

Infinity Bank and Infinity Bancorp

Personal and Business Code of Conduct
Date: September 28, 2023

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I. GENERAL STATEMENT

It is the policy of Infinity Bank and Infinity Bancorp (the “Companies”) to conduct their 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 Companies’ 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 Companies to fully comply with the spirit and intent of all applicable federal and state laws and regulations. The Companies expect their 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 Companies 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 Companies, 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 Companies, in conjunction with the Boards of Directors, shall administer the Code, determine matters of interpretation, and coordinate periodic changes. The Boards of Directors of the Companies 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 Boards.

This Code does not affect a Covered Person’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 Covered Persons 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

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engaging in such activities.

C. *Duties Owed to Infinity Bank and Infinity Bancorp*

- **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 Companies.
- **Duty to Uphold the Companies' Reputation for Honesty and Integrity** – Covered Persons shall not knowingly engage in acts or activities which discredit the Companies' reputation or best interests, which result in adverse comments or criticism from the public, or in any way damage the Companies' reputation for honesty, integrity, fairness, and as a responsible financial services organization.
- **Fair Dealing** – Covered Persons of the Companies 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 Companies, 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 Companies;
- B. Accepting anything of value (other than bona fide salary, wages and fees) from anyone in connection with the business of the Companies, 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 Companies, 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 Companies, 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 Companies.

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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 Companies or adversely affect the Covered Person's judgment in the performance of their responsibilities.

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

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 Companies. 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.

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C. Political Contributions

It is the policy of the Companies 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 from the Companies or other property of the Companies in connection with the election of a candidate to any political office. For these purposes, use of a Companies facility and/or 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 Infinity Bank's usual credit criteria and approval procedures for the particular type of loan.

The Companies' 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 Companies discourage 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 Companies duties;
- necessitate such long hours as to affect the Covered Person's productivity; or
- put the Covered Person in a situation where Companies confidential information may be used intentionally or unintentionally.

Individual participation in civic activities is encouraged. Normally, volunteer efforts must take place outside of the Companies' regular business hours. If volunteer efforts require 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 Companies, 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

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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 at Infinity 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 Companies' 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 Companies do not intend to limit Covered Persons in their personal investment activities, it is the Companies 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 Companies or between the Companies 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 Companies.
- 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 Companies.

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 Boards 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.

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G. *Lending Practices*

It is the policy of Infinity 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.

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

Covered Persons shall fully disclose to the Boards 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 Companies' Boards 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 Companies 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 Companies should not give tax advice, they should exercise care in discussing tax matters and nothing should be said that might be interpreted as giving tax advice.

I. *Insider Transactions*

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

All business transactions or affiliations between Infinity Bank, Infinity Bancorp, 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 Infinity Bank and/or Infinity Bancorp with persons who are not Insiders or their related interests, and shall in any event be at least as favorable to Infinity Bank and/or Infinity Bancorp in all respects.
- All material business transactions between Insiders and/or their related interests and Infinity Bank and/or Infinity Bancorp shall require full disclosure of Insider's interest

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in the transaction to the Boards of Directors, and such matters shall be carried out in accordance with the Companies policies.

- The minutes of any Board meeting at which a business transaction between Infinity Bank and/or Infinity Bancorp and an 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 Infinity Bank's and Infinity Bancorp's customers is essential in maintaining the public trust. It is the policy of the Companies that such confidential information acquired by a Covered Person through their employment must be held in the strictest confidence. Such information is held for Infinity Bank and Infinity Bancorp 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 and/or Infinity Bancorp, 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 of the Companies, and only with those within the Companies who have a legitimate business need to know. Confidential customer information should never be discussed in public places, even within public areas of Infinity Bank's and/or Infinity Bancorp'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 Infinity Bank and Infinity Bancorp*

Financial or other information regarding the Companies 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 Chief Executive Officer or President/Chief Operating Officer.

Any request for information where the Covered Person is in doubt should be referred to the 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.

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C. *Information Regarding Past and Present Employees*

It is the policy of the Companies 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 EVP/Chief Administrative Officer. This applies to all requests regarding employment, whether written or oral. This does not apply, however, to routine credit inquiries from legitimate businesses regarding deposit or loan information.

The Companies expect every employee to treat information concerning Infinity Bank, Infinity Bancorp and its employees with the same confidentiality as information concerning customers.

D. *Material Inside Information*

The unauthorized use or disclosure of "material inside information" subjects Covered Persons, Infinity Bank, Infinity Bancorp, 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-Infinity Bank personnel.

E. *Insider Trading*

Covered Persons are frequently entrusted with possession of confidential and highly sensitive information concerning the Companies, their clients or other businesses with which the Companies have material contractual relationships or with which the Companies 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 Companies, any of their clients, or any Confidential Party, it is policy that such Covered Person may not buy or sell the securities of Infinity Bancorp, 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.

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

F. *Protecting Trade Secrets and Confidential Information*

In the event an employee leaves employment with the Companies for any reason, California law protects the Companies' "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 Companies or the Companies' 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 Companies Property*

Covered Persons who leave the employ of Infinity Bank and/or Infinity Bancorp must deliver and return all equipment, mobile devices, computers, flash drives, documents and other media which they may have containing customer and Infinity Bank and/or Infinity Bancorp 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 Companies.

V. MISCELLANEOUS GUIDELINES FOR CONDUCT

A. *Obeying Laws and Regulations*

Compliance with laws and regulations is everyone's responsibility. All officers and employees should be familiar with and comply with the federal and state laws and regulations governing the Companies, in addition to how these laws and regulations relate to their daily work requirements and responsibilities.

B. *Bank Secrecy Act/Money Laundering Activities*

The Companies require 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 Companies 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.

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C. *Dealings with Competitors*

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

Covered Persons are prohibited from involving the Companies 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 Companies that they do not condition the sale of services to a customer upon the condition that the customer must purchase other services from the Companies 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 Infinity 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 Companies' 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 Companies 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 Companies must maintain all records, within their control, completely and accurately. Officers and employees must comply with all internal control processes and procedures established by the Companies for safeguarding of assets and proper reporting and disclosure of financial information. The falsification of any books, records, or documents of the Companies 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*

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

Officers and employees may **not** speak, write, or post "on behalf of the Companies" on any

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social media channel, including those accounts owned by Infinity Bank (LinkedIn, Facebook, Instagram, TikTok), without prior approval from the Director of Operations /Information Security Officer or the President/Chief Operating Officer.

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

H. Use of Companies Names and Resources

Use of the Companies' names and/or resources for any purpose other than Companies 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 Companies and always remain the property of the Companies.)

Pre-authorization by an Executive Officer of the Companies 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 Companies.

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

I. Credit Reports

It is against policy for any Covered Person to use Infinity 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 Infinity Bank and/or Infinity Bancorp.

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VI. WHISTLEBLOWER POLICY (the “Policy”)

It is the policy of Infinity Bank and Infinity Bancorp:

- To encourage the good faith reporting by its officers and employees of any improper action taken by officers or employees; and
- To protect 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 Infinity Bank and Infinity Bancorp 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 an Infinity Bank and/or Infinity Bancorp 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 Companies funds, and does not include unintentional errors.
- Improper Action – means any action by an 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 Companies, Companies customer(s), or public interest;
 - Is a substantial and specific danger to public health or safety; or
 - Is a gross waste of Companies 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 an Infinity Bank and/or Infinity Bancorp 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.

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- **Rule** – means any order, directive, regulation, or law, the violation of which subjects a person, Infinity Bank or Infinity Bancorp to a penalty or administrative sanction.

Improper Action Reporting Procedures

The Companies encourages the good faith reporting of

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

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

Additionally, if any officer or employee is aware of any improper action taken by any Companies officer or employee in relation to the Companies' 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 Infinity Bank's Board of Directors or to any member of the Audit Committee of the Infinity Bank Board of Directors.

Officers and 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 Companies 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.

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 officer or 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

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 Companies

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will treat 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.

Chairman of the Infinity Bank 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

Officers and employees are prohibited from taking retaliatory action(s) against any officer or 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 officer or 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 Infinity Bank do not satisfactorily resolve an officer’s or employee’s complaint that they have been retaliated against in violation of this Policy, the employee may contact the Chairman of the Infinity Bank Board of Directors or any member of Infinity Bank’s Board of Directors.

Nothing in this Policy prohibits the Companies 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.