

# Whistleblower Policy



Adopted: **4/22/2025**

Approving Body: **Board of Directors**

Date Approved: **04/28/2026**

Version: **2.0**

## 1. Purpose

The Board of Directors of Coastal Community Bank and Coastal Financial Corporation (the "Company") has constituted and established an Audit Committee (the "Committee") with the authority, responsibility and specific duties as described in the Company's Audit Committee Charter. Pursuant to the Audit Committee Charter, the requirements of the Sarbanes-Oxley Act of 2002 and the rules and regulations of the Securities and Exchange Commission, the Committee is required to establish the procedures for (1) the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters ("Accounting Matters"), (2) the receipt, retention and treatment of complaints regarding potential violations of applicable laws, rules and regulations or of the Company's codes, policies and procedures ("Compliance Matters") and (3) the confidential, anonymous submission by employees of concerns regarding questionable Accounting Matters and Compliance Matters. In order to facilitate the reporting of employee complaints, the Committee has adopted this Whistleblower Policy (this "Policy").

## 2. Scope

Pursuant to this Policy, any employee of the Company may submit a good faith complaint regarding Accounting, Compliance or Employee matters to the Company's management without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable laws, rules, regulations, standards and policies, including securities laws and regulations, accounting standards, accounting controls, audit and Human Resource practices. The Committee will oversee treatment of employee concerns in this area.

## 3. Policy Statement

This Policy covers employee complaints relating to any questionable Accounting standards and controls, Audit and Human Resource practices, including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any of the Company's financial statements;
- Fraud or deliberate error in the recording and maintaining of the Company's financial records;
- Deficiencies in or noncompliance with the Company's internal accounting controls;
- Misrepresentation or a false statement to or by a senior officer regarding a matter contained in the Company's financial records, financial statements, audit reports or Human Resource records; and
- Deviation from full and fair reporting of the Company's financial condition.

In addition, this Policy covers employee complaints relating to any questionable Compliance Matter, including, without limitation, the following:

- Applicable laws, rules and regulations;
- Listing standards of the NYSE MKT LLC applicable to domestic listed companies; and
- The governance documents and policies of the Company, such as the Company's Code of Ethics and Corporate Governance Guidelines.

## 4. Process

### Employee Complaints

Employees with concerns regarding questionable matters should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's direct manager is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his or her manager, or if he or she is not satisfied with the manager's response, the employee is encouraged to speak with Human Resources and/or anyone in management with whom they are comfortable approaching. Managers are required to report questionable complaints to Human Resources and/or the Chairman of the Audit Committee.

When an employee is not satisfied or comfortable with the above stated escalation policy, employees should report complaints to the Audit Committee and Human Resources directly through an anonymous whistleblower hotline. The hotline number is (833) 222-3893, and can be reached 24 hours a day, seven days a week. Additionally, employees can access the hotline online at [whistleblower hotline website](#).

### Treatment of Complaints

Upon receipt of a complaint, Human Resources and the Chairman of the Audit Committee will (1) determine whether the complaint pertains to Accounting, Compliance or Human Resource matters and (2) when possible, acknowledge receipt of the complaint to the sender.

Complaints relating to Accounting and/or Compliance matters will be reviewed by Human Resources and the Company's non-executive Chairman of the Board, the Chairman of the Audit Committee, the Internal Auditor or such other persons as the Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of the employee with respect to good faith reporting of complaints regarding Accounting, Compliance or Human Resource matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

### Reporting and Retention of Complaints and Investigations

Human Resources and/or the Company's non-executive Chairman of the Board and/or the Chairman of the Audit Committee will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report for the Committee. Copies of the complaints and the log will be maintained in accordance with the Company's document retention policy.

### Amendments

Human Resources may revise this policy as needed, to remain consistent with requirements of applicable laws, rules, and regulations. All policy amendments will be provided to the Board for review and approval.

## 5. Policy Exceptions

Any exceptions to this policy identified, intentional or accidental, should be escalated to Chief Human Resources Officer to ensure proper monitoring and remediation. Occasionally, management may allow a policy exception based on the expected benefit of the exception. A request for approval should be made to Chief Human Resources Officer.

All exceptions, approved or not, will be reported by internal memo detailing the exception to the Audit Committee.

## 6. Responsibilities

Role	Description of Responsibilities
Board of Directors	<ul style="list-style-type: none"> <li>• Review and approve policy at least annually</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• Review and revise policy for Board approval at least annually, providing a draft to the Audit Committee and other stakeholders for feedback</li> <li>• Review and, when possible, acknowledge complaints received through the whistleblower hotline</li> <li>• Escalate issue to the appropriate person(s) while maintaining confidentiality</li> <li>• Maintain a log of all complaints, tracking their receipt, investigation and resolution</li> <li>• Retain copies of the complaints and the log in accordance with the Company's document retention policy</li> <li>• Provide a periodic summary report for the Audit Committee.</li> </ul>
Chairman of the Audit Committee	<ul style="list-style-type: none"> <li>• Review and, when possible, acknowledge complaints received through the whistleblower hotline</li> <li>• Escalate issue to the appropriate person(s) while maintaining confidentiality</li> <li>• May maintain a log of all complaints, tracking their receipt, investigation and resolution</li> <li>• Retain copies of the complaints and the log in accordance with the Company's document retention policy</li> <li>• Provide a periodic summary report for the Audit Committee.</li> </ul>
Audit Committee	<ul style="list-style-type: none"> <li>• Oversee the receipt, retention and treatment of complaints received by the Company regarding accounting and compliance matters</li> </ul>
Managers	<ul style="list-style-type: none"> <li>• Report questionable complaints to Human Resources and/or the Chairman of the Audit Committee</li> </ul>
All Employees	<ul style="list-style-type: none"> <li>• Share their questions, concerns, suggestions or complaints with one or more of the following:                             <ul style="list-style-type: none"> <li>○ Their direct manager or whoever is in the best position to address an area of concern</li> <li>○ Human Resources and/or anyone in management with whom they are comfortable approaching</li> <li>○ The anonymous whistleblower hotline.</li> </ul> </li> </ul>

## 7. Related Policies, References, and Citations

Employee Handbook

[Code of Ethics and Business Conduct](#)

## 8. Change Management

Version	Description of Changes	Approval Date
1.0	New Policy (previously an attachment to the Employee Handbook)	04/22/2025
2.0	No changes during annual review.	04/28/2026