

Code of Ethics

Lacamas Community Credit Union employees and volunteers maintain the highest ethical standards in the conduct of Credit Union affairs and conduct the Credit Union's business with integrity and comply with the letter and spirit of applicable laws in a manner that excludes considerations of personal advantage or gain. All staff and volunteers will project a positive image of themselves and of the Credit Union and conduct the day-to-day affairs of the Credit Union in an ethical, responsible and lawful manner.

In doing so Lacamas Community Credit Union officials and representatives promote and maintain the values and responsibilities listed below:

Responsibilities to Members

- Remain knowledgeable of Credit Union products and services in order to continually provide each member or prospective member with the information they need to make sound financial decisions.
- Provide services to all individuals fairly and consistently without regard to race, color, age, national origin, sex, sexual orientation, religion, marital status, or social or economic level.
- Continually perform duties and make decisions that are in the best interest of our membership.
- Practice and maintain high standards of management, efficiency, integrity and economy of operations.
- Preserve the privacy and confidentiality of member records and information.
- Remain knowledgeable of and comply with the letter and spirit of laws and regulations and provide members with complete and accurate information concerning their rights.
- Abide by security, safety and soundness policies and practices in order to safeguard the assets of our membership.

Officials and Staff

- Continually increase knowledge and skill in order to carry out assigned duties and responsibilities to the Credit Union to the best of our ability.
- Freely share knowledge with team members in order to maintain consistently high standards of member service.
- Never use a Credit Union position to solicit for themselves or for a third party (other than the Credit Union itself) anything of value from anyone in return for business, service, or confidential information of the Credit Union.
- Never use a Credit Union position to accept anything of value (other than bona fide salary and fees) from anyone in connection with the business of the credit union either before or after a transaction is discussed or consummated.
- Any Credit Union official that is offered or receives something of value beyond the reasonable dollar value authorized (\$50.00) is required to provide full disclosure in writing to their manager who will forward to the President/CEO for approval.
 - Accepting an item of value in the following situations would not be considered a violation of this policy:

- The acceptance is based on a family or personal relationship that exists independent of any business of the credit union;
- The benefit is available to the general public under the same conditions it is available to the credit union official
- Avoid any situation, which involves or gives the appearance to involve a conflict between personal interest and the interest of the Credit Union.
- Comply with Credit Union policy and with generally accepted accounting principles and the Accounting Manual for Credit Unions in the recording and reporting of Credit Union transactions.
- Ensure that Credit Union transactions are always carried out in the best interests of the Credit Union.

Lacamas Community Credit Union considers any form of fraud or dishonesty on the part of its employees and volunteers as totally unacceptable conduct and a breach of their fiduciary duty. A fiduciary relationship exists when there is a confidence and trust by a member/third party upon the judgment and advice of the employee. Acts which are considered to be either fraudulent or dishonest include, but are not limited to:

- Any dishonest action; breach of confidence.
- Falsifying information provided for Credit Union records, by its members or by Credit Union employees.
- Falsifying Credit Union records.
- Manipulation of loan accounts, documents, computer records, and savings or checking accounts.
- Theft of any kind, including stealing from members' accounts, overpayment of dividends, and creating fictitious loans.
- Check/share draft kiting.
- Forgeries.
- Unauthorized or unapproved salary advances, overtime reimbursement or falsification of payroll.
- 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 pledging a member's shares as collateral without that member's permission.
- Granting or requesting preferential treatment for anyone.

Conflict of Interest:

Lacamas Community Credit Union employees and volunteers should avoid any situation which involves or may involve a conflict between their personal interest and the interest of the Credit Union. As in all other facets of their duties, employees and volunteers dealing with members, suppliers, contractors, competitors or any person doing or seeking to do business with the Credit Union are to act in the best interest of the Credit Union. Each employee and volunteer shall make prompt and full disclosure in writing to their manager or President/CEO of any potential situation which may involve a conflict of interest. Such conflicts include, but are not limited to:

- Ownership by employee or volunteer or by a member of their family of an interest in any outside enterprise which does or seeks to do business with or is a competitor of the Credit Union.
- Serving as a director, officer, partner, consultant, or in a managerial or technical capacity with an outside enterprise which does or is seeking to do business with or is a competitor of the Credit Union.
- Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving the Credit Union or its interests.
- Any other arrangements or circumstances, including family or other personal relationships, which might dissuade the employee or volunteer from acting in the best interest of Lacamas Community Credit Union.
- Any potential conflicts of interest where a Credit Union official may inadvertently find him or herself (due to business or personal relationship with members, suppliers, business associates, or competitors of the credit union) that could lead to questions of integrity.

Confidential Information:

The revelation or use of any confidential information, data on decisions, plans, or any other information which might be contrary to the interest of the Credit Union without prior authorization, is prohibited. The misuse, unauthorized access to, or mishandling of confidential information, particularly member or personnel information is strictly prohibited and will subject an employee or volunteer to the Discipline Policy up to and including immediate termination of the employment or volunteer relationship. Employees or volunteers will be required to sign a Confidentiality and Non-Disclosure Agreement.

Compliance:

Any violation of this policy will subject the employee or volunteer to disciplinary action up to termination. Any Credit Union employee or volunteer having knowledge of any violation of the policy shall promptly report such violation to the appropriate level of management. If you have questions about any aspect of this policy, contact your supervisor or Human Resources.

Disclosure:

The following is a list of a business(es) for the purpose of disclosure of any potential conflict of interest with Lacamas Community Credit Union. **(Please note “None,” if there are none.)**

Outside jobs could pose a potential conflict of interest, therefore please disclose to the Credit Union in writing any and all employment at any time outside Lacamas Community Credit Union. Additionally, the use of Credit Union property or time for outside employment is prohibited. Permission for outside employment needs to be obtained by the President/CEO and may be withdrawn if the second job’s responsibilities are "inconsistent" with those of the Lacamas Community Credit Union job. If performance problems persist, the Credit Union can require employees to choose between the two jobs.

Outside employment:

I have read, the above **Code of Ethics** and agree to be bound by and to follow them. I understand that the Credit Union will not tolerate fraudulent or dishonest activities of any kind and that I am not to engage in any unethical acts while employed at or volunteering on behalf of **Lacamas Community Credit Union**. I understand that a violation of these policies shall be deemed a breach of my fiduciary duty from which both civil and criminal liability may arise.

Dated this _____ day of _____, 20__

Witness

Employee or Volunteer

Printed name

Printed name