

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables management and employees to work together to address customer complaints, fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment.

### Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

### Who can file a Whistleblower Complaint?

Any employee may submit a good faith report of suspected questionable accounting or auditing matters, or possible violations of the federal securities laws related to the Company; as well as suspected violations of the Company's Code of Ethics and Business Conduct or other unethical or illegal behavior. Any such allegations may be based on first-hand, direct information, or on other information from any source that the reporting person reasonably believes to be credible.

### What Constitutes "Questionable Accounting and Auditing Matters?"

"Questionable Accounting or Auditing Matters" include, but are not limited to: (i) fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company, (ii) fraud or deliberate error in the recording and maintaining of financial records of the Company, (iii) deficiencies in or noncompliance with the Company's internal accounting controls, (iv) misrepresentation or false statements to or by a senior officer or accountant regarding a matter contained in the Company's financial records, financial reports or audit reports or (v) deviation from full and fair reporting of the Company's financial condition.

### Why do we use this EthicsPoint system to file complaints?

The EthicsPoint system is designed to complement normal communication channels between supervisors and employees. Employees can continue to raise appropriate matters with their supervisors at any time. As an alternative, if an employee wants communication to be anonymous and confidential, the employee can submit such complaints using the EthicsPoint channel.

#### **Will I be retaliated or lose my job if I file a complaint?**

No, neither the Company nor any officer, director, employee, contractor, subcontractor or agent of the Company is permitted in any way to retaliate or discriminate against you with regard to your employment based upon any lawful action you take in good faith pursuant to the Company's Whistleblower Policy. We prohibit our officers, directors, employees, contractors, subcontractors and agents from taking any such retaliatory action.

#### **What is considered as "Conflicts of Interest" for the Code of Ethics?**

Conflicts of interest may arise when an individual's position or responsibilities with the Company present an opportunity for personal gain apart from the normal compensation provided through employment. For example, use of Company funds or other assets or use and/or sharing of confidential information such as client information, loan pricing or business strategies or trading on insider information constitute a conflict of interest. For further details, please reach out to Company's Chief Audit Executive or General Counsel. All such inquiries will be treated confidentially.

#### **What constitutes a Customer Complaint?**

It is management's expectation that customers receive the highest level of customer service during their interactions with Tri Counties Bank ("the Bank"). Ideally, customer concerns should be resolved through the retail branches and through the call center. However, bank management recognizes that a customer concern can result in an escalated complaint to the Bank.

Customers should file a complaint when they have an unresolved issue related to their banking experience. The chart below provides broad categories for customer complaints.

Bank Services	Products or services that are used to access account information, access or transfer funds, or make payments. Examples include issues with Online and Mobile Banking, ATM/Debit cards or ATM Machines, fraud claims, funds transfer services like ACH payments and Wire Transfers, or the customer's service experience.
Checking and Savings Accounts	The opening and servicing of deposit accounts. Examples include the new account opening process, the Bank's documentation requirements, product features or fees, sales tactics, or the customer's service experience.

Branch Location or Facility	Closure of a branch, branch operating hours, ADA accessibility, the appearance of the physical building or surrounding property, or health and safety concerns.
Loan Accounts	The originating and servicing of loan accounts. Examples include the application process for a new loan, the Bank's documentation requirements, disclosure of rates/fees/terms, making payments to an existing loan, or the customer's service experience.
Partner Services	Accounts and Services offered by 3rd party partners including the opening and closing of accounts, regulatory requirements, the Bank's documentation requirements, product features or fees or sales tactics, or the customer's service experience.

# Reporting – General

## **May I report using either the Internet or the telephone?**

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the Internet.

## **What types of situations should I report?**

The EthicsPoint system allows employees to report any violation of our stated Code of Conduct, or other concern you may have.

## **If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?**

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with NAVEX Global. We would rather you report anonymously than keep the information to yourself.

## **Why should I report what I know? What's in it for me?**

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can threaten the very existence of an entire company.

## **Does management really want me to report?**

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

## **Where do these reports go? Who can access them?**

Reports are entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

**Isn't this system just an example of someone watching over me?**

No. EthicsPoint is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

# Reporting Security & Confidentiality

**It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?**

NAVEX Global does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports are generated during business hours.

**Can I file a report from home and still remain anonymous?**

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

**I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

**Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

**What if I want to be identified with my report?**

There is a section in the report to identify yourself, if you wish.

## Tips & Best Practices

**I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?**

Our company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

**I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. NAVEX Global can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

**What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

**What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

**Are these follow-ups on reports as secure as the first one?**

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

**What if I lose my Report Key or forget the Password I created?**

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

### **Can I still file a report if I don't have access to the Internet?**

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.

## **Human Resources Issues & Complaints**

### **What other option are there for me for resolving a problem at work?**

If something regarding your job is bothering you, you are encouraged to bring it to our attention. You can receive assistance in resolving your problem by taking one or more of the following steps.

- **First, Talk to Your Supervisor**  
Under normal conditions if you have a job-related problem, question or complaint, you should discuss it with your supervisor. The simplest, quickest, and most satisfactory solution will often be reached at this level.
- **Talk to the Next Level of Supervision**  
If the discussion with your supervisor does not answer your question or resolve the matter to your satisfaction, you may then present your concerns, orally or in writing, to the next level of supervision.
- **Talk to Human Resources**  
If you have been unable to resolve the situation with your supervisor or the next level of supervision, you may want to contact the Human Resources Department. If there is a problem that needs correcting, Human Resources will work with you and the management in your area to help resolve the problem.
- **Report Anonymously**  
In situations where you prefer to place an anonymous report in confidence, you are encouraged to use this online reporting tool or the toll-free hotline, hosted by a third-party hotline provider, EthicsPoint.