

Code of Ethics/Conflict of Interest Policy

Adopted November 21, 1996

A credit union is a member-owned, nonprofit cooperative thrift institution formed for the purpose of encouraging savings by offering a good return, using collective monies to make loans at competitively low interest rates to members and providing other member services on a cooperative basis. Members are united by a defined field of membership and democratically operate the credit union under state and federal law and regulation.

This credit union will conduct its relationships and operations in accordance with this purpose and uphold its fundamental commitment to serving its members. This credit union is committed to the highest standards of responsibility and conduct and subscribes to the following guidelines:

Responsibilities to the Members:

• To provide the highest level of personal financial services in a courteous and professional manner and to treat all individuals fairly without regard to age, race, creed, national origin, sex, religion, social or economic level.

- To encourage thrift and savings and to protect the assets placed in our care and custody.
- To provide consumer loan services at the least possible cost in the exercise of the wise use of credit.

• To practice and maintain high standards of sound management, including efficiency, integrity, and economy of operations.

- To adhere to democratic and cooperative principles within the credit union and encourage and facilitate active member participation in its democratic process.
- To provide members with timely and accurate information regarding the financial conditions, operations and services of the credit union and of their individual accounts or transactions.
- To increase knowledge and ability of members to manage and control their financial well-being through counseling and providing educational information and materials.
- To preserve and protect the privacy and confidentiality of all member financial records and transactions. Disclosure of financial conditions or transactions will be made only with the written approval of the member, due legal process, or in accordance with the law.
- To abide by the letter, spirit and intent of state and federal consumer protection laws and regulations and to provide members with complete and accurate information concerning their rights.

Responsibilities to the Credit Union Movement:

• To always promote and protect the best interests and reputation of the credit union movement and avoid and resist influences and practices which are detrimental to it.

• To associate and cooperate with other credit union organizations in building a strong democratic movement for more effective service to members.

Responsibilities to Society:

- To participate in community affairs as a responsible member of the society in which the credit union is a part.
- To make credit union membership available to as many people as possible within our field of membership.
- To observe the highest standards of personal conduct at all times.
- To strictly uphold the laws, by-laws, rules, policies and regulations relating to the operation of the credit union.

• To guard against the use of the credit union position for personal or financial advantage or special privilege and avoid conflicts of interest with its policies and operations.

• To carry out the duties and responsibilities of the credit union position to the best of one's abilities and to seek out and participate in opportunities to increase that knowledge and skill.

• To always speak of the credit union and any credit union related matters in a positive, truthful and honest fashion, and maintain any and all confidential or sensitive information in the strictest manner possible.

Conflict of Interest Policy:

It is in the best interest of the Credit Union and its membership that all persons acting on behalf of the credit union exercise their duties using independent judgment and without influence of any facts which may give rise to a conflict of interest. It is the affirmative duty of all officers, directors, committee members and employees to fully disclose to the Board any situation where he/she may have a potential conflict of interest.

While serving in any capacity related to the Credit Union, a conflict of interest may arise in the event that:

- A person uses his or her position to promote and further their own self-interests, be they financial or otherwise.
- A person serves on the Board or any committees while actively soliciting or working for companies, products or services which compete in any way with the Credit Union.

• A person actively participated in or votes on a decision by the Board or any committee which will directly or indirectly affect his or her personal interest or the personal interests or any other organization or entity in which he/she has a substantial interest.

• A person receives any gift or personal favor of substantial value in return for special consideration granted in the past, present, or to be granted in the future.

• A person has or makes any personal investments which might conflict with the interest of the Credit Union, or might influence his or her judgment when carrying out his or her Credit Union duties.