	Code of Ethics and Business Conduct Policy	
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Bonvenu Bank

CODE OF ETHICS AND BUSINESS CONDUCT

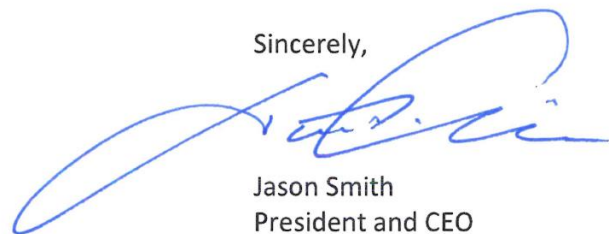
At Bonvenu Bank, N.A., strong ethics are the cornerstone of our business and our culture. While teamwork, customer service and technology play an important role in the Company's growth and future, maintaining an ethical workplace is paramount to our long term success.

Each of us shares the responsibility to depict our principles of uncompromising integrity, respect, responsibility, and community involvement.

Please carefully read Bonvenu Bank's Code of Ethics and Business Conduct. Discuss it with your manager and peers. Ask questions and accept nothing but exceptional ethical conduct from yourself and others. If, at any time, you suspect our Code of Ethics is being violated or if you are unsure about what to do in a particular situation, you have an obligation as an employee of Bonvenu Bank to report it. Reach out to your manager or the Human Resources Department.

Thank you for making Bonvenu Bank *our kind of bank*.

Sincerely,



Jason Smith
President and CEO

CUSTOMER PRIVACY

Bonvenu Bank, N.A.'s (Bonvenu Bank, also referred to as the Bank) continued success depends on its ability to keep customer information such as account numbers, social security numbers, and other private data safe from fraud, theft and improper disclosure.

CONFIDENTIALITY OF BANK INFORMATION

The *Gramm-Leach-Bliley Act of 1999* requires banks to have sufficient administration, technical, and physical controls to safeguard sensitive customer information. Specific controls are established in other bank policies with regard to protecting customer/bank information. Directors, officers and employees are held accountable to maintain these standards and may not use or disclose sensitive information collected by the bank for any reason other than the legitimate, intended use for the information. This includes both nonpublic personal information and the Bank's financial and proprietary information. Directors, officers and employees are to comply with all internal controls to protect, maintain and dispose of confidential information and shield customer information from the possibility of identity theft.

The use of banking information in which you have access as an employee shall be restricted to what is absolutely necessary for the legitimate and proper business purposes of the Bank. Sharing information about our customers with anyone inside or outside our company who does not have a business need for the information is prohibited. An innocent remark to family, friends and acquaintances can easily be misinterpreted and cause questions of bank integrity. Inappropriate discussions or release of information may result in disciplinary action up to and including termination.

ACCOUNTING AND FINANCIAL INFORMATION

The Bank will maintain the highest standards possible when preparing and disclosing financial information to the public and regulators. The Bank will not issue false or misleading information to its customers, stockholders, regulators, or the general public. The required periodic reports will be issued in accordance with the applicable laws and regulations reflecting fairly and accurately and in reasonable detail, the Bank's financial position.

Directors, officers and employees are to comply with all internal control procedures of the Bank. These are designed to safeguard both customer and bank assets. Additionally, they are designed to ensure accurate and accountable reporting of all required financial disclosures.

The Chief Executive Officer or any other member of the Executive Management Team cannot have been employed by the Bank's external financial audit firm during the one-year period preceding the audit.

CORPORATE AFFAIRS

Directors, officers and employees, and other insiders must not discuss confidential matters or divulge confidential information related to the affairs of the Bank either inside or outside its office except to the extent necessary for properly conducting its business.

Financial information regarding Bonvenu Bank is always confidential and must not be given to any person unless it has been published in reports to shareholders or made available to the public through authorized news release.

Requests concerning present or previous employees should be referred to the Human Resources Department.

INFORMATION SECURITIES COMPLIANCE POLICIES AND TRAINING

You are responsible for reviewing and adhering to Bonvenu Bank's policies and requirements concerning security as well as requirements applicable to your job function responsibilities. You are also expected to complete all compliance training on a regular scheduled basis and as assigned.

DEMONSTRATE WORKPLACE RESPECT

You are expected to treat fellow employees with professionalism, respect, consideration, and understanding in order to foster a favorable climate of high-level performance that encourages open communication at all levels. You are expected to conduct day to day business with the highest integrity and to devote your direction to work toward a successful job performance.

Treat customers, potential customers, and vendors with equal respect and professionalism. You are to conduct business ethically and in compliance with all laws and regulations. Conduct yourself in all ways that reflect favorably on the Bank. Subordination on any level will not be tolerated.

DIVERSITY

The Bank requires a work environment that values each individual's unique talents and background, respects differences and recognizes and respects the opinions and ideas of every employee.

We are committed to Equal Employment Opportunity and Affirmative Action. It is vital that as a company, we embrace a widely diverse population among our employees, customers and vendors. The Bank can much better serve a diverse marketplace by having a diverse workforce.

Note: Bonvenu Bank prohibits discrimination and harassment against any employee or applicant, and ensures that all personnel practices are administered on individual merit without regard to race, religion, color, age, sex, national origin or ancestry, sexual orientation, including gender expression or identity, genetic information, disability, veteran status, or other factors identified

and protected by law. These practices include but are not limited to, recruitment, advertising, selection, performance management, compensation, training, placement, transfer, demotion, promotion, disciplinary action and termination.

If you have concerns about Equal Employment Opportunity or Affirmative Action issues, contact the manager of Human Resources.

If you are a veteran, disabled veteran, or an individual with a disability and wish to be considered under the Bank's Affirmative Action Program, contact Human Resources.

OFFENSIVE BEHAVIOR AND HARASSMENT

It is the Bank's policy and the employee's responsibility to maintain a working environment free of discrimination, harassment, intimidation and unwelcome offensive conduct, including sexual overtures, offensive jokes, graphic material, etc. The Bank does not allow verbal or physical conduct of a demeaning or sexual nature that creates intimidating, hostile or offensive working atmosphere that in any way affects the employees or the Bank. This includes conduct deemed offensive or inappropriate.

Conduct prohibited by this policy includes, but is not limited to, verbal or physical, that shows hostility or prejudice toward an individual because of the individual's race, religion, age, color, sex, national origin or ancestry, sexual orientation including gender expression, genetic information disability, veteran status or other factors protected by laws.

Sexual harassment is specifically prohibited by this bank. Sexual harassment includes any unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature where:

- Submission to the conduct is or threatens to be a condition of employment.
- Submission to or rejection of for the basis of employment decisions.
- The conduct interferes or has the potential to interfere with an individual's work performance.
- The conduct has the purpose or effect of creating an intimidating, hostile or offensive work environment.

Each officer and employee of the Bank must complete annual Sexual Harassment Training.

PERSONAL FINANCIAL AFFAIRS

Financial Responsibility

Employment in a financial institution implies an image in keeping with a position of trust and confidence. Employees, officers and directors must consistently demonstrate an ability to properly manage personal finances. Financial activities should be avoided that pose excessive monetary or credit risk. The conduct of a responsible banker would include, but not be limited to, the prevention of personal delinquencies, overdrafts and the restricted use for corporate purposes only of the Bank's expense credit cards and expense account reimbursements.

ANNUAL FINANCIAL STATEMENTS

All borrowing executive officers and directors of Bonvenu Bank must maintain current personal financial statements at all times.

BORROWING AND LENDING PRACTICES

Directors, officers and employees should borrow only from commercial banks or other reputable institutions which regularly lend money. Directors, officers and employees are not permitted to borrow from bank customers and suppliers except those who engage in lending in the usual course of their business and then only on terms customarily offered to others under similar circumstances.

Employees, officers or directors of Bonvenu Bank may not lend personal funds to customers or suppliers of Bonvenu Bank.

INSIDER BORROWING AND REPORTING/LOANS TO EXECUTIVE OFFICERS, BOARD MEMBERS AND PRINCIPLE SHAREHOLDERS

For reference, refer to Regulation O.

SUBSTANCE ABUSE AND DRUG AND ALCOHOL WORKPLACE RULES

So that all employees may work in a safe and productive environment, the Bank prohibits its officers and employees for being under the influence of and/or the use of alcohol, narcotics, depressants, stimulants, hallucinogens, marijuana, intoxicants (any substance whether legal or illegal that produces a condition of diminished mental or physical capabilities, including medical marijuana) or any other controlled substances during working hours as well as during other work-related events.

The only exception to this is the moderate use of alcoholic beverages at company-sponsored or sanctioned events, where authorized by senior management, for example employee meetings and officer meetings.

Drug and alcohol abuse are serious problems that must be treated successfully. If you or a family member has such issues, you can confidentially contact the Bank's Employee Assistance Program.

If you are unable to work due to alcohol or drug use or come to work under the influence of alcohol, illegal drugs or other intoxicants or you use illegal drugs at or outside of the workplace, you may be sent home and subject to disciplinary action. You may also be referred to the Employee Assistance Program (EAP) for an evaluation. A referral to the EAP does not preclude disciplinary action.

DRUG AND ALCOHOL TESTING

May be conducted for the following reasons:

- For external job applicants
- When an employee has caused or is involved in a work-related accident.
- When there is reasonable suspicion that the employee has violated this policy.
- When the employee has been referred by the Bank for a chemical dependency treatment.

Bonvenu Bank will abide by all laws governing testing. Tests will be kept confidential.

You may refuse to submit to drug and/or alcohol testing, however refusal may result in disciplinary action including termination. Individuals may receive copies of their test results upon request.

HANDLING GIFTS AND ENTERTAINMENT

Bonvenu Bank prohibits employees, officers, and directors from seeking or accepting anything of value in connection with any transaction or business. Directors, officers, employees and members of their families may not solicit or allow themselves to be solicited or accept gifts, entertainment, or other gratuities intended to or appearing to influence decisions or favors toward the Bank.

RECEIVING GIFTS

Generally, the following may be acceptable. However please consult your manager prior to accepting the following:

- A gift awarded as part of a random drawing where it is clear that no inference can be drawn that acceptance of the gift could influence you in the performance of your duties of Bonvenu Bank.

Following are the guidelines for national banks concerning the acceptance of gifts:

Acceptance of Items of Value

It may be appropriate for a bank insider to accept something of value from someone doing or seeking to do business with the bank. Bank policy may authorize an insider to accept an item if it:

- Is offered based on a family or personal relationship, independent of any bank business;
- Is available to the general public on the same conditions; or
- Would be paid for by the bank as a reasonable business expense if not paid for by another party.

Common examples of these types of items include a business luncheon or holiday season gift. The bank's written policies may also permit acceptance of:

- Meals, gratuities, amenities, or favors based on obvious family or personal relationships. The circumstances should make it clear that the relationship, rather than the business of the bank, is the motivating factor.
- Meals, refreshments, travel arrangements, accommodations, or entertainment of reasonable value in the course of a meeting or other occasion. In this case, the occasion must be for a bona fide business discussion or part of an effort to foster better business relations, and the expense should be one the bank would pay as a reasonable business expense if not being paid by another party.
- Gifts of reasonable value related to commonly recognized events or occasions such as a promotion, new job, wedding, retirement, Christmas, or bar or bat mitzvah.
- Other benefits or items of value, when approved in writing, case by case. Approvals should be based on a full, written disclosure of all relevant facts and should be consistent with the bank bribery statute (18 USC 215).

While the OCC has not set a dollar limit on the value of items that may be accepted by insiders, prudently our bank policy is that gifts/benefits are not to exceed \$100 in value.

Additionally, any insider who is offered, or who receives, something of greater value than is authorized, is to disclose that fact to an EMT (Executive Management Team) member. The Bank should maintain written reports of such disclosures

Please note that gifts in the form of cash or check are strictly prohibited.

GIVING GIFTS

If you wish to give reasonable gifts to customers or potential customers, you must first consult your manager or the Executive Management Team (EMT). Gifts of cash are strictly prohibited.

WILLS

Bequests, devices or benefits under wills or trusts

Inheritance under wills or trusts from customers who are not family members could appear to be the result of a personal dealing by an employee, officer, board member or other insider. Before such inheritance is accepted, approval is required by EMT.

FIDUCIARY APPOINTMENTS

A fiduciary appointment is an appointment as an administrator, executive, guardian, trustee, or managing agent. An appointment to act as a fiduciary or co-fiduciary must be approved by the EMT before being accepted.

If you are approved as a co-fiduciary with Bonvenu Bank, compensation cannot be accepted.

CONFLICTS OF INTEREST

Officers and employees must avoid any personal activity or investment that may exploit their position at the Bank and should avoid all appearances of a conflict of interest. You may not engage in any employment which competes with any business of Bonvenu Bank, conflicts with the fiduciary obligations of any other department or creates a conflict of interest with your position or department.

All actual, perceived and potential conflicts of interest must be reported immediately to your manager. In the case involving a senior officer, report the matter to the EMT or Human Resources.

OUTSIDE EMPLOYMENT

Where an officer or employee is engaged in any business or accepts any other employment for salary, wages or commission, either during or after working hours, there is a potential conflict of interest. Your responsibility to Bonvenu Bank must be placed first, and any activity which interferes with your duties at the Bank or your loyalty to it must be avoided. To avoid such conflicts, any outside work function that may interfere with your duties at the Bank should be approved by management before it is accepted. Officers should report all outside work to the EMT for approval. Any current employment of this nature should be disclosed. Service as a member of a Board of Directors for any profit enterprise must be approved by the EMT.

In the same spirit, a Bonvenu Bank employee or officer is not permitted to process or approve Bonvenu bank business in which she or he is a partner or employee, any business in which he or she is the sole owner, or any closely-held business in which the employee or officer has an interest.

LENDING PRACTICES

Loan officers may not participate in the decision to extend credit to a customer if the officer has a direct or indirect interest in the customer's business. Propriety demands that any transaction with such person or firm be handled by a disinterested associate. Therefore no employee, officer, board member or insider may, on behalf of the Bank, grant direct or indirect credit accommodations or make recommendations with respect to family members, any individuals or organizations.

SIGNING ON CUSTOMER ACCOUNT

Employees, officers, and directors are not to act as an agent or in any signing capacity on any Bonvenu Bank account of a customer, who is not a family member, without the approval of the EMT. This includes acting in the capacity of deputy or co-tenant for a renter of a safe deposit box.

SALE OR PURCHASE OF CORPORATE PROPERTY

Employees, officers, and directors whether acting individually or in a fiduciary capacity, are not permitted to sell their own personal assets to or purchase assets for personal use from Bonvenu Bank without the prior written consent of the EMT, unless such assets are being offered by the Bank at public sale or auction or the purchase or sale has court approval. A complete record of the transaction must be filed with the EMT.

INSIDER TRADING

Bank activities can result in obtaining material and non-public information, also known as "inside" information, about other companies or about Bonvenu Bancorp.

Anyone who possesses material non-public information concerning a company or specific securities is prohibited by law from affecting any transactions in that company's securities. This applies to Bank securities as well as the securities of other companies.

Employees, directors, and officers may not buy or sell securities of companies with which they have significant dealings on behalf of the Bank or for which they have responsibility on behalf of the Holding Company. If you believe you may have come into possession of material inside information about the Bank or the Holding Company, you are strongly encouraged to consult with an EMT member. The definition of "material, non-public" information is broad, and generally means information that a reasonable investor would consider important in making a decision to trade in the securities. It is also illegal to tip or pass on inside information to any other person whom you know or reasonably suspect might use the information to trade in securities or pass the information on further to someone who may do so.

USE OF COMPANY RESOURCES

In order to perform your job duties, you may be assigned workspace, equipment or other company resources or property. For purposes of this policy “Company resources” includes but is not limited to: Bank-owned email systems, text messaging and instant messaging devices, telephones and cell phones, iPhones, tablet devices, pagers, voicemail systems, computers, copy and fax machines, supplies, mail service, or email. Your business use of such devices must comply with the policies contained in this Code.

Company resources are intended primarily for Bank business. Personal use of these or other bank resources can disrupt the vital flow of information or tie up resources on which the Bank and its customers depend. Occasional, inconsequential personal use of banking systems may be allowed as long as it is not unreasonable and does not interfere with business use, consume system resources or violate bank policy. Personal telephone calls should be limited. Email systems should not be used regularly for personal correspondence.

You may not use Bank resources to conduct outside business activities, to engage in unethical or illegal activities such as gambling, to gain access to, transmit or store material that is offensive or that in any way violates Bank policies for maintaining a respectful, harassment-free work environment. Even in the cases where access to a particular Internet site is not blocked by the Bank’s Web-filtering tools, you may not visit sites that otherwise violate Company policies.

Excessive use of personal cell phones and text messaging devices for personal reasons during work time can reduce employee productivity and be distracting to others. You are expected to refrain from excessive use of personal devices during work time.

BUSINESS COMMUNICATIONS AND RECORDS

Conduct all verbal and written business communications professionally and in compliance with Bonvenu Bank’s ethical standards. What you say, write and do should reflect a clear understanding of the Bank’s ethical values and expectations and should demonstrate sound personal judgment. Be clear, truthful, accurate, and respectful. Always avoid exaggeration, colorful language, guesswork, legal speculation, and derogatory remarks or characterizations of people, companies or their products and services. What you say, write or do should preserve or enhance Bonvenu Bank’s integrity and reputation.

EMAIL USE

Email is an important form of internal and external communication. Emails are written records that may be required to be disclosed in legal proceedings or otherwise make public. The Bank’s ethical standards apply to every email you create, no matter how informal its intent. Never create or send an email using Bank resources or personal devices used for business purposes if it does not first meet the scrutiny of the Company’s ethical standards. These standards apply to all other forms of communication as well, including voicemail and memos.

All emails should be created with the understanding that they may be formal records and should be written in a professional tone. The transmission of all messages must comply with all policies and be protected from unauthorized disclosure or access.

The standards for safeguarding information and information security also apply to email communications. Because email messages sent outside the Bank via public networks, such as the Internet, may be intercepted or misdirected, great care should be taken not to include information that may be used to harm the Bank, its customers, its employees or any of its other stakeholders.

DISCRETION IN PUBLIC AND POLITICAL ACTIVITIES

Media Relations

We are committed to building and maintaining effective and ongoing communications with our key stakeholders through the media. Effective media relations also ensure the Bank's public statements express a clear and factual representation of the Bank. That said all media inquiries should be forwarded to the Director of Marketing and Advertising or an EMT member.

Under no circumstances should any employee other than the Director of Marketing and Advertising or a member of the EMT ever communicate with any branches of the media, such as newspaper, radio, television, etc.

PUBLIC SERVICE

Employees, Officers and Directors of Bonvenu Bank are encouraged to participate in civic and public service activities. Appointed or elected officials are governed by the Louisiana Code of Governmental Ethics. Should an employee desire to run for civic office or accept an appointment to a government board or office, he must first submit the request in writing to the EMT for approval.

POLITICAL CONTRIBUTIONS

The Bank is prohibited by law from making contributions or expenditures in any election campaign for federal office and is limited by law in its involvement with respect to candidates for state and local offices. Furthermore, it is the Bank's policy to prohibit the use of its facilities, equipment, and personnel in connection with any federal, state or local election.

No one at Bonvenu Bank may make a political contribution to obtain or retain business or to obtain any other improper advantage.

Neither employees, officers nor directors may use or threaten force or reprisal against an employee to contribute to, support, or oppose any political group or candidate. The Bank is

aprotected and prohibits the practice of introducing candidates to employees. Additionally, the Bank will not display political tracts, brochures or signs in its lobbies, break rooms, restrooms or back-office areas.

If you are involved in business relationships with government entities, you may be subject to gift laws. Any gift to a public official is subject to legal restrictions or prohibitions in some areas.

FOREIGN CORRUPT PRACTICES ACT

This statute covers payment of anything of value to any foreign official, foreign political party or candidate, or any other person where an American corporation knows or has reason to know something of value was offered.

This act consists of two separate groups of rules:

- Those that prohibit the offering or payment of bribes to certain foreign officials.
- Those requiring the maintenance of complete accounting books and records and an effective system of accounting controls.

ANTI-BRIBERY PROVISIONS

These provisions of the act prohibit any U.S. company or business entity and its officers, directors, employees and shareholders acting on its behalf, from using the mail, telephone, transportation, or any other instrument of interstate or foreign commerce corruptly in furtherance of an offer, payment, promise to pay, authorization of the payment of any money or other thing of value to:

- An official of foreign government or instrumentality of a foreign government
- A foreign political party or official thereof or a candidate for political office
- Any other person the payer knows of who will pay or give the money or value to those listed above where the purpose is to influence an act or decision of the recipient in his official capacity or to induce the recipient to use his or her influence to affect or influence an act or decision of the government.

COMPLIANCE WITH IMMIGRATION LAWS

Bonvenu Bank strictly complies with all immigration laws and employs only those who are lawfully authorized to work.

USE OF FORMER EMPLOYER INFORMATION

In connection with your duties as a Bonvenu Bank employee, do not use or disclose confidential information, copyrighted information or documents, or trade secrets belonging to a former employer. If you are in possession of documents or electronic media containing such information, you must return it to the former employer or shred the contents.

MISUSE OF ACCOUNTS AND PRODUCTS

If you misuse an employee checking or other financial account or any other Bank product or service, you may lose your account privileges and face consequences of an ethics violation. Examples of misuse of an employee account that may also constitute a violation of the Bank's ethical standards and warrant immediate termination of employment include kiting and making false ATM deposits or inflated ATM deposits, so to receive immediate cash. The Bank reserves the right to monitor all account activity, including but not limited to accounts held by officers and employees, subject to applicable law, for any reason, including when it appears that the use of the account may violate criminal or civil law (such as noncompliance with any BSA and anti-money laundering/terrorist financing laws, policies, procedures and processes), violate the Bank's policy, or have an adverse effect on Bonvenu Bank or its employees.

ACTING AS AN EXPERT

The expertise you develop in the course of your employment may provide opportunities to participate in outside activities as a paid or unpaid speaker or consultant. Discuss these opportunities with your manager or supervisor to ensure there is no conflict between organizational and personal interests. Use or distribution of materials or products developed as part of your responsibilities with the Bank should occur only with the authorization of your manager or supervisor.

REPORTING OF SUSPECTED VIOLATIONS

It is not enough to put a code of ethical conduct on display for all employees, officers and directors to see. A code that lacks effectiveness and enforceability is meaningless and will soon be forgotten.

EMT members and your manager will take the responsibility to see that this Code is fully and honestly followed. All inquiries and problems should be addressed to him or her. If you have reason to suspect that a violation has occurred, it is your responsibility to immediately report it to your manager, Human Resources or to an EMT member.

An appropriate investigation will be made and the matter reported as appropriate to the Chairman of the Board.

No director, officer or employee who in good faith reports a violation of the Code of Ethics shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.