## FARMERS INSURANCE GROUP FEDERAL CREDIT UNION MEMBERS ANTI-HARASSMENT POLICY

Farmers Insurance Group Federal Credit Union ("Credit Union") is committed to the goal of providing each Credit Union employee, temporary or leased employee, volunteer, vendor, member, co-owner of member's share accounts, and cosigner, co-obligor, or guarantor on member's obligations owed to the Credit Union ("covered individuals") an environment free from unlawful discrimination, harassment, and workplace violence. Persons and individuals who engage in unlawful discrimination, harassment, or violence against a covered individual, at or in connection in any way with the Credit Union, not only engage in hurtful and/or harmful actions against the covered individual(s) but also harm the Credit Union.

The Credit Union regularly transacts business and interacts with its members. When a person engages in unlawful harassment, discrimination, made threats, acts violently, and/or generally behaves inappropriately ("unacceptable behavior") against a covered individual in connection with the operation of the Credit Union, on Credit Union premises, on Credit Union Service Center Network premises, or on non-credit union premises at a Credit Union function or operation, that person will be considered to be a "bad actor" by the Credit Union. When bad actors put a burden on the Credit Union's employees, staff, vendors, and/or volunteers they hinder the Credit Union's ability to fulfill its goal of providing service to our membership.

If a bad actor who engages in unacceptable behavior against a covered person is a Credit Union member, the bad actor will not be in good standing with the Credit Union, and will be in violation of Credit Union policy.

Depending upon the nature and duration of the unacceptable behavior, the bad actor may not be allowed to some or all membership services or benefits, and/or allowed to be a joint owner, account signatory, joint obligor, and/or have any contractual connections with the Credit Union. The Credit Union may deny benefits by suspending benefits and privileges in situations where it is clear that the Credit Union will suffer from harm relating to unacceptable behavior directed at any Credit Union covered individual<sup>1</sup>. The decision on when and whether to deny Credit Union benefits in such instances will be made on a case-by-case basis. The member will have the right to minimally vote at Credit Union general and special meetings of the membership and to have a basic share account.

<sup>&</sup>lt;sup>1</sup> Harm to other members only applies when the offending action is committed on Credit Union premises, in front of Credit Union personnel, and the other member complains, or the unacceptable action is obvious and known to the Credit Union personnel as being unlawful harassment or unlawfully discriminatory, and the Credit Union personnel is able to safely do something about it.

A new regulation is pending before the Board of the National credit union Administration (NCUA) that will permit federally chartered credit union boards of directors to adopt an anticipated Standard By-Law that will allow federal credit unions to expel members due to certain types of action by the members. Once the Board of the NCUA has adopted the regulations and established the Standard By-Law that will allow federally chartered credit unions to expel members, Farmers Insurance Group Federal Credit Union has adopted said By-Law, the Credit Union has given the required notice of said By-Law and procedures for expulsion under it to the Credit Union's membership, and if the actions of the offending person warrant it, said person may be expelled from membership at the Credit Union.

The Credit Union may take other steps when warranted as well.

It is the goal of the Credit Union to protect covered individuals from bad actors. If a covered individual observes or is subject to unacceptable behavior, the covered individual is to immediately report the unacceptable behavior to Credit Union management. The Credit Union will immediately investigate and take appropriate action.

Enforcement of this policy will not waive any right of the Credit Union to be paid any amounts owed by the person whose services and benefits have been limited or has been expelled.

This Member Anti-Harassment Policy does not apply to employment policies governing the employment relationship individuals have with the Credit Union. Those policies are separate and apart from this Member Anti-Harassment Policy.

## **POLICY**

It is the policy of Farmers Insurance Group Federal Credit Union to deny Credit Union membership benefits (except for allowing members the right to vote and maintain basic share accounts) when a member causes the Credit Union or a covered individual to suffer harm as a result of unacceptable behavior. The extent and duration of the denial of membership benefits will depend on the nature, duration and/or extent of the unacceptable behavior.

This Members Anti-Harassment Policy shall be posted on the Credit Union's website and a copy given to all existing members and new members.

Dated:	Farmers Insurance Group Federal Credit Union
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	By: Secretary of the Board