

Family First Credit Union

Personnel Ethics Policies

Code of Conduct

General

Family First Credit Union has a tradition of ethical conduct and high integrity on the part of its employees, officers, committee members, and others associated with the operation of the credit union.

All persons associated with the operation of the credit union must conduct themselves with the highest standards of integrity, honesty, and fair dealings to preclude conflict between the interests of the credit union and their personal interests. Such persons shall avoid any actions or relationships which could adversely affect, or have the appearance of adversely affecting, their judgment or actions in performing their duties.

Scope

This policy applies to officers, employees, committee members, and all others associated with the operation of Family First Credit Union.

Standards of Business Conduct

It is the policy of Family First Credit Union to conduct its business in accordance with applicable laws of the United States and the states in which it conducts business and in accordance with ethical standards of business conduct. All managers, other employees, officers, committee members, or others associated with the operation of the credit union shall adhere strictly to this policy.

All illegal or unethical acts are prohibited under this policy, including but not limited to the following:

- ❖ Making or accepting bribes, kickbacks, or other illegal payments by or on behalf of the credit union directly or indirectly.
- ❖ Maintaining funds or assets at the credit union for an illegal or improper purpose, or maintaining funds or assets which are not clearly disclosed in the books and records of the credit union, for any purpose.
- ❖ Making false, misleading, or artificial entries in the books or records of the credit union.
- ❖ Making payments by or on behalf of Family First Credit Union for any purpose other than that described by supporting documents maintained by the credit union.
- ❖ Making directly or indirectly, by or on behalf of the credit union illegal political contributions.
- ❖ Borrowing or otherwise removing from the credit union premises (without management or, if appropriate, board approval) cash, negotiable instruments,

equipment, furniture, or other property belonging to Family First Credit Union and its members.

- ❖ Using or disclosing credit union records, plans, or data (except as necessary in the course of normal business activities) unless authorized by credit union management. In this regard, it is imperative that all member information and transactions with Family First Credit Union be handled in strict confidence by credit union employees, officers, committee members, and representatives.

Conflict of Interest

Officers and employees cannot handle transactions involving immediate family members or credit union members whom they have personal financial dealings with. Employees should not put themselves in the situations of dealing with personal business relations that could influence, or give the appearance of influencing, the outcome of a business decision.

Employees and volunteers should avoid any conflict of interest when dealing with members, vendors, contractors, or anyone seeking to do business with the credit union. Employees and volunteers are to act in the best interest of the credit union. Employees and volunteers should disclose promptly in writing a conflict of interest including any circumstance or arrangement including family or other personal relationships, which might persuade the employee or volunteer from acting in the best interest of the credit union.

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Employee Training Policy

Family First Credit Union provides training in credit union products, services, and computer usage to new employees. Employees also receive on-the-job training and may attend external training programs to learn their jobs and improve their skills. Additional training varies depending on the employee's job position. Employees also have the opportunity to participate in self-study programs. Cross training on the job is provided to the extent that Family First Credit Union's resources, needs, time requirements, and other logistical requirements can be accommodated.

Family First Credit Union will provide periodic training for employees, officers, and management about their rights and responsibilities. Employees, officers, and management are required to attend and participate in this training.

Continuing compliance training on the requirements of applicable federal and state law will be provided for all staff and will be coordinated by the compliance officer.

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Fraud Policy

Policy Statement

Family First Credit Union considers any form of fraud or dishonesty on the part of its employee as unacceptable conduct. Acts considered to be either fraudulent or dishonest include but are not limited to:

- ❖ Manipulation of loan accounts, documents, computer records, shares, share drafts, or other types of accounts;
- ❖ Theft of any kind, including stealing from members' accounts, overpayment of dividends, or creating fictitious loans;
- ❖ Check/Share draft kiting;
- ❖ Forgeries
- ❖ Unauthorized or unapproved salary advances or overtime reimbursement;
- ❖ Intentional violation of credit union rules, internal controls, regulations, or procedures;
- ❖ Intentionally failing to secure collateral, to properly record a security interest in collateral or to pledge a member's shares as collateral without that member's permission;
- ❖ Unauthorized use of any computer, equipment, or software;
- ❖ Criminal activity involving a financial institution that uses the Family First Credit Union as a conduit for criminal activity (examples include structuring transactions to evade Bank Secrecy Act requirements or laundering monetary instruments).

I, _____ have read and understand the following policies. I have been provided with a copy of the following policies.

Personnel Ethics Policies – Code of Conduct
Personnel Ethics Policies – Employee Training Policy
Personnel Ethics Policies – Fraud Policy

Dated this _____ day of _____, 20____

Employee Signature

Witness

IN GENERAL, to assure the credit union's compliance with the Personnel/Ethics Policy including the Code of Conduct and Fraud Policy. All employees of Family First Credit Union will participate in all training efforts as required by management. All of the officers of the Board and all members of the credit union staff will take full responsibility for privacy rights of member's information.

Adopted _____ Date _____

Reviewed _____ Date _____

Reviewed _____ Date _____

Reviewed _____ Date _____