



CREDIT UNION

Cayman Islands Civil Service Association
Co-operative Credit Union Limited

Table of Contents

Audience.....	3
Key Messages.....	3
Overview.....	3
Introduction.....	3
Rationale.....	3
Legal.....	3
Scope.....	4
Duties to The Credit Union.....	4
Key Principles.....	4
Standard of Conduct.....	5
Respect for Others.....	6
Maintain Confidentiality.....	6
Knowledge of Relevant Rules and Acts.....	7
Promptly Report Concerns.....	7
Resignation Events.....	8
Decision Making.....	9
Attendance requirements.....	9
Training Requirements.....	9
Annual Attestation.....	10
Conflict of Interest.....	10
Background.....	10
Definition of Conflict of Interest.....	11
Examples of Conflict.....	11

Directors and Committee Members Code of Conduct and Conflict of Interest Policy

February 2024

Deemed Conflicts	12
Abide by the Law and the Rules	13
Elections	13
Confidentiality	14
Disclosure Procedures.....	14
Procedures for Resolution of Conflicts of Interest.....	15
Roles and Responsibilities in Executing Policy Requirements	16
Policy Governance.....	16
Appendix A - Definitions.....	16
Appendix B- Policies and Procedures Relating to Director Review	17
Director Review	17
Reporting to Members to the Registrar of Companies (Registrar) and to the Cayman Islands Monetary Authority (CIMA)	19
Appendix C Elected Volunteer Conflict of Interest Form.....	19

1. **Audience**

All Directors and Committee Members of the Cayman Islands Civil Service Association Cooperative Credit Union Ltd. (The Credit Union)

2. **Key Messages**

- 2.1 Directors and Committee Members must ensure that any private or personal business interest does not conflict with the duties and responsibilities owed to the Credit Union.
- 2.2 To uphold our reputation, it is imperative that a high standard of ethical, moral and legal conduct be followed by Directors and Committee Members in all business practices.
- 2.3 To avoid a conflict of interest and/or misconduct, there are scenarios where Directors and Committee Members must provide written disclosure as stated in this policy.

3. **Overview**

4. **Introduction**

- 4.1 The purpose of this Directors and Committee Members' Code of Conduct and Conflict of Interest Policy (the "Policy") is to set the standards for director conduct and to identify, prevent and resolve conflicts of interest.
- 4.2 The Policies and Procedures Relating to Director Review are appended to and form part of this Policy ("Appendix B"). Conduct that results, or potentially results, in a breach of this Policy shall be reviewed under Appendix B.

5. **Rationale**

To uphold our reputation, it is imperative that a high standard of ethical, moral, and legal conduct be followed by Directors and Committee Members in all business practices.

6. **Legal**

This Policy is to be read in conjunction with:

- The Cooperative Societies Act
- The Credit Union Rules
- CIMA's Regulatory Policy on Fitness and Propriety for Directors and Committee Members
- CIMA's Statement of Guidance on Corporate Governance
- WOCCU's Code of Conduct/Conflict of Interest Guidelines

7. **Scope**

7.1 All Directors and Committee Members of the Credit Union.

8. **Duties to The Credit Union**

8.1 All Directors and Committee Members of the Credit Union shall act in the best interests of the Credit Union in accordance with their fiduciary duties prescribed by law and the policies of the Credit Union adopted by the Board from time to time. Directors and Committee Members are required to be familiar with these duties and policies, as well as the business and affairs of the Credit Union, in order to be capable of making appropriate contributions and decisions.

9. **Key Principles**

9.1 This Code of Conduct is based on the following key principles:

- **Selflessness:** Board members should be loyal and act solely in the interest of the Credit Union and relevant stakeholders. They should not under any circumstance do any act with the purpose of gaining any financial or other consideration for themselves, their family or friends;
- **Integrity:** Board members must avoid placing themselves under any obligation to individuals or organizations that may have an inappropriate influence in the fulfilment of their duties;
- **Objectivity:** Board members must act and take decisions impartially, fairly and in the best interests of the Credit Union, on the best evidence and without discrimination or bias;

- **Accountability:** Board members are accountable to the Credit Union for their decisions and actions and must submit themselves to scrutiny appropriate to their office;
- **Openness:** Board members should act and take decisions in an open and transparent manner. Information should not be withheld from the Credit Union unless there are clear and lawful reasons for doing so;
- **Honesty:** Board members have a duty to declare any private interests related to their duties as board members and to take steps to resolve any actual or potential conflicts of interest;
- **Leadership:** Board members should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles, always conduct themselves in a professional manner and be willing to challenge poor behaviour whenever it occurs.

10. Standards of Conduct

10.1 Not every conduct issue can be specifically addressed by the Code. The Standards below are meant to provide guidance for a variety of scenarios. Directors and Committee Members are expected to apply the Standards to determine appropriate behaviour or actions respecting their role as Directors.

10.2 All Directors and Committee Members shall:

- in performing their duties as a director, act honestly, ethically, in good faith, and in a manner which will enhance the image of and be in the best interests of the Credit Union, and exercise the care, diligence, and skill that a reasonably prudent person would in similar circumstances;
- Conduct themselves in all personal, business and Directors and Committee Membership matters in a manner that will not directly or by association damage the reputation of the Credit Union; and
- deal with Directors and Committee Members, officers, employees, members, suppliers, and the public openly, honestly, fairly, ethically, and in good faith, and do not direct any officer or employee of the Credit Union to take unfair advantage of

anyone through manipulation, concealment, abuse of privileged information, stealing proprietary information, misrepresentation of material facts, or any other unfair dealing practice.

11. **Respect for Others**

11.1 All Directors and Committee Members shall:

- treat Directors and Committee Members, officers, employees and members with dignity and respect, irrespective of age, race, colour, gender, sexual orientation, religion or nationality.
- not interfere with or exercise authority over officers or staff of the Credit Union, except where expressly authorised by the Board or the EC.
- discourage direct communication by staff who attempt to bypass administration/internal policies and shall encourage staff to utilise reporting lines within the Credit Union.

12. **Maintain Confidentiality**

12.1 All Directors and Committee Members shall:

- Keep confidential all matters and information involving the Credit Union, the Board, its committees, and the employees and members of the Credit Union;
- not disclose such matters and information to anyone or in any manner whatsoever unless the information is already in the public domain through no misconduct by the director, or unless authorised by the Board or required by a court of law or a regulatory body; and
- not use confidential information or assets of the Credit Union or any of its subsidiaries or affiliates in order to, directly or indirectly, obtain a benefit or advantage for the director or anyone else.

13. **Knowledge of Relevant Rules and Acts**

13.1 Directors and Committee Members shall be familiar with the following:

- The Cooperative Societies Act;
- The Credit Union Rules;
- CIMA's Regulatory Policy on Fitness and Propriety for Directors and Committee Members;
- CIMA's Statement of Guidance on Corporate Governance;
- The Code of Conduct/Conflict of Interest Guidelines;
- The rules and procedures for proper conduct of meetings;
- The Anti-Money Laundering Regulations and the Guidance Notes on the Prevention and Detection of Money Laundering and Terrorist Financing in the Cayman Islands;

13.2 Ensure they are in compliance with the requirements of the Regulator.

13.3 Know the Credit Union Board level policies and terms of reference and abide by them.

14. **Promptly Report Concerns**

- All Directors and Committee Members shall immediately advise the Board Chair if they have, or become aware of, any information (having regard to the purpose of this Policy) that would reasonably be considered relevant to ensuring the proper

conduct and sound operation of the business and affairs of the Credit Union.

- All Directors and Committee Members shall report in writing to the Board Chair and to the Chair of the Executive Committee (EC):
- any illegal or unethical act that the director becomes aware has been or reasonably suspects may be committed by any director, officer or employee of the Credit Union;
- any potential work hazards that are brought to their attention; and
- Any violations of this Policy that they may witness or reasonably suspect by any other director of the Credit Union.

15. **Resignation Events**

15.1 All Directors and Committee Members shall submit their resignation to the Board if any of the following events occur (“Resignation Event”):

- the director determines that they are in breach of, or are in conflict with, any of the duties, standards, principles, expectations or obligations of this Policy and that breach or conflict is expected to materially adversely affect their ability to act as a director in compliance with this Policy;
- the director has not attended three consecutive regularly scheduled meetings (including committee meetings) without the approval of the Chairman;
- the director determines that they have a conflict of interest (as defined below) or potential conflict of interest (as defined below) that materially adversely affects their ability to act as a director in compliance with this Policy;
- the director becomes ineligible according to the EC; or
- there is any other change in the director’s personal or professional circumstances that the director determines has

impacted their ability to serve as a director in compliance with this Policy.

- 15.2 The Board has the discretion to accept or reject a resignation delivered upon a Resignation Event. The Board should accept any resignation delivered upon a Resignation Event if the director's ability to act as a director in compliance with this Policy has been materially adversely affected or they have become ineligible, according to the EC.

16. **Decision Making**

16.1 In reaching decisions, Directors and Committee Members must:

- act prudently and consider what is in the best interest of the Credit Union alone;
- take into account all relevant matters and make decisions on an informed basis; and
- ignore personal or other factors which might improperly affect their judgement.

16.2 If a director disagrees with the decision of the Board properly reached, publicly he/she:

- must abide by and support the decision or resign
- must not disclose his/her dissent while still a director.

17. **Attendance requirements**

17.1 Directors and Committee Members shall attend meetings on a regular and punctual basis. If they are unable to attend, they should advise the Secretary.

18. **Training requirements**

18.1 Directors and Committee Members must attend, at least annually, required AML/CFP/CFT, risk management, and governance training provided by the Credit Union or an agreed alternate/substitute training program.

18.2 Directors and Committee Members are encouraged to attend CCCU/WOCCU events and at least one CaribDE training.

19. **Annual Attestation**

All Directors and Committee Members shall, prior to becoming a director and annually as long as they are a director, acknowledge in writing in a form to be determined by the EC that the director has read, considered and agrees to abide by this Policy, and any other policies, procedures, Acts, regulations, and other documents as they may become subject to as a director.

20. **Conflict of Interest**

21. **Background**

21.1 Directors and Committee Members must take care to ensure that they identify and avoid any conflict of interest (as defined below). Directors and Committee Members must also take steps to avoid the appearance of a conflict of interest that might have the potential to interfere with their independent exercise of judgment, even where they believe that their actions as directors would not be influenced.

21.2 CIMA's Statement of Guidance on Corporate Governance states:

- The Governing Body is responsible for ensuring that the regulated entity's Conflicts of Interest policy is documented and adhered to.
- Conflicts of Interest policies should include the requirement that Directors and Committee Members disclose interests in any contract to which the regulated entity is an existing or potential party.
- Directors, Committee Members and senior managers should submit an annual declaration of any conflicts of interest. The Governing Body should consider whether this practice should be extended to all staff of the regulated entity.
- Each Director should ensure that his/her potential or actual conflicts of interest are managed and controlled.

- Directors and Committee Members should disclose any conflicts of interest relevant to discussions during meetings of the Governing Body.”

22. **Definition of Conflict of Interest**

- 22.1 A “conflict of interest” arises where a director has a duty, or a direct or indirect actual or apparent interest, that comes into conflict with, or is sufficient to influence or appear to influence, the performance of the director’s duties owed to The Credit Union.
- 22.2 A “potential conflict of interest” arises if there is a situation that could reasonably be expected to become a conflict of interest.
- 22.3 An “apparent” interest/conflict is where there is not technically an actual Interest/actual conflict but where it might appear to an outsider that there is a conflict of interest.
- 22.4 An “indirect” interest may arise through a relative, friend, firm supplier or any other personal relationship, or by being a director or officer of a party to a material contract or transaction or a person acting in a similar capacity, or by having a material interest in a party to a material contract or transaction.

23. **Examples of Conflicts**

- 23.1 A conflict of interest includes both actual and apparent conflicts of interest and may potentially involve the business of the Credit Union;
- companies in which the Credit Union has invested or in which it is planning to invest;
 - transactions with the Credit Union;
 - borrowing from or lending personal funds to an existing or potential member or supplier of the Credit Union;
 - involvement with an organisation that represents a special interest group or that carries out activities that, having regard to the purpose of this Policy and the role of a director of the Credit

Union, would reasonably be considered to conflict with the values and goals of the Credit Union or the duties of a director. For example, involvement in a consumer advocacy group adverse to financial institutions may represent a conflict of interest or involvement in a group whose mandate is inconsistent with the “Respect for others” principles set out in this Policy;

- any political activities (such as campaigning for a particular political party) on the Credit Union property or political activities conducted by a director in their capacity as a director of the Credit Union and not in their personal capacity, except where such activities have been previously consented to by the EC or the Board;
- any business activities outside of a director’s role with the Credit Union, unless such activities are passive investments that do not involve (i) any direct or indirect participation in the management or decision-making of such businesses nor (ii) such director having direct or indirect control over 20% or more of the voting securities of such businesses.
- As leaders, Directors and Committee Members must put the interests of the Credit Union before their own interests. Particularly, Directors and Committee Members must not:
 - attempt to influence the Credit Union’s policies or decisions to gain a personal or business advantage for themselves or a related party;
 - use confidential information for any personal or business advantage for themselves or a related party; or
 - use their position with the Credit Union to attempt to gain personal benefits or to confer benefits upon other persons or businesses with whom they have a common personal or business interest.

Note: This is not an exhaustive list

24. **Deemed Conflicts**

24.1 Unless the Board or EC determines otherwise, it shall be a conflict of interest for a director of the Credit Union to:

- be a director, employee (or equivalent position) or Advisory Board member of (or a person acting in a similar capacity for) any entity that competes with The Credit Union or any of its subsidiaries or affiliates;
- be a director, employee (or equivalent position) or Advisory Board member of (or a person acting in a similar capacity for) any entity that is a party to a proposed or current material contract or transaction with the Credit Union;
- have a material interest (direct or indirect) in a proposed or current material contract or transaction with the Credit Union;
- accept or provide any gift or hospitality of Material Value offered or tendered by reason of a person's position as a director of the Credit Union; and
- approach members of the Credit Union with respect to business activities other than the business activities of the Credit Union.

Note: This is not an exhaustive list.

25. **Abide by the law and the Rules.**

25.1 This Policy does not relieve a director from complying with any Acts or the EC. Directors and Committee Members must be free of conflict in exercising their fiduciary duties and, therefore, must advise the Board of any conflicts of interest or potential conflicts of interests that could impair their decision-making.

25.2 **Note:** A director will not be excused from compliance with this Policy or any other rule of law relating to conflicts of interest on the basis that the director did not realise that a conflict of interest existed or might arise.

26. **Elections**

26.1 The Board, on the recommendation of the Nominations Committee, recommends candidates to the membership who best meet the eligibility requirements under the Credit Union and the Regulator's Rules, demonstrate skills and experience in specific areas that complement and strengthen the existing Board and possess attributes consistent with the values of the Credit Union.

27. Confidentiality

27.1 All Disclosable Interests shall be kept confidential by the CEO, Secretary, and Chairman and shall be disclosed to other Directors and Committee Members only with the consent of the relevant Director or as required by this Code or by law.

28. Disclosure Procedures

28.1 Each director shall:

- Sign a **Conflict of Interest Disclosure Statement** each year and a revised Conflict of Interest Disclosure Statement, as applicable, within 15 days of any change in any information contained in it.
- The Conflict of Interest Disclosure Statement and any revisions thereto shall be delivered to the Board Secretary for review and filing with the EC. Where the EC determines it is appropriate, such disclosure reports will be delivered to the Board, which shall record the disclosure in its minutes. The Statements shall be in the form approved by the EC.
- Seek guidance from the Board Chair if in doubt as to whether a situation is, or may appear to be, or could reasonably be expected to become, a conflict of interest or from the Chair of the EC if the situation itself involves the Board Chair.
- Notify the Chair of the EC if the director wishes to accept or tender a gift or hospitality of Material Value and await approval as required under this Policy prior to accepting or tendering the gift or hospitality.
- Notify the Board Chair and the Chair of the EC in writing and await approval prior to accepting any position as a director, employee (or any similar position) or Advisory Board member of any other entity. This is necessary to ensure that there is no conflict of interest or potential conflict of interest (as defined in this Policy) between the director's duties to The Credit Union and such other entity.
- immediately disclose in writing to the Board Chair and the Chair of the EC or by requesting to have it entered in the minutes of a Board or Committee meeting the nature and extent of any

interest they have in a material contract or material transaction with the Credit Union, whether entered into or proposed, if they

- are a party to the contract or transaction;
- are a director or officer of a party to the contract or transaction or a person acting in a similar capacity; or
- have a material interest in a party to the contract or transaction.

28.2 If a proposed or current material contract or transaction would not require approval at a Board meeting, disclose to the General Counsel and CEO of the Credit Union in writing or by requesting to have entered into the minutes of the next Board or Committee meeting, immediately after they have become aware of the contract or transaction, the nature and extent of their interest.

29. **Procedures for Resolution of Conflicts of Interest**

29.1 If a conflict of interest relates to a proposed or current material contract or transaction involving The Credit Union:

29.2 **The director shall:**

- abstain from a meeting of the Board or of a Committee;
- not attempt to influence, in any way, the Board's, or any officer's or employees', dealing with the matter creating the conflict of interest.

29.3 **The EC and the Board shall:**

- Require the director to abstain from a meeting of the Board or of a Committee as required by the Credit Union Rules and instruct Committee Chairs as needed. If a conflict of interest relates to a gift or hospitality of Material Value, the director shall:
- Obtain the consent of the EC prior to accepting such gift or hospitality or
- refuse, return or refund the value of such gift or hospitality.

- 29.4 For any other conflicts aside from those referenced in this section, the director shall immediately disclose the conflict of interest in accordance with this Policy. The EC shall then undertake a review of the director's facts and conduct under Appendix B.
- 29.5 In all cases, the EC shall, upon becoming aware of an alleged or possible conflict of interest involving a director that has not been disclosed by such director, undertake a review of the facts and conduct of the director under Appendix B.

30. **Roles and Responsibilities in Executing Policy Requirements**

ROLE	RESPONSIBILITIES
Board of Directors	Adhere to this Policy and all related Policies
Board Chair	Adhere to this Policy and all related Policies Provide advice to Directors
Executive Committee (EC)	Adhere to this Policy and all related Policies Make determinations as needed on Directors conduct
Chair of Executive Committee	Adhere to this Policy and all related Policies Provide advice to Directors as needed
Legal Council	Ensure Directors submit documents as provided by the Policy and provide advice to Board as needed

31. **Policy Governance**

ROLE	RESPONSIBILITIES	CYCLE
Board of Directors	Review and approve any changes to the Policy	As needed
Executive Committee (EC)	Review the Policy	Every 2 years
Legal Council	Review and provide policy advice	At least every 2 years

32. **Appendix A – Definitions**

32.1 **Advisory Board**

- A body, including without limitation an Advisory Committee, that advises a Board of Directors and Committee Members and management of an entity but does not have the authority to vote on governance matters, nor a legal fiduciary responsibility. The main purpose of an Advisory Board is to provide expertise, experience, support, and instructions to the senior management team of an organization.

32.2 **Material Value**

- Means a value that is \$200 or greater and (a) could be perceived as creating a sense of obligation or a real or perceived conflict of interest or (b) not of a style or value commonly accepted for business occasions.

33. **Appendix B – Policies and Procedures Relating to Director Review**

34. **Director Review**

34.1 Any Board Director who believes another has breached the duties of a Director may communicate his or her concerns to the Chair of the Executive Committee (EC) or, if the concerns relate to the Chair of the EC, to the Vice-Chair of the EC.

34.2 If the EC determines the complaint is without merit, it shall notify the complainant. If it determines the complaint warrants review, it may:

- investigate the complaint by gathering additional information, including the engagement of legal counsel or others to assist with the investigation;
- consult employees and Directors and Committee Members;
- retain and consult with Legal Counsel and other advisors;
- hear directly from the complainant; and/or

- request that the respondent appear before the EC to address the matters raised in the complaint.
- 34.3 Following its review, the EC shall determine appropriate action to take. Among the actions the EC may recommend to the Board are the following:
- the Director be censured or reprimanded;
 - the Director undertake remedial action, (such as training) as may be specified by the Board; or
 - the Director be removed pursuant to Rule 54c of the Credit Union Rules.
- 34.4 If the EC makes a recommendation to the Board, it must issue a report which sets out in detail:
- the specific grounds for the recommendation;
 - the procedures followed by the EC leading to the recommendation; and
 - the facts and reasons by which the EC came to the conclusions in its report.
- 34.5 Upon receiving a recommendation for sanction or removal by the EC, the Board shall:
- invite the Director under review to respond to the EC report in writing;
 - set a meeting date for the Board to consider the recommendation, which gives the Director under review a reasonable period (e.g., 30 days or less) in which to prepare a response; and
 - invite the Director under review to attend, in person, the Board meeting convened to consider the EC's recommendation.
- 34.6 At the meeting, the Board shall provide the Director with an opportunity to address the EC report and questions from Board members (if any). A Director under review is entitled to be represented by legal counsel, who may attend the meeting and speak on the Director's behalf at the meeting.

34.7 Following such representations, the remaining members of the Board shall deliberate in camera whether to adopt, amend, or reject the recommendation of the EC. The substance of such deliberation, as well as the outcome, shall be recorded in the minutes and form part of the Board's in-camera record.

35. **Reporting to Members to the Registrar of Companies (Registrar) and to the Cayman Islands Monetary Authority (CIMA)**

35.1 The Board will ensure that a Director's statement will be circulated to the members, to CIMA, and the REGISTRAR according to the Cooperative Societies Act. The Board will ensure that CIMA and the REGISTRAR are notified within 10 days of:

- any changes in the membership of the Board;
- any potential changes in the membership of the Board; and
- any circumstances that may adversely affect the suitability of Board members.

36. **Appendix C – Elected Volunteer Conflict of Interest Disclosure Form**



Credit Union

ELECTED VOLUNTEER CONFLICT OF INTEREST DISCLOSURE FORM

NAME POSITION DATE

DEPARTMENT SUPERVISOR /MANAGER

PLEASE DESCRIBE BELOW ANY APPOINTMENTS, INTERESTS, ACTIVITY, RELATIONSHIPS, POA, USE OF PROPERTY, TRANSACTIONS, GIFTS RECEIVED, OR EMPLOYMENT MATTERS THAT YOU BELIEVE COULD CONTRIBUTE TO A CONFLICT OF INTEREST BETWEEN THE CREDIT UNION AND YOUR PERSONAL INTEREST.

DECLARATION

APPOINTMENTS TO BOARDS AND AGENCIES YES NO MUST DECLARE IF YES

FULL NAME OF COMPANY

APPOINTMENT TERM POSITION AMOUNT PAID/UNPAID

FULL NAME OF COMPANY

APPOINTMENT TERM POSITION AMOUNT PAID/UNPAID

FINANCIAL INTEREST (VENDERS OF CREDIT UNION) ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

NAME OF VENDOR % OF SHARE OWNED

I DO NOT HAVE FINANCIAL INTEREST, HOWEVER HAVE A PERSONAL CONFLICT WITH AN EMPLOYEE OF A CU VENDER

RELATIONSHIP VENDOR

DETAILS

OUTSIDE ACTIVITY (OUTSIDE WORK OR BUSINESS ACTIVITY) YES NO MUST DECLARE IF YES

EMPLOYED SELF-EMPLOYED NAME OF EMPLOYED COMPANY

DESCRIPTION OF WORK DONE

ROMANTIC RELATIONSHIPS ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

I AM IN A RELATIONSHIP WITH AN EMPLOYEE OF THE CREDIT UNION WHO WORKS IN MY DEPARTMENT.

I AM IN A RELATIONSHIP WITH AN EMPLOYEE/VOLUNTEER OF THE CREDIT UNION THAT DOES NOT WORK IN MY DEPARTMENT.

NAME OF EMPLOYEE/VOLUNTEER

POSITION DEPARTMENT/ COMMITTEE / BOARD

POWER OF ATTORNEY (POA) ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

NAME OF MEMBER RELATIONSHIP

PURPOSE OF POA



CICSA Co-operative CONFLICT OF INTEREST DISCLOSURE FORM

USING THE CREDIT PROPERTY ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

RESOURCES:

PROPERTY FACILITIES SUPPLIES EQUIPMENT OTHER

DETAILS

APPROVED BY: CEO COO

GIFTS (EXCEEDING \$100 IN VALUE) ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

NAME OF MEMBER/VENDOR

DATE RECEIVED VALUE OF GIFT

WITNESSING DOCUMENTS ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

NAME OF MEMBER DOCUMENT WITNESSED

EXECUTOR OF WILL ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

MEMBER NAME RELATIONSHIP

RELATION TO EMPLOYEE/VOLUNTEER ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

NAME RELATIONSHIP

NAME RELATIONSHIP

NAME RELATIONSHIP

ACCOUNT SIGNATORIES ACTUAL OR PERCEIVED CONFLICT TO DECLARE? YES NO

ACCOUNT NUMBER MEMBER NAME RELATIONSHIP

ACCOUNT NUMBER MEMBER NAME RELATIONSHIP

ACCOUNT NUMBER MEMBER NAME RELATIONSHIP

ACCOUNT NUMBER MEMBER NAME RELATIONSHIP

ACCOUNT NUMBER MEMBER NAME RELATIONSHIP

I HEREBY CERTIFY THAT THE INFORMATION SET FORTH ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE. I HAVE REVIEWED, AND AGREE TO ABIDE BY, THE CONFLICT-OF-INTEREST POLICY OF THE CREDIT UNION.

NAME DATE

SIGNATURE

FOR HUMAN RESOURCES USE ONLY

RECEIVED BY DATE RECEIVED