

Business Continuity Plan for Members

Purpose

In accordance with mandates set by the Federal Financial Institution Examination Council (FFIEC) Business Continuity Planning Information Technology Handbook (March 2008) and the National Credit Union Administration's Corporate Credit Union Guidance Letters, Eaton Family Credit Union (EFCU) would like to make you aware of our Business Continuity Program (BCP).

Our program is designed to ensure we can continue to do business with little or no disruption, that your assets will be secure and accessible, and that you will be able to reach us regardless of an unplanned business interruption or the scope of the situation.

Recovery Plan Objectives

EFCU's BCP addresses all essential elements of our business infrastructure to enable timely response to an event that proves disruptive to critical business functions. Representatives of EFCU's leadership team oversee and direct the Credit Union's business continuity preparedness efforts by supporting each of the following objectives:

- Ensure the allocation of sufficient resources with the knowledge to evaluate and maintain a thorough and effective BCP.
- Establish policies for business continuity and business resumption efforts by determining how the Credit Union will manage and control identified risks.
- Review simulated recovery test results.
- Approve the Credit Union's business continuity plan annually.
- Ensure the BCP is kept up-to-date and affected employees are aware and trained of individual roles.

To ensure BCP objectives set forth by EFCU's leadership, the planning process involves collaboration with executive leaders on the Business Continuity Executive Management Team (BCEMT) and operations managers on the Business Continuity Planning and Response Team (BCPRT). The Business Continuity Team works with both the BCEMT and BCPRT to develop department business continuity plans, and executes continuity program development, implementation, maintenance and testing activity.

Additionally, the Business Continuity Team coordinates disaster management activities for the BCEMT and BCPRT from recovery, to restoration and resumption of normal operations. Members of the BCEMT and the BCPRT establish recovery teams to address the immediate response to an incident and management of the situation from the time an incident occurs until the matter is resolved. Recovery team members are assigned specific responsibilities within each business continuity plan (BCP).

In creating the BCP, we assume the locations we identified as "pre-designated alternate sites" are available, that we have sufficient personnel, and those external organizations such as the Federal Reserve, government agencies and market systems, are operational.

Nevertheless, there can be no assurance service will continue without interruption in certain circumstances, such as a regional blackout, a natural disaster or a terrorist attack. However, in the

unlikely event that EFCU has determined it cannot resume operations within a reasonable amount of time, EFCU will provide as much advance notice as possible regarding its ongoing operations.

In the event EFCU is impacted by a pandemic situation, we have identified staff to perform the essential job functions required to continue operations. A detailed plan documents the procedures EFCU initiates in preparation for, and in response to, a pandemic outbreak. Our pandemic plan complies with FFIEC and NCUA guidance by: incorporating a preventative program to reduce the likelihood operations will be significantly impacted by a pandemic event; documenting our strategy for scaling pandemic efforts, outlining a framework for facilities, systems and procedures if staff is unavailable for prolonged periods; and testing our capacity to operate in a pandemic situation.

Program/Plan Testing and Updating

While no business continuity plan can eliminate all risk or delay resulting from an unplanned business interruption or disruption in service, EFCU conducts annual tests and updates our recovery plans to ensure that we have taken the steps necessary to protect our members.

Preparation

Although EFCU is confident members will continue to have access to their accounts and access to the settlement funds and payment systems in the event of a significant business disruption, it is possible there may be some temporary disruption or change in the manner in which you can access your account. EFCU will notify members of any such changes or disruptions by posting a notice on the Credit Union's website or through a message on our telephone system.

To best prepare for such contingencies we suggest you become familiar with the various means through which you can access EFCU headquarters and major operations centers:

- *Headquarters – Euclid, Ohio*
333 Babbitt Road
Euclid, Ohio 44123
- *Willoughby Hills, Ohio*
10685 Chardon Road
Willoughby Hills, Ohio 44092