[CREDIT UNION NAME]
WHISTLEBLOWER POLICY

Policy Owner: Board of Directors
Approved By: Board of Directors

1. PURPOSE
[CREDIT UNION NAME] Credit Union ("Credit Union") requires directors, employees, volunteers, officers, contractors, and representatives to observe high standards of business and personal ethics. The purpose of this policy is to establish procedures for reporting unethical, fraudulent, unsafe, improper, or illegal conduct and provide a means for communicating concerns without fear of retaliation.

2. GOVERNANCE OVERSIGHT
The Supervisory/Audit Committee monitors internal controls, safeguards member assets, reviews complaints, oversees whistleblower matters, and monitors corrective actions. The Board of Directors provides executive oversight, risk management, financial stewardship, and reviews this policy at least annually.

3. WHISTLEBLOWER DEFINITION
Whistleblowing is the reporting of suspected unethical, fraudulent, unsafe, improper, or illegal conduct.

4. REPORTABLE CONDUCT
Includes fraud, accounting irregularities, legal violations, unsafe practices, policy violations, theft, conflicts of interest, harassment, retaliation, falsification of records, insider abuse, and other serious misconduct.

5. REPORTING INAPPROPRIATE ACTIVITIES
Reports may be made to a supervisor, Human Resources, Senior Management, Compliance Officer, Supervisory/Audit Committee, Board Chairperson, hotline, email, web portal, mail, or in person. Anonymous reports are permitted.

Contact Information
Hotline: _____
Email: _____
Website: _____
Mailing Address: _____

6. ANNUAL POLICY DISTRIBUTION AND ACKNOWLEDGMENT
This policy shall be distributed annually and remain accessible to all employees, volunteers, officers, and directors.

7. INVESTIGATION OF ALLEGATIONS
Investigations shall be objective, impartial, and independent. Conflicted individuals may not investigate complaints. Initial reviews should occur within 10 business days when practicable, and investigations should generally be completed within 30 business days.

8. DUTY TO COOPERATE
All personnel are expected to cooperate fully with investigations.

9. GOOD FAITH REPORTING
Reports must be made in good faith. Knowingly false reports may result in disciplinary action.

10. CORRECTIVE ACTIONS AND REMEDIES
May include training, coaching, policy revisions, control improvements, warnings, suspension, termination, restitution, and referrals to regulators or law enforcement.

11. NO RETALIATION
Retaliation is prohibited consistent with applicable whistleblower protection laws, including the Whistleblower Protection Act.

12. CONFIDENTIALITY
Reports and investigations will be handled as confidentially as possible.

13. EXTERNAL REPORTING RESOURCES
NCUA Fraud Hotline: https://ncua.gov/regulation-supervision/regulatory-compliance-resources/fraud-prevention-resources/ncua-fraud-hotline-form
Phone: 1-800-827-9650
OSHA: https://www.osha.gov/whistleblower/WBComplaint.html

14. RECORD RETENTION
Records shall be maintained according to applicable legal and regulatory requirements.

15. POLICY REVIEW
The Board shall review and approve this policy at least annually.