

40. Code of Business Conduct and Ethics Policy

OP Bancorp Approved and Board Risk & Compliance Committee Approved: 01.23.25
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I. POLICY STATEMENT

OP Bancorp and Open Bank (referred to as the "Company") are dedicated to upholding the principles and objectives of all pertinent laws and regulations without exception. We firmly adhere to the conviction that our directors, officers, and employees should consistently demonstrate sound judgment and uphold the utmost ethical standards, refraining unequivocally from any engagement in actions that are unlawful, dishonest, or unethical.

In anticipation of potential conflicts of interest, the Company has adopted this policy.

II. APPLICABILITY

This Policy applies to all employees including the Board of Directors ("Directors"), Officers, and employees.

III. CODE OF BUSINESS CONDUCT AND ETHICS

Our core values, encapsulated in Stewardship, Integrity, Teamwork, and Excellence (S.I.T.E.) serves as the bedrock of our corporate ethos. The Code of Business Conduct and Ethics ("Code") represents an articulation of the Company's values and ethical standards. The Company requires all its employees, officers, and directors to adhere to this Code. This Code is the guide we follow to protect our most valuable asset, the reputation of the Company.

Through this Code we endorse the following principles:

- **Compliance is Paramount:** Strict adherence to all relevant governmental laws, regulations, rules, and Company policies is not only vital for the Company's prosperity but is also an essential obligation for every employee, officer, and director.
- **Integrity in Action:** Our decisions and actions are guided by an unwavering commitment to integrity, not just in substance but also in appearance to others.
- **Honesty and Fairness:** Honesty, trustworthiness, ethics, and fairness are the cornerstones of our conduct and relationships, both within the Company and on its behalf. We avoid situations where our personal interests may conflict or appear to conflict with the Company's or its clients' interests.
- **Promoting Fair Competition:** Our business thrives within a fair and competitive marketplace, wherein the Company earns profit by offering clients suitable financial products and services.
- **Safeguarding Information:** We pledge to protect proprietary and confidential information in strict accordance with applicable laws. Client information remains secure in our hands.
- **Professionalism and Respect:** Our interactions are marked by professionalism, coupled with a profound respect for the dignity of others.
- **Promoting Ethical Behavior:** Each of us plays a role in upholding the tenets of this Code and is obligated to report any observed violations or potential violations to our immediate supervisor or other designated individuals as outlined herein.
- **Sound Financial Prudence:** We maintain a sound personal financial standing, exercising prudent judgment in our own financial affairs.

All employees, officers, and directors are obliged to uphold the principles articulated in this Code during all their business interactions and throughout the entirety of their employment or directorship within the Company. These principles extend to every facet of their professional engagements, encompassing all forms of communication, including email and internet-based platforms.

It is incumbent upon employees, officers, and directors to assess the potential interpretations of their actions by others. They must constantly evaluate the appropriateness of their conduct and ensure that their actions align with the Company's best interests.

IV. CONFLICTS OF INTEREST

A conflict of interest is defined as a situation in which a person is able to derive personal benefit from actions or decisions made in their official capacity as an employee, officer, or director.

It is almost always a conflict of interest for an employee to work simultaneously for a competitor, client, or supplier, including work as a consultant or board member. While employed by the Company, employees are prohibited from working for competitors or other entities where a conflict of interest may arise with Company business. The best policy is to avoid any direct or indirect business connection with our clients, suppliers, or competitors, except on the Company's behalf.

A management official of the Company generally may not be a management official of an unaffiliated depository institution or depository holding company if it would violate the management official interlocks prohibitions as defined by the regulators.

It is the Company's policy that all employees, officers, and directors do not engage in personal or business conduct that will conflict with the interest of the Company. It is important to avoid even the appearance of a conflict of interest since the appearance can be as damaging to the Company's reputation as an actual conflict. One's position must never be used, directly or indirectly, for private gain, to advance personal interest, or to obtain favors or benefits for oneself, a member of one's family, or any other person in the exercise of personal judgment to avoid conflicts of interest or the appearance of conflicts.

Familial or romantic relationships between employees can create actual, potential, or perceived conflicts of interest. Accordingly, employees must report any such relationships to a Human Resources representative, who will determine what adjustments may be required to the relevant parties' work arrangement to eliminate the conflict. Failure to report may result in termination of both parties.

Conflicts of interest are prohibited as a matter of Company policy. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult the Compliance Officer or Risk Officer. Any employee who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager, human resources, or compliance management.

V. DISCLOSURE REQUIREMENTS OF CONFLICTS OF INTEREST

Full Disclosure. Full disclosure by directors, officers, and employees of their outside or personal involvement in any project or business activity that could pose a conflict of interest with their fiduciary duties of care and loyalty to the Company shall be made to an Executive Officer and/or Board of Directors.

Board Consideration. Specific consideration by the Board of Directors whenever a potential conflict of interest is present in any proposed loan or other transaction or relationship the Company may enter into will be documented in the Board's deliberation and decision in the minutes.

Note: Under Regulation O, Tangible economic benefit rule, an extension of credit is considered made to an insider (Board of Directors, Executive Officers, and Principal Shareholders) to the extent that the proceeds of the extension of credit are used for the tangible economic benefit of, or are transferred to, such a person. Please refer to the Reg. O policy.

Employee Consideration. All employees are required to notify their supervisor or any senior manager if they feel that they may have or have the appearance of placing him/herself in a conflict-of-interest situation.

VI. PROTECTING CORPORATE ASSETS

Directors, officers, and employees are responsible for the fair use and safeguarding of tangible and intangible assets of the Company, its clients, suppliers, and distributors that are under our control. Company assets may not be used for personal benefit except if permitted by the Company with local practices and laws. Assets include but are not limited to cash, securities, business plans, client information, supplier information, distributor information, intellectual property (computer programs, software, and other such items), physical property, and services.

The Company's telephone, email, messaging, voice-mail systems, and other communication channels are primarily for business purposes. No one may use these systems to spread information or rumors that you know to be false about the Company, fellow employees, officers, clients, suppliers, and people working on behalf of the Company or competitors.

Copying, selling, using, or distributing information, software, and other forms of intellectual property is a violation of license agreements and is strictly prohibited.

Misappropriating of corporate assets is a breach of your duty to the Company and may constitute an act of fraud. In addition, carelessness and waste regarding any Company asset is also a breach of your duty to the Company.

VII. PROPER USE AND CARE OF INFORMATION

The Company recognizes its obligation to shareholders, clients, vendors, and employees to ensure protection of the confidentiality and integrity of all forms of data and information. It is imperative that each employee keeps all information about clients in the strictest confidence. In no case shall such information be transmitted to persons outside the Company or even to other employees who do not need to know such information in discharging their duties as employees.

Employees, officers, and directors must maintain confidentiality of information even after they leave the Company. Misuse of confidential information, such as insider trading, trade secrets, trading upon material non-public information, and disclosing confidential information is strictly prohibited. Confidential Information consisting of:

- Technical information including methods, processors, formulae, compositions, inventions, machines, computer programs, and research projects.
- Business information including client lists, pricing data, sales and financial information, sources of supply, and marketing, production, merchandising systems or plans, and business plans; intellectual property holdings; correspondence, both internal and external in nature, email, computer files, software, data, research, techniques, and licensing and other legal agreements.

Commitment to Accurate Accounting and Recordkeeping: All entries to books and records must be accurate and timely, in accordance with established accounting and record-keeping requirements and sound accounting controls.

A. Inside information

If an employee, officer, or director is aware of any material information relating to the Company that has not been made public, s/he must not disclose the information to any other person without prior authorization from the Company or trade directly or indirectly in the Company's stock.

It should be assumed the information is material if an investor might consider the information to be important in deciding whether to buy or hold securities in the Company.

B. Departure from the Company

If an employee leaves the Company for any reason, s/he may not disclose in any way, directly or indirectly, confidential information about the Company or its clients. All files, records, documents, information, data, software, and similar items shall remain the exclusive property of the Company and shall not be removed from the Company's premises upon departure from the Company. Upon departure from the Company, you must assist and/or cooperate in any investigation, which occurred, during your employment.

C. Non-Public Supervisory Information

Except in very limited circumstances, the Company may not disclose a report of examination or any portion of the report without prior written permission of the appropriate regulator. Any Company employee who discloses or uses non-public information except as expressly permitted by the appropriate regulator or as provided by the regulator's rules may be subject to the criminal penalties provided in 18 U.S.C 641.

VIII. COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

You must conduct yourself at the Company and all its functions or when acting on its behalf in a manner that is in full compliance with all applicable governmental laws, rules, and regulations, as well as with Company policies and procedures. Activity or behavior that would be criminally or civilly actionable is deemed not to be in compliance. In no case shall an employee or director use illegal (theft, money

laundering, bribery, misrepresentation, or espionage) or unethical means or methods when acting on behalf of the Company. Conducting business fairly includes the following compliance laws:

Anti-bribery laws- you may not (1) solicit for yourself or for a third party (other than the Company itself) anything of value from anyone in return for any business, service, or obtain confidential information of the Company and (2) accept anything of value (other than bona fide salary, wages, and fees) from anyone in connection with the business of the Company, either before or after a transaction is discussed or consummated.

Antitrust laws- you may not work with competitors to set or control prices, rates, trade practices or marketing policies or to steer markets or clients. You may not require clients to engage in certain "tied" or reciprocal transactions. This is where the client is required to purchase or provide one product or service in exchange for another being made available.

Fair and responsible banking laws- we do business in a fair and responsible manner, and we expect the same from our business partners. This enables us to prevent unlawful discriminatory lending practices, prevent harm to our clients, avoid unfair, deceptive, or abusive acts or practices, and ensure compliance with all applicable banking laws.

Insider trading- providing information about the Company and other publicly traded companies that is considered "material and nonpublic". Information that an investor would consider important when s/he is deciding to trade securities. More information is in the 010. Bancorp Insider Trading Policy.

Money laundering and financial crimes laws including the Customer Information Program- money laundering is the process of taking the proceeds of criminal activities and making them appear legitimate. You are responsible for being knowledgeable of the policies and procedures to comply with BSA, AML, OFAC, USA PATRIOT Act, and economic sanctions obligations. More information is in the 300. Bank Secrecy Act and Anti-Money Laundering Policy and 301. Bank Secrecy Act Compliance Program.

Employees, officers, and directors of the Company must not participate in any illegal or criminal activity. Any employee who has been convicted of or pleaded guilty to a felony or who has been sanctioned by a regulatory agency must immediately report the information in writing to the Human Resources Manager or President. Employees, officers, and directors must also respond to specific inquiries of the Company's independent public accounting firm.

IX. COMPANY REPORTING

It is of critical importance that Company's filings with the Securities and Exchange Commission, banking regulators, and other regulatory agencies and authorities, as well as its other public communications be full, fair, accurate, timely, and understandable. Depending on your position with the Company, you may be called upon to provide necessary information to assure that the Company's filings and public reports meet these standards. The Company expects employees, officers, and directors to take this responsibility very seriously and to provide prompt, accurate answers to inquiries related to the Company's filing and public disclosure requirements.

X. DEALING WITH CLIENTS, PROSPECTS, SUPPLIERS, AND COMPETITORS

All dealings with clients, prospects, suppliers, and competitors must be conducted in accordance with laws, regulations, and terms that are fair and in the best interest of the Company. Employees, officers, and directors must not allow personal relationships to influence business decisions.

A. Receipt of Gifts, Gratuities, and Entertainment

It is inappropriate for employees, officers, or directors to seek or accept, directly or indirectly, for his/her use or benefit, from any individual or company doing business with the Company, any of the following:

- Cash payments of any kind,
- Loans of money, except contractual loans from another financial institution in the normal course of business,

- Gifts of more than \$200 in value, which are in connection with holidays or other recognized occasions and the gift(s) is accepted business practice and where the value of the gift is appropriate to the occasion. (All gifts of more than \$200 must be reported to the Compliance Manager),
- Bequests or legacies from any estate or trust that is a client or lender of the Company, except for relatives.

Exceptions to the general prohibition regarding acceptance of things of value in connection with bank business may include:

- Acceptance of gifts, gratuities, amenities, or favors based on obvious family or personal relationships (such as those between the parents, children, or spouse of an employee) where the circumstances make it clear that it is those relationships rather than the business of the company which are the motivating factors,
- Acceptance of meals, refreshments, entertainment, accommodations, or travel arrangements, all of reasonable value, in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided that the expense would be paid for by the company as a reasonable business expense if not paid for by another party,
- Acceptance of loans from other financial institutions on customer terms to finance proper and usual activities, such as home mortgage, except if prohibited by law,
- Acceptance of advertising or promotional material of reasonable value, such as pens, pencils, note pads, calendars, and similar items,
- Acceptance of gifts of less than \$200 that are related to commonly recognized events or occasions, such as promotion, new job, wedding, retirement, holiday, or birthday, and
- Acceptance of civic, charitable, educational, or religious organization awards for recognition of service and accomplishment.

If there is any doubt as to whether to accept the gift, the Compliance Officer or the Risk Officer should be consulted, and the following information should be disclosed:

- The date
- Who gave the gift (individual or business)?
- The gift details and value of the gift, and
- Any potential conflicts of interest.

Regardless of value, a gift should be declined if your good judgment indicates you would be obligated, in any way, to the donor, there is the slightest implication of influence, or it could be construed to be in connection with a business transaction.

B. Providing of Gifts, Gratuities, and Entertainment

It is inappropriate for an individual to offer or provide, directly or indirectly, for personal use or benefit, to any party with whom the Company is doing or seeking to do business, or who may be able to influence the business or financial interest of the Company, any item specified above.

It is inappropriate to offer any gifts or gratuities to any government or political official unless the gift is given entirely in the context of a personal friendship and cannot be considered as part of an attempt to influence the person or appear improper.

C. Extensions of Credit to Relatives or Interested Parties

Loans to corporate officers, their immediate families, correspondent banks or bankers, or any others who may control the Company balances of others will be on terms, including interest rates and collateral, no more favorable than those prevailing at the same time for comparable transactions with other persons. Officers may not make loans to their immediate family members including mother, father, brother, sister, grandparents, spouse, children, or stepchildren. Another officer may approve these loans when necessary. In addition, such loans must not involve more than the normal risk of collection or present other favorable features.

In general, the Company does not make loans for political campaigns. Any such loan must be made on terms no more favorable than other comparable loans, must be adequately secured, and must have a repayment plan independent of the political success of the candidate.

D. Personal Investments

With the exception (as a minor shareholder) of securities listed on a national securities exchange or traded over-the-counter, investments directly or indirectly in the stock, business or real estate venture of a client, borrower, supplier, or competitor by employees or their immediate families is prohibited.

Investments in shares of a publicly held company is permissible without disclosure provided the employee does not service the account as loan or relationship officer; or the investment does not exceed 1% of outstanding stock of the corporation.

Employees should be prudent in their investments and not speculate in securities, real estate, or commodities.

Employees should not accept offers which come to them because of their position to buy a security at terms more favorable than those available to the public.

E. Employees' Personal Finances

An employee may not borrow from, lend personal funds to, or use personal funds to process transactions for a client, supplier, or to another employee of the Company. Additional restrictions can be found in the Loans to Insiders-Regulation O Policy.

An employee should not sign on clients' accounts, act as deputy or co-renter of clients', safe deposit boxes, or otherwise represent clients. This does not include clients related to the employee.

An employee should keep his/her account in good standing and conduct his/her financial affairs in such a manner as to avoid regulatory or auditing criticisms or concerns. For example:

- Do not refund fees to your own or related party account.
- Do not post transactions for family members.
- Do not allow your account to be excessively delinquent or in an overdraft.

F. Transactions on Employee Accounts

Under no circumstances shall an employee process or approve transactions related to his/her own account. In addition, whenever feasible, transactions of relatives or friends should be referred to another employee to process the transaction.

G. Secondary Employment

The Company discourages employees from holding a second job that interferes with their responsibilities at the Company. Each employee is required to notify his/her supervisor in advance of accepting any other employment to ensure there is no conflict of interest. Employees who already have second jobs should inform their supervisor and Human Resources. Outside employment by an officer must be approved by the President.

H. Use of Company Letterhead

Employees are prohibited from writing letters of a personal nature on the Company's letterhead or use the letterhead in any way that could be considered personal use.

XI. TREATING PEOPLE WITH RESPECT

It is the Company's policy to treat people fairly and with respect. All employees, officers, and directors must deal with current and prospective clients, suppliers, visitors, and other employees without any discrimination because of race, religion, color, sex (including breast feeding and related medical conditions), gender identity and expression, sexual orientation, national origin, ancestry, citizenship status, uniform service member and veteran status, marital status, pregnancy, age, protected medical condition, genetic information, disability, or any other protected status in accordance with all applicable federal, state and local laws. Managers must create an environment free of harassment and discrimination. Managers and

employees who violate laws and Company policies regarding fairness and respectful treatment of others are subject to disciplinary action, up to and including termination. Any person who believes that an act of harassment or discrimination has occurred must report the incident immediately to the Human Resources Department.

XII. ADMINISTRATION OF THE CODE OF BUSINESS CONDUCT AND ETHICS

It is the responsibility of each employee, officer, and director to be familiar with this Code. Supervisors/managers are expected to make every reasonable effort to ensure that their staffs conduct themselves in a manner consistent with these guidelines.

The Directors have the exclusive responsibility for the final interpretation of this Code. The Directors delegate changes to the Board Risk & Compliance Committee and the Audit Committee, as applicable.

Every possible situation cannot be anticipated in this Code or other such policies. Senior management shall administer the Code on a day-to-day basis and determine matters of interpretation, subject to any final interpretation by the Directors. The continued implementation of this Code shall be accomplished by reviews from the Risk, Compliance, Internal Audit, and Human Resources functions.

Employees are strongly encouraged to seek the advice of the appropriate supervisor regarding questions of interpretation and of the applicability of the provisions of the Code to a particular situation.

All employees, officers, and directors shall acknowledge that they have read and understand the Code and shall sign (or electronically) provide acknowledgment in BAI.

All employees shall complete the Statement of Personal Interest upon being hired and annually. Employees who violate the provisions discussed above and the Statement of Personal Interest may be subject to disciplinary action up to and including termination.

The Statement of Personal Interest is available to all employees on the BAI Online Training Platform.

XIII. COMPLAINTS AND WHISTLEBLOWER PROTECTIONS

Federal regulations include a provision for protection of any employee who gives information on violations by federally insured banks. Basically, the employee may not be discharged or discriminated against for that reason "with respect to compensation, terms, conditions, or privileges of employment". Naturally, the employee does not qualify for this protection if they deliberately participated in the wrongdoing or "knowingly or recklessly provided substantially false information."

All employees may contact the Audit Committee to discuss any information they have regarding Questionable Accounting Matters pertaining to accounting function, internal accounting controls, or auditing matters. "Questionable Accounting Matters" include but are not limited to:

- Fraud, deliberate error(s) in the preparation, evaluation, or recording of company records, such as overstated expense reports, erroneous invoices,
- Misrepresentation(s) or false statements regarding financial results, records, or audit reports,
- Requests to circumvent ordinary review and approval procedures,
- Deficiencies in or noncompliance with internal accounting controls,
- Changes or deviations from fair and full reporting as required by laws and regulations.

The Company is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged unlawful harassment, discrimination, or other wrongdoing in the workplace.

The Company has a "Whistleblowers are Protected Notice" in each office lunchroom which details how to report improper acts.

A. Treatment of Complaints

If any employee has a complaint or concern regarding questionable accounting matters, s/he may either contact the President, Chief Risk Officer, or the Chairman of the Audit Committee, or may submit a complaint or concern on an anonymous basis. Particularly in the case of anonymous complaints,

employees are encouraged to provide as much detail as possible to enable the Company to investigate the situation. Instructions for reporting financial and internal control concerns or complaints anonymously or otherwise are posted in all employee lunchrooms and are available on the Bank's intranet.

Valid audit and accounting matters are reported to the Audit Committee for further investigation. Other types of complaints are discussed in the 512. Compliant Policy.

B. Treatment and Procedures for Anonymous Complaints

If an employee wishes to file a complaint or concern regarding questionable accounting or auditing matters, s/he may do so on a strictly anonymous basis by putting all relevant information in writing or calling the Audit Committee chairperson. Complaints or concerns regarding questionable accounting or auditing matters are treated as a confidential matter and only communicated on an as needs-to know basis.

C. Audit Committee Investigation

The original complaint or concern, together with the results of the Audit Committee's investigative efforts, shall be documented and all records concerning the complaint shall be maintained by the Company. The Audit Committee in its discretion shall determine what action may be required to correct the stated concern and shall cause any necessary corrective action to be taken. If the matter requires investigation by any outside parties such as accountants, independent counsel, or any other consultants or professionals, the Audit Committee shall have the authority to retain the services of such additional persons as may be required to investigate and/or correct the situation.

XIV. WAIVERS

Any waivers of this Code for executive officers or directors may be made only by the Directors of the Company upon the recommendation of its Board Risk & Compliance Committee. Any amendment to or grant of a waiver from a provision of this Code to any director or executive officer will be promptly filed and/or disclosed to the public to the extent and as required by all applicable securities or other laws, rules or regulations or the requirements applicable to NASDAQ issuers or such other exchange or system upon which Company's securities are listed, quoted, or traded, as applicable. Any waivers of this Code for other personnel may be made by the President.

XV. COMPLIANCE PROCEDURES

All employees, officers, and directors have a responsibility to understand and follow the Code and to report any violations thereof. In addition, all employees, officers, and directors are expected to perform their work with honesty and integrity in any areas not specifically addressed by the Code. A violation of this Code may result in appropriate disciplinary action up to and including termination from employment with the Company, without additional warning.

The Directors of the Company has the exclusive responsibility for the final interpretation of this Code. The Code may be revised, changed, or amended at any time.

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. To reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the concern.
- Discuss the concern with your immediate supervisor. This is the basic guidance for all situations. In many cases, your immediate supervisor will be more knowledgeable about the situation and will

appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve issues.

- Seek help from Company resources. In rare cases where it may not be appropriate to discuss an issue with your immediate supervisor or where you do not feel comfortable approaching your supervisor with your question, you should discuss it with a Human Resources representative. If that is also not appropriate, you may communicate any violations of this Code, either anonymously or by name, to the Directors. If your complaint has to do with accounting, internal accounting controls, or auditing matters, see Section XIII above (Whistleblowers) for guidance on appropriate reporting.

XVI. PROTECTION AGAINST RETALIATION

Retaliation in any form against an individual who reports a violation of this Code or of law, even if the report is mistaken, or who assists in the investigation of a reported violation, is itself a serious violation of this Code. Acts of retaliation should be reported immediately and may result in disciplinary action up to and including termination.

ACKNOWLEDGMENT QUESTIONS

1. I have read and understand Open Bank Company's Code of Business Conduct and Business Ethics Policy. In compliance with the reporting requirements of these guidelines, I complete this statement concerning my personal business interests honestly and accurately.			
Yes, I have read and understand the Open Bank Company's Code of Business Conduct and Business Ethics Policy.			
No, I have not read and do not understand the Company's Code of Business Conduct and Business Ethics Policy.			
	Yes	No	N/A
2. Are you a stockholder or interested financially in any way with a competing institution (e.g., bank, savings and loan, finance company, etc.) or a supplier of goods or services or other business contact with the Company?			
3. Have you accepted any gift of a value in excess of \$200 from clients, vendors, or suppliers?			
4. If the answer to 3. is "YES," have you reported the gift(s) to your supervisor?			
5. Have you solicited for yourself or a third party, other than the Company or its agents, anything of value from anyone in return for any business, service, or confidential information of the Company?			
6. Have you accepted anything of value directly or indirectly from anyone in connection with the business of the Company?			
7. Do you have outside employment which has not been previously approved as required by provisions of the guidelines?			
8. Have you received any compensation for acting as a director, officer, trustee, or consultant of an outside organization?			
9. Have you accepted an appointment as an executor, trustee, guardian, or conservator for other than those of your immediate family?			
10. Have you extended credit on behalf of the Company or otherwise influenced the extension of credit to a client where the proceeds were used to pay a debt owing to you or a member of your immediate family?			
11. Have you extended credit on behalf of the Company or otherwise influenced the extension of credit to a client who is your relative?			
12. Have you extended credit on behalf of the Company or otherwise influenced the extension of credit to an individual to finance the purchase of real estate or personal property from you?			
13. Have you extended credit on behalf of the Company or otherwise influenced the extension of credit to a firm in which you or a member of your immediate family has a financial interest or with which you are employed on a part-time or consulting basis?			
14. Have you borrowed money from clients other than recognized lending institutions?			
15. Have you lent personal funds to employees of the Company?			
16. Have you cosigned, endorsed, or otherwise assumed liability in connection with the borrowing of any client or supplier?			
17. Do you sign on any client accounts, act as deputy or co-tenant of a client's safe deposit box, or otherwise represent clients, except for family members?			
18. Have you taken for your own benefit any opportunity or information which rightfully belongs to the Company?			

	Yes	No	N/A
19. Do you have or have you solicited any business relationship with any present or former loan client of the Company of which you are aware?			
20. Do you have any relationship(s) which can appear as a conflict of interest to the Company of which you are aware?			
21. Have you ever disclosed to anyone confidential non-public information regarding the Company or its clients?			
22. Have you participated in any dealings with competitors for the purpose of setting prices, interest rates, and trade practices or marketing policies?			
23. Have you withheld information or knowingly did not notify proper Senior Officers of any wrongdoing, including violations of laws, regulations, or Company policies?			
24. Have you offered, extended, or in any way participated in the extension of a bribe to a political party, party official, or candidate for political office for the purpose of obtaining, retaining, or directing business to the Company?			
25. Are there circumstances or any other matters of a personal or family nature that could reasonably be subject to question as to their effect on the interests of the Company?			

In compliance with the provisions of the Bank's Code of Business Conduct and Business Ethics Policy, I wish to disclose the following information (indicate item number from above, dollar value, number of shares, etc. as appropriate):

(Use additional blank sheets as needed and attach to this document)

I shall not during, or at any time after the termination of employment with the Company, use for myself, divulge to others, or permit or allow to be used for my benefit or to be divulged to others, any trade secrets, confidential information, or any other data of the Company in violation of this Policy.

Date	Employee Name	Branch/Dept Name or #
------	---------------	-----------------------

Signature