



## WHISTLEBLOWER POLICY

Board Approval Date:	10/22/2024	Next Review:	January 2025
Accountability for Review and Update:	Compliance		

### POLICY OVERVIEW

This Whistleblower Policy covers OFB Bancshares, Inc., and its subsidiaries One Florida Bank and OFB Insurance, Inc. (together, the "Company"). The Company's Code of Ethics ("Code") requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Company, these persons must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. Unlawful activity of any kind is prohibited.

The term "Whistle Blowing" is used here to describe the action of a person or persons in bringing unethical or illegal acts to the attention of the appropriate authorities, particularly in circumstances where existing procedures for monitoring or disclosure have not worked or disclosure is being suppressed.

The intent of this policy is to:

- encourage all employees to raise such matters as soon as possible;
- provide a separate and additional channel of communication for doing so;
- support and protect staff from victimization or any other detriment where they have raised their serious concerns in good faith;
- challenge management and the board of directors to act speedily and effectively to investigate and take appropriate action;
- promote a climate of openness and accountability and thereby to deter and detect wrongdoing in the workplace;

The matters covered under this policy may relate to, but not be limited to, violations of applicable law, financial impropriety (such as the falsification of claims, records, or accounts), putting others at serious risk by failing to act or withholding information on known dangers to health and safety, falsification of records in breach of obligations to a regulatory body, failures by managers to respond to employee complaints, and other fraudulent or criminal acts. The Company's employees are encouraged to use the guidance provided by this policy for reporting such conduct or complaints.

The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Company rather than seeking resolution outside the Company.

## GUIDELINES

It is the responsibility of all directors, officers, and employees of the Company, to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy. Reportable offenses include any questionable activity regarding

- the Company's accounting or auditing matters,
- compliance with internal controls or disclosure controls and procedures,
- any violation of the securities laws,
- any violation of compliance regulations, or
- any violation of the Code.

Please refer to the Code that specifically prohibits unlawful activity of any kind and establishes general standards of conduct related to the following areas:

- conflicts of interest
- confidential or proprietary information
- accounting controls and procedures
- fraud
- protection of shareholder interests, and
- competition

## REPORTING VIOLATIONS

Anyone filing a complaint concerning a violation or suspected violation of the Code or other matters under this Whistleblower Policy must act in good faith and have reasonable grounds for believing the information disclosed in the report indicates a violation of the Code or other matters under this Whistleblower Policy. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense, which may include, but not be limited to, termination of employment with the Company.

The Employee Handbook addresses the open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with their supervisor or the employee is not satisfied with the supervisor's response, employee is encouraged to speak with the next management level in that department's "chain of command" or any of the Company's executives.

Wherever possible, any concern should be raised with the appropriate line manager in the first instance. Where the concern involves that line manager or the whistleblower feels, for whatever reason, that the line manager is not the appropriate person, the concern should be raised with the next level manager within that division. If the employee feels that he/she needs to go outside the division, the following identifies the chain of command.

- Department Manager
- Division Leader (Executive Vice President / Senior Vice President)
- Director of Human Resources

- Chief Compliance Officer
- President or CEO
- Whistleblower hotline/website

Contact details for these individuals are provided in Appendix A.

Supervisors and Managers involved in the chain of command are to report the issue and relevant knowledge as soon as any such employee concern is brought to their attention to the Director of Human Resources and the Chief Compliance Officer. Together, the Director of Human Resources and the Chief Compliance Officer will keep the President and CEO informed. The Chief Compliance Officer will inform the Company's Audit Committee Chairman.

For suspected federal fraud, securities law violations, or when employees, directors or shareholders are neither satisfied nor comfortable with the Company's open-door policy, individuals can contact the Company's Chief Compliance Officer directly.

Employees are encouraged to follow this chain of command and the process laid out in the policy. Complaints and the reporting of violations of laws or the Code should not be disclosed publicly on social media outlets or Internet bulletin boards such as Glassdoor. The Company is committed to resolving matters raised by concerned individuals in an appropriate manner to ensure a strong culture of ethical behavior among employees and the "airing of dirty laundry" helps no one and injures innocent parties.

### **ANONYMOUS REPORTING**

The Company has confidential resources available that are strictly anonymous if employees or shareholders are not satisfied with the responses from the above listed group or if they wish to remain anonymous. The Company has engaged NAVEX Global, the worldwide leader in integrated risk and compliance management software and services, to operate an anonymous reporting process.

Concerned individuals may submit anonymous complaints through a telephone hotline or a web portal under the following media:

- Telephone hotline: 844-719-1424
- Website portal: [onefloridabank.ethicspoint.com](http://onefloridabank.ethicspoint.com)

The NAVEX Global whistleblower application allows for anonymous two-way communication between Company administrators and the complainant. All information submitted to the hotline/website is strictly confidential and the company's "No retaliation" policy will be enforced for all good faith whistleblower complaints.

The following individuals are administrators of the NAVEX Global application:

- Chief Compliance Officer
- Chairman of the Audit Committee
- Director of Human Resources

Should an anonymous complaint arise due to the actions of one of the administrators, the NAVEX Global platform will ensure that administrator is not included in the reporting and communication process.

### **HANDLING OF REPORTED VIOLATIONS**

The Company's Chief Compliance Officer is responsible for investigating all reported whistleblower complaints and allegations and will advise the President or CEO and the Chairman of the Audit Committee. The Chief Compliance Officer has direct access to the Audit Committee of the Board of Directors and is required to report to the Committee at least quarterly on compliance activity. The Director of Human Resources may also be engaged to assist with research and inquiries related to the complaint. The Chief Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

If a concerned individual is not comfortable speaking with the Chief Compliance Officer or if the Chief Compliance Officer is unavailable or the subject of the complaint, the individual should submit the report through the NAVEX Global portal.

### **NO RETALIATION**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

The Dodd-Frank Act expressly prohibits retaliation by employers against good faith whistleblowers and provides them with a private cause of action in the event that they are discharged or discriminated against by their employers. As such, no director, officer, or employee who in good faith reports any questionable activity, conduct, or violations shall suffer harassment, retaliation, or adverse employment consequence. An employee that retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### **ACCOUNTING AND AUDITING MATTERS**

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding Company accounting practices, internal controls, or auditing. Directors, officers, and employees are also protected against retaliation for providing information to or otherwise assisting in an investigation by a federal regulatory authority or law enforcement agency, any member of Congress or committee of Congress, any person with supervisory authority over an employee or who has authority to investigate, discover, or terminate misconduct where such information or investigation relates to any conduct of the Company that the reporting individual believes constitutes a violation of applicable federal fraud statutes, SEC rules or regulations, or any other federal or state blue sky laws relating to fraud against shareholders. Any director, officer, or employee, who files, testifies, participates in, or otherwise assists in a proceeding relating to alleged violations of any of the federal fraud or securities laws are also protected against retaliation. Acts of retaliation by any director, officer, or employee are prohibited.



## WHISTLEBLOWER POLICY APPENDIX A

These are the local contact details and other sources of advice for raising a matter inside OFB Bancshares, Inc.

### **Chief Compliance Officer**

Susan Rich, Executive Vice President  
407.693.0525  
srich@onefloridabank.com

### **Chief Executive Officer**

Randy Burden  
Pineloch Operations Center  
407.257.9393  
rburden@onefloridabank.com

### **President**

Rick Pullum  
Pineloch Operations Center  
407.693.0521  
rpullum@onefloridabank.com

### **Director of Human Resources**

Pam Gass, Executive Vice President  
Pineloch Operations Center  
407.693.0639  
pgass@onefloridabank.com

## Department Executives

### **Credit Administration**

Renee Smith, Executive Vice President  
Director of Credit Administration  
Pineloch Operations Center  
407.693.0540  
rsmith@onefloridabank.com

### **Accounting and Technology and Operations**

Eric Nadeau, Executive Vice President  
Chief Financial Officer / Chief Operating Officer  
Pineloch Operations Center  
407.693.0522  
enadeau@onefloridabank.com

### **Retail Branches and Residential Mortgage**

Cary Berman, Executive Vice President  
Chief Retail Banking Officer  
Pineloch Operations Center  
407.693.0523  
cberman@onefloridabank.com

### **Treasury Management Services**

Jessica Cross, Senior Vice President  
Director of Treasury Management  
Pineloch Operations Center  
407.693.0524  
jcross@onefloridabank.com

### **Deposit, eBanking and Loan Services**

Samantha Baiman Vellios, Executive Vice President  
Director of Bank Operations  
Pineloch Operations Center  
407.693.0560  
sbvellios@onefloridabank.com

### **Commercial Lending**

Rick Anderson, Executive Vice President  
Chief Commercial Banking Officer  
Pineloch Operations Center  
407.693.0531  
randerson@onefloridabank.com

## External Anonymous Hotlines

### **NAVEX Global**

Telephone: 844.719.1424

Website: <https://onefloridabank.ethicspoint.com>