

Family First Credit Union

Whistleblower Protection Policy

Purpose:

The purpose of this policy is to encourage employees and others who have serious concerns about any aspect of the Credit Union's work to come forward and voice those concerns. The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the Credit Union without fear of victimization, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable you to raise serious concerns rather than ignoring a problem or 'blowing the whistle' outside.

'Whistleblowing' should be viewed as a positive act that can make a valuable contribution to the Credit Union's efficiency and long-term success. The Board is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices.

Guidelines:

- 1. Whistleblowing-**The act of whistleblowing occurs when a person exposes misconduct, alleged dishonest or illegal activity occurring in an organization. Misconduct and illegal activities are most often discovered by people involved with the Credit Union and its operations and can include: directors, volunteers, employees, members and third party service providers.
- 2. Reporting Responsibility-** Each director, volunteer, and employee of the Credit Union has an obligation to report questionable, improper, fraudulent or illegal conduct in accordance with this Whistleblower Policy. Examples of this conduct include:
 - a. Violations of the Credit Union's Code of Conduct;
 - b. Violations of law;
 - c. Unethical behavior;
 - d. Dangerous or unsafe practices;
 - e. Questionable financial practices;
 - f. Falsifying documents or records;
 - g. Theft;
 - h. Discrimination; and
 - i. Harassment.

3. Reporting Personnel- Employees can report violations of conduct to any one of the following individuals/committees:

- Supervisory Committee
- Executive Management (CEO, CFO)
- Compliance Officer
- Manager

4. Acting in Good Faith- Directors, volunteers, and employees reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Credit Union's code of conduct, questionable, inappropriate or illegal activity. Anyone making allegations that prove to be made maliciously, recklessly, or falsely will be viewed as a serious disciplinary offense and may result in discipline action, up to and including dismissal from the volunteer position or termination of employment.

5. Confidentiality- Reports of concerns will be kept as confidential as possible consistent with the need to conduct an investigation of the allegations.

6. No Retaliation- Directors, volunteers, and employees are encouraged to raise concerns within the Credit Union for investigation and appropriate action. In the event that questionable, inappropriate or illegal activity is reported in good faith the whistleblower will not be subject to retaliation or, in the case of an employee, adverse employment consequences.

7. Applicable Laws-The Credit Union, its representatives and employees will comply with all applicable laws and cooperate with government officials.