
Limestone Federal Credit Union
Code of Conduct/Ethics - Volunteers Policy

The honesty and integrity of our volunteers is essential to the Credit Union's reputation and success. Volunteers are expected to act in accordance with the Code of Conduct/Ethics Policy at all times. Known or suspected violations of this, or any Credit Union Policy, will be investigated and may result in disciplinary action up to and including immediate termination of employment or position.

All persons associated with the operation of the credit union must conduct themselves with the highest standards of integrity and honesty to preclude conflict between the interests of the credit union and their personal interests. Such persons will avoid any actions or relationships which could adversely affect, or have the appearance of adversely affecting, their judgment or actions in performing their duties.

Conflict of Interest

Volunteers are expected to avoid all situations that might lead to a real or apparent conflict between self-interest and duty as a Credit Union volunteer. This means volunteers are not to use their position for personal gain or benefit, or in any manner that could reflect unfavorably on the Credit Union.

Disclosure

Credit Union Officials are required to disclose all potential conflicts of interest, including those in which they have been inadvertently placed due to either business or personal relationships with members, suppliers, business associates, or competitors of the credit union.

Misuse of Confidential Information

The Credit Union considers member accounts to be very privileged information. Volunteers are to give out information on members' accounts only through authorized channels. Discussion among volunteers about members' accounts should be held to a minimum, and only on a need-to-know basis. When there are reasonable grounds to believe a volunteer has violated the confidentiality of our members' accounts, they will be subject to immediate dismissal. Volunteers remain under an obligation to keep all such information confidential, even if their position with the Credit Union is terminated.

Application of the Code of Conduct/Ethics Policy

This policy is intended to avoid real and apparent conflicts of interest and applies in all circumstances. The following examples demonstrate how the Policy's guidelines can affect specific relationships and situations.

- Outside Business Relationships: Before agreeing to act as a director, associate director, officer, consultant, or advisor for any other business organization, volunteers should notify the Board Chairman and secure written approval.
- Outside Employment: A conflict of interest may arise if volunteers work or serve one of its competitors, members, vendors, or suppliers.
- Member and Supplier Relationships: It is a criminal offense to solicit or accept anything of value in return for the business, service, or confidential information of the Credit Union.

Financial Conflicts of Interest

Limestone Federal Credit Union (LFCU) prohibits volunteers or immediate family of volunteers from having any financial or other interest directly or indirectly in any of Limestone Federal Credit Union suppliers or other organizations with whom Limestone Federal Credit Union has significant business dealings. This requirement applies regardless of whether or not the volunteer has any direct business dealing with the supplier or vendor in question.

Disclosure

Volunteers are required to disclose any financial holdings that may create a conflict of interest to the Board Chairman.

Standards of Business Conduct

It is the policy of Limestone Federal Credit Union to conduct its businesses in accordance with applicable laws of the United States and the states in which it conducts business and in accordance with ethical standards of business conduct.

All illegal or unethical acts, including but not limited to the following, are prohibited under this policy:

- No bribes, kickbacks, or other illegal payments are made by or on behalf of the credit union directly or indirectly.
- No funds or assets are maintained by the credit union for an illegal or improper purpose and no funds or assets, which are not clearly disclosed in the books and records of the Credit Union, are maintained for any purpose.

- No false, misleading, or artificial entries are made in the books and records of the credit union.
- No payments are made by or on behalf of Limestone Federal Credit Union for any purpose other than that described by supporting documents maintained by the credit union.
- No illegal political contributions are made directly or indirectly by or on behalf of the credit union.
- No cash, negotiable instruments, equipment, furniture, or other property belonging to Limestone Federal Credit Union and its members may be borrowed or otherwise removed from the credit union premises without management authorization.

Internal Decisions and Violations

Volunteers are expected to refrain from making general derogatory remarks to and/or about the credit union and/or its management. However, this does not apply to directors/associate directors when meeting as a group to discuss the performance of the credit union and/or its management, nor does it apply to any unpublicized communication with any governmental officials related to the official duties of that governmental official.

Disclosure of Corporate News or Information

Financial information about any activities of the credit union should not be disclosed or released to any person unless it has been previously published or otherwise made generally available to the public. Because improper or incomplete disclosures can often create an inaccurate impression among members or the general public, it is important to control disclosures of information to members or the general public. Questions concerning disclosures of confidential or inside information should be discussed with the CEO.

No Credit Union records, plans, or data (except as necessary in the course of normal business activities) may be divulged to anyone unless authorized by the credit union management. In this connection, it is imperative that the business of members with Limestone Federal Credit Union be handled in strict confidence by credit union directors, associate directors, volunteers, and committee members.

Confidential Information

Confidential information shall include all confidential and proprietary information of Limestone Federal Credit Union including, but not limited to, trade secrets and membership lists, whether in written, oral, electronic, magnetic, photographic, optical, or any other form now existing or created or developed, including, but not limited to, the following:

- Information relating to Limestone Federal Credit Union's planned or existing computer systems, system architecture, computer hardware, computer software, source code, object code, documentation, program libraries, program listings, processing methods, technical processes, and operational methods.
- Limestone Federal Credit Union sales, profits, pricing, and other financial information.
- Limestone Federal Credit Union member data or lists, existing or planned sales, and marketing activities or strategies.
- Information regarding Limestone Federal Credit Union's existing or planned organizational restructuring, business affairs, and business initiatives.
- Information regarding Limestone Federal Credit Union members, subcontractors, employees, directors and officers, associate directors, or contractors.
- Confidential information of a third licensed to, possessed by, or in the control of Limestone Federal Credit Union.
- Information regarding employees, including, but not limited to, health and financial information and social security information.
- Trade secrets including any inventions, innovations, processes, techniques, works of authorship, developments, derivations, contributions, supplements, enhancements, copyrights, patents, trademarks, trade dress, service mark, and any other intellectual property right and modifications as well as any copies, adaptations, documentation, algorithms, notes, or records thereof, including, but not limited to, computer programs, including both source and object versions thereof, and attendant specifications and source code listings, authored, made, developed, or conceived of and reduced to practice by or under the direction of Limestone Federal Credit Union during your employment and is not generally known to the public.
- Any other information relating to Limestone Federal Credit Union which is not generally known to the public or within the industries and trades in which Limestone Federal Credit Union competes or which may otherwise be protected by trade secret law.

Confidential information shall not include information that is:

- Generally known to the public, not as a result of an act, omission, or disclosure by Limestone Federal Credit Union.
- Rightfully in the possession of the volunteer prior to appointment or election.
- Received by the employee in good faith and without restriction from a third party and is not under a confidentiality obligation to either the Limestone Federal Credit Union or the third party.

In addition to observing the Code of Conduct/Ethics Policy, volunteers must comply with all applicable laws while conducting Credit Union business. If there are questions about the legal or ethical implications of a particular situation, discuss the matter with the Board Chairman.

Signature

Date