

**Peoples Bank SB**  
**Complaint Reporting Policy**

Approved By The Board

May 15, 2020

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## **SUMMARY**

Any person may submit a good faith complaint, report or concern regarding the conduct of the employees, officers and/or directors of Peoples Bank and the NorthWest Indiana Bancorp, including illegal and/or unethical behavior, accounting or auditing matters of the Bank, violations of the bank's policies; unfair, deceptive or abusive acts or practices, to the management of the bank without fear of dismissal or retaliation of any kind. The Bank is committed to achieving compliance with all federal and state laws, applicable securities laws and regulations, accounting standards, accounting controls and audit practices.

In order to facilitate reporting, the Board of Directors has established the following policy. The Risk Management Group will develop procedures for (a) the receipt, retention and treatment of complaints, reports and concerns regarding the above delineated matters and (b) the confidential, anonymous submission of complaints, reports and concerns regarding the same.

## **RECEIPT OF CALLS**

Any person with concerns regarding such matters may report their concerns on a confidential and anonymous basis by calling the independent, toll-free hotline, 1-800-727-3217, established by the Bank for that purpose. These procedures and the telephone number of the hotline are posted on the Bank's website.

## **SCOPE OF MATTERS COVERED BY THIS POLICY**

These procedures relate to complaints, reports and concerns about:

- Questionable accounting or auditing matters, including:
  - fraud or error in the preparation, evaluation, review or audit of any financial statement of the Bank;
  - fraud or error in the recording and maintaining or financial records of the Bank;
  - deficiencies in or non-compliance with the Bank's internal accounting controls;
  - misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports (including discussions in quarterly and annual reports filed with the Securities and Exchange Commission) or audit reports of the Bank; and
  - deviation from full and fair reporting of the Bank's financial condition
- Reports of illegal, unethical, or otherwise improper behavior, including violations of:
  - applicable laws, rules and regulations;
  - the Bank's Code of Business Conduct and Ethics;
  - the Bank's Policy of Security Trades of NWIN Stock; and
  - any other code, policy or procedure established by the Bank
- Reports of unfair, deceptive or abusive acts or practices related to:
  - advertising and solicitations;
  - deposit and loan disclosures and products;
  - loan servicing and loan collection procedures;
  - third party service providers;

## **TREATMENT OF COMPLAINTS AND REPORTS**

The Bank has retained a third party provider to accept, verify and log all calls received on the ethics line. Upon receipt of a call, the third party provider will notify the Bank's General Counsel, CEO, Internal Auditor; and the Bank's Compliance Officer who will log the call and advise the appropriate representative of the Bank. Complaints and reports regarding accounting and auditing procedures shall be directed to the Risk Management Committee and reviewed under their direction. Complaints and reports regarding the conduct of Officers and Directors shall be directed to the Corporate Governance Committee, who will then oversee the investigation. Complaints and reports regarding other employees or all other matters shall be directed to the Bank's CEO and reviewed under direction of the CEO with oversight by the Bank's General Counsel confidentiality with respect to all complaints, reports and concerns will be maintained by the third party provider and by the Bank consistent with the need to conduct an adequate review.

Prompt corrective action will be taken when and as warranted in the judgment of the appropriate Board Committee or CEO, as applicable. Whenever possible, the complaining party will be notified of any corrective action taken.

Banking Center and Department Managers, Compliance and others as deemed appropriate will be required to add a Complaint Queue Filter to their Sales Management Daily Plan. Managers and others will be expected to review this Queue daily.

Complaints that are regulatory will be reviewed and processed by Compliance and will remain in the Complaint Queue. When the Complaint has been reviewed and processed, the user will change the status from Open to Closed.

If a Complaint is Service related, the Manager of the Banking Center and/or Department affiliated with the Complaint will reassign the Complaint to themselves. The Manager will review the Complaint and take action as needed. When the Complaint has been reviewed and processed, the user will change the status from Open to Closed.

Reports, if needed, can be developed that can list Open and Closed Complaints.

The Bank will not take any adverse action against anyone as a result of their good faith complaint, report or concern pursuant to these procedures and will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions taken by the employee with respect to good faith reporting of complaints, concerns or other matters regarding the bank or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

## **REPORTING AND RETENTION OF COMPLAINTS AND INVESTIGATIONS**

The Bank's Risk Management Group will maintain a log of all calls on the ethics line, tracking their receipt, investigation and resolution and will prepare a periodic summary report for the

CEO and the Board of Directors. Reports will be maintained for 12 months by the third party service provider and by the Bank for at least seven years to the fullest extent possible.

## **AMENDMENTS**

The Board of Directors of the Bank may amend this policy at any time, consistent with requirements of applicable laws, rules and regulations.