

## **FIRSTENERGY CHOICE FEDERAL CREDIT UNION** **COMMUNICATION OF CONCERNS POLICY**

FirstEnergy Choice Federal Credit Union's Board of Directors (the "Board") has accepted this policy as guidance for FirstEnergy Choice Federal Credit Union employees, members and other interested parties to communicate concerns regarding (i) potential fraud, accounting, internal accounting controls or auditing matters and (ii) certain other matters to the Chief Executive Officer (CEO), any member of the Board, or the Supervisory Committee Chairperson.

The intent of this policy is to ensure that concerns can be raised to the appropriate FirstEnergy Choice Federal Credit Union organizational level. Interested parties may communicate concerns directly to the CEO, the Board, or the Supervisory Committee Chairperson, on an anonymous basis if necessary. FirstEnergy Choice Federal Credit Union does not permit retaliation of any kind against employees for good faith communications.

### ***Distribution of Communications***

The contacted individual(s) should distribute the communication to the Board or non-management directors of the Board, as applicable, prior to the next scheduled Board meeting. Depending on their content, length, and volume, the appropriate person may provide copies of such communications or only a summary of such communications. The original copies or records of all communications will be available to any director, as applicable, upon request.

### ***Action on Communications***

The Board of Directors or the non-management directors will determine whether any action or response is necessary or appropriate with respect to a communication provided to them for their consideration. If so, they will take or direct such action as they deem appropriate.

### ***Other Matters***

At least annually, the Chief Executive Officer, Chief Operations Officer, and Information Systems & Compliance Manager, to the best of their knowledge and with respect to the business or functional areas for which they are responsible, will report to the Board (i) as to the existence of any significant deficiencies in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect FirstEnergy Choice Federal Credit Union's ability to record, process, summarize and report financial information and (ii) as to the existence of any fraud, whether or not material, including any fraud that involves management or other employees. Such report will be documented in the applicable Board meeting minutes.