

# OREGON PACIFIC BANCORP AND SUBSIDIARIES ETHICS POLICY FOR OFFICERS AND SUPERVISORS

The Officers and Supervisors of Oregon Pacific Bancorp and Subsidiaries (the Company) hold an important and elevated role in corporate governance. As part of the Leadership Team, they are vested with both the responsibility and authority to protect, balance, and preserve the interests of all enterprise stakeholders, including shareholders, customers, employees, suppliers, and citizens of the communities in which Bancorp's business is conducted. The Officers and Supervisors fulfill this responsibility by prescribing and enforcing the policies and procedures employed in the operation of the Bancorp's financial organization, and by demonstrating the following:

#### Honest and Ethical Conduct

Officers and Supervisors will exhibit and promote the highest standards of honest and ethical conduct through the establishment and operation of policies and procedures that:

- Encourage and reward professional integrity in all aspects of the financial organization, by eliminating inhibitions and barriers to responsible behavior, such as coercion, fear of reprisal or alienation from the financial organization or Oregon Pacific Bancorp.
- Prohibit and eliminate the appearance or occurrence of conflicts between what is in the
  best interest of the Company and the personal interest of any employee, including
  Officers and Supervisors.
- Provide a mechanism for members of the financial organization to inform senior management of deviations in practice from policies and procedures governing honest and ethical behavior.
- Demonstrate their personal support for such policies through periodic communication reinforcing these ethical standards throughout the financial organization.

## Financial Records and Periodic Reports

Management will establish and manage the transaction reporting systems and procedures of the Company to ensure that:

- Business transactions are properly authorized, complete, and accurately recorded on the Company's books and records in accordance with Generally Accepted Accounting Principles (GAAP) and established Oregon Pacific Bancorp financial policy.
- The retention or proper disposal of Company records shall be in accordance with established Company financial policies and applicable legal and regulatory requirements.

• Periodic financial communications and reports will be delivered in a manner that facilitates the highest degree of clarity of content and meaning so that readers and users will quickly and accurately determine their significance and consequence.

## Compliance with Applicable Laws, Rules, and Regulations

Management will establish and maintain mechanisms to:

- Educate members of the financial organization about any federal, state, or local statute, regulation, or administrative procedure that affects the operation of the Company.
- Monitor the compliance of the financial organization with any applicable federal, state, or local statute, regulation or administrative rule.
- Identify, report and correct in a swift and certain manner, any detected deviations from applicable federal, state or local statute or regulation.

#### OREGON PACIFIC BANCORP AND SUBSIDIARIES

### Code of Ethical Conduct for Officers and Supervisors

In my role as a leader of Oregon Pacific Bancorp or its subsidiaries,

I recognize that the Officers and Supervisors hold an important and elevated role in corporate governance. I am uniquely capable and empowered to ensure that stakeholders' interests are appropriately balanced, protected and preserved. Accordingly, this Code provides principles to which Officers and Supervisors are expected to adhere and advocate. The Code embodies rules regarding individual and peer responsibilities, as well as responsibilities to the company, the public and other stakeholders.

I certify that I adhere to and advocate the following principles and responsibilities governing my professional and ethical conduct.

To the best of my knowledge and ability:

- 1. I act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- 2. I provide constituents with information that is accurate, complete, objective, relevant, timely and understandable.
- 3. I comply with rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
- 4. I act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing my independent judgment to be subordinated.
- 5. I respect the confidentiality of information acquired in the course of my work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of my work is not used for personal advantage.
- 6. I share knowledge and maintain skills important and relevant to my constituents' needs.
- 7. I proactively promote ethical behavior as a responsible partner among peers in my work environment and community.
- 8. I achieve responsible use of and control over all assets and resources employed or entrusted to me.

Non- adherence to or support of the Company's Ethics Policy may result in disciplinary action up to and including termination.

(Date)	
	(Date)