



Conduct Policy

EFFECTIVE DATE:

January 26, 2023

Board of Directors Approved: January 26, 2023

Replaces Previous Policy Dated: May 31, 2017

General Policy

The Honolulu Federal Credit Union (HOCU) will protect its employees, volunteers, and members from harmful situations and abusive conduct by members, vendors, and other individuals. Executive Management, along with the Board of Directors, is committed to maintaining a workplace free from threatening and abusive conduct.

All members and employees should be able to conduct business without fear of harm, harassment, or abusive conduct as a result of their membership or employment with HOCU.

Furthermore, sanctions may be imposed on members who cause the credit union a loss or frivolous expense.

This policy will apply to all HOCU employees, volunteers, members, vendors and visitors to the credit union.

This policy does not specifically address all forms of conduct that may be threatening, abusive, harassing or causes a loss. To the extent there is a conflict or ambiguity in questionable behavior or conduct, the credit union will determine if the conduct is severe or pervasive enough that it creates a hostile environment, unreasonably interferes with credit union operations, or is against credit union policy and/or federal, state, or local laws and regulations. This determination will result in appropriate sanctions, if applicable.

Credit union volunteers should refer to the Board Governance Policy for guidance. Staff should note additional information contained within the employee handbook regarding conduct.

This policy will be reviewed as needed.

Authority

Executive Management, or their designee, on behalf of the Board of Directors, is hereby authorized to impose sanctions against any member who engages in any type of threatening or abusive conduct.

Examples of Threatening or Abusive Conduct

For purposes of this policy, "threatening or abusive conduct" includes, but is not limited to, any of the following conduct:

- Carrying weapons into credit union facilities or possession of weapons at credit union sponsored events.
- Possession or use of illegal drugs on credit union premises or at a credit union sponsored event.
- Engaging in verbal or written abuse of a sexual; racial or ethnic nature.



- Engaging in sexual or immoral conduct or indecency on credit union premises or at credit union sponsored events.
- Sexual flirtation, overtures, advances, or propositions, or displaying sexually aggressive objects or pictures.
- Making graphic or degrading comments about an individual or their appearance.
- Engaging in offensive, intimidating, or abusive physical contact (e.g., hitting, shoving).
- Threatening the safety of employees or members, directly or indirectly through inappropriate or criminal behavior, displaying intentional and/or threatening behavior to destroy property, or said behavior that creates a reasonable fear of injury or subjects one to emotional distress.
- Stalking.
- Making false, vicious, or malicious statements verbally, or in writing, about any credit union employee, officer, or volunteer.
- Making false, vicious, or malicious statements verbally, or in writing, about credit union services, operations, policies, practices, or management.
- Using profane, abusive, intimidating, or threatening language verbally, or in writing, in any form of media towards the credit union or any employee, officer, volunteer, or fellow member.
- Attempting to coerce or interfere with credit union employees in the performance of their duties at any time.
- 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 or information to its members.
- Any posting, defacing, or removing of notices or signs on credit union premises or on the credit union's website.
- Vandalism of credit union property.
- Appropriation or misappropriation of credit union funds, property, or other material proprietary to the credit union or causes a loss.
- Deliberate or repeated violations of security procedures or safety rules.

Sanctions

The following sanctions may be imposed in accordance with credit union bylaws or policies on any individual who engages in threatening or abusive conduct.

- Restriction or denial of services.



- ✓ Denial or restriction of all credit union services other than the right to maintain a Regular Share account (minimum balance requirement must be met) and the right to vote at annual and special meetings as defined in the credit union's bylaws.
- ✓ Preclusion from personal contact with credit union employees or volunteers if services are available through remote means.
- ✓ Denial of access to credit union premises, shared branch network, and revocation of shared branch privileges.
- ✓ Denial of services to the applicable member on all additional joint accounts where the member is named as an account holder.
- ✓ All other services will be suspended including, but not limited to, ATM cards, debit cards, shared branching, and the ability to obtain loans or advances on existing loans.
- ✓ A member's general check cashing rights shall be suspended, and the member will only be allowed to deposit checks into their account, subject to Regulation CC. Also, in the case of a credit loss caused by the member, further action by the credit union's collection vendor and legal counsel may be initiated and the appropriate credit reporting agencies will be informed.
- ✓ The credit union shall cease distribution of all marketing materials to the individual unless such distribution is necessary to comply with a law or regulation.
- Reporting to law enforcement.
 - ✓ Threatening or abusive conduct, or criminal or illegal activities may be reported to appropriate local, state, or federal law enforcement, and the credit union, at its discretion, may seek a restraining order against the individual(s).
- Continuing abusive behavior.
 - ✓ Continued abusive behavioral conduct by a member may result in closure of credit union accounts, termination of services, and physical removal from a facility or event.
 - ✓ A recommendation for expulsion of the member may be made to the Board of Directors and appropriate action(s) taken in accordance with the credit union's bylaws.
 - ✓ Taking any other action deemed necessary under the circumstances that is not expressly precluded by the Federal Credit Union Act, the National Credit Union Administration Rules and Regulations, the credit union bylaws, or other applicable law.
 - ✓ If the offending party is a credit union vendor, his or her immediate supervisor will be contacted immediately and a request for removal of the individual from further contact with HOCU employees or members will be made.



Notification

The credit union will notify members in writing when services may be restricted or denied and provide a copy of the policy to members upon request.

Upon the notification to the affected member, credit union services shall be denied or restricted.

Executive Management or their designee will notify the Board of Directors of the actions taken.