

▶ **CODE OF  
BUSINESS  
CONDUCT**

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# WHO WE ARE AND WHAT WE BELIEVE

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- CEO Statement & Introduction
- Pathward's Purpose, Vision & Values
- Responsibilities of Employees, Contractors and Board Members
- Responsibilities of Managers
- See Something, Say Something Resources



# CEO STATEMENT & INTRODUCTION

Pathward is a purpose-driven company, and that means that how we go about conducting business is just as important as the financial success we drive along the way. Our reputation for doing the right thing is our foundation, and all employees, board members, and third-party contractors and contingent workers have the duty and responsibility to maintain the highest possible standards of ethics and conduct.

Pathward's Code of Business Conduct outlines what is expected from all of us. It's designed to guide us in our decisions, but ultimately it's up to you and me and every one of us to speak up if we see anything that violates, or even appears to violate, our Code of Business Conduct. If you see something, say something.

You have my commitment, on behalf of Pathward's leadership team, that we will promptly investigate any claim of a Code violation that is reported in good faith, we will protect confidentiality to the greatest extent possible, and we will ensure that no employee is retaliated against for protecting the Company's reputation for integrity.

Thank you for your dedication to Pathward's ethical well-being, and for your commitment to our shared purpose: to power financial inclusion for all.



Brett Pharr  
CEO





# PATHWARD'S PURPOSE, VISION & VALUES

We provide innovative financial solutions to customers and businesses in under-served niche markets. We believe in financial inclusion for all. At Pathward, we use our knowledge of banking and financial technology to promote better financial solutions for people and businesses who have been seemingly overlooked by traditional financial institutions. We do this by developing unique financial products and supporting entrepreneurial thinking which in turn provides better alternatives for those with limited access.

**Lead by Example**

- Do the right thing • Engage with empathy
- Foster diversity and inclusion

**Find a Better Way**

- Always ask why • Challenge how we do things
- Embrace innovation • Simplify

**Help Others Succeed**

- Elevate our teammates • Be present • Have fun
- Positively impact our customers and our communities

**Dare to be Great**

- Think big • Have the courage to disrupt • Be prepared to pivot
- Deliver best-in-class service • Promote an environment of excellence

**Our virtues -Humble, Hungry, Smart**

We aspire to serve each and every customer with equal dignity and respect. Our ability to scale up and down by leveraging technology to deliver valuable products with enhanced controls allows us to manage risk and reduce the cost of providing financial services while protecting the bank, its customers and their money.

Our goal is to continue to bring tangible solutions that help people develop a plan, gain access to financial systems, establish liquidity for unexpected challenges and get practical, systemic assistance to stay on track.

We hold firm to our values of leading by example, daring to be different, finding a better way, and helping others succeed.

# RESPONSIBILITIES OF EMPLOYEES, CONTRACTORS, AND BOARD MEMBERS

The reputational integrity of Pathward relies upon the ethical and honest actions of our employees and Board Members. We also expect third parties, including contingent workers and contractors, to act in a way that is consistent with the Code and upholds our commitment to ethical actions when they are performing work for us, or on our behalf. If, at any level of responsibility, the Code is not understood and followed, it may lead to Pathward violating the law, providing poor service to customers, or being placed at financial, legal, and/or reputational risk.

Understanding that proper ethical behavior is an essential component of Pathward's success and is, in many cases, required by applicable law and regulation, the Code is intended to help you in your efforts to avoid actions that involve ethical risk. If there is ever a real or perceived conflict between the Code and any applicable law, you must follow the law. In most instances, the Code will have stricter requirements than the law. In those situations, follow the Code. The Code cannot anticipate or answer every question that you may have, so the Code provides multiple

mechanisms for you to ask questions and report potential or actual ethical violations or other conflicts of interest.

If you observe, experience, or learn about a potential or actual Code violation involving you or another employee, contractor, vendor or Board Member, you must report this concern to any of these resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](http://Pathward.ethicspoint.com)

Confidentiality will be maintained to the extent possible and retaliation for making a report in good faith is strictly forbidden.

## ALL EMPLOYEES, AT EVERY LEVEL, ARE EXPECTED TO:

- Understand and comply with all Pathward policies and procedures for ethical behavior as set forth in the Code and the Employee Handbook, particularly as applicable to your role
- Ask questions when difficult situations arise
- Encourage coworkers and subordinates to follow the Code
- Disclose any conflicts of interest and potential or actual violations of the Code
- Use good judgment and always act in the best interest of the Company
- Understand how to use Pathward's anonymous hotline and online reporting options

## BOARD MEMBERS ARE EXPECTED TO, AMONG OTHER THINGS:

- Adhere to all expectations of employees listed above
- Devote sufficient or necessary time to Board and committee meetings and related activities as set forth in the Corporate Governance Guidelines. Exercise heightened sensitivity with respect to safeguarding confidential information, avoiding conflicts of interest (including service on the boards of directors for other organizations), and speaking on behalf of Pathward
- Not be in a romantic relationship with any employee, regardless of reporting relationship (see "Personal Relationships in the Workplace", below)
- Exercise authority to waive a provision of this Code when appropriate and by majority decision making
- Use the communication method designated by us to address security and confidentiality concerns

# RESPONSIBILITIES OF MANAGERS

At Pathward, our managers are leaders whom we view as guardians of our culture. Whether you are hiring, coaching, training, providing performance feedback, or just managing the day-to-day, we expect that you will do everything in your power to create an environment where employees know they can raise concerns without fear of retaliation.

Managers are role models and must lead by example by demonstrating their own commitment to performing their work with the highest ethics and integrity. Managers should work to create an environment of open communication where employees feel safe asking questions and raising concerns.

Managers cannot investigate any potential violations of the Code, Company policy or the law. Instead, a manager's responsibility is to report any concerns they learn about to any of the resources specified in the Code and to encourage their team members to do the same.

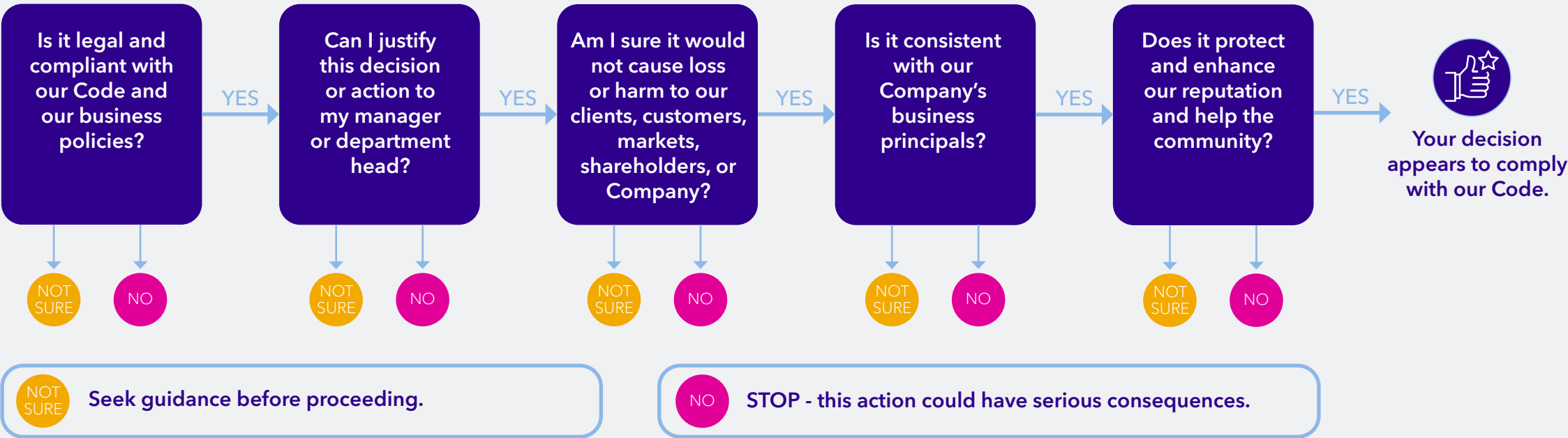
## **PATHWARD REQUIRES ALL MANAGERS TO:**

- Know the Code and how it applies to their role and that of your team
- Coach their team to adhere closely to the Code
- Clearly communicate their commitment to upholding the Code in all situations
- Quickly report any potential violations of the Code, Company policy, or the law to any of these resources:
  - Your immediate manager
  - Senior management
  - Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
  - Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
  - Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](https://pathward.ethicspoint.com)
- Ensure team members feel safe reporting concerns
- Demonstrate that they will protect any team member who reports a concern in good faith from any type of retaliation.

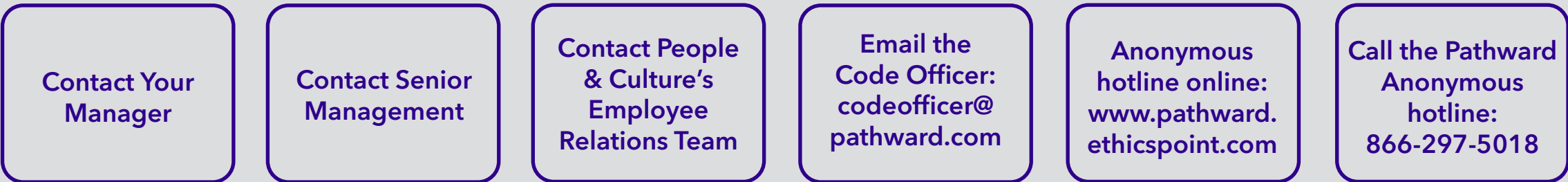
# SEE SOMETHING, SAY SOMETHING RESOURCES

## DECISION TREE

*In any dilemma, ask yourself:*



## HOW TO SPEAK UP:





# WORKING WITH EACH OTHER, CUSTOMERS AND PARTNERS

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- Commitment to Diversity, Inclusion and Equal Opportunity
- Commitment to a Harassment-Free Workplace
- Commitment to Confidentiality
- Protecting Company Assets
- Personal Relationships in the Workplace
- Commitment to a Safe Workplace
- Social Media
- Advertising & Marketing



# COMMITMENT TO DIVERSITY, INCLUSION AND EQUAL OPPORTUNITY

## COMMITMENT TO DIVERSITY AND INCLUSION

At Pathward, we place great value on the diversity of our employees, and we are proud of our commitment to treating all employees with dignity and respect through an inclusive work environment. We believe that diversity of backgrounds, thoughts and experiences in our organization leads to more innovative solutions for our customers and partners as we seek to understand the unique needs in the different markets that we serve. All employees are expected to contribute to a culture of mutual respect and inclusion.

Pathward has a firm commitment to providing reasonable accommodations to both qualified applicants and employees with disabilities, in compliance with the Americans with Disabilities Act and the ADA Amendments Act (ADA/ADAAA). If you require an accommodation to perform the essential functions of your job, contact your manager or Employee Relations at [employeerelations@pathward.com](mailto:employeerelations@pathward.com).



*Additional Resources (available in Document Control):*  
Employee Handbook - HHS & Diversity  
Employee Handbook - Equal Employment Opportunity

## COMMITMENT TO EQUAL OPPORTUNITY

We provide equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, ethnicity, religion, sex, sexual orientation, gender identity, transgender status, pregnancy, national origin, age (age 40 and over), disability, genetic information, marital status, hair texture or hairstyle, ancestry, service in the uniformed services, protected veteran status, status as a victim of domestic violence or any other class protected by federal, state and local laws. This commitment extends to all aspects of employment, including, but not limited to, selection, hiring, placement, promotion, discipline, termination, layoff, recall, transfer, leaves of absence, compensation, benefits, and training.

If, at any time, you have concerns regarding discrimination, you are encouraged to reach out to any of these resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](http://Pathward.ethicspoint.com)

Discrimination has no place at Pathward, and we will take prompt action to investigate any concerns.

# COMMITMENT TO A HARASSMENT-FREE WORKPLACE

## HARASSMENT, BULLYING AND DISCRIMINATION-FREE WORKPLACE

We believe everyone deserves to be treated with dignity and respect. We strive to create an environment that is free of discrimination or harassment. We don't tolerate bullying, abuse, or any behavior that creates a hostile work environment. Any form of harassment – physical, sexual, verbal or non-verbal, in person, over email or instant messaging, on the phone, or on social media – is never acceptable at Pathward. As such, it is everyone's responsibility to recognize harassment when they see it and report it promptly. Harassment is offensive conduct that interferes with an employee's ability to work. It can involve sexual conduct or references to a personal characteristic. It can include racial slurs, off-color jokes, or unwelcome sexual advances. Harassment can occur between members of the same sex or the opposite sex. It can occur between vendors, contractors, or employees. It can occur in the office or at off-site business events.

We rely on you to speak up if you suspect discrimination, harassment or any inappropriate workplace behavior. It's important to provide this information to any of these resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](http://Pathward.ethicspoint.com)

Every report of perceived harassment will be fully and promptly investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible and appropriate under the circumstances, or as required by law, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employees feel they have been subjected to such retaliation, they should report it in the same way a claim of perceived harassment would be reported under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including potential discharge. All employees must cooperate with all investigations.

## Q&A

### QUESTION:

After work, our team went out for drinks with one of our vendors . After a few drinks, the vendor told an off-color joke that made several of us uncomfortable. Should I speak up about this incident since it was not in the office and not a Pathward employee?

### ANSWER:

Yes. Harassment can occur on-site or off-site, by an employee or vendor, contractor or partner. It's important to speak up to maintain our commitment to a harassment-free workplace.



*Additional Resources (available in Document Control)*

Employee Handbook - Values and a Harassment-Free Workplace

Employee Handbook - Non-Harassment

Employee Handbook - Values, HHS and Diversity



# COMMITMENT TO CONFIDENTIALITY

## CONFIDENTIAL AND PROPRIETARY INFORMATION

Ensuring the confidentiality of customer and partner information is of the utmost importance to Pathward. The unapproved disclosure and/or use of confidential Company information (including current, prospective, and declined customer and/or partner information) is strictly prohibited.

The confidential treatment of customer and partner information applies to identifying information such as name, social security number, tax identification number, product selection information, financial information, and any other information that Pathward possesses with respect to customers and partners that is not available to the general public: this includes the fact a potential customer has inquired about a relationship with Pathward as well as the identity of a customer who has an on-going relationship with Pathward.

The safeguarding of confidential information is important to the competitive position of Pathward and supports compliance by Pathward with federal and state laws. Failure to adequately safeguard confidential information could result in liability of a serious nature both for employees and for Pathward that includes, but is not limited to, employment termination or civil lawsuits.

## Q&A

### QUESTION:

I'm planning to leave Pathward at some point and I would like to put together a portfolio of samples of my work product. Can I include examples of work that I have done at Pathward?

### ANSWER:

No, documents such as training plans, customer presentations, marketing initiatives, forms and templates are all considered to be confidential Pathward property and must not be taken when you leave the Company.

# COMMITMENT TO CONFIDENTIALITY CONT.

## CUSTOMER AND PARTNER INFORMATION

It's imperative that employees comply with all policies, procedures and safeguards used by Pathward to protect its customers' and partners' nonpublic personal information. You should never access or disclose customer or partner information without proper authorization or discuss any information provided to Pathward by a customer or partner with anyone outside of Pathward or any other employee of Pathward who does not have a legitimate business need to know such information.

Employees have an obligation to ensure the proper handling of confidential customer and partner information. This includes using encryption when electronically transferring data outside of Pathward and securing hard copies of printed data by locking them in a desk or cabinet. When you no longer need the data for your work, you must properly dispose of it according to Pathward's Data and Record Retention Program Standard.

When employees leave Pathward, we require that they turn in all confidential information in their possession. Confidential information must never be disclosed to another employer and employees must continue to comply with their obligations to preserve the confidentiality of Pathward's confidential information even after termination of employment.

## EMPLOYEE PERSONAL DATA

Pathward also takes great care to protect the confidential information of our employees from improper use or disclosure. Access to employee personal data is strictly limited to those with a legitimate business need in order to perform their duties. Information regarding the employment or employment history of any individual is also restricted to those with a legitimate business need to know, whether they are employees of Pathward or third-party vendors.

Any collection, use, or transmission of employee data must comply with applicable state and federal laws.

## Q&A

### QUESTION:

Can I use encrypted email to send declined customer information to my wife's accounting firm to help improve customer loan applications and improve Pathward's loan approval rates?

### ANSWER:

No. You may not access or use declined customer information for this purpose—by using encrypted email – or otherwise. Sending confidential declined customer information outside Pathward is not permitted.



*Additional Resources (available in Document Control):*  
Acceptable Use Policy  
Data Privacy Program Standard  
Data Classification Program Standard  
Data Governance Policy  
Data and Record Retention Program Standard



# PROTECTING COMPANY ASSETS

## COMPANY ASSETS AND INFORMATION

Pathward invests significant resources in personal property, real property and other assets. Personal use of Company equipment is strongly discouraged and is prohibited when that use interferes with job duties, network performance or incurs a cost to Pathward.

Pathward's assets also include proprietary information, such as intellectual property, business and meeting plans and ideas, records, and Pathward and customer information. Any prohibited use of such information violates this Code and may result in civil / criminal penalties and employment termination.



*Additional Resources (available in Document Control):*  
Acceptable Use Policy

## Q&A

### QUESTION:

Can I use my Pathward laptop to book my personal vacation over my lunch hour?

### ANSWER:

Maybe. Personal use of Pathward information technology that is excessive or otherwise interferes with your performance of your job responsibilities is not permitted. All usage must also comply with our Acceptable Use Policy.

# PERSONAL RELATIONSHIPS IN THE WORKPLACE

It is the goal of Pathward to avoid creating or maintaining a situation where the appearance or possibility of favoritism, bias or a conflict of interest may exist. As such, Pathward does not permit employees involved in a close personal relationship to function as either the manager or subordinate in a reporting relationship. Close personal relationships are defined as involving members of the same family (spouse, domestic partner, parent, stepparent, child (biological, adopted, foster, stepchild, legal guardian, de facto or loco parentis), sibling, grandparent, grandchild, legal guardian or other person who stands in place of a parent, aunt, uncle, niece, nephew, first cousin, someone who has an expectation to rely on you for care, and in-laws of any of the foregoing) or those involving a relationship of a romantic or intimate nature.

In addition, employees in a close personal relationship must not have influence or decision-making authority regarding hiring, compensation, promotion, discipline, or termination of the other employee. Employees in a close personal relationship do not violate the Code as long as the employees are not in positions that have a reporting responsibility to each other. However, employees in the position of Senior Vice President or above, along with Board Members, must not be in a romantic relationship with any employee, regardless of reporting relationship. However, Pathward reserves the right to determine there is a conflict or the potential for conflict because of the close personal relationship between employees, even if no direct reporting responsibility or authority to each other is present. In these situations, Pathward will reassign one of the employees.

Employees are responsible for disclosing each of the following to the Code Officer using the Conflicts of Interest disclosure tool: (1) close personal relationships entered into during the course of their employment; (2) if the employee is in a close personal relationship with someone (in a manager-subordinate reporting relationship or if one person has influence or decision-making authority regarding the employment decisions with respect to the other); and (3) if a relationship described in (1) or (2) develops during employment or if the hiring of an individual or a job change result in a conflict under this policy. Pathward reserves the right to determine there is a conflict or the potential for conflict because of the close personal relationship between employees, even if no direct reporting responsibility or authority to each other is present. If a conflict is present, Pathward will work with both employees to determine if there is a transfer available to a suitable open position in another department. If no acceptable position can be found, Pathward reserves the right to require the resignation of one of the employees.

## Q&A

### QUESTION:

I recently started dating someone who works as a project manager in another department. Although we work in different departments, I am part of the project team. Is this a relationship that I need to disclose?

### ANSWER:

Yes, this relationship should be disclosed to the Code Officer. Although a project manager in another department isn't your direct manager, their control over your work assignments, work schedules and input into performance review should be evaluated when considering if a conflict is present.

# COMMITMENT TO A SAFE WORKPLACE

We all share the responsibility for creating a safe working environment and everyone is encouraged to identify safety issues. The Company has a comprehensive emergency response plan and conducts drills on a regular basis to ensure appropriate action in the event of a real emergency. Employees are encouraged to be familiar with the emergency plans specific to their department and location.

Additionally, employees should refrain from allowing anyone else to use their badge to enter Company premises or to “piggy-back” on their own entry. Employees must wear their badge visibly at all times. If you see someone on Company property that doesn’t appear to belong there, contact your manager immediately.

Pathward is committed to maintaining a drug-free workplace. Employees must not use or be under the influence of alcohol, recreational or medical marijuana, or illegal drugs at any time while conducting Company business, both on and off Company premises. At certain Company-sponsored social events, limited consumption of alcohol may be permissible. Employees are never required to consume alcohol in the course of their duties. If you choose to consume alcohol, you must do so responsibly and in a manner that does not reflect negatively upon Pathward. See the Employee Handbook for additional information and Pathward’s policy on a Drug-Free and Alcohol-Free Workplace.

Pathward does not tolerate any kind of violence in the workplace, including verbal intimidation or threats. Weapons of any kind are prohibited on Company property, except in situations where they are used by law enforcement. Employees should immediately report any threat of violence to 911 if it is emergency, or to any of these resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward’s anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](http://Pathward.ethicspoint.com)

## Q&A

### QUESTION:

My coworker confided in me that she just got a restraining order put in place against her ex-boyfriend. She is worried because he has threatened to come to her workplace in order to hurt her. She told me not to tell anyone. Do I need to report this?

### ANSWER:

Yes. Pathward has many resources available to assist your coworker. Any type of threat of violence must be immediately reported.



*Additional Resources (available in Document Control):*

Communications Hub – Site Evacuation Plans

Employee Handbook – Drug-Free and Alcohol-Free Workplace

Employee Handbook – HHS and Ensuring a Safe Workplace

Employee Handbook – Workplace Safety

# SOCIAL MEDIA

When used effectively, social media can be an excellent form of communication with customers, employees, and the marketplace in general as it provides a means to promoting products and services, thought leadership, receiving customer input on products and services, responding to customer concerns, and measuring customer satisfaction. Social media also represents an effective recruiting tool to promote our Company as an employer of choice among prospective job candidates.

Many of us keep personal blogs and web pages and maintain profiles on personal and professional social media websites. When posting on social media sites, if you mention your work at the Company or our business, you must keep the following in mind:

- Do not speak on behalf of the Company unless you are authorized to do so
- Identify yourself as an employee or Board Member of Pathward and include a disclaimer that the opinion you express is your own, and not that of the company
- It is always acceptable to 'like' or share approved Company posts and job openings
- Recruiters are encouraged to advertise job postings on relevant social media platforms
- Be respectful of others – do not say anything online that you wouldn't say in person
- Never disclose anything that is proprietary or confidential to the Company or its customers, including information that could be considered as "tipping"



*Additional Resources (available in Document Control):*  
Acceptable Use Policy  
Social Media Policy  
Regulation Fair Disclosure Program Standard

## Q&A

### QUESTION:

Can I share an article about Pathward on my personal LinkedIn page and make comments about the content? I don't think the article reflected well on Pathward and I'd like to provide additional commentary.

### ANSWER:

In general, you should refrain from commenting on Pathward's business online unless you are an authorized spokesperson for the Company. You can send a copy of this article to our Corporate Communications group and they will determine if an official response is required. If you do post a comment about Pathward online, you must disclose that you are a Pathward employee and that the opinion you are sharing is your own, and not that of the Company.

# ADVERTISING & MARKETING

## TRUTH IN ADVERTISING

Pathward is committed to fair and truthful advertising and marketing practices. We carefully research and document every claim that is made in our marketing materials prior to distribution to the public in order to ensure accuracy and avoid misleading statements.

Responsible sales and servicing practices are the cornerstone of Pathward's relationship with its customers. We expect that our employees will always treat customers fairly and responsibly. To develop trust with customers, you may only offer products to customers based on their needs or requests. The products must be explained in a way that the customer understands and should never be delivered in a way that promotes a product or service in order to meet a sales or incentive goal. Aggressive, deceptive, unfair or abusive sales practices are not in line with our company values and will not be tolerated. We hold vendors and third parties working in support of customers or potential customers to the same expectations of honest and fair sales practices.

## Q&A

### QUESTION:

I overheard a co-worker telling a group of potential customers they are guaranteed to be approved if they mentioned his/her name.

### ANSWER:

This type of behavior represents potentially unfair practice. All applicants should be evaluated equally. This activity should be reported to your manager, senior management, Employee Relations, the Code Officer or Pathward's anonymous hotline.



# WORKING WITH OUR COMMUNITY

- Environmental, Social and Governance
- Industry Associations



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)

## ENVIRONMENTAL RESPONSIBILITY

Pathward's purpose of financial inclusion is at the core of our Environmental, Social & Governance ("ESG") efforts. ESG demonstrates who we are and what we do as a company. That includes our policies, practices, commitments and goals for the company, shareholders, customers, employees, community and the environment.

At Pathward, we believe that a healthy environment and environmentally responsible behavior are fundamental to the well-being and prosperity of communities and the world at large. We ask that employees commit to the following principles:

- Always operate in full compliance with all applicable laws and regulations that govern the environment and the health and safety of our employees
- Immediately contact your manager with any environmental, health or safety concerns
- Raise opportunities for improvements in the areas of environmental health and safety

When you work with our partners and suppliers, let them know that Pathward seeks continuous improvement in the sustainability of our operations, and encourage them to do the same. Employees should reach out to [esg@pathward.com](mailto:esg@pathward.com) with any questions regarding sustainability.

## COMMUNITY IMPACT

Pathward is committed to creating lasting, positive change with and for the communities where we live and operate. We know we cannot do this work alone, so we collaborate with partners to eliminate barriers, transform systems, and strengthen communities from within.

## EMPLOYEE GIVING

Pathward encourages employees to give to charitable organizations of their choice. We proudly provide philanthropic opportunities through our Community Impact Program, which includes efforts such as our annual United Way campaign.

As part of our Community Impact Program and commitment to fostering a culture of giving and volunteering, our Matching Gifts Program doubles the impact of eligible employees' charitable donations up to \$2,000 per calendar year to eligible nonprofits.

If you receive a request for charitable contributions from customers or other third parties, you should submit a charitable investment request via the form found on the Community Impact SharePoint site. We will prioritize requests for organizations that align with our community impact model focus of Financial Inclusion for All; Family and Individual Empowerment; Educational Support; and Disaster Relief.

## Q&A

### QUESTION:

My daughter is selling Girl Scout Cookies and I would like to bring some to the office and ask my coworkers if they would like to purchase them. Is this ok?

### ANSWER:

Yes, you may bring your daughter's Girl Scout Cookies to work for your coworkers to purchase. It's important to remember that if you are a manager, you must not make your team members feel that they have an obligation to contribute.

# INDUSTRY ASSOCIATIONS

## PARTICIPATION AND AFFILIATION

Pathward recognizes that membership and participation in industry associations can be an important part of personal and professional development. In general, employees are encouraged to participate in professional associations with organizations that are consistent with the values of Pathward.

If Pathward is reimbursing you for membership dues or fees in affiliation with an industry association, you must have approval from your manager prior to joining the association and submitting an expense report.

If you have any questions regarding an industry association that you would like to join, please reach out to your manager.



# WORKING WITH OUR GOVERNMENT

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- Lobbying and Political Activities
- Endorsements and Public Statements



# LOBBYING AND POLITICAL ACTIVITIES

Government plays an important role in determining the conditions under which we operate our business. Our priorities and opportunities cannot be fully accomplished without legislators who hear from and understand our industry. What happens in Washington D.C. and in the states clearly affects our bottom line.

Pathward is careful to comply with all applicable laws when lobbying lawmakers and government regulators on behalf of our company. Unless you are authorized to lobby on behalf of our company on a specific issue, you should refrain from doing so. If you are unaware of whether your actions would classify as “lobbying,” please contact the head of the public policy team at [publicpolicy@pathward.com](mailto:publicpolicy@pathward.com).

Public policy decisions made at all levels of government affect the way we run our business and impact our industry as a whole. To help elected officials understand the complex challenges and opportunities facing Pathward and our industry as a whole, we created the Pathward PAC (Political Action Committee). A PAC is an organization, often organized by a company, that enables the company’s employees, shareholders, and their families to join together to make contributions to candidates and political committees. Since corporations are forbidden by law from making direct contributions to support federal candidates and state candidates in many jurisdictions, a PAC offers companies and their employees a legal, effective way to participate in the political process. The Pathward PAC allows us to support candidates and policymakers who support Pathward’s mission and business goals and align with the best interests of our customers and employees.

Any decision to contribute to the Pathward PAC is voluntary; you have the right to refuse to participate without fear of reprisal. Pathward PAC may only receive contributions from U.S. citizens and foreign nationals with permanent residency status in the U.S. Contributions to the Pathward PAC must be from personal funds and may not be reimbursed by any other source. Suggested contribution amounts are merely suggestions, and more or less may be given. The amount given, or a decision not to give, will not benefit or disadvantage you.



# LOBBYING AND POLITICAL ACTIVITIES

Pathward encourages all employees to actively participate in the political process and make political contributions. However, no political activity may interfere with work at Pathward. Employees must avoid activities such as campaigning for an elected political office while on duty or while representing Pathward, endorsing a candidate for political office on behalf of Pathward, or otherwise assisting a candidate in the campaign for office by using Pathward's resources or reputation.

Employees may not use any Pathward staff, facilities, equipment, supplies, or mailing lists. When acting as a fundraiser for a candidate or political event, employees must ensure that their activities cannot be viewed as connected with their position with Pathward, especially when communicating with colleagues, customers, or vendors. If your political activities could cause an appearance that you are acting on behalf of Pathward, you must make it explicit that your views and activities are your own, and do not represent Pathward. Political activity should be an exercise of careful individual discretion. Employees must provide annual disclosure of political offices held to the Code Officer and obtain approval from the Code Officer before running, volunteering or being appointed for public office. Also, employees who are approved to hold a political office must annually confirm compliance with disclosure requirements and the prohibition on use of Pathward's name in political materials. Finally, employees must recuse themselves from proceedings on matters that involve Pathward or its interests.

## Q&A

### QUESTION:

I'm planning to run for a local elected office. What do I need to do to make sure this doesn't conflict with my role at Pathward?

### ANSWER:

Prior to running for elected office, you can disclose your plans to your manager, but you must obtain approval from the Code Officer prior to running for the elected office. You should ensure that the time you spend on your campaign doesn't interfere with your job responsibilities. Also, you may not use Pathward's property or assets in your political work. Finally, you should be aware that some of your coworkers may not share your political views and avoid conversations in the workplace that distract or offend others.

# ENDORSEMENTS & PUBLIC STATEMENTS

In order to preserve our reputation of integrity and maintain the confidence of our customers, partners, and investors, it is critical that we have consistent messaging coming from the Company. Inaccurate information could create a reputational risk for Pathward. As such, you may not speak on behalf of the Company unless you are explicitly authorized to do so. You may not make any public statements including on social media representing the Company or Company positions without prior written approval from Pathward's Corporate Communications team. Any media requests for an official response from Pathward must be referred to the Corporate Communications team. This will ensure that all public statements accurately reflect the Company's views.

Speeches, writings, or conference presentations that discuss Pathward's business must be reviewed and approved by Corporate Communications prior to delivery.

You may not sign contracts on behalf of Pathward without obtaining prior approval as required in the Contract Review Program Standard.



*Additional Resources (available in Document Control):*  
Contract Review Program Standard

## Q&A

### QUESTION:

I'm very excited about a recent product that we launched. Can I talk about it on my personal social media account and let my friends and family members know about it?

### ANSWER:

If the product has already been launched and the general public has been made aware of it, you may mention it on your personal social media account. However, whenever you mention Pathward online, you must disclose that you are an employee of Pathward and that the opinions you are expressing are your own, and not those of the Company.

# COMMITMENT TO SHAREHOLDERS

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- Conflicts of Interest
- Gifts, Gratuities & Entertainment
- Commitment to Ethical Behavior
- Sanctions Compliance & Accurate Accounts and Records





# CONFLICTS OF INTEREST

Employees and Board Members must always act in the best interest of Pathward. A conflict of interest arises when you or your family member's personal, social, political or financial interests, duties, obligations or activities are, or may be, in conflict with the Company's interests.

"Conflict of interest" means any personal or business-related activity, including a financial interest, that: (1) could potentially interfere with your responsibilities or judgment on behalf of Pathward or our customers or partners; or (2) conflicts, or appears to conflict in any way, with the interests, or damages reputation, of Pathward. A conflict of interest can be actual, perceived or potential.

Examples of conflicts of interest include giving preferential treatment to friends or family members, holding financial interests in companies that do business with Pathward, referring Pathward customers to others with a shared personal or financial interest, and accepting business opportunities that you learn about while performing your job. Additionally, you should never take for yourself or your family members any opportunities that are offered to or belong to Pathward or are discovered through your employment with Pathward; use Pathward property, information or position for personal gain; or compete with Pathward.

Employees must disclose conflicts of interest to the Code Officer. Employees should provide disclosures by using the Conflicts of Interest disclosure tool. Board Members shall follow procedures designated by the Corporate Secretary for disclosure of conflicts of interest. Additionally, if you become aware of a potential conflict of interest, you must disclose it by contacting any of these resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](https://pathward.ethicspoint.com)

## SELF-DEALING

Employees may not cause Pathward to purchase services, purchase products or extend a customer relationship to/from family members or businesses in which they or a member of their family has a material interest, without disclosure of the relationship and approval from the Code Officer. A material interest means a potential or actual ownership or investment interest in, or a compensation arrangement with, any organization with whom Pathward has, or is negotiating, a business relationship. Also, employees may not provide or commercially market products or services to others that compete with Pathward's product offerings. Activities are "commercial" if an employee receives direct or indirect payment of any kind for such services. Employees must disclose any such situations, as they arise, to the Code Officer.

# CONFLICTS OF INTEREST CONT.

## INSIDER TRADING AND FINANCIAL INTERESTS IN THIRD PARTIES

Pathward is committed to following all federal and state laws pertaining to the trading of securities. As such, employees and Board Members must not participate in transactions involving the stock of Pathward while possessing material, nonpublic information regarding Pathward or its activities since this would be a violation of insider trading laws. If you are unsure whether information is material or has been released to the public contact the Legal Department before trading. In addition, as set forth in the Insider Trading Policy, no employees and Board Members who, in the course of their work or association with Pathward, learns of material, nonpublic information of any other company may trade in such company's securities or the securities of another publicly traded company the price of which may be affected by such information until that information becomes public or is no longer material. Additionally, employees must disclose to the Code Officer any material amount of stock or other financial interest held personally or by an immediate family member (as defined in the Employee Handbook) in any present or prospective competitor, customer, vendor, partner or licensee with whom an employee interacts during their employment. (See the Code section on "Self-Dealing" on the previous page for the definition of material interest.) Board Members shall follow the disclosure procedures outlined by the Corporate Secretary.

## Q&A

### QUESTION:

I'm responsible to select a supplier for marketing materials and my brother-in-law owns a promotional company that would give us a very competitive price. Can I select this supplier since it would result in lower expenses for the company?

### ANSWER:

Not necessarily. Selecting your brother-in-law may present a perceived conflict of interest and we should consider other qualified suppliers as well. Contact the Code Officer or the Pathward anonymous hotline for further guidance.



# CONFLICTS OF INTEREST CONT.

## FIDUCIARY OBLIGATIONS

From time to time, employees may be asked to take on fiduciary duties such as administering property or affairs on behalf of another person or entity. Any fiduciary actions must be undertaken as an individual and must be separate from your employment with Pathward.

## OUTSIDE EMPLOYMENT AND PERFORMANCE OF SERVICES

Pathward expects employees to be fully devoted to advancing the Company's best interests. An employee may hold a job with another company if (1) there is no conflict of interest, (2) employment with another company is not during the employee's work hours for Pathward and does not use Pathward's information or resources, and (3) the employee satisfactorily performs his or her job responsibilities for Pathward.

Accepting employment from, and/or performing services for or providing goods to, a Pathward customer, vendor, or competitor while employed by Pathward is a conflict of interest and is not allowed. Employees may not receive compensation from a customer, vendor or competitor. Business Development Officers are specifically prohibited from receiving compensation for loan and financing activities outside of their commission agreement.

## DIRECTORSHIPS

Any employee who serves or is invited to serve on a corporate board of directors (whether for profit or not-for-profit) must disclose this to the Code Officer and update the disclosure annually using the Conflicts of Interest Disclosure tool. Members of Pathward's executive leadership must obtain approval from the Code Officer prior to joining a corporate board by contacting [codeofficer@pathward.com](mailto:codeofficer@pathward.com). Board Members who are invited to serve on a new corporate board or a new board committee shall notify the Code Officer at [codeofficer@pathward.com](mailto:codeofficer@pathward.com) prior to accepting any new board position.

All disclosures, requests for pre-approval, and notifications to the Code Officer, as applicable, must include a representation that 1) the corporation you seek to serve does not and has no current intention to compete with the business or interests of Pathward and that in the event you identify any decision or development with respect to the corporation that would cause the corporation to compete with or that could otherwise impact Pathward, you will disclose such decision to Pathward and recuse yourself from decisions by the corporation and its board of directors with respect thereto; and 2) that service on the other corporation's board of directors will not require you to provide services or undertake duties that would interfere in any respect with or distract from the performance of your duties for Pathward. These safeguards are in place to ensure no reasonable person could allege conflict with respect to a directorship.

# GIFTS, GRATUITIES & ENTERTAINMENT

At Pathward, we avoid giving or receiving gifts, gratuities or entertainment of more than a nominal value (over \$500.00 is a good rule of thumb) in the course of doing business with our customers and partners. We strive to build strong relationships based on a foundation of integrity in our business dealings.

Employees and contractors may give and receive cash and cash equivalents (e.g. gift cards) of minimal value (again, \$500 is a good rule of thumb) to other Pathward employees as long as they are distributed through accounting for appropriate tax treatment. Other gifts such as small promotional tokens and items such as meals that occur in the normal course of business, may be given if they would be approved under Pathward's expense policy. Cash and cash equivalent gifts for third parties do not need to be distributed through accounting for tax purposes, but they must be approved under Pathward's expense policy.

Employees may also attend events with customers and partners and potential customers and partners sponsored by them that are in line with our Company expense policy. These gifts must not influence your judgment or cause an appearance of improper influence on business decisions. Employees and contractors may not give any gifts with the intention of securing favorable business terms for Pathward. When determining what is appropriate to offer or accept, you must use reasonable judgment. If common sense tells you that something may appear to be a conflict of interest, turn down that opportunity.

For guidance in your decision-making, please contact any of these resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](http://Pathward.ethicspoint.com).

There may be occasions where an appropriate gift may exceed the \$500.00 rule of thumb. In these circumstances, employees and/or contractors should contact the Code Officer for review of the offer. The Code Officer will make the final determination if the gift should be accepted.

## Q&A

### QUESTION:

A customer offered me tickets to the Super Bowl, do I need to report this activity?

### ANSWER:

Yes, the value of these tickets would exceed that of a nominal gift or normal business expense and warrants further review by the Code Officer prior to the acceptance of this gift.



*Additional Resources  
(available in Document Control):*

Travel & Entertainment Program Standard  
Talent Anywhere Guidelines

# COMMITMENT TO ETHICAL BEHAVIOR

As a publicly traded company, Pathward sets high expectations for its employees. Any illegal or unethical behavior undermines the very foundation of who we are as a Company and will not be tolerated. The Pathward Employee Handbook and various company policies supplement this Code and provide additional guidance regarding workplace expectations and ethical standards.

## ANTITRUST

Pathward believes in promoting fair competition and is committed to abiding by all antitrust laws, which help preserve a competitive economy. Failure to adhere to these laws can result in multiple civil and criminal penalties. Poor decisions by one employee or Board Member can have a serious long-term impact on Pathward.

Pathward expects all employees and Board Members to avoid any behavior which would appear to limit competition. Agreements with competitors that limit competition are unacceptable. Employees and Board Members attending trade association meetings, or any other functions frequented by competitors, should avoid any actions which, in hindsight, would violate the letter or spirit of this Code.

## DISPARAGING COMPETITORS

Pathward competes with other financial institutions by offering superior service and personal attention. We don't engage in negative or unethical business practices of any kind. Employees must preserve Pathward's reputation for integrity by refraining from making any type of disparaging comments regarding our competitors.

## GAMBLING

Pathward does not permit employees to participate in any gambling activity while using Pathward systems, while on company property, or while conducting your duties on behalf of Pathward. This provision doesn't apply to a state-authorized lottery or "chances" sponsored by a bona fide charity or non-profit organization (e.g., churches, schools, hospitals, clinics, shelters, etc.) if state law permits such activity.

Pathward is prohibited by law from dealing in lottery tickets or any substitute for a lottery or using its offices for lottery purposes. Pathward also cannot announce, advertise or publicize the existence of any lottery or the identity of any participant or winner in a lottery. These limitations do not apply to accepting funds from or performing any lawful services for, any state operating a lottery.

## Q&A

### QUESTION:

My colleagues and I would like to conduct fantasy football picks at work during our lunch hour. Is this ok?

### ANSWER:

Yes, if employees would like to participate on their own time, such as on their lunch hour or after work, this is fine. However, this type of activity should not be conducted or advertised using Pathward systems (i.e. email or department SharePoint sites).

# COMMITMENT TO ETHICAL BEHAVIOR CONT.

## TYING

“Tying” agreements represent a specific issue closely related to antitrust concerns. These types of agreements typically take one of two forms - offering credit, property or services on the condition that the customer obtains additional credit, property or services from Pathward or conditioning services on an agreement that the customer will not obtain credit, property or services from another company. In line with Pathward’s commitment to fair competition, employees are not allowed to enter into any type of “tying” agreements.

## BRIBERY

Bribery of government officials is illegal and is in direct conflict with Pathward’s purpose and values. We proudly conduct our business based solely on the merits of the products and the services that we offer. Every employee coming into contact with government officials is expected to maintain the highest professional standards and is prohibited from offering or providing a government official anything of value in an effort to seek a favorable result for Pathward. Any attempt at bribing a Pathward employee, no matter how small an amount, must be refused and immediately reported to any of the following resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward’s anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](http://Pathward.ethicspoint.com)

## MONEY LAUNDERING

Money laundering is criminal activity that involves moving money obtained illegally through a series of transactions intended to disguise the origin of the money and eventually placing it back into normal circulation. Pathward is committed to preventing our institution from being used for illegitimate purposes, such as money laundering. We conduct extensive training with employees on how to recognize red flags that may indicate that a customer is engaged in money laundering. Suspicious activity must be reported immediately to the BSA Officer at: [bsacompliance@pathward.com](mailto:bsacompliance@pathward.com).

## Q&A

### QUESTION:

A contractor we are using in an emerging market has asked me for a cash payment that is over and above the normal fee for a license he is trying to obtain. He is the local expert, so I assume he knows what is needed. Is this okay?

### ANSWER:

No, it is quite likely in these circumstances that the contractor is attempting to use a bribe in order to gain the license, especially since he has requested that the payment be in cash. Pathward is responsible for the actions of third parties working on our behalf, so this request must be reported.



# SANCTION COMPLIANCE & ACCURATE ACCOUNTS AND RECORDS

## TRADE COMPLIANCE

Sometimes, transactions, accounts or relationships with individuals, corporate entities and/or governments are restricted or prohibited due to U.S. or international sanctions including due to terrorism, narcotics trafficking or other illegal activities.

It's critical that you check with our Legal team prior to working with any international trade activities to ensure we are in compliance with any applicable laws or regulations. You must also make the Legal team aware of any requests that you may receive concerning boycotts against any persons, companies or countries.

## ACCURATE ACCOUNTS AND RECORDS

Accuracy of accounts and records is of the utmost importance in earning and maintaining the confidence of customers, partners, investors, and regulators. Every employee is responsible for ensuring that the documents they produce are complete, timely, understandable and accurate to the best of their knowledge. Altering, forging, or backdating company documents is never acceptable.

Employees are also expected to carefully adhere to record and data retention requirements in the Data and Record Retention Program Standard. You must never destroy documents that may be relevant to pending or threatened litigation or a regulatory proceeding without prior authorization from the Legal Department.

It's imperative that the disclosures we provide to regulatory bodies and investors never misrepresent or omit any material facts. If you are required to provide information for these disclosures, you should always work to ensure the completeness and accuracy of the material.

Accounts and records include, but are not limited to, financial data, business plans, expense reports, timekeeping reports, results under sales incentive plans, and claims under employee benefit plans.



*Additional Resources (available in Document Control):*

Data and Record Retention Program Standard

Data Governance Policy

# DISCLOSURES & REPORTING

## WHISTLEBLOWER PROTECTION POLICY

Pathward takes all reports of misconduct and illegal or unethical activities very seriously and is committed to taking appropriate action upon receiving a report of these behaviors. As such, employees are encouraged to raise serious ethical or legal concerns internally so Pathward can address and correct inappropriate conduct and actions. Nothing in the Code is intended to or will be used in any way to limit an employee's right to voluntarily communicate with, file a claim or report with, or otherwise participate in an investigation with, any federal, state or local government agency, as provided for, protected under or warranted by applicable law. An employee does not need prior approval of anyone at the Company before making such communication, report, claim, disclosure or participation and is not required to notify anyone at the Company that such communication, report, claim or participation has been made. Any employee or other person who wrongfully misappropriates a trade secret may be liable for damages, exemplary damages and attorneys' fees.

Federal law provides certain protections to individuals who disclose a trade secret to their attorney, a court or a government official in certain confidential circumstances. Specifically, an individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in (1) confidence to a federal, state or local government official, either directly or indirectly, or to an attorney, in each case solely for the purpose reporting or investigating a suspected violation of law or (2) a complaint or other document filed under seal in a lawsuit or other proceeding. If an individual files a lawsuit for retaliation by Pathward for reporting a suspected violation of law, the individual may disclose the trade secret to his or her attorney and use the trade secret information in the court proceeding, but only if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

## REPORTING PROCEDURE

Employees who discover or suspect any illegal or unethical activities by Pathward or another employee are encouraged to call Pathward's anonymous hotline at 866-297-5018 or access [Pathward.ethicspoint.com](https://Pathward.ethicspoint.com). All calls can be anonymous, and confidentiality will be maintained to the extent possible. A third party vendor maintains the system used for hotline inquiries. In accordance with Pathward's investigative process, all reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Alternatively, employees may report any suspected illegal or unethical activities to the following resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](https://Pathward.ethicspoint.com)

# DISCLOSURES & REPORTING CONT.

## INVESTIGATIONS

Pathward will conduct prompt and thorough investigations of any reported violations of this Code. Investigations will be done discreetly, and confidentiality will be maintained to the extent possible. Employees have an obligation to cooperate with any ongoing investigation and provide truthful and complete information.

## TAKING ACTION

Upon completion of an investigation of a Code violation, further action may need to be taken. These actions may include remedial activities such as further training on the requirements of the Code. In the event of more serious violations of the Code, employment actions such as written notices, suspension and termination of employment may occur. Finally, if any violation of the Code is also a potential violation of a federal, state or local law, Pathward always cooperates with federal and state authorities.

## NO RETALIATION

Pathward does not retaliate against any employee who in good faith participates in an investigation of a complaint or reports an ethics violation, a suspected violation of law (such as a complaint of discrimination or suspected fraud), or a suspected violation of any regulation governing the operations of Pathward. Thus, no one may retaliate against any employee who participates in an investigation or complaint or reports any activity under this Code.

## GOOD FAITH

Employees filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Good faith doesn't mean that you have to be right. It means that you are providing truthful and accurate information to the best of your knowledge regarding the issue that you are reporting. However, any employee making allegations that prove to have been made maliciously or are knowingly false are subject to discipline.

## CONFIDENTIALITY

Employees may submit violations or alleged violations on an anonymous and confidential basis. Confidentiality will be maintained to the extent possible.

## DISCLOSURES AND COMPLIANCE CERTIFICATION

Disclosures as required in the Code must be made by employees using the Conflicts of Interest disclosure tool, at least on an annual basis. When submitting or updating a disclosure, employees acknowledge that they have made any required disclosures and that such disclosures are accurate.

# CODE ADMINISTRATION

## LAST UPDATED

This version of the Code of Business Conduct is effective as of August 21, 2024.

## TRAINING

Employees receive annual training on our Code and are required to acknowledge their receipt of this training through our Learning Management System. After training on the Code, employees will be asked to confirm that any actual or potential violations of the Code have been or will be reported using one of the channels specified in the Code (See page 8). Contact the Code Officer or Employee Relations to discuss any concerns whether an actual or potential violation is reportable.

## APPLICATION

This Code applies equally to all employees and contractors of Pathward Financial, Inc and all affiliated entities, as well as Board Members of Pathward and Pathward Financial, Inc.

## AT-WILL EMPLOYMENT

This Code does not alter the employment-at-will relationship between any employee and Pathward and does not create any rights in any employee. This Code is not a contract and does not guarantee employment for any length of time. The Code is not intended to reduce or limit the other obligations that employees may have to Pathward. Instead, the Code should be viewed as the minimum standards that Pathward expects from employees in the conduct of Company business.

## WAIVERS

Only our Board of Directors, by majority decisioning, may waive a provision of this Code for any employee, contractor or Board Member of the Company. Waivers will be disclosed in accordance with the law. If you need assistance in determining whether a waiver is required for your situation, contact any of these resources:

- Your immediate manager
- Senior management
- Employee Relations team at: [employeerelations@pathward.com](mailto:employeerelations@pathward.com)
- Code Officer at: [codeofficer@pathward.com](mailto:codeofficer@pathward.com)
- Pathward's anonymous hotline 866-297-5018 or [Pathward.ethicspoint.com](https://pathward.ethicspoint.com)