# 3300 Code of Ethics, Policy on Personal Finances, and Conflicts of Interest Policy

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The Credit Union’s Code of Ethics (3302), Policy on Personal Finances (3303), and Conflicts of Interest Policy (3304) are Board-adopted Policies that set standards for the conduct of Credit Union Employees and Officials.

### 3301-1 Code of Ethics

The Code of Ethics outlines the general obligations and responsibilities for each Employee and Official in conducting Credit Union business. The Code of Ethics requires that Employees and Officials act in the Credit Union’s best interests, demonstrate personal integrity, treat others fairly, abide by all applicable federal and state laws and regulations and Credit Union procedures, and promote a culture of compliance. The Code of Ethics will be included in the Employee Resource Guide and employee on-boarding materials and is intended to be directly referenced in employee reviews and human resource actions.

### 3301-2 Policy on Personal Finances

Under the Policy on Personal Finances, the Credit Union may review the personal financial situation of an Employee or Official when the Employee’s or Official’s financial situation may cause losses to the Credit Union or a loss of confidence in the Employee’s or Official’s decision-making ability. This review is only warranted in the case of significant issues, such as failing to file an income tax return (or intentionally filing a fraudulent or evasive income tax return), committing financial fraud or misconduct, or receiving a loan from an unlawful source.

### 3301-3 Conflicts of Interest Policy

The Conflicts of Interest Policy requires that transactions between the Credit Union and an Employee or Official (or related parties) are reviewed for fairness to the Credit Union. The Conflicts of Interest Policy requires that all Conflict of Interest Transactions are disclosed by the Employee or Official, subjected to review, and approved by the appropriate independent body prior to the Credit Union entering into the transaction or arrangement. Importantly, the Policy does not prohibit conflicts per se, but the Policy does require disclosure and review by an independent body to ensure that the Credit Union’s interests are protected. If a Conflict of Interest Transaction is not disclosed and approved prior to being entered into, the transaction will be reviewed under the same criteria at a later time; however, the Credit Union may consider its ability to terminate or rescind the transaction.

### 3301-4 Violations

Any violation of the Code of Ethics, the Policy on Personal Finances, or the Conflicts of Interest Policy may subject the Employee or Official to disciplinary action, up to and including termination of employment or other position with the Credit Union.

### 3301-5 Definitions

All capitalized terms not defined in this Section are defined in Policy 1.0 – Definitions of Terms used in BECU Policies.

For the purpose of the Credit Union’s Code of Ethics (3301), Policy on Personal Finances (3302), and Conflicts of Interest Policy (3303), the following definitions apply:
The term “Employee” includes all individuals receiving or required to receive an IRS Form W-2 from the Credit Union. The term “Employee” includes Executive Management Team members (“EMT members”), unless otherwise specifically excluded.

“Immediate Family Member” includes the Employee’s or Official’s: (i) parents and stepparents; (ii) siblings; (iii) spouse or domestic partner (including an individual in a common law marriage or other legally recognized committed intimate relationship with the Employee or Official); and (iv) biological children, adopted children, and stepchildren (whether they reside with the Employee or Official or not). “Immediate Family Member” also includes anyone residing at the primary residence of the Employee or Official (other than tenants and employees of the Employee or Official).

3302 Code of Ethics

Credit Union Employees and Officials must always:

• Serve the Credit Union’s best interests;
• Demonstrate personal integrity in carrying out the duties of the Credit Union and treat members, Employees, and Officials fairly;
• Be honest, trustworthy, and fair in all Credit Union activities and relationships;
• Refrain from engaging in or concealing fraud, manipulation, misrepresentation of facts, or other unfair, deceptive, or abusive business practices;
• Protect the Credit Union’s assets from theft, waste, loss, or improper or inefficient use;
• Obey all Credit Union policies and procedures, as well as applicable law;
• Preserve the confidentiality of information of members, employees, affiliates, and the Credit Union itself;
• Foster and maintain a positive working environment; and
• Through leadership at all levels, sustain a culture where ethical conduct and compliance with internal and external rules is recognized, valued, and exemplified by all Employees and Officials.

3303 Policy on Personal Finances

Although the Code of Ethics applies to work activities undertaken on behalf of the Credit Union, the Credit Union expects every Employee and Official to avoid activities or situations related to their own personal finances or financial relationships that may cause losses to the Credit Union or a loss of confidence in the Employee’s or Official’s decision-making ability. In general, the personal finances of Employees and Officials are private matters and will not be reviewed barring a serious situation. The following are examples of situations that may warrant further review (but will not necessarily require action):
• Bankruptcy;
• Obtaining loans or credit from unlicensed (other than family or friends) or unlawful sources;
• Financial fraud or misconduct;
• Involvement with unlicensed gambling (other than de minimis office pools or activities limited to family or friends); and
• Failing to file a required annual income tax return or intentionally filing a fraudulent or evasive income tax return (“intentional fraud” does not include unintentional mistakes or tax positions taken in good faith).

3304 Conflicts of Interest

The purpose of this Conflicts of Interest Policy (this “COI Policy”) is to protect the Credit Union’s interests in entering into transactions or arrangements that may benefit the private interest of an Employee or Official. This COI Policy supplements, but does not replace, any applicable state and federal laws governing conflicts of interest. A summary of this COI Policy will be included in the Employee Resource Guide, but the provisions of this COI Policy will govern any conflict between the Employee Resource Guide and this COI Policy.

3304-1 Requirement for Prior Review and Approval of Conflict of Interest Transactions

No Employee or Official may enter into any transaction or arrangement that causes a conflict of interest (a “COI Transaction,” as defined below) unless the COI Transaction is disclosed and approved in accordance with this COI Policy. All transactions and arrangements that are not disclosed under this COI Policy and are later determined to be COI Transactions will be subject to the review and approval process at the time of determination. These transactions and arrangements will be subject to revocation and termination unless approved by the appropriate body.

3304-2 Conflict of Interest Transaction (COI Transaction) Defined

In general, a COI Transaction occurs when an Employee or Official, or the Immediate Family Member of an Employee or Official, has a direct or indirect private financial interest in a transaction or arrangement with the Credit Union.

In addition, a COI Transaction includes any situation, position, transaction, or arrangement that:

• hinders the Employee’s or the Official’s ability to perform his or her duties and responsibilities for the Credit Union effectively and in the best interests of the Credit Union;
• interferes with the Credit Union’s interests or activities;
• creates the appearance of a conflict of interest;
• involves ownership, board service, or senior management service at any other insured depository institution or at a bank holding company or financial holding company; or

• presents a Business Conflict:

  o “Business Conflict” means a scenario that presents material risks related to, among other things: 1) use and disclosure of the Credit Union’s proprietary, strategic, or otherwise confidential information; 2) competition between the Credit Union and another entity; or 3) potential risk to the Credit Union’s brand or reputation. An example of a Business Conflict is a Director or Audit Committee Member serving as a senior management official (generally, C-suite) at a competitor or potential competitor of the Credit Union.

COI Transactions can arise in a variety of circumstances and situations, and it is not possible to list every circumstance that may give rise to a COI Transaction. The Credit Union reserves the right to review any circumstance, transaction, or arrangement to determine whether it constitutes a COI Transaction.

Under this COI Policy, certain specific transactions are automatically defined as COI Transactions, and must be disclosed and approved by the appropriate body unless allowed by an exception (a list of exceptions follows below). If an exception applies, the transaction or arrangement is not a COI Transaction and does not need to be disclosed.

3304-3 Specific Transactions that Trigger the COI Transaction Definition

A COI Transaction results when an Employee or Official (or the Immediate Family Member of an Employee or Official):

• receives compensation or payment of any kind from the Credit Union or enters into any direct or indirect transaction or arrangement with the Credit Union (other than compensation related to employment or under the exceptions below for the use of Credit Union services or loans or extensions of credit by the Credit Union);

• has a 5% or greater ownership interest (direct or indirect) or holds a senior management or leadership position in any business that receives compensation or payment of any kind or enters into any transaction or arrangement with the Credit Union (other than those transactions allowed under the exceptions below for the use of Credit Union services, extensions of credit by the Credit Union, or service as a volunteer director or officer of a non-profit organization);

• receives or potentially receives additional compensation or payment or any type of direct or indirect financial recognition (including commissions, credit for sales quotas, etc.) related to any compensation or payment made by the Credit Union or any transaction or arrangement between the Credit Union and a third party; or

• receives (or is eligible to receive upon the occurrence of certain conditions precedent) gifts or favors related to the exercise of decision-making authority on behalf of the Credit Union (but see de minimis gift exception below).

3304-4 Exceptions to COI Transaction Definition
The following are not COI Transactions (barring the presence of unusual circumstances):

- De minimis gifts are not COI Transactions. A de minimis gift includes occasional meals and entertainment (such as tickets to sporting events, concerts, or theater performances) and non-cash incidental gifts. A de minimis gift also includes any other good or service that does not exceed $500 in value. Participation in ordinary course networking (for example, attending a Mariners game with a prospective vendor) or fundraising events (for example, participating in a golf foursome with an existing vendor at a fundraiser for The BECU Foundation) does not constitute a COI Transaction.

- The use of the Credit Union’s products and services (exclusive of loans and other extensions of credit, which are addressed below), including, without limitation, deposit products, investment advisory services, wealth management services, and trust services, are not COI Transactions, as long as:

  - the products and services are extended in the ordinary course of business and subject to the same terms and conditions for the product or service as other Credit Union members (or on terms, conditions, or any special pricing programs approved and made available to all Credit Union Employees and family members);
  - the products and services are offered in compliance with all other applicable policies and laws; and
  - the Employee or Official does not participate in the decision-making process or otherwise act on behalf of the Credit Union with regard to the offering of the products or services.

- Loans or any other extensions of credit by the Credit Union to an Employee or Official, an Employee’s or Official’s Immediate Family Member, or an entity in which the Employee or Official or their Immediate Family Members control or own more than 5% of the economic interest are not COI Transactions, as long as:

  - the loan or other extension of credit is made in the ordinary course of business, under ordinary procedures, and in compliance with the Credit Union’s Loan Policy (1200), in particular 1203-3 Restrictions on Loans to Officials, Certain Employees, and Their Immediate Families and Associates;
  - any premium, bonus, discount, fee waiver, or incentive related to the loan or other extension of credit is part of an approved program and made available to significant numbers of Credit Union members;
  - the loan or other extension of credit is offered in compliance with all other applicable policies; and
  - the Employee or Official does not participate in the underwriting or decision-making process or otherwise act on behalf of the Credit Union with regard to the offering of the loan or other extension of credit.

- Uncompensated service as a director, trustee, or officer of (or membership in) a non-profit organization will not cause transactions between the Credit Union and the non-profit
organization to be treated as a COI Transaction.

For these purposes, a “non-profit organization” includes charitable, educational, and religious organizations, chambers of commerce, social clubs, credit union service organizations, home loan banks, or other similar organizations.

This exception applies even though the director, trustee, or officer may be reimbursed for his or her expenses.

- Noncontrolling equity positions in publicly traded companies (for example, if an EMT member or Employee owns shares of a public company and an Official serves on that public company’s board or senior management team, including, without limitation, direct ownership in a brokerage account or retirement account or indirect ownership through a mutual fund).

### 3304-5 Examples of the COI Transaction Definition

**Example 1:** The spouse of a non-EMT Employee owns 5% (or more) of the stock of a computer service company. The Credit Union contracts with the computer software company to provide software services.

If the Employee had any input or supervision into contracting with the computer service company, the contract is a COI Transaction and subject to disclosure. If the Employee did not have supervisory authority or involvement in hiring the company, then no COI Transaction has occurred and no disclosure is required.

However, if the spouse of an EMT member or Official owns 5% (or more) of the computer service company, then the Credit Union’s contract with the computer service company is a COI Transaction regardless of whether the EMT member or Official was involved in hiring the computer service company.

**Example 2:** The computer service company owned by the spouse of the Employee in Example 1 opens a deposit account at the Credit Union and receives a $150 cash bonus as part of a promotion being offered to all Credit Union members. The company also receives a discount on check writing fees (which is a benefit available to all Employee-affiliates). The cash bonus and the discounted check writing fees are not COI Transactions because they fit under the exception for special pricing programs/bonuses made available to a significant number of Credit Union members.

If the computer service company was owned by the spouse of an EMT member or Official, this is still not a COI Transaction because the exception for the use of Credit Union services extends to EMT members and Officials.

**Example 3:** The computer service company owned by the spouse of the Employee in Example 1 applies for a loan from the Credit Union. The Employee is in charge of reviewing the company’s application for creditworthiness. The Employee approves the loan according to usual Credit Union standards. This is a COI Transaction because, although the loan is approved according to usual Credit Union standards, the Employee is not allowed to participate in the decision-making process for a loan to a business owned by his or her Immediate Family Member.

However, if the application is not reviewed by the Employee and the Employee is not otherwise involved in the review or approval of credit, no COI Transaction has occurred, and no review is
If the spouse of an EMT member or Official owns 5% (or more) of the computer service company, this is still not a COI Transaction if the loan is made in the ordinary course of business and the EMT member or Official does not participate in the decision to extend the loan. The exception for Credit Union loans applies to EMT members and Officials as well.

Example 4: An EMT member owns 2% of a real estate investment LLC. The LLC was formed by a developer to build a new office building. Minority investors in the LLC are not involved in the management of the LLC. The LLC obtains a member business loan from the Credit Union. This is not a COI Transaction because the EMT member owns less than 5% of the LLC and does not have a senior management or leadership position in the LLC (the EMT member is only a passive investor). In addition, the loan was originated in the ordinary course of business and the EMT member did not make the lending decision on behalf of the Credit Union.

Example 5: The EMT member in Example 4 owns an interest in an investment fund. This investment fund owns a portion of the LLC that obtains a member business loan from the Credit Union. To determine if a COI Transaction has occurred, the EMT member (or Employee or Official) would determine how much of the underlying asset the EMT member owns by “looking-through” the investment fund. For example, if the EMT member owned 5% of the investment fund and the investment fund owns 50% of the LLC, the EMT member would be treated as owning 2.5% (5% x 50%) of the business that obtained the loan from the Credit Union for purposes of applying the COI Transaction rules. For the same reasons as Example #4, the loan is not a COI Transaction.

3304-6 Disclosure of a COI Transaction

Employees and Officials must promptly disclose all COI Transactions. Disclosure (and approval) should occur before the Credit Union acts by entering into an agreement, transaction, or arrangement or by providing any payment, goods, or services.

Each Employee and Official should disclose the COI Transaction to the Employee’s or Official’s “Appropriate Reporting Person” (as listed on Attachment A) by filing a Form for Disclosures of Conflicts of Interest (the “COI Form”) in the then current form maintained by the Legal Department. The COI Form must include all material facts of the COI Transaction. A written disclosure, including without limitation electronic mail, that includes all material facts is an acceptable alternative to using the COI Form.

Employees and Officials should err on the side of disclosure when faced with an unclear situation, and Employees and Officials should be proactive about disclosing transactions or arrangements that may constitute potential COI Transactions. If an Employee or Official learns of a COI Transaction after it occurs, the Employee or Official must promptly disclose the COI Transaction to the Appropriate Reporting Person.

Questions about whether a situation is a COI Transaction may be directed to the General Counsel, the Legal Department, or the Employee’s Appropriate Reporting Person.

3304-7 Referral to Approval Body; Procedures

The Appropriate Reporting Person will submit information for all COI Transactions to the Approval Body as listed on Attachment A. However, the Appropriate Reporting Person does not need to submit
information related to those COI Transactions that have been designated as approved in advance under a de minimis policy set by the Approval Body, as described below.

The Approval Body will review the COI Transaction. The Approval Body will, if appropriate, investigate the COI Transaction and collect the relevant material facts and information about alternatives to the proposed COI Transaction. The Approval Body, in its discretion, may obtain an appraisal or other information on comparable arm’s length transactions when approving a significant COI Transaction involving an EMT member or an Official. The Employee or Official must cooperate fully with this review.

After obtaining and reviewing appropriate information as needed, the Approval Body, by a majority vote of its disinterested members present and participating or the unanimous written consent of all disinterested members (this unanimous consent may be obtained via e-mail), may approve a COI Transaction based on all relevant factors. These factors may include:

- whether the transaction or arrangement is in the Credit Union’s best interest;
- whether the transaction or arrangement is on market terms and negotiated at arms-length and on terms no less favorable than terms generally available to an unaffiliated third-party under the same or similar circumstances;
- the extent and nature of the Employee’s or Official’s interest in the transaction or arrangement (or the interest of the Immediate Family Member of the Employee or Official);
- whether, and the extent to which, the transaction or arrangement is anticipated to present reputation risk to BECU;
- whether, and the extent to which, the transaction or arrangement is anticipated to attract audit or supervisory scrutiny;
- whether, and the extent to which, the transaction or arrangement is anticipated to adversely impact the Employee or Official’s effectiveness;
- whether viable alternatives to the proposed transaction or arrangement exist and the cost to be incurred under these alternatives; and
- whether the transaction or arrangement is appropriate under the Credit Union’s Code of Ethics.

In approving a COI Transaction, the Approval Body may condition its approval on guidelines or limits for the COI Transaction. All guidelines or limits must be followed, and any changes must be approved by the appropriate Approval Body. The Approval Body may obtain reports and information on comparable transactions and arrangements.

3304-8 Participation in Approval Body Discussion

When considering a COI Transaction, only disinterested persons may participate as members of the Approval Body. The following persons may not participate in the Approval Body’s discussions or decision-making:
- the Employee or Official who has a private interest in the COI Transaction (or whose Immediate Family Member has a private interest in the COI Transaction) (the “Interested Person”);

- any persons subject to the direction or control of the Interested Person;

- any persons who receive compensation or other payments subject to approval by the Interested Person; or

- any persons with a material financial interest affected by the COI Transaction.

At the Approval Body’s request, the Interested Person may make a presentation to the Approval Body of the involved facts and answer any questions posed by the Approval Body, but the Interested Person must be absent from the room during discussion of and approval of any matters related to the COI Transaction.

### 3304-9 Delegation to the Appropriate Reporting Person

In lieu of referring a COI Transaction to the Approval Body, the Appropriate Reporting Person may review and approve any COI Transaction for which the total aggregate value paid or received by the Credit Union over the course of one year does not exceed $10,000.

Each Approval Body may adopt an exceptions policy under which:

- particular types of transactions and arrangements under a certain dollar value are automatically approved and not subject to further review; and

- particular types of transactions and arrangements under a certain dollar value that may be reviewed and approved in the discretion of the Appropriate Reporting Person without review by the Approval Body.

However, the Approval Body’s adoption of an exceptions policy for certain transactions will not affect the requirement for disclosure under this COI Policy.

### 3304-10 Continuing Contracts and Arrangements

In all cases, disclosure of a COI Transaction must be updated if any material change to the terms and payment of the COI Transaction occurs after review and approval.

### 3304-11 Annual Requirement to Certify Compliance with COI Policy

Employees: Each Employee must certify annually that the Employee has reviewed the COI Policy and is in compliance with the COI Policy. Generally, this is accomplished by assigning a Conflicts of Interest training module to each Employee, making the COI Policy available and soliciting the required certification.

Officials: Each Official must certify annually that the Official has reviewed the COI Policy and is in compliance with the COI Policy. Generally, this is accomplished by annual outreach by the Corporate Secretary or the Assistant Corporate Secretary to each Official, making the COI Policy available and soliciting the required certification.
3304-12 Unapproved Transactions; Diligence

If any transaction, arrangement, or other matter involving a COI Transaction is not disclosed and approved under this COI Policy prior to payment or action by the Credit Union, the COI Transaction must be promptly disclosed to the Appropriate Reporting Person and reviewed by the Approval Body.

The Approval Body will review the COI Transaction as provided for in this COI Policy. The Approval Body will consider all of the facts and circumstances regarding the matter and may approve the COI Transaction based on the ordinary procedures for review. The Approval Body may review all options available to the Credit Union, including revision or termination.
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<th>Person with Disclosure Requirement</th>
<th>Appropriate Reporting Person</th>
<th>Approval Body</th>
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| Members of the Board of Directors (Other than the Board Chair) | Governance Committee Chair  
Copy to the Board Chair, General Counsel and Audit Committee Chair | Governance Committee may determine that there is no COI Transaction.  
Governance Committee may approve a COI Transaction, or may refer to the full Board for determination.  
Governance Committee may recommend denial of a COI Transaction, but the matter must be referred to the full Board of Directors for determination. |
| Board Chair | Governance Committee Chair  
Copy to General Counsel and Audit Committee Chair | Governance Committee may determine that there is no COI Transaction.  
Governance Committee may recommend approval or denial of a COI Transaction, but the matter must be referred to the full Board of Directors for determination. |
| President/CEO | Board Chair  
Copy to General Counsel and Audit Committee Chair | Board of Directors |
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<th>Person with Disclosure Requirement</th>
<th>Appropriate Reporting Person</th>
<th>Approval Body</th>
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<tr>
<td>Executive Vice Presidents</td>
<td>General Counsel</td>
<td>General Counsel</td>
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<td>Copy to President/CEO and Board Chair</td>
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<tr>
<td>Senior Vice Presidents (other than Chief Audit Executive)</td>
<td>General Counsel</td>
<td>General Counsel</td>
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<tr>
<td>Vice Presidents</td>
<td>Copy to President/CEO</td>
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<tr>
<td>Audit Committee Members (Other than the Audit Committee Chair) and Chief Audit Executive</td>
<td>Audit Committee Chair</td>
<td>Audit Committee</td>
</tr>
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<td>Copy to General Counsel and Board Chair</td>
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<tr>
<td>Audit Committee Chair</td>
<td>Audit Committee Members (excluding the Audit Committee Chair)</td>
<td>Audit Committee Members (excluding the Audit Committee Chair)</td>
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<td>Copy to General Counsel and Board Chair</td>
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<tr>
<td>Employees (below VP level)</td>
<td>Employee’s Supervisor</td>
<td>Handled as a personnel matter in accordance with this Policy and all applicable HR Standards, Guidelines, and Procedures.</td>
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<td>Supervisor may escalate to SVP Human Resources and/or General Counsel, as necessary on a case-by-case basis.</td>
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Revision History

Policy 3300 – Code of Ethics, Policy on Personal Finances, and Conflicts of Interest Policy

As indicated below, the Board of Directors or a Board committee added, revised, or deleted one or more sections of Policy 3300 on the following dates:

**Governance Committee**
- July 13, 2021
- March 26, 2021
- November 14, 2018
- April 26, 2017
- January 17, 2014
- October 21, 2013

**Audit Committee**
- November 12, 2015

**Board of Directors**
- January 26, 2011
- July 28, 2010
- November 17, 2010
- December 17, 2008
- September 21, 2005