



Pay Transparency Policy

Policy Type: Employment Policy

Issuer: Human Resources

Review Frequency: Annual

Issue Date: 2/1/2016

Revised: 3/1/2017

General Statement and Purpose

The employees of Capital Communications Federal Credit Union and its Subsidiaries (CAP COM) are recognized as CAP COM'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/CEO is ultimately responsible for the corporate culture and company - employee relations which are the foundation of this policy. The VP 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, as a federal contractor, 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. 41 CFR 60-1.35(c)

Policy Enforcement

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

Approved:

A handwritten signature in black ink, appearing to read "Chris McKenna".

Christopher McKenna, President/CEO