

# Annual Acknowledgment of Policies

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## First Commonwealth FCU

Any failure on the part of volunteers to adhere to the following policies could pose potential liability to the credit union. Therefore, the Board of Directors asks that each volunteer sign to acknowledge receipt and acceptance of these policies annually.

### **“No Harassment” Policy**

Each individual has the right to work in an environment conducive to equal opportunity and free from discriminatory practices. As a result, First Commonwealth Federal Credit Union does not and will not tolerate harassment of our employees and volunteers, whether committed by co-workers, supervisors, vendors, members or any other third parties with whom employees may come into contact.

### **Zero Tolerance of Workplace Violence**

Each individual has the right to work in an environment free of violence. As a result, First Commonwealth Federal Credit Union does not and will not tolerate violence or use of weapons on its premises or a company-sponsored function.

### **Code of Ethics**

First Commonwealth Federal Credit Union will conduct its relationships and operations in a manner that will uphold its fundamental commitment to serving its members. First Commonwealth Federal Credit Union is committed to the highest standards of responsibility and conduct and subscribes to the following guidelines:

- Maintain loyalty to First Commonwealth Federal Credit Union, support decisions of the Board of Directors, and pursue its mission, strategies, objectives and plans.
- Preserve and protect the confidential relationship with members as well as the confidential information entrusted through the office you hold.
- Serve all members of First Commonwealth Federal Credit Union impartially and provide no special privilege to any individual member, nor accept personal compensation from an individual member.
- Recognize and discharge responsibilities to uphold laws, regulations, bylaws and policies.
- Exercise sound business policies and principles in the conduct of the affairs of First Commonwealth Federal Credit Union.
- Uphold the Mission, Vision, and Values of the credit union.
- Endeavor to build and maintain the credit union's good name and reputation.
- Never disclose sensitive operational or competitive issues discussed during meetings of the board of directors or committees with outside parties. Disclosures to representatives of the media will only be made by parties specifically named to do so.
- Never use any information obtained in the performance of credit union duties as a means for personal gain or benefit.
- Disclose to the Chairman all potential conflicts of interest.
- Never participate on behalf of the credit union, directly or indirectly, in any deliberations or decisions on any question in which one has a personal monetary interest, including any decisions affecting the procurement of equipment, supplies or services from any source.

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## **Gift Policy**

Volunteers will comply with the Bank Bribery Act and avoid the appearance of undue influence.

Volunteers may not:

- Solicit anything of value from anyone in return for any business, service or confidential information of the credit union
- Accept anything of value from anyone in connection with the business of the credit union, either before or after a transaction is discussed or consummated.
- Exceptions to this rule include:
  - Acceptance of meals, refreshments, entertainment, accommodations or travel arrangements, all of reasonable value, in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided that the expense would be paid for by the credit union as a reasonable business expense if not paid for by another party.
  - The Internal Revenue Service uses \$50 as the threshold monetary limit for acceptable gifts from vendors and customers of an organization. Therefore, gift acceptance valued at \$50 or less (mugs, candy, small gift baskets, etc.) is acceptable for volunteers of First Commonwealth.
  - Acceptance of civic, charitable, educational, or religious organization awards for recognition of service and accomplishment.
  - If a volunteer is offered or receives something of value from a member or vendor beyond what is authorized in the code of conduct, the volunteer must disclose that fact to the President/CEO on a Gift Acceptance form.

The *Gift Acceptance Form* should be completed when receiving a gift of substantial value (over \$25). All forms should be returned to the President/CEO.

## **Fraud Policy**

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

- Manipulation of loan accounts, documents, computer records, shares or share draft accounts
- Theft of any kind
- Check kiting
- Forgeries
- Intentional violation of credit union rules, internal controls, regulations or procedures
- Requesting preferential treatment from the credit union, its vendors, or prospective vendors

## **Privacy/Confidentiality Policy**

It is the duty of all volunteers to protect the financial relationship that we have with our members. During the course of performing volunteer duties, you may have access to confidential information regarding members, employees, clients and credit union business (i.e., payroll, financial and marketing

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information, etc.). This information must be held in strict confidence, during and subsequent to your volunteer service. It is highly improper to discuss this information with any individual outside the credit union or an insider who does not have a “need to know”.

## **Conflict of Interest Policy and Disclosure**

To avoid a conflict with the interests of the credit union, volunteers must adhere to this policy.

- **Business affiliations** – No undisclosed or material interest in any business in conflict with, or reasonably likely to be in conflict with, credit union duties and responsibilities, or that would influence or affect judgment regarding credit union business transactions.
- **Positions with other entities** – No undisclosed position with a corporation or other entity that might conflict with credit union interests or that might impair independence of judgment in the exercise of credit union duties. An example of a conflict would be employment or a volunteer position at another financial institution.
- **Commission, compensations, financial incentives** – No direct or indirect commission, other compensation, financial incentive, or a promise of the same, based on credit union business transactions, other than authorized expense reimbursement.
- **Confidential information** – No disclosure of confidential information or use of such information except to fulfill credit union duties and responsibilities.
- **Gifts** – No acceptance of gifts of substantial value (per the Gift Policy) or any personal favor from any person who has or is likely to have any business dealings with the credit union.
- **Personal investments** – No holding or making any undisclosed personal investment that might conflict with the interest of or impair independence of judgment in the exercise of credit union duties and responsibilities.

## **Social Networking Policy**

First Commonwealth Federal Credit Union respects the right of volunteers to write blogs and use social networking sites. However, it is the right and duty of the credit union to protect itself from unauthorized disclosure of disparaging information or that reflects poorly on the credit union.

For the purposes of this policy, social media should be understood to include any website or forum that allows for open communication on the internet including, but not limited to:

- Social Networking Sites (Facebook, LinkedIn, Google+)
- Micro-blogging Sites (Twitter)
- Blogs (including company and personal blogs)
- Online Encyclopedias (Wikipedia)
- Video and photo-sharing websites (YouTube, Instagram, Flickr, Vimeo)

Unless specifically authorized by consensus of the board of directors, you are not authorized to speak on behalf of First Commonwealth Federal Credit Union. Do not publicly discuss members, products, procedures, employees or confidential work-related matters outside company-authorized communications. You are expected to protect the privacy of First Commonwealth Federal Credit Union and its employees and members, and are prohibited from disclosing personal employee and nonemployee information and any other proprietary and nonpublic information. Such information includes but is not limited to member information, trade secrets, financial information and strategic business plans.

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Carefully read the questions below and answer “yes” or “no”. If any answers are “yes”, provide information on a separate sheet of paper and attach it to this form.

1. Do you have any undisclosed business affiliations or material interest in any business in conflict with, or reasonably likely to be in conflict with, credit union duties and responsibilities, or that would influence or affect judgment regarding credit union business transactions?

\_\_\_\_\_  
Yes      No

2. Do you hold a position with any other entity that might conflict with credit union interests or that might impair independence of judgment in the exercise of credit union duties? An example of a conflict would be employment or a volunteer position at another financial institution.

\_\_\_\_\_  
Yes      No

3. Do you earn any direct or indirect commission, compensation, or financial incentive, or a promise of the same, based on credit union business transactions, other than authorized expense reimbursement.

\_\_\_\_\_  
Yes      No

4. Have you disclosed any confidential information as described in the Privacy/Confidentiality Policy or have you used such information for any reason except to fulfill credit union duties and responsibilities?

\_\_\_\_\_  
Yes      No

5. Have you accepted any gifts of substantial value (per the Gift Policy) or any personal favor from any person who has or is likely to have any business dealings with the credit union?

\_\_\_\_\_  
Yes      No

6. Do you hold any personal investments that might conflict with the interest of or impair independence of judgment in the exercise of credit union duties and responsibilities?

\_\_\_\_\_  
Yes      No

If your answers to any of these questions change during the year, report the change, in writing, to the Chairman of the Board of Directors.

***By signing below, I affirm that I have read, understand and agree to uphold these policies.***

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date