

## **NORTHLAND AREA FEDERAL CREDIT UNION**

### **Denial of Services Policy**

**Purpose:** A Denial of Services policy will increase our ability to protect our membership against financial losses, including but not limited to excessive legal expenses, property damage and possible abuse against our employees, volunteers, members and/or others involved in Credit Union business. Within this policy, Northland Area Federal Credit Union employees, volunteers, members and/or others related to Credit Union business will be referred to as “aforementioned individuals”. The word “member” will heretofore be defined as a member or their agent. The addition of a member conduct provision in the Denial of Services Policy is to protect the aforementioned individuals from abusive members or their agents.

This policy does not restrict the rights of the membership to maintain a share account and vote at any meeting of the membership. Further, this policy is not intended to limit or restrict Northland Area Federal Credit Union from exercising its rights under its Bylaws Article XIV Expulsion and Withdrawal. This policy is not intended to impact day-to-day temporary revocation of services. Rather, this policy is intended to address certain unacceptable conduct in order to assure the rights and protection of the aforementioned individuals by restricting the availability of certain services and access to the Credit Union.

**General:** The Board authorizes the Credit Union senior management team to deny certain financial services and access to Credit Union facilities or events for reasons related to: (1) a member’s abusive or threatening behavior to aforementioned individuals; (2) causing the Credit Union a financial loss; (3) intentionally or otherwise perpetrating real or attempted fraud on the Credit Union; or (4) any other reason that poses a safety or soundness threat to the Credit Union or its personnel. A member may be denied certain services offered by the Credit Union and such services may be terminated upon notification to the member, other than the right to maintain a share account and the right to vote.

**Notification of Denial of Services:** Once two or more Credit Union senior management team members have determined that a member shall be denied services, the Credit Union will notify the member in writing of the denial of services and the reason(s) upon which the denial is based.

**Abusive and Threatening Member Conduct:** If a member verbally or physically threatens an aforementioned individual, such misconduct will be considered unacceptable. Such behavior and conduct by a member may result in closure of respective Credit Union products and services and/or denied access to any Credit Union facility or event. Additionally, the President/CEO may seek a legal restraining order and/or the member’s name may be placed on a recommended list for expulsion, and such list will be provided to the Board of Directors.

**Notification to Members of Denial of Services Policy:** The Credit Union shall notify all members of the Denial of Services Policy by posting the policy on Northland’s website, as well as providing a copy of the policy to members at account opening and upon request.

**Reinstatement of Services:** Upon member’s written request and a minimum of 12 months since the last incident of misconduct, the Credit Union CEO/President may reinstate services of a member if the Credit Union has been provided with information that reasonably assures the credit union that abusive or threatening incidents were isolated, resolved and are not likely to occur in the future.