



## **CODE OF ETHICS**

*Updated Effective January 1, 2022)*

It is the intention of the Board of Directors and management of First Seacoast Bank (the “Bank”) that all activities of the Bank be conducted in a professional, ethical, and lawful manner, in order to maintain the trust and confidence of the Bank’s customers, communities, employees, and regulators. This Code of Ethics (the “Code”) establishes guidelines to be followed by all directors, officers, and employees of the Bank, in addition to general expectations of honesty, integrity, and professionalism in all business dealings. The Bank will ask all directors, officers, and employees to review and sign this Code every year so these important obligations remain top of mind.

### ***Introduction***

The Bank and its directors, officers, and employees must uphold and maintain a high set of standards to ensure that we act in a manner consistent with the law and the trust placed in us by our customers. The Bank’s reputation for integrity is one of its most valuable assets and is determined by the conduct of its directors, officers, and employees. All of us must strive to avoid situations that might cause a conflict between the Bank, its customers, regulators, and ourselves. Directors, officers, and employees must be professional and honest in all business dealings on behalf of the Bank and must conduct themselves according to the letter and spirit of this Code. Although it is impossible to address all ethical issues that you might encounter, this Code is intended to be a resource that provides a general direction of acceptable standards and guidance. If you have specific questions that are not addressed or need further guidance, please ask a Senior Officer/Division Head, the Human Resources Director, or the President/Chief Executive Officer.

**Any director, officer, or employee who knows of or suspects a violation of this Code should report the matter to a Senior Officer/Division Head, the Human Resources Director, the President/Chief Executive Officer or to the Chairman of the Board of Directors. Any individual may also use the reporting procedure set forth in the Whistleblower Policy below. The Bank is committed to these reporting systems, to promptly investigating reports, and to ensuring that individuals who makereports in good faith do not experience any retaliation.**

### ***Compliance with Policies, Procedures, Laws, and Regulations***

The Bank is committed to conducting its business in an ethical and lawful manner, in full compliance with applicable laws and regulations. Directors, officers, and employees may not commit any illegal or unethical acts, or instruct or cause others to commit any illegal or unethical acts.

Directors, officers, and employees are responsible for being aware of and complying with laws and regulations governing their activities as representatives of the Bank, including but not limited to applicable banking laws and rules by the FDIC. Use of the Bank's funds, assets, or personnel for an unlawful or improper purpose is strictly prohibited. Theft or embezzlement of Bank property or customer property and funds is grounds for immediate dismissal.

Many of the Bank's policies and procedures are in place to ensure legal compliance. Employees are required to follow all policies and procedures of the Bank. If any employee needs clarification or guidance concerning a policy or procedure, the employee is responsible to seek the clarification or guidance from his/her supervisor, Human Resources, or a Senior Officer/Division Head.

### ***Fair Dealing and Anti-Bribery***

Directors, officers, and employees must deal fairly with our customers, vendors, suppliers, communities, and with each other. Examples of prohibited unfair dealing include, but are not limited to: making or soliciting bribes, kickbacks, or similar payments; misrepresenting or omitting material facts; concealing information; abuse of privileged or confidential information, etc. No director, officer, or employee of the Bank may directly or indirectly make, demand, or accept any bribe, kickback, or similar payment in an effort to get or keep business or other favorable treatment.

The Federal Bank Bribery Law (18 U.S.C. §215) provides for criminal prosecution of anyone who as an officer, director, employee, agent or attorney of a financial institution (such as the Bank) who "corruptly solicits or demands for the benefit of any person, or corruptly accepts or agrees to accept, anything of value from any person, intending to be influenced or rewarded in connection with any business or transaction of such institution" and of any person (whether or not an employee of a bank or bank holding company) who "corruptly gives, offers, or promises anything of value to any person, with intent to influence or reward an officer, director, employee, agent, or attorney of a financial institution in connection with any business or transaction of such institution."

### ***Conflicts of Interest***

Directors, officers, and employees have an obligation to act in the best interest of the Bank and remain free of outside influence that could result in the loss of objectivity regarding business conducted with customers or with or on behalf of the Bank, or create any other actual or potential conflict between their interests and the interests of the Bank. In other words, your private interests and that of your family members may not interfere or conflict with, or appear to interfere or conflict with, the interests of the Bank.

The term "conflict of interest" refers to a wide range of activities. While it would not be possible to list all of the various types of conflicts of interest, the following are some examples of conflicts of interest that must be avoided:

- Using your position at the Bank to benefit yourself at the expense of the Bank.
- Being in a position to influence a decision that may result in a personal gain for you or your family member as a result of the Bank's business dealings. For the purposes of this Code, family members are defined to include spouses, parents, children, brothers, sisters, brothers- and sisters-in-law, fathers- and mothers-in-law, sons and daughters-in-law, stepparents, stepbrothers, stepsisters, stepchildren, grandparents and grandchildren. Conflicts of interest

which are prohibited by this Code may also involve individuals who are not related by blood or marriage to an employee but who reside with the employee in a relationship similar to a spousal/family relationship or who are involved in dating or other intimate relationships with an employee.

- Serving personally as an executor, trustee or guardian of an estate or trust of a Bank customer, unless there is a close family relationship.
- Performing transactions of any kind on your own accounts or waiting on or performing transactions for any of your family members or having any other interest in a transaction involving the Bank.
- Recommending attorneys, accountants, insurance agents, stock brokers, real estate agents or similar individuals or companies to customers, unless you provide at least two (2) names for consideration without any indication of favoritism.
- Accepting or soliciting gifts in violation of the guidelines below or other benefits from a customer or supplier in connection with your position at the Bank.
- Working for a customer, supplier, or competitor while employed with the Bank.
- Directing business to a vendor or supplier owned by you or your family member or with which you or your family member is affiliated.

Conflicts of interest may not always be immediately apparent. Directors, officers, and employees are to use their good faith and judgment in being alert for situations that could cause actual or potential conflicts of interests, and are encouraged to seek guidance from the Human Resources Director, a Senior Officer/Division Head, or the President/Chief Executive Officer.

If a conflict of interest arises in the context of transactions involving purchases, contracts, loans, or other Bank transactions, or in any other context, it is imperative that the employee, officer, or director immediately disclose the conflict to the President/Chief Executive Officer, Human Resources Director, or a Senior Officer/Division Head. Reports will be reviewed promptly and appropriate safeguards will be established to protect all parties.

In addition to the requirement to immediately disclose any conflict of interest that arises, the Bank's directors, officers and employees must disclose all potential conflicts of interest in writing annually. All written disclosures will be retained in the Bank's files. Potential conflicts that must be disclosed include but are not limited to the following:

- Ownership or management positions, including directorships, held at outside organizations;
- Related interests, such as a company or political campaign controlled by that person, or the funds or services of which will benefit that person; and

- Any compensation (including salaries, wages, or gifts) received from an outside organization.

It is the responsibility of each director, officer, and employee to be aware of the appearance of any potential conflict of interest and to remove themselves from any compromising position regarding the Bank's relationship with any organization with which he or she may be connected.

### ***Restrictions on Acceptance of Gifts and Entertainment***

Every employee is required to comply with the requirements of the Federal Bank Bribery Statute in their business dealings with customers and vendors. This statute prohibits the solicitation or receipt of anything of value (e.g., gift, favor, service, loan, fee or other compensation) when the item is offered with the intent of influencing a banking decision or business transaction, including, but not limited to:

- Approval of loans or other extensions of credit.
- Approval of overdrafts.
- Authorizing or accepting checks on uncollected funds.
- Waiving of Bank charges, late charges or other normal fees.
- Waiving financial statements or other loan requirements.
- Awarding of contracts or business engagements.

No Bank director, officer, or employee may accept a legacy or gift under a will or trust of a Bank customer unless there is a family relationship.

Directors, officers, and employees are prohibited from directly soliciting, accepting, or retaining any personal benefit (or doing so indirectly through a family member or business associate or other) from:

- Any customer of the Bank; or
- Any individual or organization that is or seeks to be a customer, supplier or competitor of the Bank.

The following guidelines must be followed in these circumstances:

- Monetary gifts may not be accepted at any time, under any circumstances.
- An employee shall not accept a fee for the performance of any act that the Bank could have performed or that was performed in the course of doing business.
- Gifts from customers or vendors may be accepted only if they are not offered in conjunction with a specific business transaction, they are not intended to influence any decision, they are unsolicited, they are infrequent, and they are of nominal value. For example:
  - Meals, refreshments, entertainment (e.g., golf or tennis outings) or transportation for business meeting purposes and the cost of which would have been paid for by the Bank as an authorized business expense if not paid for by an outside source.

- Advertising or promotional materials if nominal value (pens, note pads, calendars, etc.).
- Awards by civic or charitable organizations in recognition of service and accomplishments.
- Gifts on special occasions such as promotions, weddings, retirement, holidays, etc.
- Discounts or rebates on merchandise or services that do not exceed those available to other customers.

**Nominal value for the purposes of this policy is a cost or value not exceeding \$100.**

Any employee who is offered an item of value (gift, meal, service, entertainment, etc.) or fee in violation of this policy should decline the offer and report the incident promptly to the Human Resources Director, a Senior Officer/Division Head, or the President/Chief Executive Officer. Questions concerning the appropriateness of any item of value (gift, meal, service, etc.) should be directed to the Human Resources Director, a Senior Officer/Division Head, or the President/Chief Executive Officer for clarification before acceptance.

#### ***External Involvement and Employment***

- **Community Organizations:**

The Bank encourages its employees to become actively involved in those non-profit community, charitable, and professional organizations in which they are interested provided such involvement does not create an actual or potential conflict of interest with the Bank. The Bank will generally support such volunteer community involvement as appropriate.

- **Business Affiliations:**

All Bank employees are expected to uphold their fiduciary duties of loyalty and care to the Bank at all times.

To avoid any appearance of conflicts of interest, Bank employees who wish to become involved in other profit-making businesses (as owners, partners, or directors, etc.) must first consult the Bank's Human Resource Director or President/Chief Executive Officer for approval.

- **Political Activities:**

It is the Bank's policy not to contribute funds, property (including use of its facilities), or services to any government official, political party, or candidate for office.

Bank employees are not prohibited from becoming active in any governmental, regulatory, or elective process in which they are interested. This participation, however, must be on a personal basis only, and not present any indication that the individual is representing the Bank in an official capacity.

Any employee who wishes to seek or accept nomination or appointment to any public office must first inform the Human Resources Director or the President/Chief Executive Officer of their intentions/actions, and the Bank in its discretion will take any safeguards and other actions it deems appropriate.

- **Outside Employment:**

An employee may hold a job with another organization or be self-employed as long as he or she satisfactorily performs his or her job responsibilities with the Bank and as long as it does not otherwise pose a potential or actual conflict of interest.

To avoid any confusion about the status of an outside employment situation, employees are encouraged to first consult with Bank's Human Resources Department prior to accepting outside employment.

### ***Retail & Commercial Loans***

Bank directors, officers, and employees are bound by the guidelines set forth in the Bank's Loan Policy.

All employees who are in the position to approve or deny any retail or commercial loan must make certain that decision is based solely only on the facts presented. Any suggestion of conflict of interest, impropriety, or discrimination based on race, disability, sex, national origin, sexual orientation or any other basis protected by our Equal Employment Opportunity policy or law will not be tolerated.

### ***Investments***

A Bank director, officer, or employee who is in the position of making investment choices for the Bank must adhere to the Bank's Investment Policy. It is imperative that any investment information gained in the course of performing one's job responsibilities not be used for personal gain.

Personal choices for investments should be conducted prudently. Information provided by customers in the normal course of business, which is not available to the general public, is confidential and must be held as such, and may not be used for personal gain or gain for family members. Such information must never be disclosed to unauthorized persons or used as a basis for personal or family member investment decisions.

### ***Confidentiality of Bank and Customer Information***

Due to the nature of our work, federal laws dictate many of our security and confidentiality requirements. For example, all relationships between the Bank and its customers are confidential. All Bank records containing personal data on Bank customers are confidential. As such, they are to be carefully safeguarded and kept current, relevant, and accurate. Disclosing this information or any other confidential information other than on a "needs to know" basis is prohibited. Confidential information is Bank property and should never be given to an outside firm or individual except through normal channel and with appropriate authorization. Any improper use, transfer, or disclosure of confidential information is unacceptable, regardless of whether the

director, officer, or employee personally gains from the action.

Employees must not use or disclose any confidential information that they obtain during employment with the Bank, except as required by their jobs. This obligation remains even after an employee's employment relationship with the Bank ends.

Directors, officers, and employees should use care not to discuss Bank business, in any place or manner, that would in any way impair the Bank's competitive position or disclose customer information. In addition, all employees must observe good security practices. Employees are expected to keep proprietary and confidential information secure from outside visitors and all other persons who do not have a legitimate reason to see or use such information, in accordance with the Bank's Information Security Program and other security protocols.

As used in this Code, "confidential information" generally includes (without limitation) the following types of personal, proprietary, non-public information:

- **Customer Information:** Including names, Social Security numbers, birth dates, addresses, account numbers, account types, account balances, dependent information, financial records, and any information on any business that a customer has transacted with the Bank. In some instances, even the fact that an individual or business has a transaction, or is discussing a possible transaction, is considered confidential customer information.
- **Non-public, Business Information:** Including the Bank's trade secrets, strategic plans and initiatives, project plans and proposals, marketing plans, internal business-related communications, attorney-client privileged information, and non-public corporate financial and earnings information. It also includes security procedures and policies, information such as amounts of cash in our vaults, items and amounts of cash shipments, passwords, combinations, entry procedures, and legally protected personal information regarding employees and other individuals which the Bank is obligated to maintain as confidential (such as medical information, Social Security numbers, etc.).

Careful handling and protection of documents or materials containing confidential information is of critical importance. Each employee is responsible for safeguarding against theft, loss, unauthorized use, or disclosure of confidential information. The Bank's Information Security Program and any other established rules regarding document control, restricted access to areas of the office or information systems, and other such security procedures must be strictly observed by each employee.

#### ***Protection and Proper Use of Bank Assets***

Every director, officer, and employee must protect Bank assets and property against misuse, theft, and loss. Bank assets and property may not be used for personal gain.

#### ***Falsification of Documents***

Falsifying, altering, or untimely destroying any account, records, or other business-related documents is prohibited. This includes timecards which are to be completed in accordance with directions outlined in the Employee Handbook.

### ***Accounting***

Financial integrity and accuracy are important for the Bank's success. Therefore, all employees must comply with the accounting rules and controls established by the Bank. The Bank's records must accurately reflect the transactions that they record. Undisclosed or unrecorded funds, assets or accounts of the Bank will not be established for any reason, and false entries will not be made in the books or records of the Bank. All disbursements made on behalf of the Bank are to be used only for the purpose described in the documents supporting the disbursement. All employees of the Bank must communicate fully and truthfully with management, internal auditing personnel, independent auditors, government regulators, and the Bank's attorneys when the circumstances dictate.

### ***Health, Safety, and Freedom from Harassment and Discrimination***

The Bank is committed to providing a safe and healthy work environment for employees, and one that is free from unlawful harassment or discrimination. Unsafe conduct, including conduct that places others at risk of injury, will not be tolerated. Harassing and discriminatory conduct have no place in our work environment and will not be tolerated. Employees are required to follow all conduct policies of the Bank.

### ***Media Spokesperson***

The President/CEO has the primary responsibility for responding to inquiries from the news media. All inquiries from the public or news media are to be directed to the President/CEO. In the absence of the President/CEO, the CFO has been authorized to answer questions concerning the Bank. Other Bank Officers may be designated if neither the President/CEO or CFO are available.

### ***Whistleblower Policy --***

This Policy, and the procedures described below, are intended to encourage and enable employees (and other interested parties, such as vendors, contractors, and customers) to promptly report good faith complaints or concerns regarding actual or potential violations of applicable laws, regulations or the Bank's Code of Ethics. The Bank is also committed to maintaining a workplace that protects employees from unlawful retaliation for acting in accordance with this Policy and its reporting procedures.

*The types of concerns that employees can report under this Reporting Procedure include:*

- Misconduct relating to accounting, internal accounting controls or auditing matters;
- Violations of law, including without limitation, any rule of the Bureau of Consumer Financial Protection, the SEC, or any other of the Bank's regulators, or violations of any laws related to fraud, false financial reporting, or corporate governance;
- Violations or conduct that conflicts with this Code of Ethics;
- Deliberate misrepresentations or false statements to or by an officer of the Bank or an accountant or consultant regarding a matter contained in financial records, financial reports or audit reports of the Bank;

- Any other matter that, in the employee's good faith belief, the employee reporting a concern believes constitutes unethical or illegal behavior that could cause harm to the business, reputation or public position of the Bank;
- Any attempt to conceal a violation of any law, regulation or Bank policy; or Cybersecurity threat;
- Any inappropriate use or sharing of passwords or customer information;
- Retaliation, in any form, because an employee acted in accordance with this Policy, including but not limited to submitting a good faith complaint or concern.

Please note that complaints relating to harassment or discrimination or other grievances for which the Bank has a separate specific policy and reporting procedure should be made in accordance with such specific policy or procedure, which are set forth in the Bank's Employee Handbook or other publication provided to employees. For example, a complaint of sexual harassment should be reported in accordance with the Anti-Harassment Policy contained in the Bank's Employee Handbook.

### **Reporting Procedure**

If you become aware of or suspect any of the types of conduct listed above, you should report it to a Senior Officer/Division head, the Human Resources Director, the President/Chief Executive Officer or to the Chairman of the Board of Directors. If the situation involves misconduct related to financial reporting, accounting, internal accounting controls or auditing matters, then the report may be made to the Board of Directors, Audit Chairperson.

As an alternative, if you wish to submit your complaint anonymously, you may do so using the following confidential method:

- **Website:** [www.lighthouse-services.com/firstseacoastbank](http://www.lighthouse-services.com/firstseacoastbank)
- **Toll-Free Telephone:**
  - **English speaking USA and Canada: 833-490-0007**
  - Spanish speaking USA and Canada: **800-216-1288**
  - Spanish speaking Mexico: **01-800-681-5340**
  - French speaking Canada: **855-725-0002**
  - Contact us if you need a toll-free # for North American callers speaking languages other than English, Spanish or French
- **E-mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)

In order for the Bank to be able properly to respond to and investigate a report under this Policy, especially anonymous reports, the report should set forth facts and evidence with as much specific information as possible to allow the Bank to adequately assess the nature, extent and urgency of the matter. Speculation, innuendo and vague generalizations are not useful to this process. Preferably, the report should include, but not be limited to, the following:

- The event or issue that is the subject of the report;
- To the extent possible and applicable, the approximate date, time and location of any specific event(s);

- The name(s) of the person(s) involved; and
- Any documentary or other evidence to support the report.

### **Investigation and Handling of Reports**

All reports will be treated as confidential as the circumstances reasonably permit, taking into consideration the legal requirements and the necessity for investigation. The Bank is committed to this reporting system, to promptly investigating reports, and to ensuring that individuals who make reports and/or participate in investigations in good faith under this Policy do not experience any retaliation.

Either the Human Resources Director, the President/Chief Executive Officer, or the Chair of the Audit Committee, whomever is appropriate depending upon the nature of the report, will determine who should lead the investigation, and whether to use an independent third party investigator.

All employees, officers and directors of the Bank are required to respond honestly to questions asked of them in furtherance of any investigation, and to provide appropriate records as requested. Destroying of documents or other records in order to prevent full disclosure in an investigation is strictly prohibited.

### **Actions**

If an investigation confirms that a violation has occurred, the Bank will promptly take corrective action, including but not limited to (a) disciplinary action up to and including termination from employment of employees found to have committed the violation, and (b) appropriate steps to correct and remedy the violation.

The Human Resources Director will maintain a confidential log of all complaints under this policy, tracking their receipt, investigation, and resolution, and shall prepare a periodic summary report for the Board's Audit Committee.

### **Protection from Retaliation**

The Bank is committed to complying with all applicable laws that protect our employees against unlawful retaliation by the Bank, or its employees or agents, as a result of the lawful reporting of complaints and/or information regarding, or participation in, investigations under this Policy. Retaliation against any employee because he/she brought forth a complaint or concern in good faith under this Policy is strictly prohibited. If an employee believes that he or she has been subjected to any form of retaliation for their participation under this Policy, he or she is urged to file a complaint in accordance with this Policy.

The procedures set forth in this Policy are not intended to limit the right of employees to (a) report alleged legal violations to proper governmental and regulatory authorities, as allowed by law, or (b) participate in any government or regulatory investigation of legal violations. The Bank will not be discriminated or retaliated against for participating in these activities.

This Whistleblower Policy is incorporated into this Code of Ethics and the Employee Handbook.

***Consequences for Non-Compliance***

Compliance with this Code is the responsibility of every director, officer, and employee. Employees who fail or refuse to comply with this Code will be subject to corrective/disciplinary action, up to and including termination of employment. Corrective/disciplinary action may also be taken against individuals who authorize a violation of this Code, who deliberately fail to report violations of this Code, who deliberately withhold relevant information regarding violations of this Code, and those who manage or supervise a violator to the extent that the circumstances of the violation reflect inadequate leadership or lack of diligence. Violations of this Code may also result in civil or criminal penalties or other consequences.

***Changes to this Code***

Like all Bank policies, this Code is subject to change in the discretion of the Bank. Any material changes to this Code must be approved by the Bank's Board of Directors.

**Acknowledgment and Certification**

By signing below, I acknowledge receipt of First Seacoast Bank's Code of Ethics, and I certify that I have read it and understand it. I understand that it is my responsibility to comply with the Code at all times during my service as a director, officer, or employee of the Bank. By signing below, I certify that I am not in violation of any of the provisions of the Code.

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Printed Name**