



Code of Ethics

Northwest FCS' employees and directors are expected to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities. They are also expected to comply with all laws, rules and regulations to deter wrongdoing and to abide by the Association's Standards of Conduct Policy, other Board policies and related procedures.

This Code of Ethics applies to all employees and directors and supplements the Association's Standards of Conduct program. The ethical standards it establishes are met primarily through telling the truth and being honest. Above all else, when employees and directors tell the truth and are honest, ethical standards can be easily met.

This Code of Ethics will be included in the Standards of Conduct disclosure process. Employees responsible for preparing and distributing financial statements will also complete a more detailed acknowledgment relating to those activities.

Each employee and director agrees:

To engage in and promote honest and ethical conduct, including ethical handling of actual or apparent conflicts of interest between personal and business relationships.

- To avoid conflicts of interest and to disclose to the Standards of Conduct Official or through the confidential complaint hotline (EthicsPoint) any material transaction or relationship that is or reasonably could be expected to give rise to a conflict.
- To hold all information about borrowers and applicants in strict confidence and to take all reasonable measures to protect the confidentiality of non-public information about Northwest FCS and its customers obtained or created in connection with Association activities, and to prevent the unauthorized disclosure of this information, unless required by law, regulation or through the legal process.
- To comply with applicable laws, rules and regulations, as well as the terms and conditions of self-regulatory agreements to which Northwest FCS is a party.

You understand that you will be held accountable for adherence to this Code of Ethics. Your failure to observe the terms of this Code of Ethics may result in disciplinary action, up to and including termination of employment or your position on the Board of Directors. Violation of this Code of Ethics may also constitute a violation of law and may result in civil and criminal penalties for you, your co-workers and Northwest FCS.

If you have any questions regarding the best course of action in a particular situation, you should promptly contact the Standards of Conduct Official. Any individual contacting the Standards of Conduct Official may remain anonymous when reporting a possible violation of this Code of Ethics by others. EthicsPoint may also be used for this purpose.