

Code of Ethics & Conduct

Introduction

This Code of Ethics & Conduct outlines the principles and guidelines that all employees, contractors, Board members, shareholders and stakeholders are expected to follow in their interactions and decision-making.

Our Company firmly believes that its success is the outcome of the conduct of each and every member of the Company. Our Company has applied best practices which promote effective Corporate Governance and appropriate individual behaviour within a framework of the highest level of ethics. The Company is committed to maintaining the highest standards of ethical conduct in all aspects of its operations.

Core Values

UNIVERSAL FINANCIAL ASSOCIATES, INC is guided by the following core values, which serve as the foundation of our ethical principles:

Integrity: We are committed to honesty, transparency, and doing what is right, even when it is challenging.

Respect: We treat all individuals with dignity, fairness, and respect, valuing diversity and inclusivity.

Teamwork: We work together to get the job done.

Objectivity: Don't make career decisions based on whom you like best.

Corporate Responsibility: We accept responsibility for our actions, decisions, and their consequences.

Accountability: We are accountable for upholding our ethical standards and taking corrective actions when necessary.

Growth: Always pursue professional growth.

Compliance with Laws & Regulations

All individuals associated with UNIVERSAL FINANCIAL ASSOCIATES, INC are expected to comply with all applicable laws and regulations governing our activities. Violations of these laws and regulations will not be tolerated.

Conflicts of Interest

The Company has entrusted us with the responsibility to advance its legitimate interests when the opportunity to do so arises. Company property or information must never be used for personal gain or personally take for ourselves any opportunity that is discovered through our position with the Company.

Employees and stakeholders should avoid situations that could create a conflict of interest between their personal interests and the Company interests. If such conflicts arise, they should be disclosed promptly.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from their supervisors and/or executive management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR Department.

Confidentiality

Essential to the Company business success is the protection of confidential and proprietary company information, as well as non-public information entrusted to employees, customers and other business partners and stakeholders. Information received in the course of one's Company work and responsibilities should be kept confidential at all times and shall not be disclosed to unauthorized individuals, both during and after their affiliation with the organisation.

Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or non-public information about other companies, including current or potential suppliers. Employees and stakeholders shall not disclose confidential and non-public information without a valid business purpose and proper authorisation.

Gifts & Gratuities

Accepting gifts, favours or gratuities from individuals, organisations or entities with which the Company does business may create conflicts of interest. Employees and stakeholders should exercise caution and seek guidance when faced with such situations.

The Company is committed to competing solely on the merit of our services. The Company is bound to avoid any actions that create or might create a perception that favourable treatment was sought, received or given by the Company in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom we do or may do business. The Company will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business incentives that would violate any law, regulation or Company or customers policies or would cause embarrassment or reflect negatively on the Company's name and reputation.

Fair Competition

Our Company is committed to fair and ethical competition. We do not engage in unfair or anti-competitive practices, including price-fixing, bid-rigging, or market manipulation.

Harassment & Discrimination

We maintain a workplace free from discrimination, harassment, or any form of unfair treatment. We respect the diversity of our workforce and uphold anti-discrimination and anti-harassment policies.

Reporting Violations

Employees and stakeholders are encouraged to report any violations of this Code of Ethics & Conduct to the appropriate Company channels. Whistle-blower protections will be provided to those who report in good faith.

Consequences of Violations

Violations of this Code of Ethics & Conduct may result in disciplinary action, up to and including termination of employment or business relationships, and legal action if warranted.

Review and Updates

This Code of Ethics & Conduct will be reviewed periodically and updated as necessary to ensure it reflects the Company values and principles.

Conclusion

UNIVERSAL FINANCIAL ASSOCIATES, INC is dedicated to upholding these ethical standards and values, and we expect all individuals associated with us to embrace and uphold this Code of Ethics in all of their actions and decisions.