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**TITLE: CODE OF ETHICS**

**INDEX NO: BD-105**

**Created on April 24, 2019, by Doug Sanders, Internal Audit Director**

**Revised on April 20, 2021, by Pat Jacob, SVP/Corporate Oversight**

**Reviewed on May 6, 2021, by Kathy Courtney, EVP/COO Amy Henderson, EVP/Consumer Services and Christopher Pech, VP/Chief Legal Officer**

**Approved on June 16, 2021, by Board of Directors**

**Policy Owner: Pat Jacob, SVP/Corporate Oversight**

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### ***Overview***

The Code of Ethics (Code) is designed to promote a responsible and ethical work environment and applies to all GreenState Credit Union employees and directors. The code contains guidelines on proper behavior in the workplace and who you should contact with questions or concerns.

### ***Your Responsibilities***

You are responsible for abiding by and following the applicable laws, regulations and GreenState Credit Union policies that relate to your job, including the Code, employment policies, operations policies, etc. Violations may result in corrective action up to and including termination of employment, recovery of damages and filing of criminal charges. However, most problems can easily be avoided by simply using good judgment and seeking guidance when questions arise. It is your responsibility to raise questions, make appropriate disclosures and bring potential problems to the GreenState Credit Union's attention.

Questions to ask:

- Is this the right thing to do?
- Are you authorized to do this?
- Is this permitted under our Code of Ethics?
- Is this legal?

If the answer to any of these questions is "No", you should discuss the situation with your supervisor, the Human Resources Department or the Internal Audit Department.

Supervisors are responsible for reviewing the Code with their employees and preventing, detecting and responding to compliance problems by:

- Leading with integrity;
- Encouraging employees to raise questions and concerns;
- Providing education and coaching to employees;
- Reviewing periodic compliance requirements with employees; and
- Taking prompt and effective action where necessary.

### ***The Code***

- To serve others with truth, trust, integrity, caring and respect.
- To adhere to the Credit Union's core values:
  - **We Go Above and Beyond** – We're not average and neither is our service, which sometimes means unconventional or beyond what's expected.

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- **We're Truthful and Accountable** – We treat others with uncompromising candor and respect. We're responsible for our work and that of our teammates, and keep our promises with integrity.
  - **We're Adventurous, Creative, and Open-Minded** – We take strategic risks and challenge each other with innovative ideas.
  - **We Embrace Continuous Improvement and Efficiency** – We involve affected parties in making quick decisions, and return more to our stakeholders through efficiency and growth.
  - **We Create Fun** – We're proud to be authentic, unconventional, and celebrate our differences! We collectively create an engaged environment full of meaningful relationships.
  - **We Build Positive Team Spirit** – Our diverse teams are our families. We are inclusive, putting the interest of others before our own and proactively give credit where it's due.
  - **We Grow Through Learning** – We expect growth, and help employees unlock their potential while learning from occasional mistakes.
  - **We're Bold yet Humble** – We take nothing for granted, and are never satisfied with the status quo.
- To recognize and accept personal responsibility to build and maintain the credit union's good name and reputation.
  - To maintain loyalty to the credit union and to pursue its objectives.
  - To give earnest effort and best thought to the professional performance of all duties.
  - To provide the highest level of service in a courteous and professional manner and treat all individuals fairly without regard to race, creed, color, sex, national origin, religion, age, veteran status, sexual orientation, gender identity, marital status, mental or physical disability, or any other characteristic protected by law.
  - To never tolerate any form of discrimination or harassment, including sexual harassment.
  - To maintain a drug and alcohol-free work environment.
  - To take all reasonable precautions to ensure our safety as well as the safety and well-being of our membership.
  - To preserve, protect, respect and value member and employee confidential information and to guard against inappropriate access and disclosure.
  - To never use any information obtained in the performance of credit union duties as a means for personal gain or benefit.
  - To never accept bribes, kickbacks, or other types of unusual payments from any organization or individual seeking to do business with, doing business with, or competing with the GreenState Credit Union. You may accept gifts in accordance with the Bank Bribery Act Policy: Acceptance of Gifts and Conflicts of Interest (MA-430).

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- To not process or authorize transactions on your own accounts; accounts on which you are a joint owner, custodian or trustee; accounts belonging to a relative or individual with whom you have an amorous or intensely personal relationship in accordance with the Employee Accounts Policy (MA-420).
- To use credit union equipment, systems, software, facilities, and supplies only as authorized by the proper authority.
- To make all decisions and to act in the best interests of the Credit Union, and not for personal benefit. To avoid any actions that create – or appear to create - conflicts of interest.
- To never mislead, coerce, manipulate or fraudulently influence government examiners, internal or external auditors for the purpose of concealing information or making the audit report inaccurate.
- To clearly indicate, when engaging in political activity and making political contributions, that you are acting as an individual and not as a representative of the credit union, unless authorized to do so.
- To disclose to the appropriate officer of the credit union without fear of retaliation or retribution:
  - All potential conflicts of interest in accordance with the Board of Directors Conflict of Interest Policy (BD-110) or the Employee Conflict of Interest Policy (MA-419);
  - All fraudulent activity, dishonesty or corruption in accordance with the Employee Fraud Policy (MA-425);
  - Evidence of violation of the laws, rules or regulations applicable to the credit union and the operation of its business, or a violation of this Code of Ethics.

### ***Reporting Concerns***

If you have concerns about activities which you suspect to be possible violations of the Code of Ethics, the following procedures may be utilized to achieve resolution of your concern:

- First, contact your direct supervisor unless there are circumstances that preclude you from doing so. Your supervisor will listen to you regarding the concerns that you have and should be given the opportunity to resolve the issue. He or she has access to resources throughout the GreenState Credit Union and is required to assist you in upholding the Code of Ethics.
- Second, if you have raised an issue and you do not think it is getting proper attention, or if your supervisor cannot find the appropriate answer in a timely manner, you may relate your concern to the Human Resources or Internal Audit Department.
- If assistance is still needed, or if you are uncomfortable with taking the above steps, you may contact the Ethics Hotline at 1-888-475-8376 or log onto the [Ethics Website](#) . Reports to the Ethics Hotline or Website may be made anonymously.

It may be helpful to ask yourself the following questions prior to relating your concerns:

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- Do I have all the facts?
- If I need more information, where do I find it?
- Are there any laws, regulations, policies or procedures that apply to the situation?
- Have I followed normal procedures to try and resolve my concern?

Your right to report your concern is not dependent on the answer to the above questions, but such forethought may aid in the resolution of your concern.

Confidentiality for those who report will be maintained to the extent possible. Neither your supervisor, nor the Credit Union will take any action against you for reporting suspected misconduct in good faith. All concerns or allegations of possible violations of the Code of Ethics, policies, procedures, laws or regulations will be received openly and courteously. There will be no direct or indirect retaliation or retribution against anyone who, in good faith, raises such problems or concerns.

#### ***Policy Review***

The Code of Ethics Policy will be reviewed annually by the Credit Union's Board of Directors.