

EMPLOYEE REPORTING AND PROTECTION POLICY

Columbia Credit Union has adopted this policy to encourage Credit Union employees to report known or suspected wrongful conduct, as defined below, and to protect employees who in good faith make any such report. This policy applies to all Credit Union employees.

1. Reporting Known or Suspected Wrongful Conduct.

a. Duty to Report.

Employees have a duty to report any known or suspected wrongful conduct, regardless of the identity or position of the offender or suspected offender. Failure to report known or suspected wrongful conduct may result in disciplinary action, up to and including termination of employment. The Credit Union will treat all good faith reports of known or suspected wrongful conduct as confidentially as possible as described below.

b. Definition of Wrongful Conduct.

For purposes of this policy, wrongful conduct means: (1) a violation of any federal, state, or local law or regulation that affects the Credit Union or its operations; (2) fraudulent conduct; (3) questionable accounting or auditing matters; (4) falsification of any document or report; (5) unauthorized alteration of any record or file; or (6) misappropriation or misuse of Credit Union funds or other property.

2. Reporting Procedure.

a. Reports.

Employees should promptly report any known or suspected wrongful conduct in accordance with the following procedure. An employee is encouraged to first report the matter to the employee's supervisor. The employee's supervisor must then inform the SVP of Human Resources or the SVP of Risk Management about the report. If the matter involves the employee's supervisor or the employee cannot report the matter to the employee's supervisor for any reason, the employee should report the matter to the SVP of Human Resources or the SVP of Risk Management. If the matter involves these individuals, the employee should instead report the matter to the CEO, the Chair of the Board of Directors or the Chair of the Supervisory Committee. If the matter involves one or more of these individuals, the employee should report the matter to the individual not involved or report the matter to the SVP of Risk Management.

Information reported should include the identification of the individual believed to have committed the wrongful conduct, a brief description of the alleged wrongful conduct, and any evidence of the alleged wrongful conduct that is known to the reporting employee.

In addition, employees may report any known or suspected wrongful conduct through a confidential, anonymous hotline, provided by Ethics Point, Inc.

To contact Ethics Point Inc.: Call 888-205-1292 or email www.ethicspoint.com.

b. Investigation.

The Credit Union will investigate all reports of known or suspected wrongful conduct as the Credit Union determines is necessary. Any employee found to have engaged in any wrongful conduct will be subject to disciplinary action, up to and including termination of employment, by the Credit Union and civil or criminal prosecution when warranted.

Employees are expected to cooperate in the investigation of any report made under this policy. This may include answering questions; providing evidence that is in the employee's possession, custody, or control; or other actions that may be requested. The Credit Union will attempt to keep all investigations as confidential as possible as described below.

3. Protections.

a. Confidentiality.

The Credit Union will keep the identity of anyone who in good faith reports known or suspected wrongful conduct or who participates in good faith in any investigation under this policy confidential to the extent possible. However, the Credit Union cannot guarantee complete confidentiality in all circumstances because some information may need to be disclosed.

b. Protection Against Retaliation.

It is the Credit Union's policy that no employee will be retaliated against in any way for making a good faith report of any known or suspected wrongful conduct or for participating in good faith in any investigation under this policy. Any employee who believes that he or she has been retaliated against in violation of this policy should report the matter to the Credit Union's SVP of Human Resources. If the employee's concern involves this individual, the employee should instead report the matter to the SVP of Risk Management, the CEO, the Chair of the Board of Directors or the Chair of the Supervisory Committee. Any employee who engages in any retaliation in violation of this policy will be subject to disciplinary action, up to and including termination of employment.