services. Personal financial pressure must never influence counselling recommendations, client communications, or the handling of confidential information. Even the appearance of compromised judgment can weaken trust and harm NCCB’s credibility.

Outside employment, consulting work, board service, or side businesses may create real or perceived conflicts of interest. This is especially true when the outside activity relates to credit repair, debt settlement, lending, collections, bankruptcy services, financial advising, or referral-based services. These activities may require disclosure and written approval before you begin.

If you are uncertain whether an outside activity presents a conflict, do not assume it is acceptable. Speak with your manager or Compliance in advance so appropriate safeguards can be applied.

Fair Competition and Antitrust Compliance

NCCB is committed to competing fairly and ethically. Antitrust and competition laws exist to protect free and open markets, benefiting consumers, communities, and responsible organizations. These laws generally prohibit agreements or coordinated behavior with competitors related to pricing, fees, service terms, client allocation, or any other factor that could restrict fair competition.

Because competition laws can be complex and fact-specific, you should avoid informal discussions or arrangements with competitors that could be misunderstood or create legal risk. If you are unsure whether a conversation, meeting, or industry activity is appropriate, seek guidance from Legal or Compliance before proceeding.

FAQ

May I participate in industry forums where pricing or service terms are discussed?

Use caution. Conversations about fees, pricing models, service terms, or business strategy may raise antitrust concerns. If such topics are likely to arise, consult Legal or Compliance in advance for guidance on how to participate responsibly.



No Conditional Services and No Referral Pressure

NCCB counselling must never be tied to the purchase of any product or service, the use of a third party, or the selection of a particular provider. We do not pressure clients toward any option, and we do not restrict support based on a client's choices.

Clients must remain free to consider lawful alternatives and make their own decisions. Our role is to provide clear, unbiased guidance based on the client's circumstances, with integrity, fairness, and respect.



Accurate Records and Responsible Reporting

NCCB relies on complete and accurate records to serve clients properly, meet legal and regulatory requirements, and uphold trust with all stakeholders. Every team member is responsible for ensuring that documentation created or maintained on NCCB's behalf is clear, timely, and truthful.

No one may knowingly misstate, alter, conceal, or omit material information in any record, report, or communication. If you suspect that records are inaccurate, incomplete, or being handled improperly, you must escalate the concern promptly to the appropriate manager, Compliance, Legal, or through the reporting channels outlined in this Code.

NCCB Standards for Neutrality and Consumer Protection

NCCB is a credit counselling organization, and our credibility depends on independence, neutrality, and a strong consumer-first commitment. Clients come to us for guidance they can trust. That trust must never be influenced by personal interests, outside relationships, or business pressure.

When working with affiliates, partners, creditors, attorneys, or service providers, you must remain objective and avoid conflicts of interest, whether real or perceived. Our guidance must always be based on the client's circumstances and best interest. If any situation could compromise, or appear to compromise, NCCB's impartiality, escalate it promptly to your manager or Compliance.



Our Commitment to Clients

At NCCB, the client's best interest is our highest priority. People come to us during moments of stress and uncertainty, and we earn their trust through integrity, professionalism, and respect. We protect confidentiality with great care, provide guidance without bias, and ensure that every interaction reflects our consumer-first mission. Client trust is not assumed. It is earned through what we do, how we communicate, and how consistently we uphold our standards.

This area of the Code outlines the practices that protect clients and strengthen confidence in NCCB's counselling services:

- Confidentiality and Protection of Client Information
- Responsible Handling of Sensitive Information
- Quality Review and Counselling Oversight
- Gifts, Hospitality, and Outside Benefits
- Conflicts of Interest and Maintaining Objectivity
- Fair Dealing and Ethical Conduct



Confidentiality and Protection of Sensitive Information

Protecting confidential information is fundamental to NCCB's mission and to the trust clients place in us. Every NCCB team member is responsible for safeguarding client information, NCCB internal information, and any other sensitive data accessed or created through work at NCCB. This includes information about current or prospective clients, NCCB operations, and any confidential supervisory or regulatory information received or generated in the course of our duties.

Access to confidential information must be limited to authorized individuals with a legitimate business need. Sharing information internally should occur only when it supports NCCB's work and complies with privacy requirements. Confidential information must never be sent to personal email accounts or shared through non-approved messaging platforms. Using unauthorized systems to store, transmit, or discuss NCCB or client information is strictly prohibited.



Responsible Handling of Sensitive Information

In the course of counselling, NCCB team members may learn highly sensitive information about a client's personal life, finances, employment, health, or legal circumstances. This information must be treated with the highest level of confidentiality and care. It may be used only for legitimate NCCB purposes, such as providing counselling services, meeting legal or regulatory requirements, and protecting the client's interests.

Client information must never be used for personal benefit, shared for convenience, or leveraged to market unrelated services. It must not be disclosed to any third party unless there is proper authorization and a lawful, documented basis to do so.



FAQ

What should I do if I receive sensitive information that I do not need for my role?

Do not forward it, download it, or store it outside NCCB-approved systems. Limit access to those with a legitimate need to know. If you are unsure how to handle it, consult your manager or Compliance.

A creditor, vendor, or outside party asked me to share client details to “speed up” a process. What should I do?

Do not share client information unless you have the client's authorization and a lawful, documented basis for disclosure. If you are uncertain, escalate to Compliance or Legal before responding.

Can I discuss a client case with colleagues to get advice?

Yes, but only when there is a legitimate business need. Share the minimum information required, avoid unnecessary personal identifiers, and use only NCCB-approved communication channels in line with confidentiality procedures.

Quality Review and Counselling Oversight

NCCB is committed to providing counselling that is accurate, ethical, and consistent. To protect clients and uphold our standards, we maintain clear quality review and escalation practices. These processes help ensure that guidance is appropriate, compliant, and always aligned with the client's best interest.

Some situations require added care and additional review. This may include cases involving heightened vulnerability, suspected fraud, threats of harm, legal notices, or complex debt structures. In such circumstances, do not make assumptions or proceed without support. Escalate the matter promptly to your manager or the appropriate internal resource, and consult Compliance or Legal when needed.



Gifts, Hospitality, Travel, and Entertainment

NCCB supports professional relationship-building with clients and third parties when it serves a legitimate business purpose and aligns with our consumer-first mission. However, anything we offer must always be appropriate, reasonable, and free from any intent, or appearance, of influencing judgment or outcomes.

To protect NCCB and our team members, prior approval is required before providing:

Any gift, or

Any travel or entertainment that exceeds local limits to a client or third party.

Additional safeguards apply when the recipient is a **restricted recipient**, including employees or representatives of governments, government agencies, public international organizations, state-owned enterprises, or public pension funds. Many laws and regulations limit what may be offered in these situations. When a restricted recipient is involved, you must obtain pre-approval and follow NCCB requirements before proceeding.

When in doubt, do not proceed. Seek guidance from your manager, Compliance, or Legal.



FAQ

May I invite a client or prospective client to dinner?

Yes, appropriate business meals may be permitted when they support a legitimate business purpose. Pre-approval is required if the meal involves a restricted recipient or if you expect the cost to exceed local entertainment limits. Follow the NCCB approval process before extending the invitation.

Conflicts of Interest and Maintaining Objectivity

Because clients rely on NCCB for unbiased guidance, we must protect our independence in every interaction. A conflict of interest occurs when personal, financial, or relational interests interfere, or appear to interfere, with objective counselling and professional judgment. Even the appearance of a conflict can weaken trust and damage NCCB's credibility.

NCCB team members must avoid activities, relationships, or outside interests that could compromise impartiality or create favoritism, pressure, or divided loyalty. You must never use your role at NCCB to pursue personal gain, benefit a third party, or take advantage of opportunities discovered through client work or internal information.

If you become aware of an actual or potential conflict, do not ignore it or attempt to manage it alone. Disclose and escalate the matter promptly to your manager, Compliance, or Legal so appropriate safeguards can be applied.



Fair Dealing and Ethical Conduct

NCCB's credibility is built on fairness, honesty, and respect. We serve clients best when our guidance is transparent, our actions are consistent, and our decisions are grounded in ethics. We do not seek advantage through improper behavior, and we never compromise integrity to achieve results.

Unfair dealing has no place at NCCB. This includes manipulating others, withholding material information, misusing confidential data, misrepresenting facts, or applying pressure that undermines informed choice. In every interaction, whether with clients, creditors, partners, vendors, or colleagues, we are expected to act professionally, communicate truthfully, and treat others fairly.

Community Impact and Responsible Citizenship

NCCB's work extends far beyond our offices. Every counselling session, every ethical decision, and every respectful interaction can strengthen families, support small enterprises, and improve financial resilience across the communities we serve. Our reputation is shaped not only by what we do internally, but also by the trust we build and the outcomes we help create.

As a responsible organization, we recognize that our mission is connected to community well-being. We aim to contribute positively through responsible practices, meaningful partnerships, and thoughtful community engagement. When we support education, financial literacy, wellness, and inclusive opportunity, we help build stronger communities and a more stable future.

We also understand that community involvement must be conducted with care and integrity. Our actions must remain consistent with NCCB's consumer-first mission, applicable laws, and the standards set in this Code. We engage respectfully, avoid conflicts of interest, and ensure that our involvement reflects transparency, fairness, and accountability.

This area outlines key standards for community-focused responsibility, including:

- Human Rights, Sustainability, and Inclusive Opportunity
- Charitable Giving and Community Support
- Political Activity and Contributions
- Personal Financial Interests and Conflict Awareness
- Outside Activities and Community Involvement
- Ethical Communication and Responsible Counselling Conduct
- Tax Compliance and Responsible Reporting



Human Rights, Sustainability, and Inclusive Opportunity

NCCB recognizes that financial well-being is closely tied to human dignity, community stability, and long-term sustainability. We are committed to conducting our work in a way that respects human rights, supports ethical practices, and promotes fair access to opportunity.

Our mission is not only to help people manage debt, but also to strengthen financial resilience through responsible guidance and education. We support inclusive opportunity by advancing financial literacy, encouraging sound budgeting habits, and helping individuals and small enterprises regain stability with dignity. In our operations and partnerships, we strive to consider social and environmental responsibility where relevant and to act in ways that contribute to healthier, more sustainable communities.



Charitable Giving and Community Support

NCCB supports our communities through charitable contributions, volunteer service, partnerships with nonprofit organizations, and participation in community events. We encourage meaningful engagement that aligns with our mission and strengthens the well-being of the communities we serve.

At the same time, charitable giving must never be used, or appear to be used, to influence a business decision or gain improper advantage. Donations must not be tied to counselling outcomes, referrals, creditor relationships, or any expectation of favorable treatment from a public official, client, or prospective client.

If you are unsure whether a proposed donation, event sponsorship, or charitable request is appropriate, seek guidance from Compliance before taking action.



FAQ

A client asked me to donate to a specific charity. May I do so?

Possibly, but proceed with caution. In some situations, donating at a client's request could create the appearance of improper influence. Before proceeding, consult Compliance or the appropriate NCCB engagement function for guidance.

Political Activity and Contributions

NCCB respects the right of team members to participate in political activities in their personal capacity. At the same time, laws governing political contributions and engagement can be complex, vary by jurisdiction, and carry significant penalties for non-compliance.

To protect individuals and NCCB, political activity must remain clearly separate from NCCB business. Team members must not imply NCCB endorsement, use NCCB resources, or allow political involvement to influence professional decisions. Where required by law or policy, prior approval may be necessary before making political contributions or participating in certain political activities. In some jurisdictions, these requirements may also extend to activities involving immediate family members.

If you are considering political involvement and are unsure about applicable rules, consult Compliance before proceeding.



Personal Financial Interests and Conflict Awareness

Because NCCB provides impartial credit counselling, every team member is expected to avoid personal financial activities that could compromise, or appear to compromise, professional objectivity. Personal interests must never influence counselling guidance, client communications, or decisions made on behalf of NCCB. Protecting client trust requires both ethical conduct and the clear avoidance of conflicts.

If you plan to enter into a personal financial arrangement, investment, or business interest that could intersect with NCCB's work or create the appearance of a conflict, you must disclose it in advance and obtain the required approval. This expectation also applies to financial activities involving members of your household or anyone financially dependent on you. If you are unsure whether an activity requires disclosure or approval, consult your manager or Compliance before proceeding.



Outside Activities and Community Involvement

NCCB team members are expected to use sound judgment and uphold high ethical standards in all activities, including personal and community involvement. Volunteer work, nonprofit support, and other outside activities can be positive, but they must not interfere with your responsibilities at NCCB, create conflicts of interest, or harm client trust.

Some outside activities may require prior approval, whether they are paid or unpaid. This is especially important when you hold a leadership role, represent an organization publicly, or engage in work connected to financial services, credit-related industries, or referral-based activity. These situations can create real or perceived conflicts that need to be reviewed and managed appropriately.

If you are unsure whether an outside activity requires approval, consult Compliance before you proceed.

Ethical Communication and Responsible Counselling Conduct

NCCB communications must be truthful, respectful, and easy to understand. We never mislead clients about our services, fees, timelines, expected outcomes, or legal implications. We do not use fear-based language, exaggeration, or pressure tactics, and we never exploit financial distress to drive decisions.

Counselling integrity can be compromised when guidance is inaccurate, when a client is pushed toward a preferred outcome, when confidential information is mishandled, or when promises are made that cannot be supported. NCCB maintains policies, supervision, and quality controls to reduce these risks and protect the people we serve.

If you notice misleading materials, improper outreach, or counselling practices that conflict with this Code, report the concern promptly through the appropriate channel. Failure to follow these standards may result in disciplinary action and may expose both individuals and NCCB to legal and reputational harm.



Tax Compliance and Responsible Reporting

NCCB is committed to meeting all tax, filing, and reporting obligations required by law. We maintain accurate records and provide truthful information to regulators and authorities.

No team member may participate in, support, or conceal unlawful activity, including any effort to falsify documents, manipulate records, or misrepresent information to bypass legal requirements. If you suspect improper reporting or record manipulation, escalate the concern promptly through the appropriate channels.

The Code

Accountability and Governance Provisions

Reviewing this Code is an important step, but living it is what protects clients and preserves trust. Every NCCB team member plays a direct role in safeguarding the organization's credibility by acting with integrity, maintaining confidentiality, and delivering impartial, consumer-first guidance.

Questions and concerns are expected, and seeking guidance is encouraged. If you need clarification on any part of this Code, or if you are unsure how to handle a situation, you should promptly consult your manager or contact Compliance. Asking early helps prevent harm, protects clients, and supports consistent ethical decision-making.

Waivers of this Code are uncommon and will be granted only when legally permissible and consistent with NCCB's mission and consumer protection responsibilities. Any waiver involving an executive officer or Board member requires approval by the Board of Directors or an authorized committee. Waivers for all other personnel require written approval from NCCB's General Counsel or Chief Compliance Officer, or their designated representatives, and may be disclosed when required by law or policy.



The Code

Confidential Reporting of Concerns and Incidents

At National Credit Counselling Bureau, we are committed to maintaining the highest standards of integrity and accountability. To support this commitment, we have established secure and confidential channels for reporting concerns and incidents. If you observe or suspect any unethical behavior, legal violations, or breaches of our Code of Conduct, you are encouraged to report them promptly. We ensure that all reports are thoroughly reviewed and investigated while maintaining the strictest confidentiality. Retaliation against anyone who reports a concern in good faith is strictly prohibited. You can report concerns anonymously through our third-party hotline or web form, available 24/7 in multiple languages, or directly to your manager, Compliance, or Legal department. Your vigilance and willingness to report issues are vital to upholding our ethical standards and protecting our firm's reputation.

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Code Interpretation and Legal Notice

This Code of Business Conduct and Ethics establishes the ethical framework that governs the work of the National Credit Counselling Bureau. While it provides clear standards and guidance, it cannot anticipate every situation that may arise in the course of credit counselling and related activities. Team members are expected to exercise sound professional judgment and to seek guidance from their manager, Compliance, or Legal whenever uncertainty exists.

The policies and standards described in this Code may be updated from time to time to reflect changes in law, regulation, or NCCB operations. NCCB reserves the right to revise or amend this Code as necessary. This document does not create an employment contract or guarantee continued employment.

Failure to comply with this Code, or failure to report known or suspected violations, may result in disciplinary action, up to and including termination. Certain violations may also expose individuals to civil or criminal liability under applicable law. For detailed policy guidance or clarification on specific matters, employees should consult the relevant NCCB policies or contact Compliance or Legal directly.







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