



Complaint Management

Banner Bank is committed to compliance with all complaint requirements prescribed by applicable laws and regulations. The Federal Deposit Insurance Corporation indicates that a Consumer Complaint Response Program is a component of an overall Compliance Program. Additionally, the Consumer Financial Protection Bureau specifies that an effective Compliance Management System includes response to consumer complaints as a component.

Banner Bank strongly encourages employees and clients to raise possible ethical concerns and complaints. This includes concerns relating to those matters involving accounting, internal control, financial reporting or auditing functions. Any retaliatory action against an employee who in good faith raises concerns or questions about a possible discrepancy or violation with respect to financial disclosure matters is strictly prohibited. Non-retaliation against employees is fundamental to Banner's Code of Ethics, and there are strong legal protections for those who in good faith raise an ethical concern or a complaint about their employer. Ethics complaints are managed by Banner's Ethics Officer.

Banner Bank takes all complaints seriously and strives to resolve every complaint in a timely and compliant manner. Promptly addressing employee and consumer concerns or complaints helps Banner Bank by:

- Providing management with timely information regarding consumer concerns by identifying, responding, analyzing, trending, and reporting complaints;
- Reducing potential reputation, compliance, and legal risk by escalating certain complaints as appropriate;
- Avoiding harming or inadvertently giving the appearance of harming consumers;
- Evaluating Banner Bank's business practices and product and services based on trends in complaints; and
- Meeting regulatory expectations for a Complaint Management Program as part of Banner Bank's overall Compliance Management System.

The Bank's complaint management policy and program establish a formal and centralized system of complaint management, along with review of high impact complaints and an escalation process to executive management as necessary. The Bank's Compliance Department reports complaints trends to executive and Board committees as appropriate. The Bank defines a consumer complaint as any verbal or written communication to the Bank through any channel expressing confusion or dissatisfaction with, including but not limited to, a Bank product or service, a Bank employee, a third-party provider, or a business act or practice.

An effective complaint management program is essential to the Bank's overall risk management process. Inadequate management of complaints could subject the Bank to significant reputation, compliance, and legal risk. Additionally, non-compliance with consumer laws and regulations may subject the Bank to civil monetary penalties, regulatory enforcement actions, litigation risk,

reputational damage, as well as other adverse outcomes resulting from non-compliance. Therefore, all Bank employees are expected to comply with consumer laws and regulations including when responding to complaints.