

BCU Employee Handbook

2026

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This Employee Handbook contains a summary of certain guidelines and policies that affect BCU's employees. Each employee should read and become familiar with the information contained in this Employee Handbook. Failure to comply with BCU's guidelines and policies may result in discipline, up to and including termination.

BCU may change or modify the provisions in this Employee Handbook at any time. Accordingly, employees should refer to the current version of this Employee Handbook, which is available on the HR SharePoint site.

The provisions in this Employee Handbook are not intended to in any way create any contractual obligations between BCU and its employees.

NOTHING IN THIS EMPLOYEE HANDBOOK CREATES OR IS INTENDED TO CREATE A PROMISE OF CONTINUED EMPLOYMENT FOR A DEFINITE TERM. SUBJECT TO THE REQUIREMENTS OF APPLICABLE LAWS, EMPLOYMENT AT BCU IS EMPLOYMENT AT-WILL AND MAY BE TERMINATED BY EITHER BCU OR THE EMPLOYEE, AT ANY TIME, FOR ANY REASON, WITH OR WITHOUT CAUSE OR NOTICE. NO MANAGER HAS ANY AUTHORITY TO ENTER INTO A CONTRACT OF EMPLOYMENT EXPRESS OR IMPLIED THAT CHANGES THE FACT THAT EMPLOYMENT WITH BCU IS AT-WILL. ONLY THE CEO OR THE CHRO OF BCU OR THAT PERSON'S AUTHORIZED REPRESENTATIVE HAS THE AUTHORITY TO ENTER INTO AN EMPLOYMENT AGREEMENT THAT ALTERS THE FACT THAT EMPLOYMENT AT BCU IS AT-WILL, AND ANY SUCH AGREEMENT MUST BE IN WRITING SIGNED BY THE CEO, CHRO, OR THAT PERSON'S AUTHORIZED REPRESENTATIVE. IN ADDITION, NOTHING IN THIS EMPLOYEE HANDBOOK IS INTENDED TO PROHIBIT OR DISSUADE EMPLOYEES FROM ENGAGING IN ACTIVITIES PROTECTED BY STATE OR FEDERAL LAW, INCLUDING THE NATIONAL LABOR RELATIONS ACT.

This Employee Handbook revokes and supersedes all previous versions of the Employee Handbook.





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Name: Accommodations Policy

Owner: Human Resources

Effective Date: January 1, 2026

A. Purpose:

BCU is committed to providing a reasonable accommodation to employees and applicants who need one due to their disability, religion, pregnancy, and/or status as a victim of domestic violence, sexual offense, and stalking, in accordance with applicable law.

B. Scope and Applicability:

All BCU Employees

C. Policy:

Disability Accommodation. BCU will make a reasonable accommodation for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee, unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result.

Religious Accommodation. Where possible, BCU will reasonably accommodate an employee's religious beliefs, observances, and practices in a manner that permits the employee to perform the essential functions of their job. An accommodation will generally be granted if it is reasonable, eliminates conflict between an employee's religious beliefs, observances, or practices and the employee's job requirements, and does not cause an undue hardship to BCU.

Pregnancy Accommodation. BCU will also consider requests for reasonable accommodations made by an applicant or employee who is pregnant and for medical or common conditions related to pregnancy and childbirth, in accordance with applicable law. Depending on the type of request, employees may be required to provide supporting documentation from their healthcare provider regarding the need for an accommodation. It is the employee's or applicant's duty to provide requested documentation to BCU.

Lactation Accommodation. BCU will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk as required by applicable law. Each BCU location has a designated private room, free from intrusion with a lock. The location will be in close proximity to the work area, safe, clean and free from toxic or hazardous materials; contain a surface (e.g. a table or shelf) to place a breast pump and other personal items; contain a place to sit; and have access to electricity. Each room has a small refrigerator that should be used solely for the purpose of storing the expressed breast milk. Employees storing milk in the refrigerator assume all responsibility for the safety of the



milk and the risk of harm for any reason, including improper storage, refrigeration and tampering. Employees may also have access to a sink with running hot and cold water. Additional rules for the use of the room and refrigerator storage are posted in the room. Employees who work offsite or in other locations will be accommodated with a private area as necessary.

For the first year following the birth of a child, BCU will provide paid lactation breaks, so long as they are reasonable in length and as otherwise required by law. If possible, the lactation break time should run concurrently with scheduled meal and rest breaks already provided to the employee. After one year, lactation breaks are unpaid unless otherwise required by law.

Employees on break shall have complete privacy, free from distractions or interruption by their manager or any other individual.

Employees who have a need for a lactation accommodation should contact Human Resources to discuss how to request a room and to discuss any other lactation accommodation needs.

Special note for San Francisco, CA, Baltimore, MD and New York City employees: To request a lactation accommodation, employees should contact Human Resources. BCU will respond to a request for accommodation within five business days and will engage in an interactive process (or in NYC, a cooperative dialogue) with the employee to determine the appropriate break periods and lactation location for the employee. If BCU denies a request for lactation accommodation, is unable to provide a lactation location, provides a location that does not fully comply with applicable laws or asserts an undue hardship, it will provide a written statement identifying the reason(s) for doing so.

Accommodations for Victims of Domestic Violence, Sexual Offense, and Stalking. BCU will provide reasonable accommodations to employees who are victims of domestic violence, a sexual offense or stalking, in accordance with applicable law.

Requesting an Accommodation

Individuals who believe they need an accommodation for any of the aforementioned reasons and/or to perform the essential functions of their job, enjoy an equal employment opportunity, or obtain equal job benefits should contact Human Resources to request an accommodation and should, absent extenuating circumstances, complete the documentation provided by Human Resources to initiate an interactive process. Human Resources will communicate with the employee and engage in an interactive process to determine the nature of the issue and what, if any, reasonable accommodation(s) may be appropriate. BCU will evaluate information obtained from the employee, and possibly the employee's health care provider or another appropriate health care provider, regarding any reported or apparent barriers or limitations, and





will work with the employee to identify possible accommodations, if any, that will help eliminate or otherwise address the barrier(s) or limitation(s).

If an identified accommodation is reasonable and will not impose an undue hardship on BCU and/or a direct threat to the health and/or safety of the individual or others, BCU will make such an accommodation, or it may propose another reasonable accommodation which may also be effective. Employees are required to cooperate with the process by providing all documentation necessary to support the need for an accommodation and being willing to consider alternative accommodations when applicable.

Any employee who perceives a conflict between job requirements and religious belief, observance, or practice should submit a request for accommodation to Human Resources to initiate the review process. BCU requests that accommodation requests be made in writing, and in the case of schedule adjustments, as far in advance as possible.

Reasonable Accommodation Examples

Examples of reasonable accommodations may include: (1) modifying work schedules to provide earlier or later hours; (2) modifying work duties/job restructuring, practices or policies; (3) providing time off; (4) acquiring, providing, and/or modifying furniture (such as stools), equipment and devices; (5) providing additional break time for lactation; (6) more frequent or longer restroom, food or water breaks; (7) assistance with manual labor or light duty; (8) reassignment to a vacant position; (9) appropriate adjustment or modification of examinations, training materials or policies; (10) an accessible worksite; (11) limitations on lifting; and (12) time off to recover from conditions related to childbirth or a leave of absence necessitated by pregnancy, childbirth or medical or common conditions resulting from pregnancy or childbirth. BCU will also transfer you to a less strenuous or hazardous position, where one is available, or duties if medically needed because of your pregnancy.

However, unless BCU does so or would do so for other classes of employees who need accommodation, BCU will not create an additional position or terminate another employee, transfer another employee with more seniority, or promote or transfer any employee who is not qualified to perform the new job as a part of the accommodation process.

Leave of Absence

Employees may be eligible for leaves of absence as a reasonable accommodation under applicable law. Employees should provide notice of the need for leave in advance if possible. Requests for pregnancy-related leaves must be supported by medical documentation. Pregnancy-related leaves will run concurrently with all other available leaves, including leaves granted under the Family and Medical Leave Act.

Special Note for CA employees: If time off or a reduction in hours is granted as a reasonable accommodation, BCU will consider the reduced hours/time off as pregnancy disability leave and





deduct the hours from an employee's four-month entitlement. Lactation is considered a pregnancy-related condition under California law. BCU will otherwise treat lactation as a pregnancy-related medical condition and address lactation-related needs in the same manner that it addresses other non-incapacitating medical conditions, including requested time off for medical appointments, requested changes in schedules and other requested accommodations.

Reinstatement and Reemployment

Employees will be reinstated to their original position or similar position with equivalent pay and benefits to the extent required by law. In some cases, employees may be reinstated to an equivalent position with equivalent pay, seniority, benefits and other terms and conditions of employment upon their notification to BCU of their intent to return to work or when the employee's need for reasonable accommodation ends to the extent required by law. Reinstatement is not required, however, if an undue hardship would result to BCU's business operations.

Non-Discrimination and Anti-Retaliation

BCU will not deny employment opportunities or take adverse employment actions against employees or otherwise qualified applicants for employment based on the need to make reasonable accommodations, nor will BCU retaliate against applicants or employees who request accommodations or otherwise exercise their rights under applicable law.

D. Review Cycle:

Annual

E. Next Review Date:

December 2026



Guideline Name: Adoption Reimbursement

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

The purpose of this guideline is to support our employees undergoing the adoption process. BCU will reimburse up to \$10,000 of eligible expenses per adoption. Employees must apply for reimbursement and provide any required documentation.

B. Scope and Applicability:

All BCU employees

C. Guidelines:

Qualified Adoptions:

- Children younger than age 19
- Persons age 19 or over that are incapable of self-care because of physical or mental disability
- Your adoption of a spouse/domestic partner's child or stepchild
- Adoption of your child or stepchild by a spouse/domestic partner

Eligible Expenses:

- Court costs
- Foreign adoption fees
- Private and public agency fees
- Legal fees
- Home study fees
- Pre-adoption medical examinations and treatments (i.e. dental, eyeglasses, etc.)
- Required transportation costs (including lodging, meals, and transportation fees for personal auto use (calculated using the current auto reimbursement rate)
- Temporary foster care costs associated with the placement of a child in foster care
- Any other reasonable and customary costs or expenses approved by the Health & Welfare Committee.

Reimbursement Process

Please submit the following to the Benefits Department for reimbursement:

- Copy of child placement agreement or court order, stamped and signed





- Billing statement from your adoption agency, accompanied with a detailed itinerary for travel expenses
- Copy of all cancelled checks or bank statements for payments made toward the adoption
- Documentation from adoption agency that states the date the adoption was initiated. Expenses must be submitted within eight (8) months of the date of the expense. You will be reimbursed via your payroll check and reimbursement are usually received within two pay periods from the date the application is received and approved by HR. Any payment under this program is considered taxable income to you, so the company will withhold all applicable taxes and any reimbursements will be included on your W-2 form.
- If an employee and their spouse both work at BCU and are eligible employees, each must submit an application, and each may submit multiple claims for reimbursement. The maximum for reimbursement is \$10,000 per adoption, per employee. Duplicate expenses are not covered.
- If the adoption ends up not being successful, you can still be reimbursed for incurred eligible expenses up to the maximum limit.
- If you leave BCU after your adoption reimbursement has been approved, you may still be eligible for reimbursement. You may submit claims for reimbursement up to 30 days after your termination date and you will be reimbursed for any expenses incurred prior to your termination.
- There is no limit to the number of adoptions for which you can submit a reimbursement application for consideration.

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028





Guideline Name: US Attendance
Guideline Owner: Human Resources
Effective Date: January 1, 2026

A. Purpose:

The purpose of this guideline is to establish the criteria for attendance expectations for employees. Employees are expected to attend work as scheduled with a minimal number of unscheduled absences. Those employees whose absenteeism exceeds the limits of the guideline will be considered unsatisfactory for employment.

B. Scope and Applicability:

All US BCU Employees

C. Responsibility:

Employees are expected to be on time and at work each scheduled day. Employees are encouraged to take care of personal business during non-scheduled working hours or days.

Supervisors are responsible for holding employees accountable to these guidelines by providing timely and appropriate counsel and corrective action as needed.

The employee and supervisor have accountability and are responsible for managing all absences so that they do not interfere with business needs.

It is the joint responsibility of the employee and the supervisor to track absences.

D. Definitions

TERM	DEFINITION
Scheduled Absence	Employee notifies supervisor in advance, per Attendance Guidelines below, and receives approval for time off.
Unscheduled Absence	Employee is not present at work during scheduled work period and did not receive prior approval from supervisor for time off.
Tardy	An employee is considered tardy if they are not ready to work at their scheduled starting time.
Leave Early	An employee leaves prior to the end of their scheduled shift.
No call/No show	The employee does not show up to work and the employee does not call their supervisor to report their absence. *See further details below





E. Guidelines:

Scheduled PTO

Employees must schedule and receive approval for time off 24 hours (or one business day) in advance.

Employees requesting to schedule more than one day off at a time are encouraged to provide sufficient notice to accommodate business need.

All time off requests should be submitted to immediate supervisor for approval. Supervisors will approve or reject time off requests based on business needs. If a request is rejected, the supervisor should provide the employee with an explanation for the rejection.

Employees will be required to use PTO for all absences not covered by any other leave (i.e. Jury Duty, Bereavement Leave, etc).

No Call/No Show

Each day the employee doesn't report to work or call to notify a supervisor is considered a no call no show event. If the employee fails to report for 3 days, it's considered a voluntary termination by the employee.

Unscheduled Time Off

Unscheduled time off may be required in cases of illness or emergency. You should continue to follow your department procedures for notifying your supervisor regarding unscheduled time off.

Increments of Scheduled Time Off

Employees may request scheduled time off in increments of 30 minutes for Salaried Non-exempt and in 4-hour or 8-hour increments for Salaried Exempt.

Salaried Non-exempt employees will be required to use time off for any scheduled or unscheduled absence of 30 minutes or more. Unscheduled absences of less than 30 minutes will be charged as unpaid time, for Salaried Non-exempt employees

Unscheduled Absences

Attendance points will be assessed for unscheduled absences on the following schedule (excludes approved FMLA or STD, Jury Duty, Bereavement or Personal Leave):

Unscheduled absence of 4 hours or less	½ point
Unscheduled absence of greater than 4 hours	1 point
No call no show absence (full day)	2 points





*New hires who receive 4 points within the first 90 days of employment will be subject to termination.

2 Points	Verbal warning
3 Points	Final written warning
4 points	Termination

Corrective Action

The corrective action process for attendance shall be administered as follows:

At 4 points and less than 6 points	Counseling
6 or more points	Verbal warning
Next unscheduled absence beyond Verbal warning	Written warning
Next unscheduled absence beyond Written warning	Final written warning
Next unscheduled absence beyond Final written warning	Termination

When an employee reaches 6 or more points within a sliding 12-month period, corrective discipline will be issued. For every unscheduled absence thereafter, corrective discipline will be issued based on the schedule above.

Attendance points will fall off 12 months from date of occurrence. An employee may fall below 6 points during a 12-month period, however, if the employee has an active final written warning on file for attendance, then that discipline remains active for 1 year from date of issuance, regardless of how many points drop off.

If an employee falls below 6 points, even with an active written warning on file, they may incur additional attendance points with no additional discipline, until they reach 6 or more points again.

As a warning expires, further disciplinary action will revert to the appropriate step.

While the corrective action write-up may roll off according to regression guideline, if there is a pattern of warnings on the same or similar issue over time that evidence a person has not corrected their behavior, the Company specifically reserves the right to consider the employee's record as a whole and to issue discipline, up to and including termination. Nothing in this guideline suggests that the Company must tolerate consistently uncorrected behavior.

Reference

This guideline shall be interpreted to follow state, federal and local laws.





F. Review Cycle:

Annual

G. Next Scheduled Review Date:

December 2026



Guideline Name: Bereavement Leave Guideline

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

BCU provides paid bereavement leave in the event an employee experiences the death of an immediate family member. Bereavement leave must be coordinated with the employee's supervisor.

B. Scope and Applicability:

All BCU employees

C. Definitions:

TERM	DEFINITION
Immediate Family Members (Up to 5 Days)	<ul style="list-style-type: none">• Sibling• Parent, including biological, adoptive, step or foster father or other individual who stood in loco parentis to the employee who the employee was a son or daughter• Parent-in-law (including a domestic partner's parents)• Son/daughter-in-law• Grandparent• Grandchild• Relative(s) who resides in the same household as the employee
Immediate Family Members (Up to 10 Days)	<ul style="list-style-type: none">• Spouse (including common law, domestic partners, and other recognized unions)• Child or domestic partner's child

D. Policy:

The length of paid bereavement leave is a maximum of five or ten days (based on the definitions above) at the employee's scheduled hours. In cases of death of immediate family members who are not the employee's spouse, child or parent, supervisors may require documentation of death (through copies of death certificates and/or published obituaries) to approve the bereavement leave.

If the employee does not qualify for paid bereavement leave, it is at the manager's discretion to consider other approved paid or unpaid time off to provide the employee time off from work.





E. Review Cycle:

3 Year

F. Next Scheduled Review Date:

December 2028





Guideline Name: Break/Lunch Guidelines

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

BCU provides full and part-time employees with breaks to ensure you're able to remain productive at work.

B. Scope and Applicability:

All US employees

C. Guideline:

All Salaried Non-Exempt (SNE) Full-time employees who work seven and one-half (7 ½) continuous hours, will have two 15-minute paid break periods and one 30-minute unpaid meal period. Meal periods are to be taken within the first five hours and cannot be combined with your break.

Meals

- One 30-minute unpaid meal period each workday which also includes travel time to and from the workstation.
- Must record start and end time for meals
- Effective 1/1/2018 for California: meal periods must be taken within the first 5-hours of start of shift. Penalty for non-compliance: 1-hour of pay will be automatically added to the payroll for each violation.
 - The timekeeping system will automatically deduct 30 minutes after 5 hours of work.
 - All employees must take their meal period.

Breaks

- The purpose of break periods is to ensure that employees maintain productivity and have an opportunity to use the restroom, eat a snack, make personal phone calls, or otherwise be refreshed upon returning to their workstations.
- Breaks should not be used to arrive late or leave work early.
- There are no additional break periods to allow for smoking. Smoking breaks must coincide only with scheduled breaks as detailed above.
- The two 15-minute breaks include travel time to and from the work area and must be taken as such.
- No additional compensation is provided for not taking break periods.





- All Salaried Non-Exempt (SNE) Part-time employees that work up to 5 hours have one 15-minute paid break.

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028



Guideline Name: Bridge of Service
Guideline Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

To allow for the recognition of bridging of service as one factor in calculating length of service when determining certain rights, benefits and privileges of employment.

B. Scope and Applicability:

All BCU employees

C. Guideline:

Length of Service is the accumulated time worked plus certain qualifying nonworking time, such as PTO/vacations, holidays, sick days, and approved leaves of absence.

A break in the length of service usually occurs when employment terminates. However, service may be bridged if a former employee is rehired within twelve (12) months of a break in service. This means that:

- A. The employee's continuous service date at the time of rehire will be the same as it was at the time of the break. Continuous Service Date is used to determine PTO/vacation and sick pay eligibility.
- B. The employee must re-enroll in all welfare plans (i.e., medical and dental) and the Retirement Savings Plan.

A break in service of more than twelve (12) months will not be bridged, except as required by the Incentive Investment Plans.

D. Review Cycle:

3 Year

E. Next Review Date:

December 2028





Guideline Name: Civic Duty Leave
Guideline Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

Civic Duty Leave is provided to all employees who need to take time away from work to vote or serve jury duty, or who are subpoenaed to appear before an agency or court as a witness to give testimony and/or deliver documents.

B. Scope and Applicability:

All US employees

C. Guideline:

Voting Time Leave (Local, State, and Federal Governmental Elections)

Voting should be done outside working hours when possible. If an employee needs to vote during working hours, the following guidelines apply:

- Employees must provide their supervisor with reasonable advance notice for scheduling purposes and verify they do not have sufficient time to vote before or after working hours, unless prohibited by state/local law.
- Non-Exempt employees can take as much time as needed to vote but will only receive paid voting leave for up to 2 hours unless state/local laws are more generous. Additional time used for voting will be unpaid unless the employee elects to use PTO for that time.
- Exempt employees will receive regular pay.

Jury Duty Leave Guidelines

- Jury Duty leave will be granted for the length of time required for jury duty.
- Employees must provide a copy of the juror's summons to their supervisor as soon as practicable after it is received.
- Jury Duty leave is paid. Employees are to provide proof of their completed jury duty service to receive compensation and are permitted to keep the pay issued by the court for jury duty service as well.

Witness Leave Guidelines

- Witness leave will be granted for the length of time required to appear as a witness under the subpoena.
- Employees must provide a copy of the subpoena to their supervisor as soon as practicable after it is received.





- Witness leave is unpaid. However, the business may choose to provide paid witness leave, particularly if the witness/employee is providing testimony as a result of activity conducted within the scope of employment. PTO must be used if available.

Generally, witness leave will **not** be granted if the leave is for the employee to give testimony and/or deliver documents in a proceeding or lawsuit in which the employee is claimant/plaintiff or respondent/defendant, provided that leave will be granted to the employee respondent/defendant if the Company is otherwise providing for the employee's defense.

All leaves provided under this policy are not considered "hours worked" for purposes of overtime.

D. Review Cycle (Annual/Bi-Annual)

3 Year

E. Next Review Date:

December 2028





Name: Code of Conduct

Owner: Human Resources

Effective Date: January 1, 2025

Core Principles

The following principles are at the core of our commitment of ethics and compliance in everything we do and apply to all employees:

INTEGRITY AND COMPLIANCE: BCU employees are personally accountable for achieving their goals with integrity and in compliance with BCU policy and legal requirements.

OPEN COMMUNICATION: BCU employees are responsible for encouraging open, honest, and full debate of any issue related to compliance with BCU policy or legal requirements.

RAISING QUESTIONS: BCU employees are responsible for raising and resolving questions about compliance with BCU policy or legal requirements when they arise.

REPORTING VIOLATIONS: BCU employees are required to report perceived violations of BCU policy or legal requirements to management, Human Resources, or the Ethics and Compliance Helpline.

COOPERATION: BCU employees are required to assist fully with any audit, compliance assessment, or internal inquiry with candid, accurate, and complete information.

NON-RETALIATION: BCU employees may not punish or retaliate against anyone for raising a good-faith concern about compliance with BCU policy or legal requirements.



Shared Values

The following values are meant to **enhance our culture and describe the behavior we can expect of each other (cultivating our “Why”).**

We foster an environment of INCLUSION.

All individuals are treated fairly and respectfully, have equal access to opportunities and resources, and can contribute fully to the organization’s success.

We act with INTEGRITY.

We follow the golden rule without exception. We say what we mean and mean what we say. We work to the best of our ability no matter who is or isn’t watching.

We display COURAGE in our convictions.

We drive innovation, reaching beyond boundaries and thoughtfully explore new horizons. We seek help from others who are strong in ways we are not. We challenge the status quo and believe that progress is better than perfection.

We excel through COLLABORATION.

By working as one, sharing information and seeking solutions, we deliver exceptional outcomes. We appreciate one another’s skills and experiences and hold ourselves and each other accountable for the success of the team.

We WOW our Members.

We focus intensely on putting the member first, delivering extraordinary experiences that create lasting relationships inside and outside the organization. Our authentic and passionate service to others sets us apart.

General Expectation

BCU’s reputation is attained through our individual business conduct. Every interaction with our members is an opportunity for us to demonstrate that integrity is central to our business success — that “integrity works here.”

Each BCU employee, officer and director must endeavor to deal fairly with our members, suppliers, competitors, and each other. We will not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

We do not change our standards because others behave differently. We do not compromise our standards to meet financial goals.

Because the standards and the supporting policies and procedures may change from time to time, we are each responsible for knowing and complying with the current laws, rules, regulations, standards,





policies, and procedures that govern our work. The most current version of our Code of Conduct can be found on the HR Homepage on BCU's Sharepoint.

BCU employees who fail to comply with applicable laws, rules, regulations, standards, policies, and procedures are subject to discipline up to and including termination.

Ethical business conduct is part of everyone's job:

Everyone's Responsibilities

- Understand and comply with all of the Code of Conduct standards that apply to your work at BCU.
- Prevent compliance violations and protect BCU's reputation by actively supporting ethical behavior.
- Consult with your management, the Human Resources department, or subject matter experts when in doubt as to the correct compliance action to take.
- Fully and honestly cooperate in any compliance assessment or investigation of alleged violation of the Code of Conduct or BCU policies and procedures.
- If you believe or suspect a compliance violation has occurred, report the situation immediately through the resources identified in this Code of Conduct including the Ethics and Compliance Helpline.

Management's Responsibilities

- Inspire those with whom you interact to be accountable for delivering results with integrity.
- Create an open environment to aid and support others so they may successfully raise compliance questions without hesitation.
- Seek real-time advice from the Human Resources department and business leadership when in doubt as to the correct compliance action to take.
- Identify and address compliance risks ahead of issues arising.
- Achieve results with integrity.

Employment Practices

As part of our highly-skilled, motivated and diverse workforce, you are one of BCU's greatest strengths. We expect your help to maintain an atmosphere of dignity and respect in our workplace by following these standards:



DIVERSITY AND NON-DISCRIMINATION

BCU is committed to attracting, motivating and retaining an inclusive and diverse workforce. As part of this commitment, our policies prohibit discrimination based upon race, color, religion, gender, national origin, age, disability, sexual orientation, gender identity or expression, veteran status or any other basis protected by law.

HARASSMENT

BCU provides a safe workplace. BCU does not tolerate verbal or physical harassment or intimidation.

DRUGS OR ALCOHOL

BCU employees may not possess, use or unlawfully sell drugs on BCU property or perform their work under the influence of alcohol or the unlawful use of drugs. BCU may require employees to take drug and/or alcohol tests to ensure a drug and alcohol-free workplace.

BCU Assets and Property

You must conserve, preserve, and protect BCU's physical and intellectual property and financial assets.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

BCU's intellectual property and confidential information are valuable assets and must be closely guarded and protected. Likewise, BCU's financial information is confidential and should not be shared outside the company without authorization.

Confidential information must not be shared outside BCU without a confidentiality agreement approved by the Legal department. Confidentiality obligations continue even after you leave BCU.

In many circumstances confidential information may also be restricted within BCU. Sharing of this information is limited to those who have a need to know, and the information must be kept secure with limited access by others.

You must report any unauthorized disclosure of BCU's confidential information, whether inadvertent or not, to your manager or the Human Resources department immediately.

PHYSICAL PROPERTY AND INVENTORY

Facilities and equipment must be well-maintained and secured appropriately against theft and misuse. You may use BCU's property only for company business, unless approved by management.





MOBILE DEVICES, ELECTRONIC MEDIA, INTERNET AND E-MAIL USE

Exercise reasonable care to protect confidential business information and mobile devices, such as laptop computers, external drives, mobile phones, and the like, from theft or unauthorized access.

Precautions:

- Encrypt or password protect data;
- Keep mobile devices with you, or lock these while traveling;
- Protect BCU's confidential information and electronic media;
- Use these tools primarily for business purposes; only incidental personal use is permitted;
- Use these tools consistently with BCU's Acceptable Use Standard.

Accurate Business Records

We are in a highly-regulated industry, where inaccurate records could put the company at legal risk and threaten our competitive advantage. To ensure accurate recording of information and appropriate record management, you must:

- Legibly record information accurately, completely, and in accordance with BCU requirements;
- Take special care with financial records, and business-expense and time records;
- Maintain records in keeping with the record-management policy or quality system for your business;
- Preserve all documents related to pending or anticipated litigation and audits or investigations.

Conflicts of Interest

As an employee, you must work objectively and effectively — that is, without conflicts of interest. A conflict may arise when an employee's, contractor's or business partner's private interests interfere (or even appear to interfere) with BCU's interests.

FINANCIAL CONFLICTS

Neither you nor any relative of yours may have a significant financial investment in any company that competes, does business with, or seeks to do business with BCU.

A significant financial investment exists if:

- The employee or relative owns more than 1% of the outstanding capital of a business; and/or
- The investment represents more than 5% of the total assets of an employee or relative.





INTERNAL CONFLICTS

Internal conflicts of interest may arise if you and a family member, domestic partner, or individual with whom you have a close personal relationship:

- Share a reporting structure;
- Are members of the same management team; or
- Have influence or decision-making authority with respect to one or the other's position.

Disclose the relationship to your manager to determine if there is a conflict and what to do about it.

CONFLICTS OF INTEREST

A conflict of interest may happen when you are engaged in a second job or business of your own that may conflict with your responsibilities to BCU.

BUSINESS OPPORTUNITIES

It is your duty to advance BCU's legitimate interests whenever the opportunity arises. You may not compete with BCU or take for yourself any opportunities that you discover through the use of BCU property or information, or through your position with the company.

In all of these situations, you must disclose any apparent or actual conflicts of interest to management. When BCU management approves an apparent or actual conflict, the approval must be documented.

DATA PRIVACY

BCU respects the privacy of its members and employees. The company's privacy policies define BCU's privacy standards and guides the company's operations to follow similar controls for protecting personal and member information.

Employee Gifts and Entertainment

Providing or accepting inappropriate gifts or entertainment has the potential to harm BCU's business and reputation — and may be illegal.

WHAT YOU CAN ACCEPT

Generally, accepting modest gifts, entertainment or other business courtesies is permissible if:





- It legitimately helps improve business or community relationships;
- You are not involved in a current purchasing decision or procurement process;
- Your ability to act in the best interest of BCU would not be compromised; and
- You cannot be perceived as giving or accepting a bribe or kickback.

When exchanging gifts and entertainment with business associates, BCU employees must:

- Ensure gifts are in good taste, reasonable, and customary in value;
- Adhere to the receiving entity's gift policy;
- Not exchange cash, gift cards, or cash equivalents,
- Avoid the appearance of giving or accepting a bribe or kickback;
- Avoid embarrassment; act as if the public could view the exchange; and
- Avoid compromising the ability or appearance of being able to make decisions in the best Interest of BCU.

Business Partners

BCU relies on its network of business partners to produce quality products for our members. It is critical that all of these partners share our commitment to conducting business with integrity. When engaging or dealing with a partner, you must:

- Clearly define requirements and engage in fair and open competition;
- Ensure business partners are reputable and qualified;
- Ensure the engagement of a business partner does not create an actual or apparent conflict of interest
- Evaluate, approve and contract with business partners before any services, materials, components or products are purchased from them in accordance with BCU's requirements.



Communications with the Media

To maintain our outstanding reputation, it is important that we provide accurate, timely and consistent information about our company to the media.

Unless you have been expressly authorized to speak on behalf of BCU, employees should follow these steps if contacted by a member of the media via email or on social media:

1. **Do not reply.**
2. Forward the email or send a screen shot of the message on social media to Corporate Communications immediately at Media.Inquiry@BCU.org (do not reply and cc).
3. Never forward emails from BCU Corporate Communications to members of the media.

Raising Concerns and Doing the Right Thing

In BCU's complex and highly-regulated environment, making the right decisions can be challenging. Occasionally, you may need advice or help in resolving issues you face. We encourage the open discussion of all your questions and concerns.

As an employee, you have an obligation to report conduct that you believe may violate any laws or our Code of Conduct. BCU strictly enforces a non-retaliatory environment, which means that it is safe for you to raise ethics and compliance concerns in good faith.

As a first step, seek out your manager or the Human Resources department for assistance in addressing concerns. You may also contact the Ethics and Compliance Helpline at 844-857-5483.

Using these resources in your decision-making process will help us maintain BCU's reputation.

Ethics and Compliance Helpline

Helpline representatives are available 24 hours a day, seven days a week to consult with you in almost any language. You may file a report online at bcu.ethicspoint.com or dial 844-857-5483.

When using the Helpline, your identity will be treated confidentially and shared with a limited number of people who have a need to know or who are responsible for dealing with reports and investigations. Your personal information will be held and used in accordance with BCU's applicable policies and data privacy laws. You do not have to identify yourself unless required by specific laws or regulations.





A. Review Cycle (Annual/Bi-Annual)

Annual

B. Next Review Date:

December 2026





Guideline Name: Dress Guidelines
Guideline Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

BCU’s Dress for Your Day guideline applies to all business activities, whether you are onsite, offsite, or working remotely using video conferencing technology. For dress guidelines specific to individual Branches/location, please refer to your SEG’s handbook, the Branch Experience Playbook, or your manager for site specific guidelines.

While Dress for your Day is intended to be relaxed when employees have a workday that does not involve in-person interactions with members or meetings with vendors or Company Partners, the expectation is that employees will dress appropriately for the nature of our business and the type of work performed.

B. Scope and Applicability:

All BCU employees

C. Definitions:

TERM	DEFINITION
Dress for your day	<ul style="list-style-type: none">• Being well groomed• Appearing neat, clean, and professional• Not exposing an excessive amount of skin• Not distracting or interfering with your ability or that of others to work• Being respectful and consistent with the working environment and local customs• Clothing that does not exhibit any profanity or inappropriate graphics

D. Guideline:

You have an opportunity every day to promote your personal brand in the workplace. When deciding how to present yourself in a professional capacity, think about the type of impression you want to make. Ask yourself:

- How do I want to be represented and perceived?
- Do I come across as professional in both my demeanor and attire?
- Is my attire appropriate for the work I will be performing?



Your personal brand is a representation of you: A subtle indication of your professionalism is expressed by the way you present yourself, both in-person and online. Keep in mind that dressing “casually” does not imply it's appropriate to wear gym clothes or sloppy clothing.

E. Violations of the BCU Dress Guidelines:

Violations of BCU’s dress guidelines can range from inappropriate clothing to overly strong fragrances and body odor. If an employee has inappropriate attire, the employee may be asked to change or properly groom before continuing to work. In some circumstances, employees may be required to use their PTO/Vacation time.

Remember

Sound judgment is the best measure of determining appropriate attire. If you have any doubt about a particular item of clothing, please check with your manager or HR. Formal business attire and BCU spirit wear are always acceptable, and your manager may require formal business attire for certain meetings or events.

F. Review Cycle:

3 Year

G. Next Scheduled Review Date:

December 2028





Guideline Name: Employee Performance & Conduct

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

Progressive and corrective disciplinary action will normally be followed to ensure proper performance and conduct.

B. Scope and Applicability:

All BCU employees

C. Guideline:

It is the supervisor's responsibility to maintain, communicate and consistently apply standards of job performance and personal conduct and to ensure that each employee is made aware of unsatisfactory performance and conduct on a timely basis.

When an employee's performance or conduct does not meet expectations, the purpose of all corrective disciplinary action, short of termination, should be the correction of the employee's performance or conduct. The supervisor shall counsel the employee and allow reasonable time to meet acceptable standards. Performance or conduct issues and all actions taken should be documented in the employee's personnel file. Where appropriate and consistent with local practice, the employee should be given copies of such documentation. All documentation should be reviewed and approved by Human Resources prior to delivery to an employee. Management retains full discretion with respect to providing employee corrective and/or progressive disciplinary action.

Final Notification/ Performance Plan

Once an employee's performance or conduct issue(s) has been identified, and where informal actions such as counseling, training and assistance have not resulted in acceptable performance or conduct, then a Performance Improvement Plan (PIP) should be provided. A review of the facts should take place and the seriousness of the situation should be emphasized. The specific issues and specific performance or conduct requirements should be detailed in the PIP, signed by the employee and supervisor. If the employee refuses to sign, the supervisor and/or Human Resources should write on the documentation acknowledgment that the document was received by the employee and that the employee chose not to sign. Failure to sign and/or acknowledge the PIP does not delay implementation of the PIP. The employee should be given a copy (where practicable) and a copy will be placed in the employee's personnel file. Failure to improve performance to an acceptable level will result in termination. If sufficient improvement is noted, the PIP may be extended.



Performance Improvement Plan should be given only after review with the appropriate Human Resources representative.

Suspension and Termination

Termination situations must be reviewed with Human Resources and the Function Head. Human Resources will be involved in all aspects of the termination process.

In some circumstances, based on the nature or severity of the employee's performance or conduct, it may be necessary to accelerate the corrective action process. Under those circumstances, suspension and/or termination may occur without informal actions and/or a Performance Improvement Plan.

Employees are subject to all other workplace rules of conduct and behavior. Appropriate disciplinary action will be determined by management. Progressive discipline is not required or appropriate in every situation. The Company retains discretion to discipline and terminate without progressive discipline.

This Employee Performance and Conduct Procedure is effective from the first day of employment or after the employee has completed any applicable probationary period.

In Puerto Rico, this discretion may be exercised in situations that involve conduct or a pattern of conduct that amounts to gross misconduct.

The implementation of the Employee Performance and Conduct procedure must be consistently applied by each decision-maker or within decision-making groups. Human Resources should be consulted to ensure consistency of application.

The following is strongly encouraged to be included in all notification documents:

1. Performance/conduct expectations.
2. Areas where the employee is not meeting standards, including examples.
3. Impact of the employee's conduct on the business, department, co-workers, etc.
4. Time frame for expected compliance and review.
5. Action plan to improve or correct the situation.
6. Consequences of not meeting expectations (further disciplinary action up to and including termination from the company).
7. Verification of delivery to employee.

Employees have the option to write comments in response to any notification documents.

The corrective disciplinary action process is cumulative. Improvement in performance is expected to be self-sustaining and continuous. Generally, there should not be multiple performance plans for similar performance issues or misconduct.





All corrective disciplinary action documents are part of the employee's personnel file.

D. Review Cycle (Annual/Bi-Annual)

3 Year

E. Next Review Date:

December 2028





Name: Employee Principles
Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

One of the greatest assets we have as an organization is the trust of our members. This trust is based on members' expectation that BCU will always understand their needs, act with their best interests in mind, and handle their accounts honestly, confidentially and accurately. BCU will give advice that is financially sound and provide good value with our products and services. BCU expects its employees to act with integrity and to conduct themselves in an ethical manner.

B. Scope and Applicability:

All BCU Employees

C. Policy:

BCU considers any form of fraud or dishonesty on the part of its employees as totally unacceptable conduct. Acts which are considered to be either fraudulent or dishonest include, but are not limited to:

Fraud Standards

- Unauthorized manipulation of loan accounts, documents, computer records, share or share draft accounts.
- Theft of any kind, including stealing from members' accounts, overpayment of dividends and creating fictitious loans or fictitious share accounts, or any other misappropriation of funds.
- Check/Share draft kiting (defined as the process of floating worthless checks between accounts established in two or more financial institutions to artificially inflate the account balances by taking advantage of the time needed for checks to clear the Federal Reserve System).
- Unauthorized or unapproved salary advances, bonus payments, or overtime reimbursement.
- Intentional request for overpayment of incentives.
- Misrepresentation of time worked on BCU timecard. Examples include, but are not limited to: entering hours that you did not work on your time card, entering PTO for hours you are not normally scheduled to work, entering PTO for more hours than your scheduled shift or entering a start or end time that does not accurately reflect the time you started or ended your shift.
- Submission of requests for reimbursement of business expenses either not actually incurred, or expenses that were incurred for personal use.





- Intentionally failing to secure collateral, recording a security interest in collateral or pledging a member's shares as collateral without that member's permission.
- Granting or requesting preferential treatment for ANYONE, outside of a stated guideline.
- Employees at no time should perform financial or non-financial transactions on their own account except as allowed through the ATM or BCU website.
- Employees at no time should perform financial or non-financial transactions on a family member's account (which is defined to include spouse, child, parent, brother, sister, aunt, uncle, grandparent, grandparents-in-law, mother-in-law, father-in-law, brother-in-law, sister-in-law, first cousin, step-relative (i.e., stepfather), or any other person who resides in the employee's household). Transactions include, but are not limited to: loan applications, loan advances, loan payments, collection arrangements, opening new accounts, share deposits, withdraws or transfers, wire transfers or any other account maintenance activity.
- Intentional violation of credit union rules, internal controls, regulations, guidelines and procedures.
- Knowingly approving or directing others to approve membership for an individual that does not meet credit union eligibility requirements.

Personal Account Management

BCU encourages employees to maintain deposit accounts and take advantage of loan opportunities at BCU. Your account(s) will be held to the same standards that we expect of our members.

Irresponsible account management on employee and member accounts is managed the same based on individual product policy and may lead to any of the following: reduced withdrawal limits, suspended services, derogatory credit bureau reporting, account closure, and ineligibility for membership.

Irresponsible management of accounts includes, but is not limited to:

- Delinquent loans
- Frequent late payments
- Frequently overdrawn accounts
- Excessive NSF or ODP fees within a prescribed time period (defined as eight or more fees a month for two or more consecutive months).

Universal Sales & Service Principles

Universal Sales & Service Principles are documented because BCU's reputation with members, the community and our regulators is dependent upon the ethical practices of our staff.

- All sales will be made in compliance with any relevant laws, rules and regulations



- All sales should be based on the member's needs.
- All sales presentations and marketing materials must be honest, accurate and clearly understood.
- All systems records holding member data must be maintained accurately
- Application information must be accurate and complete and reflect the sale that occurred.
- All products or services must be presented as an option and must not be sold unless it is fully understood and agreed to by the member.

Employees are not to engage in acts of fraud or dishonesty while employed at BCU. Management will not tolerate fraudulent or dishonest activities of any kind by BCU employees. Employees who engage in these acts will have their employment at BCU terminated.

Assistance is available through the Employee Assistance Program (EAP) or BCU if you are experiencing any financial difficulties.

Should dishonest or fraudulent behavior of others be witnessed, employees are encouraged to report their observations to appropriate management. If the employee is uncomfortable discussing the issue with anyone internally, the information can be reported anonymously to the BCU's Ethics Hotline at 844-857-5483 or online at bcu.ethicspoint.com

D. Review Cycle:

Annual

E. Next Review Date:

December 2026



Guideline Name: Employee Referral Eligibility

Guideline Owner: Talent Acquisition

Effective Date: January 1, 2025

A. Purpose:

The Employee Referral Program is designed to encourage and reward employees who direct quality candidates to BCU. It's important for us to find candidates who can help us drive a high-performing organization. BCU typically rewards \$1,000 for each Salaried (SEE) referral and \$500 for each Salaried Non-exempt (SNE) referral.

B. Scope and Applicability:

All BCU employees

C. Definitions:

TERM	DEFINITION
Referral	The act of directing someone to a different place or person for information, help, or action
SEE	Exempt; Salaried employee
SNE	Non-Exempt; Completes timecards and is eligible for overtime.

D. Guideline:

- In order to be eligible for the referral award, the following guidelines must be met / followed:
 - The applicant's information is submitted via the employee referral channel.
 - The referred employee has been a BCU employee as a regular full-time or part-time employee for 90 days after their start date.
- There is no limit to the number of referrals an employee may make or to the number of referral awards they may earn in a given period of time.
- In some instances, we come across a candidate who has been referred to BCU by more than one employee. If an instance like this should occur, the guidelines for the referral award are as follows:
 - The referral award will be paid to the candidate who submitted the referral's resume and information via the appropriate channels. If more than one employee submitted the candidate, the individual who submitted the referral for the position for which they were hired will receive the award.



Employees will not be eligible to receive the referral award if...

- A search firm or agency fee is to be paid.
- The referred employee has worked as a temporary employee for BCU within the past 12 months.
- The referred candidate has responded to an advertisement or recruiter message.
- The referred candidate has been referred within the past 12 months by another BCU employee.
- The referred candidate is currently (or has been within the past 12 months) an intern or BCU employee.
- The referred candidate is seeking an internship.
- Temp-to-hire, contingent worker, and consultant candidates are not considered employee referrals, except for those temporary employees who were referred by a BCU employee and on an approved payrolling service until the final hiring decision was made.
- They are a member of the hiring team.
- They are a member of the talent acquisition team.

NOTE: *If the candidate was hired into a position for which they were not specifically referred, the first employee to submit the candidate will receive the award.*

NOTE: *Employee's referral rights expire for a candidate after one year from submission to the Employee Referral Program.*

E. Review Cycle (Annual/Bi-Annual)

3 Year

F. Next Review Date:

December 2028





Name: Employment at Will
Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

This policy defines the at-will employment status of BCU employees

B. Scope and Applicability:

All US Employees

C. Policy:

Employment with BCU is at-will unless state law provides otherwise. This means that an employee's employment with BCU is subject to termination by the employee or BCU at any time, for any reason, with or without cause or notice.

Nothing in any BCU guideline, policy or any oral statement shall limit the right to terminate at-will. This employment at-will policy is the sole and entire agreement between the employee and BCU regarding the fact that employment with BCU is at-will. No manager has any authority to enter into a contract of employment express or implied that changes the fact that employment with BCU is at-will. Only the CEO or the CHRO of the company or that person's authorized representative has the authority to enter into an employment agreement that alters the fact that employment at BCU is at-will, and any such agreement must be in writing signed by the CEO, CHRO, or that person's authorized representative.

D. Review Cycle:

Annual

E. Next Review Date:

December 2026





Guideline Name: Employment of Relatives

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

The Company permits the employment of relatives of employees under these guidelines and as long as such employment does not, in the opinion of the Company, create actual or perceived conflicts of interest.

B. Scope and Applicability:

These guidelines apply to US employees. It does not apply to **Puerto Rico employees**. *BCU Puerto Rico Operations does not permit the employment of relatives.*

C. Definitions:

For purposes of these guidelines, "relative" is a spouse, domestic partner, child, parent, sibling, grandparent, grandchild, aunt, uncle, niece, nephew, first cousin, or corresponding in-law, "half" or "step" relation, and any person who resides in the same household.

D. Guideline:

BCU will exercise sound business judgment and appropriate consideration in the placement of related employees in accordance with the following guidelines:

- Individuals who are related are permitted to work at BCU, provided no direct reporting or supervisory/management relationship exists. That is, no employee is permitted to work within the "direct chain of command" (direct or one-over-one relationship) of a relative such that one relative's work responsibilities, salary, or career progress could be influenced by the other relative.
- No relatives are permitted to work in any position in which BCU believes an inherent conflict of interest may exist.
- Employees who marry while employed, or employees who through a marriage or union create a relative relationship, will be treated in accordance with these guidelines. That is, if, in the opinion of BCU, a conflict or perceived conflict arises as a result, BCU will make an effort to transfer the employee as practicable.
- In addition, BCU recognizes that at times, employees and their non-relative "close friends" or "significant others" may be assigned to positions that create a coworker or supervisor-subordinate relationship. BCU will, in its discretion, exercise sound judgment with respect to job assignments and will transfer employees as practicable in these situations in order to avoid the creation or the appearance of a conflict of interest.



- Relative relationship issues must be disclosed, discussed and, if approved, documented.

These guidelines apply to all categories of employment at BCU, including regular, temporary, internships, and part-time classifications. It also applies to non-employees providing services to the Company, which includes but is not limited to, independent contractors, employees of temporary agencies, and employees of on-site service providers.

Employment of relative situations that exist at the adoption of this policy will be reviewed with the appropriate level of management. As appropriate, a plan will be developed to assess and monitor the situation.

E. Review Cycle:

3 Year

F. Next Review Date:

December 2028



Guideline Name: Evacuation Procedures

Guideline Owner: Facilities

Effective Date: January 1, 2025

A. Purpose:

The purpose of this guideline is to ensure the safe evacuation of employees from the Vernon Hills campus in the event of an emergency.

B. Scope and Applicability:

All Vernon Hills employees. Service Center employees should refer to the evacuation procedures of their local facility.

C. Guidelines:

Modified Evacuation Procedures for Employees/Visitors with Disabilities

Employees and visitors with permanent or temporary disabilities that limit their ability to safely evacuate the building are strongly encouraged to report their disability to Human Resources. This information will remain confidential and will be utilized to assist in the safe evacuation from the building.

- All employees with any type of disability that could hinder their ability to evacuate the building or to take cover must have a minimum of two buddies to assist them.
- Buddies may be selected by the employee or their supervisor. The buddies should work near the employee with disabilities, have a similar work schedule and be able to assist during an emergency.
- A minimum of two buddies must accompany the employee to the stair tower entrance.
- Enter the stair tower entrance after all (or a majority of) the traffic from your area has entered. NOTE: The 340 building has three stair towers: North, Central and South. The 300 building has three stair towers: West, Central and East.
- One buddy stays with the employee and the other sends word down to the Fire Department that there is an employee requiring assistance at the specified location.
- Close the door and remain there until the Fire Department evacuates you from the stair tower.

Fire Evacuation Procedures (Vernon Hills)

Before the evacuation:

- Become familiar with your workplace
- Know multiple ways out of the building
- Formulate a workplace escape map showing multiple ways of exiting the building
- Appoint a designated alternate head counter





- Evaluate the need for a buddy employee for anyone needing assistance evacuating the building
- Know that BCU has a Medical Emergency Response Team (MERT) that will assist employees evacuate the building during an emergency

During the Evacuation:

- Leave by the nearest safest exit
- Follow the overhead EXIT signs
- Go down to the first floor and out to the exterior of the building
- Always keep the doors closed
- Do NOT use the elevators

After the Evacuation:

- Once outside, go to your assembly area for head count
- Reenter the building only when the All Clear is given. Only Security, Facilities Management or the Fire Department will give the All Clear

If Evacuation is Not Possible:

- Stay below the smoke at all times
- If trapped, close all doors between you and the fire
- Signal for help from a (telephone, window, etc)

Always:

- Assume all alarms signify a true emergency
- Be responsible for your visitors
- Never use the elevators in an emergency evacuation
- Close all doors behind you
- Refer media questions to the appropriate company management
- Stay calm

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028





Name: Equal Employment Opportunity Policy

Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

BCU is committed to equal employment opportunity, and to create an inclusive culture and a diverse work environment. This cultural diversity drives innovation; creates trusted partnerships with members and the community; and ultimately contributes to the success and sustainability of business.

B. Scope and Applicability:

All BCU employees

C. Guideline:

Discrimination Prohibited

BCU is committed to ensuring that all employees and applicants for employment are given consideration without regard to their race, color, religion, gender, national origin, age, disability, genetic information, sexual orientation, gender identity or expression, military or veteran status or any other basis protected by law in recruitment, hiring, compensation, promotion, training, and all other personnel actions.

Harassment is a form of discrimination. BCU prohibits harassment on the basis of race, color, religion, gender, national origin, age, disability, genetic information, sexual orientation, gender identity or expression, military or veteran status, or any other basis protected by law. Employee and applicants should refer to the Prohibition of Workplace Harassment Policy for further information.

Reporting, Investigation and Disciplinary Action

Reporting

Any individual who experiences and/or becomes aware of any actions that may constitute discrimination in violation of this policy shall report it to one of the following resources;

- Their supervisor, or another manager or supervisor
- Human Resources
- Ethics and Compliance Hotline: 844-857-5483





It should be emphasized that an employee is not required to report discrimination to a supervisor who has engaged in the actions giving rise to the concern or who is a close associate of the person who engaged in such actions. The individual should use one of the other resources available to report such concerns. Any manager or supervisor who receives a report of discrimination must notify Human Resources as soon as possible.

Investigation

All reports of violations of this policy will be investigated. Generally, Human Resources will conduct, direct and/or consult on all investigations. The reporting individual will be expected to cooperate throughout the investigation. During the process, efforts will be made to avoid unnecessary disclosure of confidential and/or sensitive information, while at the same time ensuring that each incident is carefully and completely investigated. If the individual has any concerns regarding the investigation, they should bring those concerns to the attention of the appropriate Human Resources representative.

Disciplinary Action

Any employee who is determined to have violated this policy will be subject to disciplinary action up to and including termination of employment. Any applicant who is determined to have violated this policy will be disqualified from employment. Any third party who violated this policy will be addressed for corrective action with the appropriate parties. A complaint made in bad faith, or an individual who, during the investigation, has intentionally concealed information, or knowingly misrepresented or provided false information, will also be subject to disciplinary action up to and including termination of employment.

Retaliation Prohibited

Employees and applicants will not be subject to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in filing a complaint, assisting or participating in an investigation, compliance review, hearing or any other activity related to the administration of applicable equal employment opportunity laws, opposing any act made unlawful by applicable equal employment opportunity laws, or exercising any other right under applicable equal employment opportunity laws. Applicants and employees will not be subjected to retaliation for making a good faith complaint under this policy or for participating in good faith in an investigation under this policy. Any individual who experiences or becomes aware of any actions that may constitute retaliation in violation of this policy should report it following the same reporting resources available to them as for discrimination.

D. Review Cycle:

Annual





E. Next Review Date:

December 2026





Guideline Name: Firearms and Dangerous Weapons

Guideline Owner: Facilities

Effective Date: January 1, 2025

A. Scope and Applicability:

All BCU Employees

B. Guidelines:

Firearms and dangerous weapons are prohibited.

At BCU, we are committed to ensuring the safety and security of all BCU employees, contractors and visitors at all BCU facilities. Firearms are strictly prohibited at all BCU facilities and on any BCU premises to the maximum extent prohibited by applicable federal, state and local laws. No person is permitted to bring a firearm or other dangerous weapon, whether concealed, partially concealed or unconcealed, to any BCU facility or onto BCU property, except for law enforcement officers conducting official business or as otherwise expressly required by law. If you see anyone with a firearm or other dangerous weapon, alert the facility department and/or security office in your location immediately. In the event of immediate threat or danger, alert the local police or call 911.

C. Review Cycle:

3 Year

D. Next Scheduled Review Date:

December 2028





Guideline Name: Flexible Work Guidelines

Guideline Owner: Human Resources

Effective Date: January 1, 2026

A. Purpose:

BCU designed a flexible work program to ensure alternate work arrangements are beneficial to our employees, department and company but also to promote flexibility and work/ life harmony where possible. This program may be appropriate for some employees and some jobs. It is not an entitlement, it is not a company-wide benefit, and it in no way changes the terms and conditions of employment.

Implementing a flexible work program provides a range of work arrangements that contribute to the attraction and retention of a high performing workforce. Hybrid, working a compressed work week or working part-time can assist employees to balance work and other life responsibilities or assist employees to complete tasks/projects requiring high levels of concentration without interruption. It also is a way to balance personal needs while continuing to meet member commitments, business demands and business goals. Ultimately, you and your manager must partner together to develop the best work arrangement and solution to fit the needs of employees and the business.

Generally, employees with acceptable levels of performance may discuss the possibility of flexible work arrangements with their managers. Job requirements, personal characteristics, the ability to continually exhibit our Shared Values, business and department goals and other issues impact the suitability and type of flexibility which may or may not be possible. Employees and their manager will work together to determine a flexible work arrangement that works for both the individual employee and the organization.

B. Scope and Applicability:

All BCU employees

C. Definitions:

Hybrid

Definition: Working from multiple approved locations.

If you live within BCU's designated radius, you're expected to work from the office three days each week (this applies to the Vernon Hills Headquarters, Bianca, and Golden Valley locations). We understand the importance of flexibility, and our goal is to support our members, each other, and you—while ensuring the business runs smoothly.

In-Office Requirements:

- You must be in the office every Wednesday.





- Your second and third in-office days can be any other days (M_F) that work best for you, your team, and the business.
- On in-office days, you are expected to work at least 6 hours of your 8-hour day on-site.
- Please talk with your manager if you'd like to split your day between in-office and remote work.

Coverage Expectations:

- All departments must ensure coverage between 8:00 AM and 6:00 PM CT (to support members from California to Puerto Rico).
- The level of coverage needed depends on your department's responsibilities and interactions with members or other teams.
- Your department manager will determine specific coverage needs.

Weekly Hours:

- Full-time SNE employees: 38.75 hours/week.
- Full-time SEE employees: 40 hours/week.

Our top priorities are:

1. Supporting our members and the business.
2. Supporting one another.
3. Providing as much flexibility as possible for every BCU employee.

In order to accommodate this option, employees must also have an acceptable level of performance and acceptable attendance patterns. The essential functions of the job must be well-suited for a hybrid work arrangement, which will be determined by your manager. If you are approved, the company will expect you to continue to meet all performance requirements. If technical difficulties in the remote office prevent an employee from effectively working on any given day, they may be required to report to the office or take PTO/vacation time with supervisor's approval. Note: Employees who are based 100% remote with no in office location will be expected to work immediately with their manager to resolve any technical issues in order to fulfill their full duties or take PTO/Vacation time with supervisor's approval.

Locations: Hybrid can take place at home, another satellite location, or other work location deemed suitable and approved by your manager. Public places such as public libraries, coffee shops, restaurants, etc., are not considered suitable telecommuting locations.

Performance evaluation: Your manager will evaluate your performance by using the same standards used to measure onsite employees. It is suggested that you maintain this evaluation using monthly check-in journals via Dayforce.



Remote

Definition: Working anywhere other than a BCU location 100% of the time. (BCU cannot accommodate employees working outside of the United States/Puerto Rico on a regular basis.)

Employees with a 100% remote work arrangement should work directly with their manager to establish if regular travel to a BCU office will be required, and when.

Working a Compressed Week

Definition: Working the same number of hours in less than the traditional number of days.

Possible Schedules: There are a variety of schedules, including but not limited to:

- 80 hours of work over 9 days instead of 10, with alternate 3-day weekends.
- Four 10-hour days with the fifth day off.
- For PR & California employees, consult with HR for appropriate documentation prior to starting a compressed work week arrangement.

Part Time Schedule

Definition: Working fewer than 40 hours per week.

Flexible Work Program Eligibility Definitions

- This program applies to all full-time and part-time permanent employees of BCU. Interns, temporary employees, or contractors are not eligible to participate in a flexible work arrangement. Your manager must approve this arrangement.
- Employees will be continuously evaluated for effectiveness and performance while utilizing the program. Participants are expected to meet all performance requirements and connectivity requirements to maintain eligibility.
- Employees can participate in the Flexible Work Program only if their job duties permit it. This should be a two-way discussion between employee and manager, but the final decision-making authority is the manager. Roles that may have limited ability to accommodate flexible work include, but are not limited to: Roles requiring work with classified documents or in a high-security area; Member-facing roles obliged to directly serve members, such as a receptionist or a branch position; Roles that utilize equipment only available on premise (such as wire transfers), Facilities roles that involve working on or in the physical building, etc. Employees who carry out most of their work on a computer can typically participate in the Flexible Work Program.
- Employees must show availability in all communication and collaboration platforms during their agreed-upon working hours, meet communication standards, attend all scheduled team or member meetings, and meet deadlines in order to maintain eligibility.





	Pay	Benefits	Time Off
Telecommuting	No impact to pay	No impact to benefits if working more than 20 hours in the US and PR.	No impact to time off
Compressed Work Week	No impact to pay	No impact on benefits if working more than 20 hours in US and PR.	<ul style="list-style-type: none"> • The holiday pay benefit is 8 hours • If a holiday falls on your scheduled day off, you will receive a day off during the same week in which the holiday falls
Part Time	<ul style="list-style-type: none"> • Salary will be pro-rated • Bonuses (if eligible) will be pro-rated • You will continue to be eligible for department incentives (if applicable) 	If you work at least 20 hours in the US and PR you will receive similar coverage options. Some coverage options may decrease with your change in hours.	<ul style="list-style-type: none"> • PTO/Vacation will be pro-rated • If a holiday falls on your day off, you will receive a day off during the same week in which the holiday falls

D. Guideline:

- Employees may be required to change or cancel flexible workday(s) based on business needs.
- The Flexible Work Program must not be used as a substitute for family care responsibilities or long term personal medical (childcare, medical etc.); however, it can assist employees to balance work and family responsibilities in the short term. Employees must manage their family responsibilities in a way that allows them to successfully meet their work requirements.
- While participating in the Flexible Work Program, employees who fill out a timecard must accurately reflect time worked on their timecard.
- Employees working remotely are still eligible for all applicable lunch and break periods that would be offered while working in a physical BCU office.
- Compliance with BCU’s guidelines and policies must occur at all times (ex: Employee Principles, Code of Conduct). Please visit the HR SharePoint site for a list of applicable policies and guidelines.
- Understand that this is not a guarantee and the employee, at the sole request of management, may be required to come to the office where business needs dictate (for example during projects, training, department requests, etc.).

Employee Requirements and Responsibilities

- Provide and maintain a quiet workspace free of any distractions that may interfere with the ability to meet or exceed performance requirements.



- When participating in the Flexible Work Program, BCU’s intellectual property and/or confidential data must be protected at all times. Employees are required to ensure their surroundings are free and clear of anything that can compromise BCU security, member data, and overall confidentiality.
- Any notes or other documents that may contain confidential information must be stored in a locked cabinet until proper disposal can occur.
- Never leave your laptop unattended.
- Use caution with wireless networks, only use trusted and secure connections. Stay away from free or public wi-fi’s.
- Your company laptop should only be used by you.
- Abide by BCU Data Handling Guidelines for protecting and controlling PII or member information in hardcopy and/or electronic format.
- All remote users must use VPN and ROAM services.
- Remote workplace uptime requirement is 98%. If, while working remotely, employee’s remote connectivity is down for 2 hours, the employee may be required to go into the office or required to take PTO or vacation time.
- At no time will an employee provide their password to anyone.
- Company issued mobile computing and external storage devices must be registered through the Intune portal.
- Employees approved for hybrid or remote work will be issued an equipment package by the BCU IT department as determined by the manager. Cost of remote equipment package will be charged to the manager’s budget.
 - Company-issued laptop will have department level access tested and verified before remote work begins.
 - Internet service package that has a minimum of 10 Mbps upload and 10 mbps download to ensure expected connectivity.
 - Any BCU calls must be connected via Genesys Cloud in a capacity that your department requires.
 - Must register with E911
- Remote employees will not have a designated workspace at a BCU facility.
- Technical issues must not be frequent or consistent. If technical issues are frequent and consistent and this is not a companywide issue, participation in the program can be discontinued at any time at management’s discretion.
- BCU employees and their managers are responsible for:
 - Ensuring at-home work areas meet security and safety requirements.
 - Checking with management and budgeting for the necessary resources and equipment, if applicable. Please give IT at least 2 weeks’ notice before your work arrangement begins.
 - Ensuring compliance with all applicable policies, procedures, and guidelines.
 - Reporting security incidents immediately, in this preferred order:
 - Email infosec@bcu.org
 - Contact the Service Desk





- Call supervisor (may be only option if system is compromised/unusable)
- Report if equipment is lost or stolen by immediately **calling** the BCU Service Desk at 847-932-8860:
 - For stolen equipment, select option 3
 - For damaged equipment, follow the standard prompts
- **Replacing equipment is the responsibility of the employee it was assigned to if the reason for replacement is due to gross negligence.**
- Understanding eligibility and requirements

Additional Notes and Terms

- BCU is not responsible for phone, electric and internet services. All costs and troubleshooting of internet connection and phone connection will be the responsibility of the employee with their provider.
- BCU equipment can only be repaired and assessed by BCU IT Department. This includes such services as “Geek Squad”, PC Matic, Support.com, etc.
- BCU will not provide any furniture (desk, chair, cabinet, etc.), for the designated workspace in the participant’s home office, unless required under the Americans with Disabilities Act. Contact HR to discuss ADA accommodation and required documentation, if needed.
- Employees should obtain necessary office supplies while in the office and bring required supplies back and forth between remote and physical office. Employees with 100% remote work arrangements should work with their manager to determine and order supplies needed at the home office.
- Employees must ensure that their remote workspace provides:
 - Ergonomically sound seating, lighting and typing surfaces.
 - Adequate noise control to ensure clear telephone and video conference calls to colleagues and/or members.
 - Adequate privacy provisions, including, where appropriate, locking doors and windows to ensure that family or household members do not have access to confidential BCU materials.
 - Freedom from distractions and interruptions that might affect workplace performance.
- **BCU reserves the right to monitor and log, without notice, all employees’ e-mail and internet activities, regardless of where BCU work is conducted. No BCU employee should have any expectation of privacy in the use of BCU computer related resources, including when the employee’s personal device or equipment is utilized for BCU purposes.**
- BCU has the right to audit compliance with company safety and security standards, including and up to visits to your home office.
- Employees are expected to turn webcams on when in video-enabled meetings, when possible.
- Any department guidelines and procedures can supersede these program guidelines or vice versa





- Upon termination of employment, equipment must be returned to BCU according to the following timelines:
 - **Employees in N. IL:** Equipment must be turned in to the mailroom by noon on the last day of employment.
 - **Employees in/near a branch location:** Equipment must be turned in to the agreed upon branch by noon on the last day of employment.
 - **Remote Employees:** Equipment must be shipped through a local UPS store by noon on the last day of employment and shipped to:

BCU
Attn: Mailroom
340 North Milwaukee Avenue
Vernon Hills, IL 60061

- BCU will reimburse the expense of the shipment.

E. Review Cycle:

3 Year

F. Next Review Date:

December 2028



Guideline Name: Holiday Guidelines - US

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

The purpose of this policy is to provide an overview of the company-designated holidays available to employees each year.

This policy, as with all BCU policies, is intended to provide guidance, and is subject to management interpretation and discretion. **This guideline is not a binding contract, and it does not change the at-will nature of employment of BCU employees.**

B. Scope and Applicability:

All US employees

C. Guideline:

BCU provides a total of ten (10) paid company-designated holidays each year (calculated 8 hours per day for a total of 80 hours annually). Senior Management approves and communicates the holiday schedule each fall for the coming year and has the right to change the holiday schedule based upon business needs.

Company-designated holidays may vary between sites and also from year to year. The calendar dates of the traditional holidays, facility shutdown dates and business need of the facility will determine the holiday schedule each year.

An employee will receive holiday pay if:

- The employee works the day before and the day after (if scheduled, the employee must also work the day of the holiday, in order to receive holiday pay);
- Scheduled PTO is used the day before or the day after the holiday; or
- FMLA is used the day before, the day after, or on the scheduled holiday.

An employee will not receive holiday pay if unscheduled time-off (paid or unpaid) is used the day before, the day after or on the scheduled holiday of the unscheduled time-off or unscheduled PTO is not used concurrent with FMLA.

Holiday pay for eligible part-time employees will be pro-rated based upon their standard work schedule. Standard hours and shifts vary between locations due to business needs.





D. Review Cycle:

3 Year

E. Next Review Date:

December 2028





Guideline Name: Inclement Weather

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

Due to the nature of our business, it is highly unlikely that we will ever close operations completely. However, the decision to close a facility prior to the start of the workday or to adjust the work schedule must be agreed upon by Facilities and Senior Management.

To define our guideline regarding payment of wages to employees during periods of inclement weather or other "Acts of God", which may alter normal business hours.

B. Scope and Applicability:

Applies to all BCU employees

C. Guideline:

In the event that an employee requests to leave early due to inclement weather conditions and that request is granted by the supervisor, pay will be based on time worked. The remaining time may be paid as PTO/Vacation or Banked Holiday, if available.

In the event that the facility management provides an option for employees to leave early due to inclement weather conditions, employees will be paid for time worked and may be paid the remaining time as additional company-provided Personal Time.

If the facility is closed prior to the start of the workday, employees will be required to work remote if their position allows. For positions that don't allow remote work, your manager will work with you to determine remote work and/or appropriate pay.

BCU does not pay for tardiness due to weather.

For PR employees, sick pay does not apply to time taken for inclement weather.

Banked Holidays or PTO/Vacation Days may be used at times of inclement weather with supervisor's approval. However, should an employee have no banked holiday or PTO/vacation days available, time without pay may be used or time can be made up at the supervisor's discretion. Note: if allowed to make up time, it must be completed within the current timecard period.

(*Please note: BCU employees located in a service center will follow the decisions of local management to open/close the facility.)



D. Review Cycle:

3 Year

E. Next Review Date:

December 2028





Guideline Name: Lactation Accommodation Guideline (Mother's Room)

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

As part of our family-friendly guidelines and benefits, BCU supports employees by accommodating their need to express breast milk during normal working hours.

B. Scope and Applicability:

All BCU employees

C. Guideline:

For up to one year after the child's birth, employees who are breastfeeding their child will be provided reasonable breaks from their regular schedule to express breast milk. Each BCU location has a designated private room solely for this purpose; contact HR for the details, including how to request/reserve a room.

Each room has a small refrigerator that should be used solely for the purposes of storing the expressed breast milk. Employees storing milk in the refrigerator assume all responsibility for the safety of the milk and the risk of harm for any reason, including improper storage, refrigeration, and tampering. Additional rules for use of the room and refrigerator storage are posted in the room. Employees who work offsite or in other locations will be accommodated with a private area as necessary.

Breaks are paid, so long as they are reasonable in length. Employees on break shall have complete privacy, free from distraction or interruption by their manager.

Employees who need an accommodation to be able to breastfeed their child directly, rather than express milk, should make such a request directly with HR. BCU will make every reasonable effort to accommodate such an employee, so long as doing so does not create an undue hardship.

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028





Guideline Name: Loss Prevention

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

Ensure employees know the steps to take to prevent and report any kind of loss.

B. Scope and Applicability:

All BCU Employees

C. Definition:

Losses of any kind, whether company or personal property, should be reported to Facilities Management or to your supervisor so that appropriate action can be taken. To prevent losses, use caution and protect your personal property. The company is not responsible for any personal items that are lost, damaged, or stolen while employees are at work.

Reference

This guideline shall be interpreted to follow state, federal and local laws.

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028



Name: Medical Travel Reimbursement

Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

It is BCU's guideline to provide eligible employees with reimbursement up to \$2,000 per year for eligible travel expenses incurred while seeking medical care.

B. Scope and Applicability:

All employees who are scheduled to work at least 20 hours a week.

C. Reimbursement Administration

Complete the [Medical Travel Reimbursement Form](#) and return to BCUbenefits@bcu.org with required documentation/receipts. Form and receipts must be submitted within 30 calendar days after your appointment or latest travel date. After receiving your completed form with all required documentation, HR will review and may request additional documentation. Once the review process has been completed, you will receive a reimbursement if eligible on your next available paycheck. If you require any assistance or to check the status of your reimbursement, email BCUbenefits@bcu.org

Eligible Expenses

Expense	Covered
Economical Airfare	✓
Ambulance for medically necessary facility transfer	✓
Bus	✓
Electronic Vehicle charging station fees	✓
Ferry	✓
Gas	✓
Hotel and Lodging	✓
Meals	✓
Mileage reimbursement for use of your personal automobile (current mileage rate)	✓
Parking fees	✓
Rental car	✓
Taxi/Uber/Lyft (Rideshare service)	✓
Tolls	✓
Train	✓





Expense	NOT Covered
Caregiver expenses	X
Childcare expenses/babysitting	X
Lavish of extravagant hotel/lodging	X
Legal fees	X
Recreation or vacation in the travel away from home	X

E. Review Cycle:

Annual

F. Next Review Date:

December 2026





Guideline Name: Military Leave
Guideline Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose

BCU provides a Military Leave of Absence in accordance with applicable laws when such duty calls the employee away from work on scheduled workdays. The intent of this policy is to comply with the Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA") and other applicable laws pertaining to employees who are absent from work to fulfill military service obligations. To the extent any state law mandates more generous reemployment rights, such state-mandated rights will apply.

B. Scope and Applicability

All BCU employees

C. Policy

An employee who performs duties on a voluntary or involuntary basis in the "Uniformed Services" as defined by USERRA will be placed on Military Leave. Uniformed Services means the United States Army, Navy, Air Force, Marines, Coast Guard, Army and Air National Guards, Public Health Services, Reserves and any other category of persons designated by the President in time of war or national emergency.

An employee taking Military Leave must provide advance notice to their supervisor and/or BCU's leave of absence administrator to be eligible for the protections and benefits of this Policy. Notice may be written or verbal; however, where possible, an employee should submit a copy of their military order to their supervisor as soon as possible. No notice is required if providing such notice would be precluded by military necessity or if it would be impossible or unreasonable.

An employee may waive their rights to the Military Leave benefits provided in the Pay and Benefits sections of this policy, but not the reemployment rights described in the Reemployment section.

Policy Administration

U.S. Employees:





Questions regarding the policy or the procedures described here should be directed to Human Resources.

Puerto Rico Employees:

Questions regarding the policy or the procedures described here should be directed to Human Resources.

Pay Differential for Training

An employee on Military Leave, who is participating in temporary military duty, known as Uniformed Services training, or active-duty training, and whose BCU gross pay is greater than their military gross pay for the period of the leave, will be eligible to receive a pay differential equal to the difference between their BCU gross pay and military gross pay.

Each employee participating in Uniformed Services training will be eligible for **up to 10 workdays** of pay differential per calendar year. Uniformed Services training does not include time spent traveling to and/or from the place of training.

Pay and Pay Differential for Involuntary Active Duty

An employee who is involuntarily called to active duty because of their participation in Uniformed Services is eligible to receive 2 weeks of BCU gross pay. For employees who are involuntarily called to active duty whose BCU gross pay is greater than the military gross pay for the period of the leave will also be eligible to receive a pay differential equal to the difference between the BCU gross pay and military gross pay. This pay differential will begin in week 3* of the leave of absence and will continue through week 52.

In addition, employees may be eligible for additional weeks of pay differential in the event that the Company decides to institute a Company-wide pay differential policy to apply to the particular event. An employee on involuntary active duty will be entitled to this pay differential each time that they are involuntarily called to active duty. A pay differential under this Section is in addition to any pay differential an employee may receive under the Section titled Pay Differential for Training.

Documentation for Pay

For purposes of this Section and the Section titled Pay Differential for Involuntary Active Duty, an employee seeking pay differential must provide BCU Human Resources with documentation, applicable to the particular branch of the service in which one is enlisted, identifying the gross military pay. Except as described below, all other non-temporary military duty due to participation in Uniformed Services training will be unpaid. Documentation regarding military gross pay must be received by Human Resources no later than 2 weeks after leave begins, or the pay differential will not start until such documentation is received. *An employee who applies





PTO or Vacation time, will receive full PTO/ Vacation pay and the pay differential will not begin until PTO has been exhausted and will continue through week 52.

Note: Employees who perform duties on a voluntary basis in the "Uniformed Services" as defined by USERRA will not be eligible to receive pay differential.

Health and Dental Insurance Benefits

An employee on Military Leave may be absent for a period of up to six (6) months without affecting their health and dental insurance benefits. After six (6) months, the employee may be eligible for COBRA coverage. If an employee is receiving any pay while on Military Leave, deductions for health and dental insurance premiums will continue to be taken to the extent pay is sufficient and the deductions are permissible under applicable wage laws for the first 12 weeks of the leave. To the extent that the pay is not sufficient, the premiums will be held in arrears.

During the first 12 weeks of unpaid Military Leave, the employee's share of the health and dental insurance premiums will be held in arrears. The employee will be required to pay this cost upon resumption of employment in accordance with the then current arrears repayment policy. Individuals whose pay differential has been ceased pending appropriate documentation will have their share of health and dental insurance premiums held in arrears starting in week three through week twelve, or until necessary documentation is received. Upon receipt of the appropriate documentation, back pay differential will be processed and deductions that have been placed in arrears will be withheld. If appropriate documentation is not received prior to the employee's resumption of active employment, the employee will be required to repay the arrears in accordance with the then current arrears repayment policy.

After the first 12 weeks of Military Leave (paid or unpaid), the employee is responsible for sending their premium payments to the Company on a timely basis. If the premium payments are not received by the last day of the month for which such payments are due, health and dental insurance coverage will be discontinued.

Retirement Plans

An employee on Military Leave who meets the reemployment requirements of the Section titled Reemployment, A-E will be entitled to vesting, benefit accruals, contributions and distributions in accordance with the provisions of the retirement plans in which the employee is a participant.

Other Employee Benefit Plans

An employee on Military Leave will be entitled to continued coverage and participation under any other Company employee benefit plan to the extent the employee would otherwise be entitled to coverage and participation during any non-military leave of absence from the Company, up to a maximum of twenty-six (26) weeks.

During the first 12 weeks of paid involuntary Military Leave, benefit premium deductions





and RSP loan repayments, if applicable, will continue to be taken to the extent pay is sufficient and the deductions are permissible under applicable wage laws. To the extent that the pay is not sufficient, the benefit premium deductions will be held in arrears. Individuals whose pay differential has been ceased pending appropriate documentation will have their share of benefit premium deductions held in arrears starting in week 3 through week 12, or until necessary documentation is received. Upon receipt of the appropriate documentation, back pay differential will be processed, and any deductions that have been placed in arrears will be withheld. If appropriate documentation is not received prior to the employee's resumption of active employment, the employee will be required to repay the arrears in accordance with the then current arrears repayment policy. If RSP loan repayments were missed during this period, the employee's loan will be re-amortized to a new payment amount to recover the missed payments.

During the first 12 weeks of unpaid voluntary Military Leave, the employee's share of benefit premiums deductions will be held in arrears. The employee will be required to pay this cost upon resumption of employment in accordance with the then current arrears repayment policy. During the period of unpaid voluntary Military Leave, RSP loan repayments will be suspended. Upon return from leave the loan can be extended by the period of time they were unpaid. The loan will be re-amortized to a new payment amount to include the extended payoff period.

After the first 12 weeks of Military Leave (paid or unpaid), the employee is responsible for sending their premium payments to the COBRA administrator on a timely basis. If the premium payments are not received by the last day of the month for which such payments are due, coverage will be discontinued.

PTO/ Vacation Benefits

An employee may voluntarily choose to apply earned PTO/ Vacation time to Military Leave. If an employee does not voluntarily apply their earned PTO/ Vacation time to Military Leave, they will be entitled to a payout of that earned PTO/ Vacation time at the end of the 1st calendar year of the leave if the employee has not returned to employment by December 31st of such year.

Note: PTO is defined as vacation for Puerto Rico employees.

Reemployment

In accordance with USERRA and other applicable laws, an employee returning from Military Leave may have reemployment rights. Reemployment rights are governed by the following guidelines:

- a) The employee must give advance written or verbal notice of Military Leave as described in the Section titled Notice.





- b) The employee seeking reemployment may not exceed a five-(5) year cumulative limit on periods of service. An employee whose Military Leave lasts more than five years may, under certain circumstances, be entitled to reemployment rights. Many types of service, including several types of Reservist and National Guard member duties, are statutorily excepted from the five (5) year limitation. See Exhibit A for a list of excepted service.
- c) The employee must be released from service under conditions other than dishonorable.
- d) The employee must submit a timely application for reemployment or report back to the Company in a timely manner.
- e) Upon return, the employee must provide documentation (unless such documentation doesn't exist or is not available) showing that the application for reemployment is timely, the period of service does not exceed five (5) years, and the employee was honorably discharged.

Timely Application

Timely application for reemployment means that for periods of Military Leave up to thirty (30) consecutive days, the employee must report back to work on the first full calendar day for the first full regularly scheduled work (i.e., pay) period following the completion of the period of Military Leave, safe transportation home and eight (8) hours' rest, or as soon as possible if circumstances beyond the employee's control make this reporting deadline impossible or unreasonable.

After a period of Military Leave of thirty-one (31) to one hundred eighty (180) days, the employee must submit a written or verbal application for reemployment not later than fourteen (14) days after completion of the period of Military Leave, or as soon as possible if circumstances beyond the employee's control make this reporting deadline impossible or unreasonable. After a period of Military Leave of more than one hundred eighty (180) days, the employee must submit an application for reemployment not later than ninety (90) days after completion of the period of Military Leave.

The reemployment application deadline may be extended for two years or more if an employee is recovering from a service-related illness or injury.

Reinstatement of Position

A returning employee who has satisfied the above requirements is eligible for reinstatement and seniority benefits. Specifically, at the completion of less than ninety-one (91) days of Military Leave and if the employee is qualified or can become qualified after reasonable efforts by the Company, the employee is entitled to reemployment in a position the employee would have been employed if their employment had not been interrupted by Military Leave.





If the employee is not qualified for that position after reasonable efforts by the Company to qualify the employee, then they are entitled to reinstatement to their former position. If the employee is not qualified for their former position after reasonable efforts by the Company to qualify the employee, then they are entitled to reemployment in any other position for which they are qualified that most nearly approximates the above positions, with full seniority.

At the completion of more than ninety (90) days of Military Leave, and if the employee is qualified or can become qualified after reasonable efforts by the Company, the employee is entitled to reemployment in a position the employee would have been employed if their employment had not been interrupted by Military Leave or in a position of like seniority, status and pay.

If the employee is not qualified for that position after reasonable efforts by the Company to qualify the employee, then they are entitled to reinstatement to their former position or one of like seniority, status and pay. If the employee is not qualified for any of these positions after reasonable efforts by the Company to qualify the employee, then they are entitled to reemployment in any other position for which they are qualified, that most nearly approximates the above positions, with full seniority.

Rights for Continued Employment

After an employee is reemployed, the Company may not terminate the employee without "cause" for the following periods of time:

- For Military Leave of thirty-one (31) to one hundred eighty (180) days, the Company cannot terminate an employee except "for cause" for a period of six (6) months, and;
- For Military Leave of more than one hundred eighty (180) days, the Company cannot terminate an employee except "for cause" for a period of one (1) year.

D. Review Cycle:

Annual

E. Next Scheduled Review Date

December 2026





Guideline Name: Employee No Call No Show

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Scope and Applicability:

All BCU Employees

B. Guideline:

An employee no call/no show is the failure to report to work at their location and scheduled shift (where applicable) for three consecutive days, combined with the failure to notify management of their absence. No call/no show is considered to be “job abandonment.” An employee terminated for no call/no show may be reinstated upon “good cause shown,” for example, the employee was unable to notify management within the three-day period due to injury or medical care, but did notify management at the earliest opportunity thereafter. Consult HR on any such issues immediately as applicable law may require reinstatement.

C. Review Cycle (Annual/Bi-Annual)

3 Year

D. Next Review Date:

December 2028



Guideline Name: Paid Time Off (PTO) Policy
Guideline Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

BCU's Paid Time Off (PTO) plan allows for and encourages employees to take time away from work to relax and recharge. PTO can be used for any reason, including for sick time, family leave or any other reason provided for under applicable law.

B. Scope and Applicability:

All US employees who work more than 20 hours a week

C. Definitions:

YEARS OF SERVICE	PTO ALLOWANCE*/ACCRUAL
0-4	20 days/13.33 hours per full month worked
5-9	25 days/16.66 hours per full month worked
10-19	30 days/20 hours per full month worked
20+	35 days/23.33 hours per full month worked

*One day= 8 hours

D. Guideline:

Anniversary years

Employees who reach an applicable service anniversary date at any time during the year will begin earning PTO at their higher rate as of January 1st of their service anniversary year.

Accrual and use

All your PTO days are available for your use beginning on January 1st of each calendar year. PTO days accrue on an hourly basis where required by law, and otherwise monthly, throughout the year and are borrowed against, if used before accrued. PTO is earned at the end of each month. An employee must be employed on the first and last calendar day of the month to earn PTO for that month. Except where required by law to carry over, any PTO that is unused at the end of the calendar year expires.

Non-exempt employees may use PTO in increments of 30 minutes. Exempt employees may use PTO in increments of half day (4 hours) or full day (8 hours).

Employees who have resigned may not use PTO to reach their resignation date.

Supervisor Approval





In all cases, an employee requesting scheduled PTO must receive approval from their supervisor, except for time being taken pursuant to a state or municipal paid sick leave law. For such time off, see below for further information. Supervisors have the discretion of rejecting a PTO leave request for legitimate business needs. If a request is rejected, the supervisor should provide the employee with an explanation for the disapproval.

Salaried Non-Exempt and Salaried Exempt employees are required to track and request PTO in Dayforce.

Unscheduled PTO

An employee who has an unscheduled absence will be required to use PTO time to cover the missed work hours. Unscheduled PTO may be required in cases of illness or emergency. You should continue to follow your local procedures for notifying your manager and/or HR team regarding unscheduled PTO. BCU's attendance guidelines will continue to apply and use of unscheduled PTO may result in an attendance point for employees subject to the point system.

PTO is not counted towards hours worked for purposes of calculating overtime.

PTO Exhaustion Before Unpaid Leave

An employee must exhaust all their unused PTO before unpaid time off will be available under any other leave policy unless state leave regulations prohibit. An employee who has used up all their PTO and unpaid FMLA time away from work should consult with HR to determine next steps.

Termination and Rehire

Accrued but unused PTO plus any carryover where legally required is paid out at termination of employment. Any earned PTO payout the employee is eligible to receive will be calculated based on the PTO allotment that corresponds with the employee's years of service with the company. If you leave BCU and you are rehired as a regular employee within one year of your termination date, your prior service date will be used to determine your PTO benefit.

E. Review Cycle:

Annual

F. Next Scheduled Review Date:

December 2026





Guideline Name: Phishing & Social Engineering Exploit Guidelines

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

The purpose of this guideline is to increase awareness and accountability regarding phishing & related social engineering exploits. As a financial services provider, a significant amount of information contained in the files and systems at BCU is classified as **confidential** and therefore must be carefully protected. Physical files, reports, receipts, and information systems are an integral part of credit union operations, and the protection of the information that they contain is the responsibility of all employees. Confidentiality, integrity, and availability of information are essential to maintaining BCU's reputation, financial position, and ability to service its members.

B. Scope and Applicability:

All BCU employees, contractors, temporary employees, and interns.

C. Guideline:

Quarterly all employees will participate in phishing training for a maximum of 45 minutes.

- Annually all employees will participate in Security Training.
- Department specific training will occur based upon work patterns and department shadowing. (i.e., The Hub or Mortgages may receive more intense training as they may be more frequently targeted)
- Continuous, unevenly distributed phishing tests will occur during the year.
- All new hires will receive training on this topic during their first two weeks of employment.

Accountability

- After any phishing failure, the employee is required to take mandatory phishing training through Dayforce Learning. In addition, an email is sent to the employees' direct manager to make them aware.
- After a second phishing failure, the employee's manager must meet with the employee to review the phishing failure and gain understanding as to why it is happening. Those conversations will be reported back to BCU's CISO/SVP of Security.
- Employees who fail three phishing tests in a single year will have a group meeting with cybersecurity staff, Human Resources, and their manager. This conversation will also be reflected in the employee's year end performance conversation.
- Each VP will receive a list of employees who failed the test. The VP will hold their managers and staff accountable to discuss results with those who failed.





- BCU's progressive discipline guideline will be used for additional steps as deemed appropriate by management.

D. Review Cycle:

Annual

E. Next Review Date:

December 2026





Guideline Name: Attendance Guidelines – Puerto Rico Only

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose

The purpose of this policy is to establish the criteria for attendance expectations for employees located in BCU Puerto Rico facilities. It provides the guidelines for the management of absences, tardy and absenteeism pattern that affect business operations. Employees are expected to attend work as scheduled with a minimal number of unscheduled absences. Those employees whose absenteeism exceeds the limits of the policy will be considered unsatisfactory for employment.

B. Scope and Applicability

BCU PR Employees

C. Responsibility

Employees are expected to be on time and at work each scheduled day. Employees are encouraged to take care of personal business during non-scheduled working hours or days. All employees have access to Dayforce and are expected to be aware of their current attendance status. Employees are responsible to communicate with the supervisor on every absence.

Supervisors are responsible to track employees' absences and for holding employees accountable to this guideline by providing timely and appropriate counsel and corrective action as needed.

The employee and supervisor have accountability and are responsible for managing all absences so that they do not interfere with business needs.

It is the joint responsibility of the employee and the supervisor to track absences.





D. Definitions

Scheduled Time Off	Employee notifies supervisor in advance, per Attendance Guidelines below, and receives approval for time off.
Absence	Employee is not present at work during scheduled work period and did not receive prior approval from supervisor for time off.
Tardy	An employee is considered tardy if they are not ready to work at their scheduled starting time.
Leave Early	An employee leaves prior to the end of their scheduled shift.
No call/No show	The employee does not show up to work and the employee does not call their supervisor to report their absence. *See further details below

E. Guidelines

Sick Time

Each calendar year, PR employees will have the right to use 96 hours of paid sick leave exempt of attendance points or corrective actions, as established in Law 180. These sick hours could be **scheduled** or **unscheduled** and includes the days that the employee uses for own medical care, for a family member or eligible dependent medical care, in accordance with the law.

Once the 96 sick hours are exhausted, all absences where sick time is used will count towards attendance points and applicable corrective actions, even if the employee has available sick days with pay.

Scheduled Time Off: (Vacation/ Floating Holiday)

Employees must schedule and receive approval for time off 24 hours (or one business day) in advance.

Employees requesting to schedule more than one day off at a time are encouraged to provide sufficient notice to accommodate business need.

All time off requests should be submitted to immediate supervisor for approval. Supervisors will approve or reject time off requests based on business needs. If a request is rejected, the supervisor should provide the employee with an explanation for the rejection.

Employees will be required to use Vacation for all absences not covered by any other leave (i.e. Sick, Jury Duty, Bereavement Leave, etc.).





No Call/No Show

Each day the employee doesn't report to work or call to notify a supervisor is considered a no call no show event. If the employee fails to report for 3 days, it's considered a voluntary termination by the employee.

Increments of Time Off

Employees may request scheduled time off in increments of 30 minutes for Salaried Nonexempt (SNE) and in 4-hour or 8-hour increments for Salaried Exempt (SEE).

Employees will be required to use time off for any scheduled or unscheduled absence of 30 minutes or more. Unscheduled absences of less than 30 minutes will be charged as unpaid time.

Unscheduled Absences

Unscheduled time off may be required in cases of illness or emergency. You should continue to follow your local procedures for notifying your supervisor/manager and/or Human Resources regarding unscheduled absences.

Attendance points will be assessed for absences on the following schedule (excludes: **96 hours** of sick time, approved FMLA or STD, Jury Duty, Bereavement or Personal Leave):

Absence/ tardiness of 4 hours or less	½ point
Absence for more than 4 hours	1 point
No call no show absence (unknown - full day)	Double points

*New hires who receive 4 points within the first 90 days of employment will be subject to termination

Corrective Action

The corrective action process for attendance shall be administered as follows:

At 4 points and less than 6 points	Counseling
6 or more points	Verbal warning
Next absence beyond Verbal warning	Written Warning
Next absence beyond Written warning	Final Written Warning
Next absence beyond Final written warning	Termination





When an employee reaches 6 or more points within a sliding 12-month period, corrective discipline will be issued. For every absence thereafter, corrective discipline will be issued based on the schedule above.

Attendance points will fall off 12 months from date of occurrence. An employee may fall below 6 points during a 12-month period, however, if the employee has an active Final Written Warning on file for attendance, then that discipline remains active for 1 year from date of issuance, regardless of how many points drop off.

As a warning expires, further disciplinary action will revert to the appropriate step.

While the corrective action write-up may roll off according to regression guideline, if there is a pattern of warnings on the same or similar issue over time that evidence a person has not corrected their behavior, the Company specifically reserves the right to consider the employee's record as a whole and to issue discipline, up to and including termination. Nothing in this guideline suggests that the Company must tolerate consistently uncorrected behavior.

F. Reference

This guideline shall be interpreted to follow state, federal and local laws

G. Review Cycle

Annual

H. Next Scheduled Review Date

December 2026





Guideline Name: PR Educational Assistance – Undergraduate & Graduate Level

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

BCU encourages you to continue learning. This is why BCU reimburses certain classes and/or undergraduate and graduate coursework through the Education Assistance Plan. You will be reimbursed for approved expenses when you pass the course.

B. Scope and Applicability:

This policy applies to PR employees if:

- Regular full-time
- Regular part-time, scheduled to work at least 20 hours per week

While you are on a leave of absence, you are not eligible to participate in the Educational Assistance Plan (unless you began attending qualified classes prior to your leave).

C. Definitions:

What is Paid

The Educational Assistance Plan pays for approved expenses for approved courses.

- The course(s) must be taken at an accredited institution
- You may take a maximum of two (2) courses per semester or quarter.
- 100% of tuition, book and lab fees will be reimbursed up to a maximum amount of \$5,500 per calendar year for **undergraduate courses**.
- 100% of tuition, book and lab fees will be reimbursed up to a maximum amount of \$6,500 per calendar year for **graduate courses**.

Requirements to receive a refund:

- Be a regular full-time employee, active on payroll at the time of completion of the course(s).
- Your participation in the program was previously approved
- Expenses incurred do not exceed the maximum refundable amount, \$5,500 for undergraduate courses and \$6,500 for graduate courses per calendar year.
- You must apply for reimbursement within 3 months from the date you complete the course and must submit the following:
 - An official copy of your grade report
 - Itemized original receipts for books, fees and tuition (your tuition receipts must correspond with the courses listed on your grade report)



- Completed [Educational Assistance Plan Reimbursement Application](#)
- Send the above original forms to **Safaa.Syed@bcu.org** (make sure you keep copies for your own records)
- Tax considerations in relation to reimbursement:
 - It is subject to applicable tax laws, as defined by the Internal Revenue Service.
 - The refund you receive for educational assistance is considered income and subject to taxation.

Course Requirements

The Plan does not reimburse any course you complete with a letter grade lower than a "C". If you take a "pass/fail" course, the Plan reimburses the qualified course as long as you receive a "pass". However, if you complete a course that normally assigns letter grades upon completion and you receive a "pass", the Plan will not accept this as proof of the course's completion.

You can take the courses at any time.

The following types of courses are excluded from coverage under the Educational Assistance Plan (Tuition Reimbursement):

- Audit classes
- Entrance exams
- Exam prep
- Sport, game or hobby related classes (such as photography or gardening)

The following courses are covered under the Educational Assistance Plan:

- CPA Certificate Program courses and exams

How to Apply

You must complete the Educational Assistance Plan Reimbursement Application and forward it to your manager for pre-approval for undergrad courses and to the Executive Leadership Team (ELT) for graduate level courses.

Receiving Payment

You will be reimbursed through payroll.

Repayment

If you leave BCU (other than due to a position elimination or short- or long-term disability) within 12 months of the day you receive a reimbursement from the Plan, you must repay BCU the full amount of your reimbursement.

Contact

For more information, contact Safaa.Syed@bcu.org



D. Review Cycle:

3 Year

E. Next Review Date:

December 2028





Guideline Name: Holiday Guidelines – Puerto Rico

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

The purpose of this guideline is to provide an overview of the company-designated holidays available to employees each year.

This guideline, as with all BCU guidelines, is intended to provide guidance, and is subject to management interpretation and discretion.

B. Scope and Applicability:

All PR employees

C. Guideline:

BCU provides a total of twelve (12) paid company holidays each year (calculated 8 hours per day for a total of 96 hours annually). Senior Management approves and communicates the holiday schedule each fall for the coming year and has the right to change the holiday schedule based upon business needs.

Company-designated holidays may vary between sites and from year to year. The calendar dates of the traditional holidays, facility shutdown dates and business need of the facility will determine the holiday schedule each year.

An employee will receive holiday pay if:

The employee works the day before and the day after (if scheduled) the holiday. Scheduled vacation time is used the day before or the day after the holiday; or, FMLA is used the day before, the day after, or on a scheduled holiday.

An employee will not receive holiday pay if:

Unscheduled time-off or sick time is used the day before or the day after the holiday; or, Unscheduled time off/ sick time is not used concurrent with FMLA.

Holiday pay for eligible part-time employees will be pro-rated based upon their standard work schedule. Standard hours and shifts vary between locations due to business needs.

D. Review Cycle:

3 Year





E. Next Review Date:

December 2028



Guideline Name: Meal Period- Puerto Rico

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

It is the policy of BCU to comply with state and federal laws regarding meals and breaks.

B. Scope and Applicability:

All PR employees

C. Guideline:

All Salaried Non-Exempt (SNE) Full-time Puerto Rico employees will have a meal period of 1 hour, after the end of the 3rd but before the beginning of the 6th consecutive hour worked.

I. *Meal Period*

- Meal breaks also include travel time to and from the workstation.
- Must record start and end time for meals
- During meal periods, employees should leave their workstation and not engage in any work activities.
- If a non-exempt employee performs work during their unpaid lunch break, they must notify their supervisor immediately and (if applicable) reflect the work time on their timecard.
- All employees are encouraged to take their lunch periods.

II. *Enforcement*

- Managers are responsible for the scheduling of meals and rest periods. Employees who fail to return on time from breaks or lunch will be subject to disciplinary action and docking of pay for time missed.
- By written agreement between the employee and supervisor, lunch break may be shortened to 30 minutes. This will require adjustment to the work schedule to avoid overtime.
- Penalty for non-compliance: 1-hour or 30 minutes of pay will be automatically added to the payroll for each violation.

D. Review Cycle:

3 Year



E. Next Scheduled Review Date:

December 2028



Guideline Name: Overtime Pay - Puerto Rico

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

To ensure that employees are properly paid for hours worked and paid time off, and that accurate company records are maintained, this policy provides guidance as it relates to timekeeping and overtime work when business needs deem it necessary.

B. Scope and Applicability:

All PR employees

C. Guideline:

Non-exempt employees will be paid for all recorded time. It is the responsibility of each employee in Dayforce to clock in and out for actual starting and stopping times to be recorded in the system for pay purposes. Employees who are clocked in are expected to be working or on an authorized break.

Prior to reporting to assigned work areas, employees are responsible for clocking in/recording time through Dayforce. Similarly, employees working remotely are expected to record start and stop times for all working time in Dayforce. Clocking in or out on behalf of an employee or clocking in and going or returning to the employee breakroom, going to vehicles, etc. (e.g., driving up to the front door to clock in and then leaving to go park) are strictly prohibited. Falsification of timekeeping data is strictly prohibited and may be subject to discipline, up to and including termination.

Meal period

During meal periods, employees should leave their workstation and not engage in any work activities. If a non-exempt employee performs work during their unpaid lunch break, they must notify their supervisor immediately and (if applicable) reflect the work time on their timecard.

Overtime

Overtime work will be performed on a voluntary basis unless business needs cannot be met. In those instances, mandatory overtime will be required. Whenever practical, the scheduling of mandatory overtime will be announced at least 48 hours prior to the start of overtime. There are times when advance notice may not be practical, such as when a specific skill is required to perform a critical task in an emergency situation, in which case notice will be given as soon as possible under the circumstances, and in accordance with applicable law.



Overtime is paid for hours worked in excess of 8 in a day and in excess of 40 in a work week. Overtime (OT) Premium is calculated using half time of the average rate of pay. This means OT hours are paid at 1.5 times the employee's rate of pay.

In cases where an employee is requested to work on a holiday, the employee will be paid holiday pay at straight time in addition to compensation of 1.5 times for the hours actually worked on the holiday.

All employees scheduled to work overtime are expected to report to work. Failure to do so will be considered an absentee occurrence. All overtime needs to be approved by the employee's supervisor/manager before working.

Off-the Clock Work

BCU strictly prohibits "off-the-clock" work. Non-exempt employees are required to record all time spent working for the company (including time spent emailing or making and receiving phone calls) both during and outside normal working hours. Employees are expected to obtain approval from their manager before engaging in any work outside of normal working hours that would constitute overtime work. Should an employee work without obtaining such approval, then the employee will be compensated for any and all time worked but may be subject to discipline for violating this policy.

Mandatory Reporting Procedures

In the event an employee believes they have not been paid for all hours worked, including at least time and a half for all OT hours worked in a week, and the employee has been unable to resolve the dispute with their supervisor, the employee must report this issue to HR. The payroll team will review the audits in the timekeeping system and confirm with HR if corrections need to be made in the system for payment.

An employee must also utilize this reporting procedure in the event they believe any inappropriate deductions have been made to their pay.

Summary of Employee Obligations and Consequences

Non-exempt employees are responsible for proper timekeeping practices which include:

- Having knowledge of the location and content of this policy
- Clocking in/clocking out or recording your work hours accurately
- Taking all breaks and meal periods, holidays and vacations as scheduled
- Avoiding unauthorized overtime and "off-the-clock" work for yourself or coworkers
- Reviewing and certifying your time records on a regular basis and pursuant to BCU guideline
- Reporting inaccuracies immediately



- Not performing any principal work outside of your regularly scheduled hours of work unless authorized in advance by your supervisor or manager
- Not performing any overtime work without the express, advance permission of your supervisor

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028



Guideline Name: Vacation Leave – Puerto Rico Only
Guideline Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

BCU encourages employees to take time away from work for rest and relaxation by granting paid vacation leave.

B. Scope and Applicability:

All PR employees

C. Guideline:

Employees must request vacation leave in advance for approval by their supervisor. The supervisor will establish the required number of days in advance that an employee must request vacation. This advance notice time may vary depending on business needs for the department or area.

Vacation Schedule

Eligible employees earn vacation based on the applicable employer plan.

Classification	Years of Service	Total Vacation Leave Per Year
SNE	Year of Hire to 5 years	15 days
	6 years or more	18 days
SEE	Year of Hire to 5 years	15 days
	6 years to 14 years	18 days
	15 years or more	20 days

SEE will be allowed to carry over maximum of 10 vacation days into following year. Any vacation balance greater than 10 days (80 hours) will expire.

All carryover days (maximum 10) must be used by March 31st of the following year. Any unused vacation days after March 31st will expire.

SNE may carry over any unused vacation hours to the following year. These will not expire.

D. Review Cycle:

3 Year





E. Next Scheduled Review Date:

December 2028



Guideline Name: Prohibition of Drugs and Alcohol Guidelines

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

This policy explains BCU's prohibition against the use of drugs and alcohol in the workplace.

B. Scope and Applicability:

All BCU employees and job applicants.

C. Guideline:

BCU is committed to protecting the safety, health and well-being of all employees and others in our workplace. We recognize that alcohol and drug abuse pose a significant threat to these goals.

Employees are expected to report to work in a condition to perform their duties safely and effectively. Employees shall not use, possess, sell, trade, and/or offer for sale illegal drugs or intoxicants or be under the influence of alcohol in the workplace. Subject to applicable law, BCU may require job applicants and employees to submit pre-employment, random, post-accident, and reasonable suspicion testing for drugs and/or alcohol.

Any questions regarding this policy should be directed to Human Resources.

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028





Name: Prohibition of Workplace Harassment Policy

Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

This policy explains BCU's prohibition against workplace harassment.

B. Scope and Applicability:

All BCU employees

C. Guideline:

Workplace harassment can take many forms including, but not limited to, threats, insults, slurs, unsolicited remarks, jokes, gestures, or physical contact, and displays or circulations of derogatory or inappropriate written, electronic, voice or other physical materials or pictures, when such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile or offensive work environment.

One type of workplace harassment is sexual harassment. It is specifically and legally defined as unwelcome sexual advances, requests for sexual favors, and/or other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment; or
- Submission to or rejection of such conduct by an individual is used as the basis for an employment decision affecting that person; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment can take many forms including, but not limited to:

- Verbal: Sexual innuendo and other suggestive comments, humor and jokes about sex, or gender specific traits, sexual advances or propositions, insults, threats; or
- Non-Verbal: Leering, whistling, suggestive or insulting looks, sounds, gestures, pictures, cartoons or calendars; offensive or derogatory written, electronic or voice materials; or
- Physical: Intentional touching of the body (e.g., brushing, patting, pinching), kissing, inappropriate display of body parts; coerced acts of a sexual nature, or exclusionary or demeaning actions based on sex.

The sexual harassment of employees and/or job applicants by supervisors, other management personnel, coworkers, job applicants and/or any third party such as visitors or clients is strictly prohibited.





Prohibited and potentially illegal conduct which also constitutes workplace harassment includes physical, verbal or non-verbal conduct by any employee based on race, age, religion, sexual orientation, gender identity and/or expression, disability, veteran status or any other characteristic protected by Federal, State or local law when such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Reporting of Harassment

Any employee who experiences and/or observes the actions or words of another BCU employee and believes those actions or words constitute harassment has a responsibility to report as soon as possible to their supervisor, Human Resources and/or any management employee of the Company.

It should be emphasized that an employee is not required to report harassment to a supervisor who has engaged in harassment against the employee, or who is a close associate of the person who has engaged in the harassment in question. If such situations would otherwise prevent the employee from reporting, such reports may be directed to Human Resources or to any manager of the Company.

Any manager who receives a complaint of harassment or who witnesses possible harassment in the workplace must consult with their Human Resources representative as soon as possible.

Investigation of Harassment Reports

All reports of harassment will be investigated as expeditiously as possible. Human Resources should conduct, direct and/or consult in all investigations. The reporting employee will be expected to cooperate throughout the investigation. During the process, efforts will be made to avoid unnecessary disclosure of confidential and/or sensitive information, while at the same time ensuring that each incident is carefully and completely investigated. In all cases, the employee is to be advised of the outcome of the investigation.

If an employee is not satisfied with the handling of the report, then the employee should bring their concerns to the attention of the Chief Human Resources Officer or their designee. An employee's intentional filing of false reports will not be tolerated.

Disciplinary Action

After the investigation, any employee who is determined to have engaged in workplace harassment or who has intentionally reported false reports of harassment is in violation of this policy and will be subject to appropriate corrective action up to and including termination.





External Business Relations

Harassment may also involve vendors, contractors and members. BCU employees should maintain all business relations free of harassment. If an employee experiences or observes harassment in external business relations with the Company, the problem should be reported following the reporting procedures outlined above, in the section titled, “Reporting of Harassment.”

Retaliation

Retaliation against employees who report harassment or who participate in the investigation of harassment reports is prohibited and will not be tolerated.

D. Review Cycle:

3 years

E. Next Review Date:

December 2028





Guideline Name: Service Awards and Retirement Gifts

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

Recognize employees for their dedication and length of service.

B. Scope and Applicability:

All BCU employees

C. Guideline:

Service Awards

BCU appreciates your hard work and dedication toward attaining our business goals. To show our gratitude, you will receive an anniversary award every five years and the award will be commensurate with your total years of service. Please submit the Milestone Anniversary Award Form in Dayforce to claim your retirement gift and type within **30 days** of your milestone anniversary date.

Retirement Gifts

BCU would like to show appreciation for all your years of hard work and service. A retirement gift will be given based on your level in the organization and total years of service.

D. Review Cycle:

3 Years

E. Next Review Date:

December 2028





Guideline Name: Smoke & Vape-Free Workplace Guideline

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose

BCU is committed to providing a work environment that supports the health of its employees and visitors. BCU recognizes the fact that smoking is harmful to the user and to those who are exposed to secondhand smoke. Additionally, BCU recognizes that smoking is addictive, and is committed to helping employees who wish to stop smoking.

B. Scope and Applicability

All BCU employees, contractors, and visitors within all workplaces or utilizing company vehicles in the US and PR. This includes anyone who is representing or conducting business for BCU outside of a BCU workplace, including at company-sponsored events and during all working hours.

C. Definitions

TERM	DEFINITION
Smoking	The “act of lighting, smoking, or carrying a lighted or smoldering cigar, cigarette or pipe of any kind.”
Vaping	The use of electronic nicotine delivery systems or electronic smoking devices such as e-cigarettes, e-pipes, e-hookahs and e-cigar.

D. Guideline

Prohibited Behavior

BCU prohibits smoking and vaping on all company premises and in company owned or leased vehicles. Smoking/vaping are not permitted in any vehicle while on BCU premises, including at the property entrance. It is the employee’s responsibility to ensure that their visitors comply with this policy.

If BCU shares building space or property with other companies that allow tobacco use on site, BCU employees are only allowed to smoke in public areas that are not controlled by BCU or co-tenants.

Employees who choose to smoke during work hours must do so off-site on their regularly scheduled breaks and meal periods. No additional time will be granted for this activity.





E. Review Cycle

3 Years

F. Next Scheduled Review Date

December 2028





Guideline Name: BCU Social Media and Updates Feed Usage Guidelines

Guideline Owner: Human Resources

Effective Date: September 2025

A. Purpose

To provide a guide for BCU employee participation in social media and to ensure that BCU's Updates Feed remains a productive and respectful space for internal collaboration aligned with BCU's business objectives.

B. Scope and Applicability

All BCU Employees

C. Definitions

Social Media: Sites include (but are not limited to): Facebook, Instagram, LinkedIn, Sharepoint and The Updates Feed.

D. Guideline

Social Media:

When posting on social media, always try to consider our Shared Values before posting or reacting. As a BCU ambassador, your conduct on social media, personal or professional, reflects our entire Credit Union. Always embody our brand and values online, keeping in mind the do's and don'ts as you represent both BCU and yourself:

Social don'ts:

- Don't disclose confidential information obtained through employment.
- Don't spoil any upcoming news or updates that haven't been announced yet.
- Don't post or share images with confidential information including, but not limited to, computer screens, badges, member information, policy and procedural documents.
- Don't post any content on social media feed (including currently active and inactive channels) regarding opinions about BCU or Company Partners.
- Don't divulge any procedural or organization information to third-party individuals to post on their behalf on any social media feed.
- Don't post responses to any member posts on social media feeds unless you are authorized to do so.
- Don't act as an official BCU spokesperson. Make it clear that you are an employee of BCU and opinions are your own.
- Don't post photos of fellow employees or members without their consent.





- Don't post information of any advertising nature or comments on any competitors.
- Don't create any social media accounts on behalf of BCU.
- Don't comment on any operational or procedural items that are outside of "normal member access."
- Don't promote BCU products or use BCU brand assets without first reaching out to marketing to ensure you are following appropriate FI regulations.
- Don't share you own or any other person's Personally Identifiable information and/or Protected Health Information.

Social do's:

- Go ahead and brag about what you do here at BCU, as long as it is truthful.
- If you choose to connect with members on social, be mindful of how they could interpret your content.
- Definitely share your fun experiences at a BCU event, or some of the great volunteer work you've done, or how much you like your awesome coworkers.
- "Share" BCU posts to spread our news.

If you see something concerning on social, say something. Reach out to your manager, Human Resources or the BCU Ethics Hotline (844-857-5483).

Employees of BCU are encouraged to "share" BCU-published content within their own social media networks to extend the reach and visibility of the BCU brand. Employees are required to share the original post directly from the BCU-published post so that we can track shares and provide support to any activity requiring attention.

In social media interactions, BCU employees must adhere to ethical conduct, ensuring discussions are inclusive and respectful. Avoid sensitive topics such as religion and politics. Steer clear of offensive terms and personal insults. Review and understand the Employee Principles and confidentiality obligations within BCU's Employment Agreement.

The Updates Feed:

The Updates Feed (Viva Engage) is an enterprise social platform intended for business-related communication only. All posts, comments, and interactions must support BCU's strategic goals, operational needs, or employee engagement initiatives tied directly to work.

Prohibited Use:

- Personal updates, opinions, or commentary unrelated to BCU business.
- Content that could be construed as promotional, political or controversial.
- Posts that violate BCU's standards for respectful communication as outlined in the Employee Handbook.



Moderation and Enforcement:

- The Employee Experience and Internal Communications teams reserve the right to remove any content that violates this policy.
- Users will be notified if their post is removed and may be subject to further review if violations persist.
- The ability to delete posts will be disclosed transparently to all users.

Reminder: The Updates Feed (Viva Engage) is not a personal social media platform. It is a business tool governed by the same standards as email, Teams, and other internal communication channels.

F. Review Cycle

Annual

G. Next Scheduled Review Date

December 2026





Guideline Name: Tornado Procedures

Guideline Owner: Facilities

Effective Date: January 1, 2025

A. Purpose:

The purpose of this guideline is to ensure the safety of our employees and guest during a tornado.

B. Scope and Applicability:

All Vernon Hills employees and contractors. Service Center employees should refer to the tornado procedures of their local facility.

C. Guidelines:

Modified Evacuation Procedures for Employees/Visitors with Disabilities

Employees and visitors with permanent or temporary disabilities that limit their ability to safely seek shelter during a tornado are strongly encouraged to report their disability to Human Resources Facilities department. This information will remain confidential and will be utilized to assist in assisting you to seek shelter during a tornado.

- All employees with any type of disability that could hinder their ability to seek shelter or to take cover must have a minimum of two buddies to assist them.
- Buddies may be selected by the employee or their supervisor. The buddies should work near the employee with disabilities, have a similar work schedule and be able to assist during an emergency.
- A minimum of two buddies must accompany the employee to seek shelter.

Tornado Procedures (Vernon Hills)

Before the evacuation:

- Become familiar with your workplace
- Know multiple safety shelters
- Formulate a workplace map showing multiple places to seek shelter from a tornado
- Evaluate the need for a buddy employee for anyone needing assistance seeking shelter
- Know that BCU has a Medical Emergency Response Team (MERT) that will assist employees find a safe shelter





During a Tornado:

- Remain in the building and seek shelter
- Stay away from all windows and glass
- Seek additional shelter under a table
- Do NOT use the elevators

Seek shelter in the following areas:

- Washroom
- File room
- Storage room
- Stairway

After the Evacuation:

- Remain in your space until the All Clear is given. Only Security, Facilities Management or the Fire Department will give the All Clear

Always:

- Assume all alarms signify a true emergency
- Be responsible for your visitors
- Never use the elevators in an emergency evacuation
- Close all doors behind you
- Refer media questions to the appropriate company management
- Stay calm

D. Review Cycle:

3 Year

E. Next Scheduled Review Date:

December 2028





Guideline Name: US Educational Assistance - Graduate Level

Guideline Owner: Human Resources

Effective Date: June 1, 2025

A. Purpose:

BCU's Non-Qualified Educational Reimbursement Guidelines provide reimbursement to employees for eligible "job related" or "non-job related" educational expenses for graduate level courses. Manager pre- approval is required in order to receive reimbursement. Providing benefits under these guidelines is at the sole discretion of BCU.

B. Scope and Applicability:

These guidelines apply to you if you:

- Are a regular full-time employee
- Have been employed for a minimum of 12 months of continuous service
- In a management role or an individual contributor role of grade 18 or above
- Are in a current or future role where an MBA or advanced degree has relevance to your development plan
- Are in good standing in all other aspects of your position and receive approval from your manager to participate (see approval application link in 'how to apply' below)

You can still participate in the Non-Qualified Educational Reimbursement Program if you are on an approved leave of absence (for courses approved prior to your leave.)

C. Guideline:

The Non-Qualified Education Reimbursement Guidelines pay up to 90% of covered expenses for approved courses:

The Non-Qualified Education Reimbursement Guidelines cover:

- All fees (excluding late registration fees)
- Online fees
- Equipment; if required for the course
- Supplies; if required for the course
- Text books
- Tuition
- Correspondence courses





The Non-Qualified Education Reimbursement Guidelines do not cover:

- Late and deferral fees
- Transportation *
- Pens, pencils, paper, mechanical tools, etc.
- Backpacks
- Calculators and computers
- Meals and lodging
- Shipping and handling costs of text books

*Meals, travel and lodging would be covered if required by course and approved

You have to earn a letter grade of "C" or above. The plan does not reimburse any course you complete with a letter grade lower than a "C". If you take a course "pass/fail", the Plan reimburses the qualified course as long as you receive a "pass".

You can take the courses at any time.

To qualify under the Non-Qualified Educational Reimbursement Guidelines, the course must link to your job and to the success of the business

The following types of courses are covered under the Non-Qualified Educational Reimbursement Guidelines:

- Correspondence
- Graduate

To qualify for Non-Qualified Educational Reimbursement, schools must be approved educational institutions.

Maximum Benefit

You are limited to two courses per term.

How to Apply/Approval Process

- You must complete the [Non Qualified Educational Assistance Pre-Approval Application](#).
- Seek supervisor approval (See Approval).
- Your supervisor must present the application and justification to their respective SVP/EVP.
- The SVP/EVP makes a recommendation to the CEO and his/her direct reports for a final decision.





Approval is based on management sole discretion, is not guaranteed, and is based on the needs of the business and BCU's need to educate the individual employee. Sr. Management reserves the right to review and approve courses on an annual basis.

Timing to apply

You must complete the approval process prior to the start of the course. Once you complete your course and receive your grade, you must submit your reimbursement form and supporting documents to BCU Benefits Department within 90 days of course completion to be eligible for reimbursement.

Receiving Reimbursement

After you complete the course, you must submit the following:

- [Reimbursement Form](#)
- Original receipts
- Grade report

You will be reimbursed via payroll.

Advance Payment

You cannot receive an advance to pay for tuition

Taxes

Reimbursement of the cost of non-job-related educational expenses is taxable income to the employee and will not be grossed up to cover the tax impact.

Non-job-related educational expenses (which are taxable to the employee as income), are those which:

- Are necessary to meet the minimum requirements for qualification of your present position or qualify you for a new trade or business

Tax Exclusion Certification

Instructions: To qualify for exclusions from federal income tax, CHECK YES ON BOTH BOXES BELOW to affirm that the education for which you receive graduate-level educational assistance reimbursements above \$5,250 per year (A) maintains or improves skills in your present job and (B) does not qualify you for a new trade or business. For more information, please refer to the Baxter Graduate Level Non-Qualified Educational Assistance Policy.



- A. I agree that this education will maintain or improve existing skills in my present job
Select: **Yes or No**

- B. I agree that this education will maintain or improve existing skills in my present job
without qualifying me to move into a new trade or business
Select: **Yes or No**

Contact

For more information, contact BCU Benefits Department

D. Review Cycle:

3 Year

E. Next Review Date:

December 2028





Guideline Name: US Educational Assistance-Undergraduate Level

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

BCU encourages you to continue learning. This is why BCU reimburses certain classes and/or undergraduate coursework through the Education Assistance Plan. You will be reimbursed 80% of approved expenses when you pass the course.

B. Scope and Applicability:

This policy applies to US employees if:

- Regular full-time
- Regular part-time, scheduled to work at least 20 hours per week

While you are on a leave of absence, you are not eligible to participate in the Educational Assistance Plan (Tuition Reimbursement), (unless you began attending qualified classes prior to your leave).

C. Definitions:

What is Paid

The Educational Assistance Plan (Tuition Reimbursement) pays 80% of approved expenses for approved courses.

The Educational Assistance Plan (Tuition Reimbursement) covers:

- All fees (excluding late registration fees)
- Online fees
- Equipment; if required for the course
- Supplies; if required for the course
- Textbooks
- Tuition

The Educational Assistance Plan (Tuition Reimbursement) does not cover:

- Fees such as: late/deferral and health fees
- Transportation
- Pens, pencils, paper, and mechanical tools, etc.
- Backpacks
- Calculators and computers
- Meals and lodging
- Shipping and handling costs of textbooks



Course Requirements

You must earn a letter grade of "C" or above. The Plan does not reimburse any course you complete with a letter grade lower than a "C". If you take a "pass/fail" course, the Plan reimburses the qualified undergraduate course as long as you receive a "pass". However, if you complete an undergraduate course that normally assigns letter grades upon completion and you receive a "pass", the Plan will not accept this as proof of the course's completion.

The courses don't have to be job-related.

You can take the courses at any time.

The following types of courses are excluded from coverage under the Educational Assistance Plan (Tuition Reimbursement):

- Audit classes
- Entrance exams
- Exam prep
- Graduate level course work
- Sport, game or hobby related classes (such as photography or gardening)

The following courses are covered under the Educational Assistance Plan (Tuition Reimbursement):

- CPA Certificate Program courses and exams
- Undergraduate courses

To qualify for the Educational Assistance Plan (Tuition Reimbursement), schools must be an accredited institution

Maximum Benefit

There is a maximum annual benefit of \$5,250 per calendar year. The annual limit applies for the year in which you submit your form (subject to any limitations set forth by law). There's no limit to the number of courses you can take.

How to Apply

You must complete the [Education Assistance Reimbursement Application](#) forward it to your manager for pre-approval.

Receiving Payment

You must apply for reimbursement within 3 months from the date you complete the course and must submit the following:



- An official copy of your grade report
- Itemized original receipts for books, fees and tuition (your tuition receipts must correspond with the courses listed on your grade report)
- Completed Educational Assistance Plan Reimbursement Application
- Send the above original forms to Safaa.Syed@bcu.org (make sure you keep copies for your own records)

You will be reimbursed through payroll.

Repayment

If you leave BCU (other than due to a position elimination or short- or long-term disability) within 12 months of the day you receive a reimbursement from the Plan, you must repay BCU the full amount of your reimbursement.

Taxes

The Internal Revenue Code allows the exclusion of BCU paid non-job-related educational expenses from income.

This link will allow you to look at IRS regulations regarding taxability of education benefits:

[Internal Revenue Service publication](#).

Contact

For more information, contact Safaa.Syed@bcu.org

D. Review Cycle:

3 Year

E. Next Review Date:

December 2028





Guideline Name: GRADUATE EDUCATIONAL ASSISTANCE PRE-APPROVAL FORM

Guideline Owner: Human Resources

Effective Date: January 1, 2025

Name		Department		Location	
Name of Educational Institution				City/State	
Degree/Program	Start date	End date	Approx. Annual cost to include tuition, Books, fees	Expected month/year of graduation	
How does this advanced degree correlate to your job?					

- I understand that I need to remain in good standing to receive reimbursement (i.e. not on a work improvement plan).
- I understand that my participation in the program will be reviewed annually.
- If I voluntarily leave BCU while enrolled in this program, I agree to reimburse 100% of the funds I have received from BCU for this program





Signature (Employee)

Date

Signature (Officer)

Date

Receiving Payment

Pre-Approval is required to receive reimbursement.

Contact

For more information, contact Safaa.Syed@bcu.org

A. Review Cycle:

3 Year

B. Next Review Date:

December 2028





Guideline Name: Educational Assistance Plan Reimbursement Application

Guideline Owner: Human Resources

Effective Date: January 1, 2025

PLEASE PRINT OR TYPE			
Last Name	First Name	Initial	
Employee Number			
Home Address - No. and Street	City	State	Zip
Daytime Phone			

Course (only one course per form)	Tuition	Required Fees	Books	Total
Date Course Began	Date Course Ended			
Name of Educational Institution				
Address	City	State	Zip	

CERTIFICATION OF SUPERVISOR	
I have read and understand the Highlights of the Educational Assistance Plan as outlined in the Educational Assistance Plan Highlights and the terms of the Educational Assistance Plan.	
For purposes of IRS reporting, I certify that this course is job related. <i>See Plan Highlights for definition of job related.</i>	
Supervisor Certification	Date
I have read and understand the Highlights of the Educational Assistance Plan as outlined in the Educational Assistance Plan Highlights and the terms of the Educational Assistance Plan. I understand that I may obtain a copy of the Plan through my supervisor or BCU HR Dept. I certify that I am not being reimbursed for the above expenses by any other source. If I voluntarily terminate employment with BCU within 12 months of receiving reimbursement, I understand that I am legally obligated to repay BCU any amounts paid to me, or on my behalf, under the Educational Assistance Plan within the 12-month period prior to my voluntary termination of employment.	
Employee Signature	Date





OFFICE USE ONLY

Approved by	Amount
GL Number	Date

- **Receiving Payment**

You will be reimbursed through payroll.

- **Repayment**

To be eligible for reimbursement - Completed form with the required supporting documentation must be submitted within three months of the date you complete the course.

- **Contact**

For more information, contact Safaa.Syed@bcu.org

A. Review Cycle:

3 Year

B. Next Review Date:

December 2028





Guideline Name: Overtime Pay
Guideline Owner: Human Resources
Effective Date: January 1, 2025

A. Purpose:

To provide guidance on when an employee will receive overtime and how it is calculated. This guideline, as with all BCU guidelines, is intended to provide guidance, and is subject to management interpretation and discretion. **This guideline is not a binding contract, and it does not change the at-will nature of employment of BCU employees.**

B. Scope and Applicability:

All US employees

C. Definitions:

The following terms are used in this policy and have the following meanings:

- Exempt Employee: an employee who is not eligible to receive overtime pay.
- Nonexempt Employee: an employee who is eligible to receive overtime pay.
- Workweek: Fixed and regularly recurring period of 168 hours OR seven consecutive 24-hour periods. This policy and any applicable local policy will be interpreted consistent with all applicable federal, state and local laws and regulations, including the federal Fair Labor Standards Act (FLSA). *Refer to the State Law Considerations section of the policy and applicable local policies for variances to the overtime pay rules based upon state or local law.*

D. Guideline:

Overtime Pay

Nonexempt employees are eligible to receive overtime pay for all hours worked in excess of 40 hours in a workweek. The overtime rate is calculated at 1.5 times the employee's regular rate of pay (*refer to the State Law Considerations section of the policy and applicable local policies for variances to the overtime pay rules based upon state or local law*).

Hours Worked

For purposes of this policy, the following are guidelines on what are considered hours worked that would be included when determining eligibility for overtime pay. Hours worked generally includes all the time during which an employee is required to be on the employer's premises, on duty or at a prescribed workplace. This includes all time between when the employee starts work until when the employee ends work in the day, including short breaks of 20 minutes or less. Meal periods and other breaks in excess of 20 minutes are not considered hours worked.





Training Time

Time spent by an employee attending company-required training or training on-the-job is considered hours worked. Voluntary training outside normal work hours that is not related to the employee's job would not be considered hours worked.

Travel Time

The following considerations apply in determining time worked for nonexempt employees who are required to travel for business purposes:

- Travel time that is part of an employee's principal work activity and occurs during the employee's regular work hours, such as traveling to a customer site or traveling between company locations, is considered time worked in determining whether a non-exempt employee will receive overtime pay.
- Travel time away from home for an overnight period is considered time worked in determining whether a nonexempt employee will receive overtime pay if it cuts across the employee's normal work hours. This includes any travel time that occurs on a weekend or regular day off if it cuts across the hours that the employee would normally work in a typical workday. For example, a non-exempt employee who normally works 8:30am to 5pm, Monday through Friday, takes an overnight business trip to another city. The employee takes a flight that leaves at 7 am and arrives at the destination city at 10am. All time spent traveling (e.g., 7am-10am) is considered time worked because it cuts across the employee's normal work hours, even if the employee is required to travel on a weekend.
- Travel time that occurs entirely outside of working hours is not considered time worked in determining whether a nonexempt employee will receive overtime pay, unless otherwise required by state law.
- Time spent commuting between home and the employee's work site is not considered time worked in determining whether a non-exempt employee will receive overtime pay.

Other Time Not Typically Included in Hours Worked

The following types of time off from work are not included in hours worked unless the employee performs work for the Company during that time off:

- Company holidays
- Jury duty
- Funeral or bereavement leave
- Unpaid personal time off
- Paid time off /vacations
- Any paid or unpaid volunteer time other than Paid Team Volunteer Time



Accurate Recording of Hours Worked

All nonexempt employees are expected to accurately record hours worked in accordance with Company policy. Nonexempt employees are expected to obtain prior approval from their supervisor before working overtime hours. Even if the employee fails to seek or obtain such prior approval, the employee must still accurately report all hours worked so that the employee is properly compensated. Under no circumstances should an employee not accurately report hours worked or not be paid for all hours worked.

Compensatory Time Not Permitted

Nonexempt employees may not receive compensatory time off in lieu of overtime pay. Compensatory time is, instead of being paid overtime, a nonexempt employee is provided time off in the following workweek because the employee worked overtime in the previous workweek. This is not allowed under Company policy under any circumstances.

State Law Considerations

The following are additional state law considerations applicable to nonexempt employees. The below is not a complete compilation of state law requirements but is intended to highlight state overtime requirements that must be followed in addition to the general policy:

- **California:** Nonexempt employees that do not work an alternative workweek will receive daily overtime after 8 hours in a workday and for the first 8 hours in the 7th consecutive day worked at a rate of 1.5 times the employee's regular rate of pay.
 - Nonexempt employees that do not work an alternative workweek will receive daily overtime after 12 hours in a workday and after 8 hours in the 7th consecutive day worked at a rate of 2.0 times the employee's regular rate of pay.
 - Nonexempt employees who work an alternative workweek (four 10-hour workdays in the workweek) will receive daily overtime after 10 hours up to 12 hours in a workday and for the first 8 hours of any days worked beyond the number of days in the alternative workweek at a rate of 1.5 times the employee's regular rate of pay.
 - Nonexempt employees who work an alternative workweek will receive daily overtime after 12 hours in a workday and after 8 hours on any days worked beyond the number of days in the alternative workweek at a rate of 2.0 times the employee's regular rate of pay.
- **Colorado:** Certain nonexempt employees who work in jobs covered by Colorado Minimum Wage Order 29 will receive daily overtime after 12 hours in a workday and after working 12 consecutive hours (excluding duty free meal breaks) at a rate of 1.5 times the employee's regular rate of pay.
- **Kentucky:** Nonexempt employees will receive overtime pay for all hours worked on the 7th consecutive workday at a rate of 1.5 times the employee's regular rate of pay.





- **Oregon:** Nonexempt employees who work in manufacturing facilities will receive daily overtime after 10 hours in a workday and after working 12 consecutive hours (excluding duty free meal breaks) at a rate of 1.5 times the employee's regular rate of pay.
- **Puerto Rico:** Nonexempt employees will receive daily overtime after 8 hours in a workday at a rate of 1.5 times the employee's regular rate of pay (please refer to PR Overtime pay guideline).

Reference

This guideline shall be interpreted to follow state, federal and local laws.

E. Review Cycle:

3 Year

F. Next Scheduled Review Date:

December 2028



Guideline Name: Visitor Guidelines

Guideline Owner: Facilities

Effective Date: October 1, 2025

A. Purpose

To ensure the safety and security of all personnel, visitors, and sensitive information within the facility, this guideline mandates that all visitors will either be issued a security badge or will be escorted by an Authorized Employee while on the premises.

B. Scope and Applicability

This guideline applies to all visitors, including but not limited to contractors, vendors, clients and any other individuals who are not permanent employees of the company.

C. Definitions

“Authorized Employee” means a member of the Senior Management Team or an authorized employee designated by a member of the Senior Management Team.

D. Guideline

Escort Requirement:

Unless a Visitor is subject to an appropriate contractual relationship with BCU and is issued a security badge (see below), the visitor is required to be escorted by an Authorized Employee throughout their entire visit. The employee escort is responsible for ensuring that the visitor does not access restricted areas and adheres to all company guidelines and policies.

Access Restrictions:

Visitors may only access areas of the facility that are necessary for the purpose of their visit. All other areas, including those marked as restricted or off-limits are prohibited unless otherwise authorized in advance.

Escort Responsibilities:

The designated escort is responsible for:

- Ensuring the visitor follows all safety procedures and guidelines.
- Always accompanying the visitor, including during meetings, tours and breaks.
- Reporting any unusual or suspicious behavior to management immediately.





Visitor Departure:

Upon completion of the visit, the escort will ensure the visitor exits the facility safely and does not remain on the premises without supervision.

Each visitor that requires unsupervised access or longer periods of duration on site must obtain a security badge from the BCU facilities team before accessing the premises. To obtain a security badge, such visitor must be covered by an applicable NDA or written contract for services that includes appropriate confidentiality obligations, and such NDA or written contract must be fully executed and on file prior to such visitor being issued a security badge.

E. Review Cycle

Annual

F. Next Scheduled Review Date

December 2026





Guideline Name: Volunteer Guidelines

Guideline Owner: Human Resources

Effective Date: January 1, 2025

A. Purpose:

BCU recognizes and celebrates employee volunteer efforts that improve the employee's health, well-being and quality of life in the communities around us. Paid Volunteer Time, both personal and team, is intended to be used during your normal shift. Employees will not be paid for volunteer time that occurs outside of their normal shift.

You may have questions about what constitutes volunteerism and what doesn't. The recipients of your volunteer efforts should be not-for-profit organizations but are not limited to those with 501(c) 3 status. For further clarification, the following can be used as guidelines.

B. Scope and Applicability:

All BCU Employees

C. Definitions:

Examples of Approved Volunteerism:

Boy/Girl Scouts, health related organizations (leukemia, AIDS, diabetes, cancer, March of Dimes, LifeSource or other approved blood donation centers, etc.) religious organizations (teaching Sunday school, maintenance work for place of worship, volunteering for soup kitchen, etc.), schools (PTO/PTA, volunteering for fieldtrips and classroom, lunchroom, gym class assistance, room parent, etc.) non-profits (Habitat for Humanity, Chicago Food Depository, Junior Achievement, Feed My Starving Children, etc.), non-paid athletic coaching, non-governmental organizations such as conservational parks, park districts, and working for organizations that help those in need.

Examples of Non-Approved Volunteerism:

Helping a neighbor with a house project, babysitting, or any contribution toward an individual with the intent of being a good family member or neighbor, as opposed to a school, church, club, non-governmental agency, park district, etc.

D. Guideline:

Personal Volunteer Time: Regular full-time employees may be eligible for up to 16 hours of pay per calendar year in recognition of their volunteer efforts; this is called Personal Volunteer Time. Regular part-time employees may be eligible for a pro-rated number of hours of Personal Volunteer Time per calendar year based on the full time equivalent of 16 hours.

Team Volunteer Time: Regular full-time employees may be eligible for up to 16 hours of additional pay per calendar year in recognition of their team volunteer efforts; this is called





Team Volunteer Time. **Team Volunteer Time is time designated by departments or local management** for the combined purpose of team building and performing volunteer work for charitable organizations. Teams may take from 1 hour to 16 hours per calendar year to use as an opportunity to increase BCU's community involvement. The volunteer work may take place on-site at a BCU location, at a Company Partner location or at the charitable organization's designated location. Employees will be paid at their normal base pay rate for Team Volunteer Time service hours. Team Volunteer Time service hours will be included in the employees' total hours worked when calculating hours for overtime pay for non-exempt employees. Employees are not obligated to perform community service or volunteer activities as part of a Team Volunteer Time activity.

Employees who request Personal or Team Volunteer Time must obtain supervisory approval. Click here to print out and complete the [VOLUNTEERISM REQUEST FORM.docx \(sharepoint.com\)](#). Employee requests for Personal or Group Volunteer Time must be made in advance and include:

- Organization name and mission
- Planned activity
- Date and amount of time needed

Supervisor approval of Personal/Team Volunteer Time is subject to circumstances under which business needs can be met. Consideration should include the employee's ability to complete work assignments and maintain satisfactory job performance within scheduled and budgetary limitations.

Organizations used for volunteer purposes should be not-for-profit organizations but are not limited to those with 501c3 status. Some examples would be non-governmental organizations such as conservational parks, park districts or schools. If it is determined that the organization's focus or mission conflicts with the interests of BCU or BCU's Shared Values, the activity will not be approved.

Employees will be paid at their normal base pay rate for Personal/Team Volunteer Time service hours (total annual hours are 32). Volunteer service hours will be included in the employee's total hours worked when calculating hours for overtime pay for non-exempt employees.

Verification of service may be required upon completion of Personal/Team Volunteer Time. Employees will be informed as to what type of verification is needed, if necessary.

Any expenses incurred by employees participating in Personal/Team Volunteer Time activity will be considered personal expenses and generally will not be reimbursed by BCU.

E. Review Cycle (Annual/Bi-Annual)

3 Year





F. Next Review Date:

December 2028

