



Responsible Sales Practices

Banner Bank is committed to engaging in responsible sales practices that are consistent with applicable laws, regulations and guidance, and Bank policies. The Responsible Sales Practices Policy is available to all employees and intended to provide guiding principles that help ensure the Bank:

- Complies with applicable federal consumer protection laws and regulations
- Attracts, retains, and rewards talented employees and third-party service providers through incentive programs and compensation plans that promote both high performance and ethical sales practices
- Minimizes risk of potential consumer harm by requiring employees to engage in responsible sales practices and by avoiding incentives or compensation that encourages unethical or illegal sales practices,
- Develops and maintains appropriate risk-based controls to prevent, detect and correct such practices, including incentive programs and compensation policies

The Bank provides training at regular intervals regarding appropriate sales techniques, expectations for incentives including standards of ethical behavior, and common risky behaviors for employees and service providers to foster greater awareness of primary risk areas among both new hires and existing employees. These training programs also discourage unethical sales practices, address the regulatory and business requirements for obtaining consumer consent, and describe methods for reporting unlawful or unethical conduct. The Bank's compliance department reports regularly on the status of adherence to the Bank's Responsible Sales Practices Policy, including whether any significant or systemic issues were identified and any corrective action taken.