

Advantis Credit Union  
**OFFICIALS' CODE OF ETHICS &  
STANDARDS OF PERSONAL CONDUCT POLICY**

February 20, 2019

Advantis Credit Union is committed to an ethical work environment. Advantis' Officials (members of the Board of Directors, Associate Directors and Audit Committee) serve the needs of the Credit Union's members, and each person holds a position of trust in the Credit Union. Officials are united by the purpose of objectively participating in the oversight of the Credit Union and ensuring that their decisions and actions are in the best interests of the members. Each Official is expected to conduct him or herself in such a way as to meet this responsibility.

Officials are expected to be committed to the highest standards of conduct and adhere to the following principles:

1. To strictly uphold the laws, rules, regulations, bylaws and policies relating to the operation of the Credit Union.
2. To observe the highest standards of personal conduct relating to the business of the Credit Union at all times.
3. To talk and act in a respectful manner. This particularly includes talk or actions that could be construed as harassment based on a person's race or color, age, gender, sex, sexual orientation, religion or creed, ethnic heritage, marital status, veteran's status or physical or mental disability.
4. To guard against the use of their Credit Union position for personal or financial advantage or special privilege; to avoid the granting of preferential treatment or special favors to anyone; and to avoid conflicts of interest with its policies and operations. This includes the avoidance of soliciting or accepting gifts or entertainment that exceeds nominal value from Credit Union members or suppliers. (Nominal value is defined as something under \$50 in value and for which a legitimate claim for reimbursement could be made from the Credit Union under similar circumstances.)
5. To immediately disclose to the President/CEO or Board Chair any actual or potential conflict of interest as the situation arises.
  - a. If a conflict of interest is determined to exist, it is expected that the Official shall abstain from making recommendations or voting on any issues related to the conflict.
  - b. Examples of potential conflicts of interest that should be reported promptly include: (a) being employed by the Credit Union or any subsidiary, or serving as a consultant or independent contractor of the Credit Union during the past three years; (b) an immediate family member currently serving as an Official, paid employee, consultant or independent contractor of the Credit Union; (c) currently serving, or have a Family Member who serves, as a current partner of the Credit Union's outside auditor, or was a partner or employee of the Credit Union's outside auditor any time during any of the past 2 years; (d) serving on the Board or currently

employed at another credit union, bank, financial services company, or vendor of the Credit Union; (e) a spouse, significant other, or other immediate family member living within the Official's household serving on the Board, or being employed at a management level by another financial institution within the Credit Union's service market.

As used above, the term "Family Member" means a person's spouse, domestic partner, parents, children, stepchildren, siblings, half-siblings, grandparents, grandchildren, aunts, and uncles, whether by blood, marriage or adoption, or anyone residing in such person's home.

6. To carry out the duties and responsibilities of the Officials' role, exercising the care, diligence and skill of a reasonable and prudent person under comparable circumstances in conducting the affairs of the Credit Union and its membership.
7. To adhere to open, democratic procedures in the election of Officials and in the formulation of Credit Union policy and practices. As part of this standard, board members are expected to actively participate in the consideration of policy and other matters that come before them. Officials commit themselves to spirited and respectful dialogue, fair deliberations and a goal of consensus. Once a matter is decided by a vote, the Board shall communicate a single, unified position on the issue that reflects the decision of the Board. Individual Officials shall not communicate the positions of individuals or the nature of the deliberations that may have occurred. Individual Officials do not have individual authority and shall not attempt to exercise individual authority over Credit Union or Board actions, unless such authority is provided by Board resolution or explicitly set forth in Board policies.
8. To encourage member thrift and savings and to protect the assets placed in the Credit Union's care and custody.
9. To preserve and protect the privacy and confidentiality of all discussions and decisions of the Board of Directors that are not subject to public access. Officials shall refrain from disclosing or allowing to be disclosed any confidential Credit Union information to anyone, and such information shall not be used for the Official's personal benefit or the benefit of the Official's family, friends or associates, or by any other individual or entity other than the Credit Union. Exceptions to this standard shall be made only upon prior approval of the Board of Directors or Executive Committee of the Board.
10. To not engage in fraudulent or dishonest activity and to report any unethical or fraudulent activity to the Credit Union. Acts which may be considered fraudulent or dishonest include, but are not limited to:
  - a. Manipulation of Credit Union records;
  - b. Theft or fraud of any kind;
  - c. Unauthorized or unapproved expense reimbursement;
  - d. Intentional violation of Credit Union rules, internal controls, regulations or procedures;
  - e. Granting or requesting preferential treatment for/from anyone.

- 11. To adhere to a higher standard of financial responsibility than other members with regard to account activity, overdrafts, insufficient funds, etc.

**Policy Administration**

Advantis expects every Official to act in accordance with the highest standards of personal and professional conduct in all aspects of their service and association with Advantis and to comply with all applicable policies and procedures of Advantis.

Annually, each Official will sign a statement affirming their continued commitment to the Credit Union’s *Officials’ Code of Ethics & Standards of Personal Conduct Policy*.

All potential Officials shall review and sign this policy before they will be considered for service with the Credit Union.

The Audit Committee has the responsibility for monitoring compliance with this policy. However, the primary accountability and responsibility for adhering to the Code of Ethics and Standards of Personal Conduct rests with each individual Official.

**Acknowledgment**

I fully understand and do hereby acknowledge that in serving as an Official with Advantis Credit Union, I am expected to conform to and abide by the foregoing standards. I understand and agree that violations of this Policy may result in disciplinary action, up to and including termination from official capacity with the Credit Union.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_