

## LIMITATION OF SERVICES POLICY

### I. PURPOSE

The purpose of this policy is to address standards of member conduct in order to assure the rights and protection of the Credit Union, the Credit Union's employees, volunteers and members.

The Credit Union is committed to treating its employees, volunteers and members with the respect they deserve and is committed to maintaining a work place free from unacceptable conduct from any source. In the event that any member engages in any type of abusive, harassing or intimidating conduct towards another Credit Union member or a Credit Union employee or volunteer engaged in Credit Union business or causes injury to others or damage to Credit Union premises or property, the CEO, or her/his designee, is authorized to apply appropriate remedial measures against such individual in her/his sole discretion. Any such remedial measures taken in response to such conduct shall be reported to the Board of Directors at its next regularly scheduled meeting.

### II. SCOPE

This policy shall extend to any member and to any person who has access to Credit Union services, or is on Credit Union premises, directly or indirectly through a member. In addition to the applicability of this Policy to the behavior described above, it is also applicable to members who:

- A. Fail to comply with the terms and conditions of any lawful obligation with this Credit Union and cause the Credit Union to suffer a "pecuniary loss" as described in Section D, below;
- B. Manipulate or otherwise abuse Credit Union services or products to the detriment of the Credit Union or the Credit Union's membership;
- C. Commit fraud or engage in unusual account activity in violation of State or Federal laws or regulations or as determined in good faith by Executive Management; or
- D. Otherwise cause a pecuniary loss to the Credit Union through negative account balances or unpaid loan amounts that the Credit Union, in good faith, considers to be uncollectible and are charged off or any other demonstrable loss as determined by Executive Management.

The determination of whether any individual has engaged in any of the activity described above will be made at the sole discretion of the Executive Management of this Credit Union.

### III. DEFINITIONS

- A. "Member services" include any products or services now or hereafter provided or sponsored by the Credit Union other than the right to vote and to maintain a share account. Services may include, but are not limited to: loans, deposit accounts, check cashing, cashier checks, money orders, wire transfers, ATM services, online banking services, mobile and remote deposit capture banking services and other electronic fund transfer services.
- B. "Unusual account activity" may include, but is not limited to, kiting of funds, member-maker returned deposit items, check fraud, ATM fraud, endorsement or maker's signature forged, deposit of stolen or counterfeit item, identity theft, elder financial exploitation or other transaction or pattern of unusual account activity in violation of the Bank Secrecy Act (BSA) or other Federal or State regulations.
- C. "Abusive, harassing or intimidating behavior" includes, but is not limited to, any of the following conduct:
  1. Any threats of or actual bodily harm or illegal activity against another member or an employee or volunteer.
  2. Any form of action that may constitute harassment such as, for example:
    - a. Any type of harassment, including sexual harassment or harassment based on an individual's age, disability, protected medical condition, marital status, sexual orientation or any other legally protected status. This includes, but is not limited to age, sexual, ethnic, or racial harassment; making racial or ethnic slurs, engaging in sexual conduct; making sexual overtures.
    - b. Inappropriate or unwanted touching.
    - c. Making sexual flirtations, advances or propositions; engaging in verbal abuse of a sexual, racial or ethnic nature; making graphic or degrading comments about an individual or his or her appearance.

3. Displaying sexually suggestive objects or pictures, fighting, kicking or other physical harm or attempted harm towards a Credit Union member, employee or volunteer or any other person engaged in Credit Union business. For example:
  - a. Engaging in offensive or abusive physical contact.
  - b. Making false, vicious or malicious statements about any Credit Union employee or volunteer or the Credit Union and its services, operations, policies, practices, or management.
4. Cursing or other abusive, vulgar, profane, intimidating or threatening language directed towards a Credit Union member, employee or volunteer or other person engaged in Credit Union business.
5. Bringing or possessing firearms or weapons or any hazardous or dangerous device on Credit Union premises or at a Credit Union function.
6. Possession, sale, use or being under the influence of an unlawful or unauthorized alcoholic or other substance on Credit Union premises or at a Credit Union function.
7. Attempting to coerce or interfere with a Credit Union employee or volunteer in the performance of their duties at any time.
8. Uncivil conduct or failure to maintain satisfactory or business-like working relationships with other members, employees and volunteers at the Credit Union.
9. Conducting or attempting to conduct or engage in any fraudulent, dishonest or deceptive activity of any kind involving Credit Union employees or Credit Union services.
10. Any posting, defacing, or removing notices or signs on Credit Union Premises or writing on Credit Union bulletin boards or property without proper authorization.
11. Appropriation or misappropriation of Credit Union funds, property or other material proprietary to the Credit Union.
12. Immoral conduct or indecency on Credit Union premises.
13. Deliberate or repeated violations of security procedures or safety rules.
14. Any other act which endangers the safety, health or well-being of another person or which is of sufficient magnitude that causes disruption of business at the Credit Union.

The list is not comprehensive and provides examples of types of behavior that may be viewed as “abusive, harassing or intimidating behavior” by the Credit Union.

#### **IV. POLICY**

The availability of member services for members who are in violation of the above standards shall be subject to restriction and any or all of the following actions may be imposed against an individual who is in violation:

- A. Denial of all services other than the right to maintain a share account and the right to vote at annual and special meetings.
- B. Preclusion from personal contact with Credit Union employees or volunteers such that Credit Union services may be available only through written communication through the U.S. mail, online banking, or other remote access device designated by Credit Union Executive Management.
- C. Preclusion from access to the Credit Union premises.
- D. Taking any other action deemed appropriate under the circumstances that is not precluded by the Federal Credit Union Act, NCUA Rules and Regulations, the Credit Union’s Bylaws or other applicable federal or state law.
- E. Threats of bodily harm or any other illegal activity against any Credit Union employee, volunteer or other member shall be reported to appropriate federal, state and/or local authorities.
- F. In the case of continued abusive, harassing or intimidating behavior or an incident considered by Executive Management to merit such treatment, a member shall be subject to removal from membership at a special meeting of the members or at the next annual meeting of the membership.

These limitations shall not prohibit a member from exercising his or her rights under federal or state law or regulation (e.g., Regulation “E” or Regulation “Z”).