



I. GENERAL STATEMENT

It is the policy of Infinity Bank (the “Bank”) to conduct its business in accordance with the highest ethical standards of honesty and integrity in order to merit and maintain the complete confidence and trust of its customers and the public in general.

This Personal and Business Code of Conduct (“Code”) addresses both business and social relationships that may present legal and ethical concerns, and also sets forth a code of conduct to guide the Bank’s Directors, Officers and Employees (described as “Covered Persons” for the purpose of this Code).

A. Compliance with Laws and Regulations

It is the policy of the Bank to fully comply with the spirit and intent of all applicable federal and state laws and regulations. The Bank expects its Covered Persons to use good judgment, to maintain high ethical standards of honesty and integrity, and to refrain from any form of illegal, dishonest or unethical conduct.

Covered Persons must comply with all established accounting, record keeping and internal control procedures of the Bank so as to ensure that all records are safeguarded and maintained completely and accurately. A Covered Person who knows or suspects that false, inaccurate or misleading entries have been made in the records of the Bank, or that entries have not been made in such records, must immediately advise their supervisor, any Executive Officer, or the Director of Human Resources.

B. Administration of the Personal and Business Code of Conduct

It is the responsibility of each Covered Person to be familiar with this Code. Supervising officers are expected to make every reasonable effort to ensure that their staff complies with the provisions of this Code.

- Executive Officers of the Bank, in conjunction with the Board of Directors, shall administer the Code, determine matters of interpretation, and coordinate periodic changes. The Board of Directors of the Bank shall administer this Code in its application to Executive Officers and Directors.
- Covered Persons are encouraged to seek the advice of their supervisor, any Executive Officer, or the Director of Human Resources regarding questions of interpretation and of the applicability of the provisions of the Code to a particular situation.
- Covered Persons who violate the provisions of this Code shall be subject to disciplinary action, up to and including termination of employment. Directors who violate the provisions of this Code may be subject to removal from the Board.

This Code does not affect an employee’s ability to exercise their constitutional, statutory or other protected rights. Nor will this Code be interpreted or applied in a way that would interfere with the



rights of employees to self-organize, form, join, or assist labor organizations, to bargain collectively through representatives of their own choosing, or to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, or to refrain from engaging in such activities.

C. *Duties Owed to the Bank*

- **Honesty and Diligence** – All Covered Persons are expected to, and shall, exercise honesty, objectivity, and diligence and act ethically in the performance of their duties and responsibilities as Covered Persons of the Bank.
- **Duty to Uphold the Bank’s Reputation for Honesty and Integrity** – Covered Persons shall not knowingly engage in acts or activities which discredit the Bank’s reputation or best interests, which result in adverse comments or criticism from the public, or in any way damage the Bank’s reputation for honesty, integrity, fairness, and as a responsible financial services organization.
- **Fair Dealing** – Covered Persons of the Bank shall deal fairly with customers, suppliers, competitors, and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair dealing practice.

II. PROHIBITIONS

All Employees, Officers, and Directors of the Bank, are generally prohibited from:

- A. Soliciting for them self or a third party anything of value from anyone in return for any business, service, or confidential information of the Bank;
- B. Accepting anything of value (other than bona fide salary, wages and fees) from anyone in connection with the business of the Bank, either before or after a transaction is discussed or consummated; or
- C. Self-dealing, conflicts of interest, or otherwise trading on their positions with the Bank, for personal advantage, including, but not limited to, accepting a business opportunity or other benefit from one doing or seeking to do business with the Bank, which opportunity or benefit is not made available to the public generally or which is made available because of such party's position with the Bank.



III. CONFLICTS OF INTEREST

A. *Conflicts of Interest*

A conflict of interest is generally defined as a Covered Person's involvement in "outside interests" which might either conflict with the Covered Person's duty to the Bank or adversely affect the Covered Person's judgment in the performance of their responsibilities.

It is the Bank's policy that Covered Persons do not engage in any conduct which will or might conflict with the interests of the Bank. It is important to avoid even the appearance of a conflict of interest, since the appearance can be as damaging to the Bank's reputation as an actual conflict.

B. *Acceptance of Gifts (Bank Bribery Act)*

Federal law makes it a crime for any director, officer or employee of a federally insured bank or a bank holding company, directly or indirectly, to ask, solicit, accept, receive or agree to receive anything of value, for themselves or for any other person or entity intending to be influenced or rewarded, for or in connection with any transaction or business of the Bank. Any offer of or receipt of such an improper payment or personal benefit should be immediately reported to the Covered Person's supervisor, to any Executive Officer, or to the Director of Human Resources.

Special exceptions to this prohibition are made if there is no, and there appears to be no, reasonable likelihood of improper influence in the Covered Person's performance of duties on behalf of the Bank. The personal benefit, however, must be one of the following:

- Normal business courtesies, such as a meal, refreshment or entertainment of reasonable value, involving no more than ordinary amenities in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions.
- Non-cash gifts of nominal value (under \$100.00) received at holiday time or special occasions, such as a new job, promotion, birthday, wedding, or retirement which represent expressions of friendship.
- Gifts based upon kinship, marriage or social relationships entirely beyond and apart from any business relationship.
- Unsolicited advertising and promotional material of nominal value.
- Awards given by charitable, educational, civic, or religious organizations for meritorious contributions or service.
- Loans from other banks or financial institutions on customary terms to finance proper and usual activities, such as a home mortgage or an auto loan.



- Discounts or rebates on merchandise or services that do not exceed those available to other customers.

C. *Political Contributions*

It is the policy of the Bank to strictly comply with all applicable federal and state political campaign laws.

Under California and Federal law, a bank is prohibited from making a contribution or expenditure in connection with any federal or state election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for political office.

In accordance with California and Federal law, no Covered Person shall make any direct or indirect contribution of funds of the Bank or other property of the Bank in connection with the election of a candidate to any political office. For these purposes, use of Bank facilities and equipment for political activities is deemed to be a contribution.

Loans to a candidate for political office or to a political committee are not prohibited so long as the loan is made in the ordinary course of business and meets the Bank's usual credit criteria and approval procedures for the particular type of loan.

The Bank's policy regarding corporate political contributions is not intended to discourage Covered Persons from making personal contributions to candidates or political parties of their choice.

D. *Outside Activities*

The Bank discourages Covered Persons (excluding non-employee directors) from holding outside employment. No outside employment should be undertaken which might:

- encroach upon the Covered Person's regular working hours;
- create an actual, potential, or perceived conflict of interest;
- interfere with regular Bank duties;
- necessitate such long hours as to affect the Covered Person's productivity; or
- put the Covered Person in a situation where Bank confidential information may be used intentionally or unintentionally.

Individual participation in civic activities is encouraged by the Bank. Normally, volunteer efforts must take place outside of the Bank's regular business hours. If volunteer efforts require Bank business time, prior written approval must be obtained from the Covered Person's supervisor.

Because of possible conflict of interest, Covered Persons should not act as executor, administrator, trustee, guardian or conservator, or in any other fiduciary capacity for any customer of the Bank, except for a family member.



For the purposes of this section, outside directors shall not be deemed as Covered Persons.

E. *Personal Finances*

Personal finances should be managed in a manner consistent with employment in a financial institution.

- Covered Persons are expected to conduct their personal financial affairs honestly and responsibly; this includes accurate maintenance of personal checking accounts and prompt payment of personal obligations. Overdrafts, kiting, or taking advantage of float in accounts maintained in the Bank is prohibited.
- Covered Persons and their immediate families should borrow only from reputable organizations that regularly lend money and such borrowings should carry the prevailing rate of interest and not involve favored treatment of any kind. Borrowing from relatives is not subject to restriction.
- Covered Persons should not borrow money from their co-workers or from the Bank's customers, but should discuss any financial emergency with their immediate supervisor, any Executive Officer, or the Director of Human Resources.
- Covered Persons should not sign on a customer's account(s) or otherwise represent a customer; however, this does not include a customer related to the Covered Person by blood or marriage.

F. *Personal Investment Activities*

While the Bank does not intend to limit Covered Persons in their personal investment activities, it is Bank policy that no Covered Person enter into investment transactions which would create, or give the appearance of creating, a conflict of interest between the Covered Person and the Bank or between the Bank and any customer. While it is not possible to enumerate all of the possible conflicts, the following specific situations should be avoided when making investment decisions:

- Investment in securities of a customer, supplier, borrower or competitor, since it may be construed as affecting the Covered Person's judgment exercised on behalf of the Bank.
- Investments in a company involving the possible use of non-public or insider information concerning that company.
- A Covered Person should not allow a customer to arrange investments for the account of the Covered Person or their immediate family, nor should the Covered Person become involved in investments sponsored by a customer under circumstances which might create either a conflict of interest or the appearance of such a conflict.



- Investment activity paralleling or anticipating investment action by the Bank.

Where an investment conformed with this Code when made, but subsequently, through change of circumstance, results in a conflict of interest, the Covered Person involved should immediately report the condition to an Executive Officer or the Board of Directors, who will take appropriate action, but in no event should action be taken which results in a financial loss to the Covered Person.

G. *Lending Practices*

It is the policy of the Bank to maintain prudent lending practices that adequately supply the credit needs of its customers. Any decisions in regard to rates, terms, etc. shall be based solely upon a borrower's creditworthiness and overall client relationship with the Bank.

Federal and California law prohibits any director, officer or employee of the Bank from granting any loan or gratuity to any bank examiner or assistant bank examiner, who examines the Bank or has authority to examine the Bank.

Covered Persons shall fully disclose to the Board of Directors or Executive Officers a conflict of interest presented by any loan or other business transaction arising from any business or personal relationship with a borrower, and shall abstain from any involvement with transactions so identified unless specifically approved by the Bank's Board of Directors.

H. *Giving Advice to Customers*

Legal Advice

Covered Persons may occasionally be asked by customers to comment upon the legality of a particular transaction. Since the Bank cannot practice law or give legal advice, Covered Persons must exercise care in discussing transactions with customers and nothing should be said that might be interpreted as the giving of legal advice.

Tax Advice

Covered Persons may be asked by customers for advice in regard to tax matters and/or the preparation of tax returns. Since the Bank cannot give tax advice, Covered Persons should exercise care in discussing tax matters and nothing should be said that might be interpreted as giving tax advice.

I. *Insider Transactions*

A "Bank insider" shall, for purposes of this provision, include all Directors, Executive Officers and controlling persons of the Bank, and any of their related interests, and any employee or agent of either the Bank or any controlling person of the Bank who has authority to establish policy or otherwise influence the policies or procedures of the Bank or its controlling person(s).

All business transactions or affiliations between the Bank and any Covered Person and/or their related interests shall be entered into only under the following conditions:



- The circumstances, terms, conditions and means of compensation shall be substantially similar to other similar business transactions previously entered into by the Bank with persons who are not Bank insiders or their related interests, and shall in any event be at least as favorable to the Bank in all respects.
- All material business transactions between Bank insiders and/or their related interests and the Bank shall require full disclosure of the Bank insider's interest in the transaction to the Board of Directors, and such matters shall be carried out in accordance with Bank policy.
- The minutes of any Board meeting at which a business transaction between the Bank and a Bank insider or such person's related interest is approved or denied shall include the nature and source of all information used to establish the reasonableness and comparable nature of the terms, conditions and means of compensation, with copies thereof attached as appropriate.

IV. CONFIDENTIALITY

A. *Customer Information*

Safeguarding confidential financial information concerning the Bank's customers is essential in maintaining the public trust. It is the policy of the Bank that such confidential information acquired by a Covered Person through their Bank employment must be held in the strictest confidence. Such information is held for Bank purposes only and should not be used as a basis for personal gain.

This obligation to keep Customer Information confidential continues not only while employed by Infinity Bank, but also continues after such employment ends.

Aside from routine credit and personal inquiries, information regarding a customer may be released to private persons, organizations or governmental bodies that request it, generally, only with the consent of the customer involved or upon receipt of legal process, such as a subpoena or court order.

Confidential customer information should never be discussed with anyone outside the Bank, and only with those within the Bank who have a legitimate business need to know. Confidential customer information should never be discussed in public places, even within public areas of the Bank's offices. Covered Persons should be sensitive to the risk of inadvertent disclosure resulting from open doors, speaker phones, cellular phones, and when transmitting confidential information by fax, text, email, or other electronic media.

B. *Information Regarding the Bank*

Financial or other information regarding the Bank is not to be released to any outside person or organization unless it has been published in reports to shareholders, or otherwise made



available to the public through authorized news releases. All news media inquiries must be referred to the Bank's Chief Executive Officer or President/Chief Operating Officer.

Any request for information where the Covered Person is in doubt should be referred to the Bank's Chief Executive Officer or President/Chief Operating Officer. Former employees are not entitled to information that is not made available to the general public and shareholders are entitled only to material as authorized by law.

C. *Information Regarding Past and Present Employees*

It is the policy of the Bank to: (i) safeguard the confidential nature of its relationship with its officers and employees, (ii) satisfy all requirements of applicable federal and state labor laws and regulations, and (iii) maintain uniformity in replies to inquiries concerning past and present officers and employees.

In order to assure that this policy is consistently maintained, any request for information regarding past or present officers and employees should be referred to the Director of Human Resources. This applies to all requests regarding Bank employment, whether written or oral. This does not apply, however, to routine credit inquiries from legitimate businesses regarding deposit or loan information.

The Bank expects every employee to treat information concerning the Bank and its employees with the same confidentiality as information concerning customers of the Bank.

D. *Material Inside Information*

The unauthorized use or disclosure of "material inside information" subjects Covered Persons, the Bank, and third parties to whom the information is communicated, to severe penalties under federal and state securities laws. Information is "material" when there is a significant likelihood that a reasonable investor would think the information is important in making an investment decision. Information is "inside" when it has not been disseminated to the public at large.

Any Covered Person possessing such material inside information must not trade in or recommend the purchase or sale of the securities involved until the information is actually disseminated to the public. Lending personnel must not disclose confidential information on existing or proposed loan customers to non-Bank personnel.

E. *Insider Trading*

Covered Persons are frequently entrusted with possession of confidential and highly sensitive information concerning the Bank, its clients or other businesses with which the Bank has material contractual relationships or with which the Bank may be in the process of negotiating material transactions (a "Confidential Party"). As long as a Covered Person is aware of material non-public information relating to the Bank, any of its clients, or any Confidential Party, it is the Bank's policy that such Covered Person may not buy or sell the securities of the Bank, the client, or the Confidential Party, as applicable, regardless of how that information was obtained. Equally important, the Covered Person must maintain such



information in the strictest confidence.

A Covered Person must also not permit any member of their immediate family or anyone acting on their behalf, or anyone to whom they have disclosed such information, to purchase or sell such securities.

After the information has been publicly disclosed through appropriate channels, Covered Persons should nevertheless allow a reasonable time to elapse (usually three full business days) before trading in the security, to allow for broad public dissemination and evaluation of the information.

Inquiries, as to whether information is material non-public information or whether a company or person is a client of the Bank or is a Confidential Party, should be directed to the Bank's Chief Executive Officer or President/Chief Operating Officer.

F. *Protecting the Bank's Trade Secrets and Confidential Information*

In the event an employee leaves employment with the Bank for any reason, California law protects the Bank's "trade secrets" and other confidential/proprietary information from use or disclosure by such former employee in their new job.

The types of information which may constitute a "trade secret" protected by law include, but are not limited to, financial or other confidential information regarding the Bank or the Bank's customers, employees, shareholders, directors and officers, lending sources, business plans, marketing plans, budgets, processes and compilations of information, records, programs, methods, techniques, policies and procedures, information systems, etc. which derive independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use. The use or disclosure of such information in violation of the Uniform Trade Secrets Act can subject a former employee to personal liability for civil damages.

G. *Return of Bank Property*

Covered Persons who leave the employ of the Bank must deliver and return to the Bank all equipment, mobile devices, computers, flash drives, documents and other media which they may have containing customer and Bank information. For the purposes of this paragraph, "information" includes, but is not limited to, trade secrets, records, practices, letters, plans, drawings, computer programs and data, technical data, financial and any other business data owned by, or referring or relating to, the Bank.

V. MISCELLANEOUS GUIDELINES FOR CONDUCT

A. *Obeying Laws and Regulations*

Compliance with laws and regulations is everyone's responsibility. All officers and employees of the Bank should be familiar with and comply with the federal and state laws and regulations governing the Bank, in addition to how these laws and regulations relate to



their daily work requirements and responsibilities.

B. *Bank Secrecy Act/Money Laundering Activities*

The Bank requires all Covered Persons to comply with the laws and regulations regarding the Bank Secrecy Act and the laws and regulations prohibiting the laundering of money. Covered Persons need to be alert to the dangers to the Bank should it, even unwittingly, become involved in receiving or laundering the proceeds of crimes. Regulators require banks to report any known or suspected criminal activity structured to avoid the Bank Secrecy Act requirements, such as the laundering of monetary instruments or structuring of transactions. Covered Persons should contact the Bank Secrecy Act Officer or the President/Chief Operating Officer immediately in the event any known or suspected criminal activity or transaction comes to their attention.

C. *Dealings with Competitors*

The policy of the Bank is to require Covered Persons to observe fair and ethical conduct in dealing with the Bank's competitors. The dissemination of rumors or the making of disparaging remarks concerning the Bank's competitors is considered to be inappropriate and unethical. The Bank's policy is always to emphasize the soundness of our Bank and the quality and competence of our staff and services, rather than to criticize our competitors.

Covered Persons are prohibited from involving the Bank in arrangements with competitors which provide for the setting or controlling of rates, prices, salaries or marketing policies. Periodic checks with competitors on the current market on rates, terms, or charges will not be deemed a violation of this policy so long as the Covered Person does not enter into any price-fixing agreement with the competitor.

D. *Exclusive Dealings*

It is the policy of the Bank that it does not condition the sale of services to a customer upon the condition that the customer must purchase other services from the Bank or upon the condition that the customer is prohibited from dealing with other suppliers of such services. Rates, however, may be regulated, determined, and conditioned upon certain requirements established in the Bank's Credit Policy, as amended from time to time, with respect to compensating balances and other factors.

E. *Audits and Investigations*

Covered Persons are required to fully cooperate with investigations, examinations, reviews and/or audits conducted by the Bank's management, regulatory examiners, internal or external audit firm(s), and any other authorized examiner(s), auditor(s), and/or investigator(s). Specifically, Covered Persons must comply with all requests for documents and/or other physical evidence, and questions raised by investigators, auditors, or examiners must be responded to honestly and no adverse information in response to a question may be concealed.

F. *Falsification of Books and Records*

It is the policy of the Bank to maintain records, accounts and customer information which



accurately reflect its assets, liabilities, receipts, disbursements, operations and transactions of every kind. Officers and employees of the Bank must maintain all Bank records, within their control, completely and accurately. Officers and employees of the Bank must comply with all internal control processes and procedures established by the Bank for safeguarding of assets and proper reporting and disclosure of financial information. The falsification of any books, records, or documents of the Bank is grounds for disciplinary action, up to and including termination of employment, and can be deemed a criminal act punishable by fine and/or imprisonment.

G. Social Media

Bank officers and employees may access social media channels (LinkedIn, Facebook, Instagram, TikTok) via the Bank's computer/internet access for Bank business purposes only.

Bank officers and employees may **not** speak, write, or post "on behalf of the Bank" on any social media channel, including those accounts owned by the Bank (LinkedIn, Facebook, Instagram, TikTok), without prior approval from the Director of Operations or the President.

Bank officers and employees who violate this policy may be subject to disciplinary action, up to and including termination of employment.

H. Use of Bank Name and Resources

Use of the Bank's name or resources for any purpose other than Bank business is prohibited. The term "resources" includes, but is not limited to, owned or controlled funds, property, vehicles, equipment, supplies and stationery, as well as the working time and work product of Covered Persons. (Note that work product includes all writings, ideas, reports and data generated or developed in connection with employment at the Bank and always remain the property of the Bank.)

Pre-authorization by an Executive Officer of the Bank is required for any non-job related external communications, such as speeches, letters, or publications, which could reasonably be construed as directly or indirectly representing the Bank.

Although unintentional, personal letters, testimonials and letters of recommendation written on the Bank's letterhead may lead to embarrassing situations for both the writer and the Bank. Accordingly, it is inappropriate for Covered Persons to use Bank stationery or envelopes for personal correspondence or other non-job related purposes.

I. Credit Reports

It is against the Bank's policy for any Covered Person to use the Bank's credit reporting systems to improperly obtain their own or another person's credit report. Covered Persons may only obtain consumer and business credit reports that are in relation to the business of the Bank.



VI. WHISTLEBLOWER POLICY (the “Policy”)

It is the policy of the Bank:

- To encourage the good faith reporting by its officers and employees of any improper action taken by Bank officers or employees; and
- To protect Bank officers and employees from retaliatory actions based on the good faith reporting of an improper action in accordance with this Policy.

Authority and Responsibility

- Executive Officers of the Bank have the responsibility to implement and oversee this Policy for (i) reporting improper actions, and (ii) protecting employees against retaliatory actions.
- Each supervisor is responsible for ensuring this Policy is fully implemented within their area of responsibility.
- Violations of this Policy may result in appropriate disciplinary action, up to and including termination of employment.

Definitions

- Abuse of Authority – means intentional misuse of power or position by a Bank officer or employee for an improper purpose.
- Emergency – means a circumstance that if not immediately changed may cause harm or injury to persons or property.
- Good Faith – means action taken after a reasonable investigation of facts available to the employee, after due consideration, and with an honestly held belief or reasonable cause to believe that there was improper conduct.
- Gross Waste – means a significant or recurring intentional misuse of Bank funds, and does not include unintentional errors.
- Improper Action – means any action by a Bank officer or employee:
 1. That is undertaken in the performance of an officer’s or employee’s official duties, whether or not the action is within the scope of an officer’s or employee’s employment; and
 2. That:
 - Is a violation of any federal, state or local law, regulation or rule;
 - Is an abuse of authority with substantial adverse impact to the Bank, Bank customer(s), or public interest;
 - Is a substantial and specific danger to public health or safety; or
 - Is a gross waste of Bank funds or property.

Improper Action does not include personnel actions including, but not limited to, employee grievances, complaints, appointments, promotions, transfers, assignments, reassignments, reinstatements, restorations, reemployments, performance evaluations, reductions in pay, layoffs, dismissals, suspensions, demotions, reprimands, or any other personnel action taken under authority of state or federal law.



- Retaliatory Action – means any adverse change in a Bank employee’s employment status or in the terms and conditions of an employee’s employment based on the good faith reporting by that employee of an improper action.
- Rule – means any order, directive, regulation, or law, the violation of which subjects a person or the Bank to a penalty or administrative sanction.

Improper Action Reporting Procedures

The Bank encourages the good faith reporting of

- any improper action taken by a Bank officer or employee, and
- any retaliatory action(s) which is a result of such reporting.

Bank employees who obtain knowledge of facts demonstrating improper actions are encouraged to report their good faith concerns to their immediate supervisor, to any Executive Officer, or to the Director of Human Resources in order to facilitate the expeditious resolution of all such matters and to minimize any adverse impact of the improper action. In the case of an emergency, an employee may in good faith report the improper action directly to a person or entity who is not, their supervisor, any Executive Officer, or the Director of Human Resources, such as a law enforcement authority.

If an employee feels uncomfortable discussing their good faith concern or complaint with anyone inside the Bank or, once reported, feels Bank management has not satisfactorily investigated and/or resolved their concern, the employee is encouraged to contact the Chairman of the Board of Directors or any member of the Bank’s Board of Directors.

Additionally, if any employee of the Bank is aware of any improper action taken by any Bank officer or employee in relation to the Bank’s financial accounting, reporting, disclosures and internal controls, they are encouraged to report their good faith concern to any Executive Officer, to the Chairman of the Audit Committee of the Bank’s Board of Directors or to any member of the Audit Committee of the Board of Directors.

Employees who make knowingly false reports may be subject to disciplinary action(s) including, but not limited to, termination of employment.

Investigation Procedures

Executive Officers, along with the Director of Human Resources, will take prompt action to properly investigate any report of improper action.

The Bank may employ a variety of methods to conduct investigations. To the extent permitted by applicable law, investigation methods may include interviews with the parties and witnesses, review of relevant financial and other records, criminal and background checks, and monitoring and/or analysis of computers, systems, offices, and other resources. If warranted, appropriate agencies responsible for the enforcement of federal, state and local law may be contacted to assist with the investigation.

Bank officers and employees involved in the investigation will keep the identity of a reporting employee confidential to the extent possible and permitted by applicable law. An employee reporting the improper action will be advised of the results of the investigation upon completion, with the exception of personnel



actions taken as a result of the investigation which must be kept confidential.

Participation in Investigations

Bank officers and employees have a duty and obligation to fully cooperate with and participate in investigations and to promptly, completely and truthfully comply with all requests for information, interviews, or documents and to respond to questions during the course of an investigation. To the extent possible, the Bank treats as confidential all reports of alleged improper action, and only those persons with a need to know are informed of and involved in an investigation.

Maintenance of Report Log

The Director of Human Resources will maintain a log of all reported improper actions, tracking their receipt, any investigations that may be conducted, and the ultimate resolution of such matters.

The Chairman of the Audit Committee will maintain a log of all improper action reports regarding accounting, internal accounting controls, or auditing matters, tracking their receipt, investigation and resolution and shall prepare periodic summary reports for the Audit Committee.

Retaliatory Action(s) Prohibited

Bank officers and employees are prohibited from taking retaliatory action(s) against a Bank employee because they have in good faith reported an improper action in accordance with this Whistleblower Policy. Specifically, an officer or employee shall not directly or indirectly use or attempt to use their official authority or influence to harass, intimidate, threaten, coerce, command, influence, or attempt to intimidate, threaten, coerce, command or influence, another officer or employee, as applicable, in an effort to interfere or prevent the disclosure of information concerning an improper action.

For purposes of this section of the Policy, use of “official authority or influence” includes taking, directing others to take, recommending, processing, or approving any personnel action, such as an appointment, promotion, transfer, assignment, reassignment, reinstatement, reemployment, evaluation, or disciplinary action.

An employee who believes they have been retaliated against for reporting an improper action should advise their immediate supervisor, any Executive Officer, or the Director of Human Resources. Executive Officers, in conjunction with the Director of Human Resources, will take appropriate action to investigate and address complaints of retaliation. If Executive Officers of the Bank do not satisfactorily resolve an employee’s complaint that they have been retaliated against in violation of this Policy, the employee may contact the Chairman of the Board of Directors or any member of the Bank’s Board of Directors.

Nothing in this Policy prohibits the Bank from initiating proper disciplinary procedures against an officer or employee, as applicable, who is untruthful or who does not act in good faith when reporting and/or disclosing information concerning an improper action.