

# Ethics Policy

Columbia Credit Union wants to comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter and spirit of relevant laws and refrain from dishonest or unethical conduct.

Columbia has worked hard to earn a reputation of trust in the community. Consequently, employees shall, during both working and nonworking hours, act in a manner which promotes public trust in their integrity, impartiality, and devotion to the best interests of the credit union and its members.

To ensure ethical and impartial business, Columbia employees must not:

1. Except as expressly provided for below, offer, accept or solicit money, property, service, or other items of value by way of gift, favor from members or vendors attempting to influence the Employee in the performance of their duties. Columbia recognizes that employees may occasionally receive small gifts from vendors or grateful members. Employees are allowed to keep such gifts only if the value is \$50 or less. In addition, invitations to participate in limited day events such as lunch, dinner, theater, sports events, golf, fishing, and hunting are acceptable with the prior approval of the appropriate senior manager. However, the vendor or member must be in attendance and participation by the employee's family members is not acceptable.
2. Use their official position to secure special advantage in business, personal gain, or other benefit derived from such relationship.
3. Use any credit union facility, building, equipment, materials, or vehicle for their personal use or benefit, or for the personal use or benefit of any other individual. No employee shall have unauthorized possession of Columbia property.
4. Invest or hold a financial interest, directly or indirectly, in any business entity, transaction or business endeavor that would create a conflict between the employee's duty to uphold the public trust and the individual's private interest.
5. Disclose, misuse, mishandle, or access, without authorization to do so, confidential information of Columbia and/or its members.

Columbia employees may be offered honorariums. If the employee is being paid by the credit union for the time for which the honorarium will be received, the honorarium will be rejected.

In general, the use of good judgment, based on high ethical principles, will be the guide with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter must be disclosed to the Human Resources Vice President, or his/her delegate, for the purpose of precluding any real or apparent conflict of interest.