



MEMBER SERVICE DENIAL POLICY

This policy statement applies to all members of Coast360 Federal Credit Union.

Coast360 Federal Credit Union is a not-for-profit financial institution chartered under the Federal Credit Union Act and organized for the purpose of serving the credit and savings needs of its members. Federal credit unions are owned by its members. The benefits of ownership (membership) flow back to the members through access to quality financial products and services at higher rates on shares, lower rates on loans, and fewer and lower fees than banks and other for-profit financial institutions. Membership (ownership) also bestows an implicit responsibility for all members to maintain their accounts in good standing and to ensure a congenial, conducive, and safe environment at all credit union facilities and events.

Article II, Section 4 of the credit union by-laws stipulates that once a member becomes a member, that person may remain a member until the person or organization chooses to withdraw or is expelled from membership. It further stipulates that members who are disruptive to credit union operations may be subject to limitations on services and access to credit union facilities.

The purpose of this policy is to establish the parameters of which members' services and/or access to credit union facilities will be limited.

POLICY

Federal Credit Union Act provides that the two basic credit union membership rights are the right to maintain a share account and the right to vote at annual and special meetings. Credit unions are not obligated to provide any other services than these.

It is the policy of Coast360 Federal Credit Union that a member who has either:

- A. Engaged in abusive conduct with Coast360 staff, Coast360 officials or other members while conducting credit union business;
- B. Engaged in abusive conduct with Coast360 staff, Coast360 officials or other members while conducting credit union business;

May be subjected to the following remedial actions:

- Denial of all services other than the right to maintain a share account at par value and the right to vote at annual and special meetings.
- Denial of services that involve personal contact with credit union employees.
- Denial of access to the credit union premises.
- Other actions, including expulsion, deemed necessary under the circumstances that are not expressly precluded by the Federal Credit Union Act, National Credit Union Administration rules and regulations, or the credit union's bylaws.

The severity of a member's behavior shall dictate whether any or all the remedial actions above are imposed on a member. This policy covers all forms of interactions including but not limited to: in person, oral, written, telephonic or electronic communication (i.e. e-mail, Coast Online e-messaging, Coast by Phone).

Abusive conduct includes but is not limited to:

- Any unprovoked type of harassment, including sexual, ethnic, or racial harassment.
- Making racial or ethnic slurs.
- Engaging in sexual conduct.
- Making sexual overtures, flirtations, or advances.
- Engaging in sexual, racial, or ethnic verbal abuse.
- Making graphic or degrading comments about individuals or their appearance.
- Displaying sexually suggestive objects or pictures.
- Engaging in offensive or abusive physical contact.
- Making false, vicious, or malicious statements about any credit union employee or the credit union and its services, operations, policies, practices, or management.
- Using profane, abusive, intimidating, or threatening actions or language toward COAST360 staff, COAST360 officials or fellow members.
- Attempting to coerce or interfere with credit union employees in the performance of their duties.
- Conducting any fraudulent, dishonest, or deceptive activity involving credit union employees or services.

- Acts of robbery, theft of credit union property or defacing or removing notices or signs on credit union bulletin boards.
- Appropriation or misappropriation of credit union funds or property.
- Immoral conduct on credit union premises and events.
- Deliberate or repeated violations of security procedures.
- Possession, use, or being under the influence of drugs or alcoholic substances on credit union premises and events.
- Fighting or possession of weapons of any kind on credit union premises and events.

CONFIDENTIALITY, PRIVACY, AND INTEGRITY

All parties have the right to expect that any information that is shared with other participants during the review process will be treated with discretion so as to protect his or her privacy. Everyone involved in the process is obligated to protect the privacy of the proceedings. Board of Directors, Supervisory Committee, Management, the complainant and respondent and witnesses are expected to show respect for the rights and sensibilities of all the participants by avoiding discussion of the proceedings and related information with uninvolved individuals. The limitation on discussion and the respect for privacy must be maintained after the review process is concluded.

The success and effectiveness of the process depends upon assuring that individuals involved in the process have confidence in its integrity before, during and following the proceedings. Confidentiality and respect for privacy, and protection from all forms of retaliation are therefore critical. Any credit union volunteer or official will refrain from participating in the process if a conflict exists with either the complainant or respondent.

Individuals who willfully disregard these privacy guidelines will be subject to COAST360's discipline procedures.

RETALIATION AND SUBVERSION OF THE PROCESS

All COAST360 staff involved in this process whether complainant or witness are expected, as a condition of their employment at COAST360, to participate in good faith in the process when called upon. In addition, all participants shall be free from any threat of retaliation.

Any retaliatory behavior or any acts that subverts or undermines the process by a COAST360 staff shall subject that employee to immediate discipline up to and including suspension or termination. Retaliation may include actions during or after the proceedings have been concluded that have a negative impact on another staff's workplace environment or on opportunities for advancement or professional enhancement.

In the event an individual suspects retaliation or subversion of the process, he or she should so advise the Human Resources Manager. The Human Resources Manager after review of the facts or further inquiry will then determine if discipline is appropriate.

FALSE ALLEGATION

It is a violation of this policy for anyone to knowingly or with reckless disregard for the truth make false accusations of sexual harassment. Failure to prove a claim of sexual harassment is not equivalent to a false allegation. Sanctions may be imposed against individuals who knowingly or with reckless disregard for the truth make false accusations of sexual harassment.

ADMINISTRATION

The CEO will be responsible for the administration of this policy, through the engagement of the Management Review Committee and the established procedures to address Incidents/Concerns raised by employees, officials or other members. Other credit union policies and procedures that are applicable and can be referred to for guidance include but are not limited to:

- All Credit/Collection Policies
- Employment Policy
- Board Governance Policy
- Bank Bribery Act Policy
- Member Information Security Policy
- BSA Compliance Program
- Fraud Prevention Detection and Enforcement