Suspension of Services Policy Effective Date: November 21, 2019

POLICY STATEMENT

Members are expected to treat other members, employees, officers, and volunteers of Allegacy Federal Credit Union ("Credit Union") in a professional and courteous manner. Members who act or continue to act in an abusive, threatening or otherwise unacceptable manner may have services suspended up to and including revocation of membership.

BACKGROUND

The Credit Union is dedicated to doing what is right, treating every member in a professional and courteous manner, and fostering an abuse-free work environment. Unfortunately, there are some members who, when conducting their business in the Credit Union, are unable to control their behavior or who return the professional and courteous manner shown to them with abuse and threats.

To protect employees, volunteers and other members of the Credit Union from the abusive and threatening behavior of other members, it is prudent to have a fair mechanism to sanction members who act in an abusive or otherwise unacceptable manner towards other members or Credit Union employees.

1. DEFINITIONS

- **1.1.** <u>Procedure</u> is the procedure promulgated pursuant to this Policy;
- **1.2.** <u>Sanction</u> is a denial or suspension of service or access imposed on a member pursuant to this policy and its procedures. Sanctions imposed may include:
 - **1.2.1.** Denial of all Credit Union services;
 - **1.2.1.1.** Any denial of the right of a member to maintain a basic share account or to vote at annual and special meetings may only be imposed by an affirmative vote of the Credit Union members.
 - **1.2.2.** Denial of services which involve personal contact with Credit Union employees.
 - **1.2.3.** Denial of services at any physical Credit Union location.
 - **1.2.4.** Taking any other action deemed necessary under the circumstances that is not expressly precluded by the Federal Credit Union Act, the NCUA Rules and Regulations, or the credit union's bylaws.

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1.3. <u>Unacceptable conduct</u> is abusive, inappropriate or threatening behavior, including verbal, by a member towards another member or any person affiliated with the Credit Union.

2. SCOPE

2.1. This Policy shall apply to all interactions between Members, and between members and Credit Union employees and volunteers conducting Credit Union business.

3. PURPOSE

3.1. To protect the Credit Union's officers, employees, volunteers, and members from abusive, inappropriate and threatening behavior.

4. ROLES, RESPONSIBILITIES AND DELEGATION OF AUTHORITY.

- **4.1.** The Board appoints the Chief Operations Officer to implement and enforce this Policy and any Procedure promulgated thereunder.
- **4.2.** The Chief Operations Officer shall be assisted by a select committee of Credit Union employees ("Committee of Review") to investigate Unacceptable Conduct and to make recommendations regarding any possible sanctions.
 - **4.2.1.** The Credit Union's General Counsel and The Corporate Security Officer shall be standing members of the Committee of Review. The Chief Operations Officer may choose to appoint others to the commit on an ad hoc basis.
- **4.2** The Vice President of Human Resources shall be notified of any unacceptable conduct that is specifically focused towards or against an employee of the Credit Union.

5. STANDARDS

- **5.1.** Any employee or officer should promptly report incidents of threats or acts of violence as set forth in the Policy or any procedure.
- **5.2.** Any sanctions should be commiserate with and tailored to address the specific abuse or unacceptable conduct.
- **5.3.** Nothing in this Policy alters any reporting obligations that may be detailed in other Credit Union policies and procedures.

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6. MONITORING & REPORTING

- **6.1.** The Committee of Review and the Chief Operations Officer shall report annually to the Chief Executive Officer about those members who have been sanctioned or had services suspended in accordance with this Policy and the reasons for each.
- **6.2.** The Board shall continue to monitor this Policy, but an annual review is not required.

7. REFERENCES

- 7.1. NCUA Opinion Letter ID 93-0217
- 7.2. NCUA Opinion Letter ID 05-0723
- 7.3. 2016-CFPB-0024
- 7.2 NCUA Opinion Letter ID 08-0431
- 7.3 Allegacy Federal Credit Union Bylaws

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