



UNDERSTANDING EXETER'S CODE OF CONDUCT: RAISING ETHICAL CONCERNS

Our Code of Conduct emphasizes that protecting Exeter's reputation is the responsibility of every employee in the company. In section 2, here's what the Code tells us:

RAISING ETHICAL CONCERNS

If you see or suspect that something is illegal or unethical, you have not only the right, but also the obligation, to speak up and share your concerns. We encourage employees to ask questions and have open conversations with their managers on business and conduct concerns. We rely on our employees to speak up when something is unclear.

It is your responsibility to report any concerns regarding financial, reputational, operational, and/or systemic risk issues. While not exhaustive, the following notable concerns should be escalated immediately:

- If there appears to be a conflict (difference) between this Code, Company policies, and the laws of the jurisdictions in which you conduct business
- If you suspect inappropriate handling of Exeter's financial records, accounting practices, or auditing matters
- Conduct that is viewed as unethical, unlawful, or dishonest
- Conduct that has the potential to harm a co-worker, customer, business partner, or supplier
- Conduct that could damage our Company's brand as a trustworthy financial institution

To report a violation, contact the policy owner, your manager, your Human Resources representative, or the [Whistleblower & Ethics Portal](#) or Hotline (1-877-XXX-XXXX).

For more info about doing business the right way, please read [Exeter's Code of Conduct](#).

