



Title: Pay Transparency Policy

Issue Date: 2/1/2016

Issuer: Human Resources

Revision Date:

Review Frequency: Annual

GENERAL STATEMENT and PURPOSE of POLICY:

The employees of Capital Communications Federal Credit Union and its Subsidiaries (Credit Union) are recognized as the Credit Union's most valuable asset. We are committed to administering a Pay Transparency policy that is fair and equitable, and protects our employees.

SCOPE and RESPONSIBILITY:

The President and CEO is ultimately responsible for the corporate culture and company - employee relations which are the foundation of this policy. The Director of Human Resources is responsible for the communication and implementation of this policy throughout the organization. The Human Resources staff members are responsible for the administration of this policy on an ongoing basis.

POLICY:

CAP COM will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with CAP COM'S legal duty to furnish information.

POLICY ENFORCEMENT:

Violations of this policy may result in corrective action, up to and including termination of employment.

Approved:

President/CEO

2/1/2016

Date