RBB BANCORP
皇佳商業金控

# WHISTLEBLOWER POLICY

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# WHISTLEBLOWER POLICY

## I. GENERAL STATEMENT OF POLICY

We encourage all employees to bring forth any information that will prevent fraud, abuse, misconduct, and other violation of the Company's policies. If any employee has a good faith belief that any other employee is engaging in fraud and/or illegal activity, including accounting and auditing misconduct, that could potentially violate any federal or state laws, we encourage each employee to report such activity to Management or any appropriate governmental agency.

Likewise, we intend to protect employees who refuse to act, at the direction of their supervisor or other individual associated with the Company, in a manner the employees reasonably believe would result in a federal, state or local law being violated.

In the context of this policy, the "Company", "we", "us" or "our" means RBB Bancorp and its direct and indirect subsidiaries, including RBB Asset Management Company and Royal Business Bank.

## II. REPORTING PROCEDURE

If an employee has a good faith belief that any person working on behalf of the Company, including any independent contractor, independent auditor, or any outside vendor, is engaging in any illegal, fraudulent or otherwise unethical conduct, the employee should report such activity to the Director of Human Resources, Chair of the Audit Committee of the Company's Board of Directors, regarding audit or accounting matters, the Chair of the Nominating and Governance Committee of the Company's Board of Directors, regarding illegal activities, suspected violations of the Code of Ethics, etc., or the Company's Whistleblower Hotline. Any reporting of illegal, fraudulent or otherwise unethical conduct pursuant to this policy may be anonymous.

The telephone number, website address and email address to the Company's Whistleblower Hotline is 866-296-8657, http://www.openboard.info/RBB/ and RBB@openboard.info.

In addition, an employee may also report to the appropriate governmental agency should they reasonably believe someone associated with the Company has, in connection with the service provided to the Company, violated a federal, state, or local law enacted for the protection of shareholders, investor, employees, customers or the general public.

We shall not make, adopt, or enforce any rule, regulation, or policy preventing an employee who reasonably believes that a violation of or noncompliance with a federal, state, or local law has occurred from:

1. contacting a government or low enforcement agency;

2. contacting a person with authority over the employee or contacting another employee with the authority to investigate, discover or correct the alleged violation or noncompliance;

3. Contacting any public body conducting an investigation, hearing, or inquiry relevant to the alleged violation or noncompliance.

## III. INVESTIGATION

Once the Audit Committee or the Nominating and Governance Committee receive an employee's complaint, the Committee shall promptly start to investigate the complaint and take any other necessary actions. The Committee shall keep the identity of the reporting employee confidential unless the Committee determines that it is necessary to disclose the employee's identity to conduct an investigation.

We may discipline any employee found to be in violation of the Company's policies or having otherwise engaged in unlawful activities, including, and up to, termination. At the sole discretion of the Company, employees suspected of dishonest, fraudulent, or criminal acts within the Company may be suspended without pay while the Company, regulatory authorities, and/or law enforcement officers conduct an investigation. A complete investigation will follow suspected acts of fraud or dishonesty. In addition, it is an obligation of any Company employee to report criminal activities on the part of another employee to the Company's management. Investigation of suspected acts of dishonesty or fraud may involve the cooperation of appropriate local, state and federal law enforcement agencies and regulatory agencies.

Following investigations, a suspended employee may return to work depending on the outcome of an investigation. If the Audit Committee knows the identity of the reporting employee, it shall notify the employee of the result of investigation.

## IV. ANTI-RETALIATION

We prohibit retaliation against any individual who makes any report or complaint, pursuant to this policy, or otherwise participates in any investigation. We also prohibit retaliation against an employee for refusing to participate in an activity that the employee reasonably believes would result in a violation of a federal, state, or local law. Any employee who engages in retaliation may be subject to discipline, including, and up to, termination. We also will not:

- ☐ Retaliate against an employee who reasonably believes that a violation of or noncompliance with a federal, state, or local law/statute/rule/regulation has occurred for disclosing information about the employee's belief as described above; or

- ☐ Retaliate against an employee for disclosing information in connection with any former employment about the employee's belief as described above.