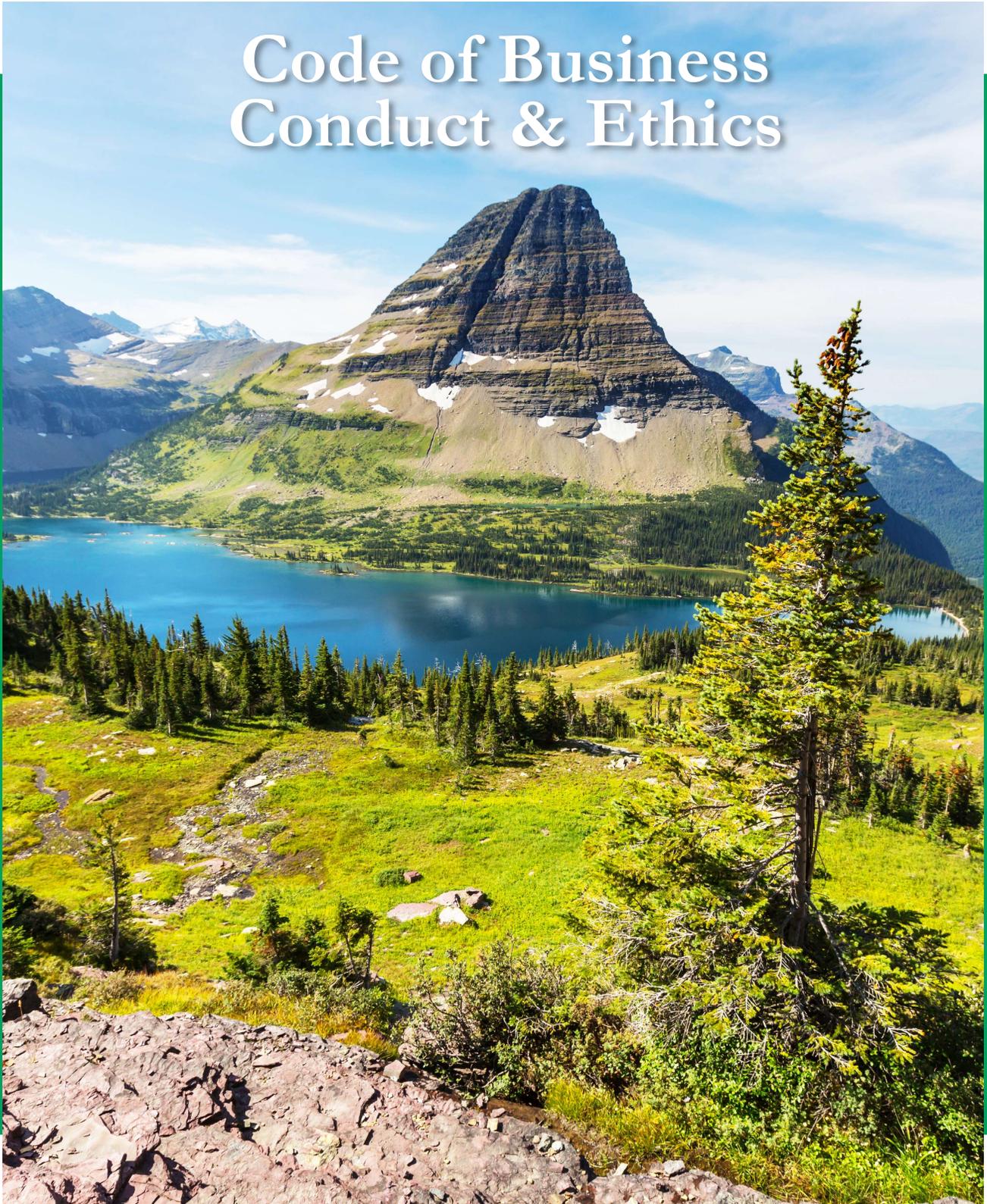




**GLACIER BANCORP, INC.**

Montana, Idaho, Utah, Washington, Wyoming, Colorado, Arizona & Nevada

# Code of Business Conduct & Ethics



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## Overview

Our standard for honesty and integrity must be recognized by our customers as a valuable reason for doing business with us. “Doing the right thing” is at the heart of our mission, vision, and values. This Code of Business Conduct and Ethics ("Code") serves as the guide by which we operate and conduct daily business.

Glacier Bancorp, Inc. (“GBCI”) employees consist of employees of the company as well as employees in the various Divisions: Glacier Bank, First Security Bank of Missoula, Valley Bank of Helena, First Security Bank, Western Security Bank, First Bank of Montana, Mountain West Bank, Citizens Community Bank, Bank of the San Juans, First Bank of Wyoming, First State Bank, North Cascades Bank, Collegiate Peaks Bank, Foothills Bank, First Community Bank Utah, Heritage Bank of Nevada, as well as any future affiliates of GBCI.

This Code pertains to all employees of GBCI. It is the responsibility of all employees to agree to this Code to always respond honestly and candidly while interacting with the organization’s auditors, regulators, legal counsel, management, and associates. Our vendors and other business partners serve as an extension of our organization and are expected to adhere to the spirit of any applicable provisions.

This Code is intended to be used in conjunction with the GBCI Employee Manual and applicable company policies as well as applicable state and federal laws. If you have any questions about this policy or its application in any specific circumstance, please speak with your direct Supervisor or Division Human Resources Representative.

Any violation of this Code will be handled as a disciplinary action up to and including termination.

## Raising Concerns & Reporting Suspected Violations

Employees are obligated to report suspected violations of this Code. Confidentiality will be maintained to the fullest extent possible without putting GBCI at risk. To raise concerns, employees may do one or more of the following:

- Speak with their direct Supervisor
- Speak with their Division Human Resources Representative
- Follow the steps of the Problem Resolution Procedure of the Open Door Policy
- Follow the steps of the Complaint Procedure of the Whistleblower Policy (for Accounting and Audit matters only)

GBCI will not tolerate retaliation of any kind against an employee who, in good faith, makes a complaint or participates in an investigation, even if no violation is ultimately found. Retaliation or attempted retaliation in violation of this policy is strictly prohibited

and will result in appropriate disciplinary action up to and including termination.

## Code Principles

### **Civility & Respect in the Workplace**

Our employees are one of our most valuable assets and we are committed to treating every employee with dignity and respect and protecting their human rights. We promote and support a courteous work environment free from any form of harassment, discrimination, bullying, or retaliation.

We are committed to the principles of equal employment opportunity and take affirmative steps to hire and advance qualified minorities, women, individuals with disabilities, and protected veterans. We strive to increase diversity in our organization and include and utilize employees to the maximum extent possible in balance with financially safe and sound business practices.

### **Injury and Illness Prevention**

GBCI is committed to working with our employees to maintain a safe and healthful work environment. Through our Injury and Illness Prevention Program, we have established protocols for minimizing work place injuries and incidents. Safety is more than a value. It is a standard of practice facilitated by the Safety Committee at each Division and Safety & Wellness Ambassador at each location.

### **Confidentiality**

GBCI employees are exposed to confidential information about our company, our clients and our employees on a daily basis. Disclosure of such information to any outside parties, either in a business or social context, can seriously affect the public's perception of us. Such disclosure may also jeopardize a relationship of trust that we enjoy with our customers. Any breach of confidentiality cannot be tolerated. Employees should consult with their direct Supervisor if there are any questions as to whether information should be disclosed.

### **Customer Privacy**

GBCI has a duty to maintain the privacy of our customer's records. Not only is privacy guaranteed by law, it is critical to our reputation and success. Therefore, the following guidelines must be strictly observed and enforced:

- Employees should discuss customer information with the customer only;

- Employees will shield customer information from the possibility of identity theft; and
- No disclosure of a customer's financial condition or a customer's transaction is permitted except in strict accordance with provisions in loan and deposit procedures, manuals, and written request of management.

These records include all customer transactions, balances, names and addresses and other information obtained in market surveys.

Employees often acquire general and confidential customer/supplier information informally. This information may not be shared with persons outside the company, including immediate families and associates or even with other company employees who do not need to know. It is important to remember that someone else may attach exaggerated importance to your informal personal comments about potentially confidential information.

## **Training & Education**

We recognize that initial training and ongoing education play a vital role in fulfilling the standards outlined in this Code. To that end, GBCI established a Training Committee charged with creating global training expectations for employees that encourage adherence to internal policies/procedures and external laws/regulations. Additionally, we stay aware of state and federal law changes and update our respective policies and procedures to ensure our training materials include the most current information.

We strive to offer multidisciplinary education opportunities for employees to improve their knowledge and skills utilized in their current position as well as opportunities to progress and advance to other areas within the organization. We also support employees in achieving degrees and certifications through our Tuition Reimbursement program and we promote education in our communities by offering scholarships to area students.

## **Competition**

GBCI believes in fair and open competition in the markets we serve. This belief dictates the following guidelines:

1. Employees shall not hold discussions or enter into arrangements with competitors concerning prices, services, or other competitive policies or practices.
2. In authorized dealings with competitors, discussions shall be limited to the specific transaction involved.
3. Participation in trade associations and other banking and financial groups must not be an occasion for discussion of competitive policies.

Our policy is to stress the merits of our service and products and to refrain from criticizing those of competitors. No employee shall make false or misleading remarks about suppliers,

customers, or competitors, their products or services.

## **Use of Property, Influence, and Time**

GBCI's property, influence, and time, as described below, may be used for business purposes only. Personal use violates the Code and may constitute fraud and lead to disciplinary action up to and including termination.

*Property:* Anything the company owns, leases, controls, or uses to conduct business. Some forms of property include:

- Physical assets, i.e. offices, telephone systems, autos, computers;
- Physical expense items, i.e. copy paper, official letterhead stationery, legal documents; and
- Funds for travel or other business expense.

*Influence:* A misuse of GBCI influence includes:

- Misrepresenting oneself as an agent of GBCI; and
- Using GBCI official documents and letterhead when conducting personal, non-protected activities exceeding one's authority when conducting business.

*Time:* Each position at GBCI has designated working hours to accomplish the responsibilities of the job. It is intended that employees use these designated working hours to perform their job. Examples of misuse of company time include, but are not limited to, excessive tardiness, unauthorized early departure from work, or extended meal breaks, or any other non-protected personal activity such as excessive use of a personal cell phone.

## **Computer and Technology Systems**

Employees shall not use company computer systems for personal or unauthorized purposes. These computer systems are the property of GBCI and any misuse or unauthorized activities will constitute grounds for disciplinary action or possible prosecution.

## **Social Media**

There is a significant difference in speaking "on behalf of our bank" and speaking "about" the company. The following guidelines are intended for Social Media Programs both through approved work access as well as other access channels where employees might refer to GBCI.

Employees must never disclose any information that is confidential or proprietary. This information includes, but is in no way limited to, customer information, including the fact that they are our customers, strategic decisions, underwriting criteria, intellectual property,

and other announcements deemed inappropriate for public exchange. Unless authorized, employees must never comment on any aspect of our company's financial business or any policy issue in which GBCI is involved. In other words, an employee may acknowledge in their personal Social Media sites the name of their employer and their title and contact information. Any discussion on products, services, company performance, customers, or other details regarding the company's financial business is prohibited unless the employee has written approval.

## **Transactions with Glacier Bancorp, Inc.**

Whenever our employees, or their immediate family members, transact any business with our company, the potential for conflict of interest or misconduct arises. In these cases, it is important for employees to avoid not only improper conduct but also the appearance of improper conduct. Proper disclosure and maintaining an arm's length for the transaction can prevent this appearance. Employees must maintain an arm's length from any direct/indirect business transaction with our company.

## **Personal Accounts**

Employee accounts with GBCI and its Divisions should be maintained in a prudent manner. Employees who overdraw their accounts and are covered by the terms of our overdraft program will not be given special treatment over that provided to other customers in terms of payment of overdrafts, associated fees, or the forced closure of accounts not meeting program guidelines.

Any maintenance and all transactions to an employee's own account must always be done by another bank employee. An employee should never post or cause to be posted anything to his/her account. Deposits to an employee's account should be given to another teller for receipt and posting. Cashing and posting checks should be done by another teller. Loan payments should be given to someone else for posting. Any request for tax or insurance refunds, or funds out of the tax insurance, will require approval of senior management. Reimbursement checks for expenses should be approved by the department Supervisor and written by another employee. No employee will grant him/herself a loan in any form. Under no circumstances is an employee's account to be file maintained without approval of a department Supervisor. Any violation of this policy may result in disciplinary action up to and including termination.

## **Gifts and Payments**

Employees who receive and dispense money, gifts or favors, including unusual hospitality jeopardize the performance of their duties. Employees must not become involved in any act that could be interpreted as seeking, receiving, or dispensing a bribe, kick-back or questionable payment. Involvement in such activity may result in immediate dismissal without notice.

Employees are strictly forbidden from either asking for or accepting gifts, monetary rewards, payments, services, special privileges, or loans that are perceived as inducements from any source. This includes the favor of purchasing products and services at significantly reduced prices for personal benefit.

All employees are strictly forbidden from dispensing any major payments, gifts, or equivalents in an attempt to get or keep business. However, certain jobs involve entertainment of individuals, groups, or organizations on behalf of our company. In these instances, entertainment should be of minor value. Guidance in this regard must be obtained from an immediate Supervisor.

## **Political Activity/Contributions**

We recognize the inherent rights and responsibilities of good citizenship. Employees are encouraged to take part in political activities on their own time and in their own name, so long as their participation does not affect their job performance; however, employees may not solicit campaign funds or engage in other forms of electioneering on business premises.

GBCI generally refrains from making contributions of anything of value to directly/indirectly influence an election for political office. This includes the use of company facilities and equipment, loan of employees, loans or advances (other than under normal credit standards), furnishing of transportation, or special duplicating services.

## **Community Involvement**

GBCI recognizes the importance of community involvement; therefore, employees are encouraged to accept appointments as an official member of non-profit, social, religious, or civic organizations, colleges or schools of trade, or professional organizations associated with GBCI's business. Check with your Supervisor before accepting community involvement that might involve excessive travel and time but might also be in the best interest of GBCI.

## **Conflict of Interest**

### *Outside Business Interest*

Outside business interests can result in serious conflicts of interest and can harm both GBCI and the employee's reputation. Because our general policy is that no employee, director, or officer shall have a conflict of interest with GBCI, an employee, director, or officer's outside business interest must be treated with great caution. All significant investments must be disclosed. Ten percent of the outstanding stock or ownership of the business is considered a significant investment. Certain kinds of outside business interests are prohibited including:

- Any significant investment in a business association that competes with GBCI beyond a mere deposit or loan relationship; and
- Any interest which materially encroaches upon an employee's time or attention and affects an employee's job or performance.

### *Outside Employment*

In general, outside employment that may create an actual or perceived conflict of interest is discouraged. This does not apply to outside employment by members of the Board of Directors. Outside employment is specifically of concern if it might:

- Subject our company to criticism or adverse publicity;
- Create a personal, professional, or financial conflict of interest between the outside employment and your employment with GBCI;
- Impair your job performance; or
- Involve services generally rendered by our company.

Employees must have prior approval from the Human Resources Department before accepting outside employment if it poses a potential conflict of interest. Employees are encouraged to contact the Human Resources Department if there is any question regarding a potential conflict of interest.

## **Internal Audit**

The GBCI Internal Audit group strives to protect and add organizational value to our operations by performing independent, objective assurance and auditing services over the company's risk management, controls, and governance processes. These audits help ensure that our employees are fulfilling the standards outlined in this Code and that our processes protect human rights and workplace rights.

## **Criminal Conduct**

It is a serious breach of discipline to engage in criminal conduct, to attempt to engage in criminal conduct, or to withhold knowledge of another employee's criminal conduct or attempt at criminal conduct. GBCI will inform the proper law enforcement authorities of any criminal activities that occur, making no distinction between employees and customers or other outsiders. Furthermore, it is our duty as a corporate citizen to cooperate with these authorities in the prosecution of employees who commit criminal acts against our company, our customers, or other employees.

## **Insider Trading Policy and Procedures**

The Insider Trading Policy is intended to both satisfy GBCI's obligation to take reasonable steps to prevent violation of insider trading laws and to help employees avoid the severe

consequences of such violations. Employees are responsible for signing the annual acknowledgement affirming receipt, review, and understanding of the Insider Trading Policy annually. Newly hired employees sign the acknowledgement during their onboarding process.

## **Fraud Policy**

GBCI recognizes the importance of protecting the organization, its operations, its employees, and its assets against financial risks, operational breaches, and unethical activities. Therefore, it is incumbent upon the GBCI Board of Directors and management to institute and clearly communicate the fraud prevention policy to both internal and external customers, vendors, and partners. We have a zero tolerance policy regarding fraud and corruption and we are committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls, and audit practices.

## **Whistleblower Policy**

### **Complaint Procedures for Accounting and Audit Matters**

Any employee and/or agent of the company may submit a good faith complaint regarding accounting or auditing matters to the management of the company without fear of dismissal or retaliation of any kind. The company is committed to achieving compliance with all applicable securities, laws and regulations, accounting standards, accounting controls, and audit practices. In order to facilitate the reporting of employee and/or agent complaints, the company's Audit Committee has established the following procedures for (1) the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters ("Accounting Matters") and (2) the confidential, anonymous submission by employees or agents of concern regarding questionable accounting or auditing matters.

### **Complaint Procedures**

The company shall forward to the Audit Committee of the Board of Directors (the "Committee") any complaints that it receives regarding financial statement disclosures, accounting, internal controls, or auditing matters ("Financial Disclosure Matters").

Any company employee may submit, on a confidential, anonymous basis (if the employee so desires), any concerns regarding financial disclosure matters by setting his/her concerns in writing and forwarding them in a sealed envelope or via email to the Chair of the Committee. Alternatively, concerns may be forwarded to the Chair of the Committee in the care of the Corporate Secretary. The envelope should be labeled with "To be opened by the Audit Committee only" or a similar legend. If the employee wishes to discuss the matter with the Audit Committee, she/he should indicate this in the complaint and provide contact information. The Corporate Secretary shall promptly forward, unopened, any such

envelopes to the Committee.

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Reports of violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The Committee shall review and consider complaint(s) it has received at each meeting and take appropriate action in order to respond thereto.

The Committee shall retain any such complaints for a period of no less than seven years. These procedures relate to complaints involving any questionable accounting or auditing matters, including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of GBCI;
- Fraud or deliberate error in the recording and maintaining of financial records of GBCI;
- Deficiencies in or noncompliance with GBCI's internal accounting controls;
- Misrepresentation or false statement(s) to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports, or audit reports of GBCI; or
- Deviation from full and fair reporting of GBCI's financial condition.

## Statement of Workplace Rights

At GBCI, we promote a workplace where all employees are valued and inspired to be the best they can be. An important part of our commitment to our employees is our Statement of Workplace Rights. Each Division of GBCI prominently displays posters communicating employee rights in accordance with applicable state and federal employment and labor laws.

### Affirmative Action

We acknowledge our responsibilities as a federal contractor and strive for compliance with all applicable laws, executive orders, and regulations in order to improve our pool of qualified internal and external job applicants who are women, minorities, protected veterans, and individuals with disabilities.

### Diversity & Inclusion

We recognize the value that a diverse mix of backgrounds, skills, and abilities can bring. We strive to increase diversity in our organization and to include and utilize employees to the maximum extent possible in balance with financially safe and sound business practices.

## **Wage and Hour Practices**

We are committed to providing a fair and competitive compensation program that will attract, retain, and reward high-performing employees at all levels. We strive for full compliance with applicable federal and state wage and hour laws including equal pay practices. We also promote training and career development to support our employees in achieving their professional goals.

## **Non-Discrimination & Anti-Harassment**

We are committed to treating every employee with dignity and respect and protecting their human rights. We promote a courteous work environment free from any form of harassment, discrimination, or retaliation based on applicable state and federal protected statuses and ask all vendors and suppliers to similarly commit to these principles.

## **Child Labor & Forced Labor**

We also recognize applicable state and federal laws establishing a minimum age for employment in order to support the safe and limited use of minors in the workplace. We do not accept or condone any aspect of forced or compulsory labor.

## **Safe & Healthy Workplace**

We are committed to providing a work environment that is safe and healthful for all the aspects surrounding each employee's particular job function and the physical location where they work. Our commitment is embodied in our Injury and Illness Prevention Program and we encourage all employees to be alert for safety and health hazards and to report safety concerns immediately.

## **Privacy**

We are committed to protecting the privacy of those who entrust us with their personal information including our customers, consumers, website visitors, employees, and all those that do business with us.

## **Anti-Retaliation**

We support employees that report suspected violations of workplace rights, human rights, or this Code. We will not tolerate retaliation of any kind against an employee who, in good faith, makes a complaint or participates in an investigation, even if no violation is ultimately found. We strive to effectively address grievances in accordance with the Problem Resolution Procedure of our Open Door Policy and the Complaint Procedure of the

Whistleblower Policy (for Accounting and Audit matters only).

## Training & Education

We recognize that initial training and ongoing education are vital to ensure we safeguard workplace rights while fulfilling our mission and purpose. We strive to offer comprehensive, multidisciplinary education opportunities to increase the skills and knowledge of our employees and leaders. Additionally, we stay abreast of changes to state and federal laws and update our respective policies and procedures to ensure our training materials include the most current information.

## Statement of Human Rights

At GBCI, our main purpose is to serve our customers and communities. We are committed to improving the quality of life of the people we serve by supporting, to the best of our ability, the communities in which they live.

Human Rights are the basic standards of treatment to which all people are entitled worldwide, regardless of factors such as nationality, gender, race, or economic status. While governments bear the primary responsibility for protecting the rights of their citizens, we acknowledge that GBCI has an important role to play as an employer and a corporate citizen.

There are several human rights risks facing the banking and financial services industry today. Examples include, but are not limited to, risks of adverse impact to prospective employees and current employees in hiring and promotion practices, compensation disparities among employees in similar jobs, lack of opportunity and fair consideration for financial services, and attacks on information systems impacting the privacy and security of employee and customer information. GBCI is committed to mitigating these risks to the best of our abilities.

To stay aware of new risks, we will engage employees from all levels and Divisions of the company to receive feedback and concerns. We support all employees that report suspected human rights violations and we will not tolerate retaliation of any kind against an employee who reports in good faith.

Protecting human rights is our social responsibility and we strive to fulfill this responsibility through our interactions and relationships with our employees, customers, vendors, and communities. This statement applies to all Divisions of GBCI. Our commitment is guided by the principles of affirmative action and equal employment opportunity consistent with applicable federal, state, and local laws and is embodied in the following:

- Company values and code of conduct;

- Company policies including those for employee relations, ethics, health, safety, and risk management; and
- Reporting resources including the Problem Resolution of the Open Door Policy and the Complaint Procedure of the Whistleblower Policy (for Accounting and Audit matters only).

## **Employees**

Our employees are one of our most valuable assets and we are committed to treating every employee with dignity and respect and protecting their human rights. We promote and support a courteous work environment free from any form of harassment, discrimination, bullying, or retaliation.

We offer equal employment opportunity for all and we are committed to taking affirmative action to hire and advance qualified minorities, women, individuals with disabilities, and protected veterans. We strive to increase diversity in our company and to include and utilize employees to the maximum extent possible in balance with financially safe and sound business practices. We are committed to equal pay practices and philosophies, consistent with market and individual qualifications.

We are also proud to be a leader in prioritizing the health and wellness of our employees through our Injury and Illness Prevention Program.

## **Customers & Vendors**

We value the rights of our customers in everything we do. We are committed to understanding their basic financial needs and helping them achieve their goals by offering the most complete range of financial services.

To fulfill this commitment, we expect our employees to demonstrate uncompromising integrity and honesty in all of their interactions. The orientation and ongoing support our employees receive helps reinforce job-specific performance expectations to minimize associated human rights risks. We also routinely monitor our business practices through our internal audit program to help ensure we are meeting performance expectations and identifying and addressing new risks that may arise.

It is our duty to safeguard the privacy of our customers' information. To that end, we have developed and implemented comprehensive information security practices to protect our customers and give them peace of mind.

We strive to attract and retain business customers that share our values and support our efforts in protecting human rights.

We strive to partner with vendors whose values and business policies reflect their respect

for the human rights of the people and the communities with and in which they conduct business.

## **Communities**

Giving back to our communities is one of the core values practiced by our employees. We take great pride in investing our time and financial resources in our communities so that we may all grow and prosper. We also strive to continually improve our business processes to ensure that our operations have the least possible impact on the environment, protecting and preserving natural resources for future generations.

## **Training & Education**

GBCI recognizes the importance of employee training and development as well as measuring outcomes to confirm the transfer of skills and knowledge. On an annual basis, Division Human Resources Representatives, Hiring Managers, and employees receive training on human rights topics highlighting job-related risks as well as policies, job aids, and other resources to ensure we protect the rights of all people in everything we do. Annually, employees also acknowledge policy additions and updates to our Employee Manual to maintain their awareness of risks and performance expectations.

## **Stakeholder Engagement**

GBCI will engage stakeholders from our Divisions including Human Resources leaders and a multi-disciplinary group of employees to discuss their ideas on how we can best continue to protect basic human rights. We are committed to maintaining awareness of human rights risks and to assist managers with incorporating recommended tools and processes to minimize those risks.

## **Safety & Wellness Program**

GBCI and its Divisions are committed to working with our employees to maintain a safe workplace. Employees are required to report any/all incidents, injuries, and unsafe conditions to their Supervisors as soon as possible. We have established a protocol for this purpose and expect to see our mission of minimizing work place injuries and incidents fulfilled.

All employee recommendations to improve safety and health conditions are encouraged and will be given thorough consideration by management and Safety Teams. Management will give top priority to and provide the financial resources for the correction of unsafe conditions and analysis of unsafe work practices.

Our Safety and Health Program will be coordinated, implemented, and maintained by the Corporate Safety and Wellness Coordinator.

Senior management will be actively involved with our workforce in establishing and maintaining an effective safety and health program. Our Safety Coordinator and other management team members will participate with each Division in ongoing Safety and Health Program activities by:

- Promoting both employee and safety committee participation;
- Providing safety and health education and training; and
- Reviewing and updating safe work practices expectations as needed.

This is intended to reiterate our management's commitment to, involvement in, and expectations of providing our employees a safe and healthful workplace. Our workplace Safety and Health Program will be incorporated as the standard of practice for our company. Compliance with these safe work expectations will be required of all employees as a condition of employment. Our company focus will hold all employees accountable for safety performance equal with quality and production expectations.

## **Safety & Health Program Purpose and Objectives**

GBCI and its Divisions strive to establish, implement, and maintain an effective Injury and Illness Prevention Program:

To establish a proper culture of safety for employees by demonstrating that:

- Safety is strongly supported by all levels of management;
- Safety is equal in importance to other work functions;
- Safety standards must be monitored by all employees; and
- Safety is a requirement of the federal and state law (OSHA and Montana Safety Culture Act of 1993).

To implement safety objectives we:

- Provide an environment where employees are safe and healthful;
- Furnish and use safety devices and safeguards where needed;
- Adopt and use practices, methods, operations, and processes which are reasonably adequate to render our facilities safe and healthful; and
- Do everything reasonably necessary to protect life, safety, and health of all employees.

## **Safety Committee Organization & Responsibilities**

The primary function of the Safety Committee is to establish and maintain injury prevention

as a primary goal in our company. Each Division has a minimum of one Safety Committee comprised of supervisors and staff level employees. Each branch office may have an employee or supervisor serve as a Safety & Wellness Ambassador for their location.

The principle activities and responsibilities of the Safety Committee include:

- Act as a clearinghouse for all safety concerns, ideas, activities, and needs;
- Conduct bi-annual safety inspections to identify hazardous conditions and unsafe work practices and recommend corrective action at every physical site;
- Review incident investigation reports and near misses provided by the Corporate Safety Coordinator;
- Assist in the continued education of safe work performance expectations and work practices;
- Administer online safety training programs each quarter for enhancing employee's knowledge and skills in safety;
- Individually promote safety activities and set good examples in all areas where you work, as well as respond to employees concerns and complaints in the area of safety and health; and
- Assist supervisors with new employees in becoming competent and familiar with company safety practices and procedures.

## Employee Training

### Statement of Need and Purpose

The Board of Directors and management team of GBCI and its Divisions recognize the importance of employee training, career development, and supporting training programs. This company-wide training program is intended to ensure continued support of employees to efficiently, compliantly, and effectively perform their job duties.

### General

GBCI expects that our employees are well trained to encourage adherence to internal policies/procedures and external laws/regulations. A master list of baseline training courses is maintained and assigned to all employees and Supervisors/Managers annually. Each Division may assign additional training to their employees and Supervisors as needed to meet specific initiatives and objectives. Course completion is monitored by each Division's Human Resources Department.

GBCI will provide periodic training to cover applicable federal and state law requirements. Training will be completed via web-based training, in person, or using other methods as required by regulation or when additional training is deemed necessary. Baseline training is ongoing and evaluated at least annually with an emphasis to continue to enhance training

for our employees.

New employee training will be completed via web-based training, in person, or using other methods. Each Division's Human Resources Department and department Supervisors will collaborate on training to ensure that new employees can effectively perform their job duties as well as receive training on their benefits.

## Responsibilities

Department Supervisors are responsible for the training of their employees and for identifying when employees need additional training. Employees should notify their department Supervisor if they believe they need additional training in order to perform the essential functions of their job. Additional training may be requested through our internal request process.

Project Management will ensure training is provided as part of every Project Management Office-led project, if deemed necessary by the project team.

The Corporate Compliance Department is responsible for communicating clear interpretations of regulations to the Divisions and assisting department Supervisors with developing training that encompasses regulations and how they apply to employee job duties. The Corporate Compliance Department is also responsible for answering employee questions regarding compliance concerns.

The annual review of required baseline courses will be completed through a coordinated effort from the Corporate Compliance and Internal Audit Departments and the Corporate Training Manager in accordance with the GBCI Training Committee Charter. Examples of required baseline courses assigned to all employees and Supervisors/Managers include but are not limited to:

Course Name	Description
FDIC 326 Security Program	Overview of GBCI security program to protect employees, customers, assets, records, and facilities from harm.
Fair Service for All	Equal credit opportunity / fair lending, forms of discrimination, cultural diversity.
GLB and Financial Privacy	Financial Privacy – fair credit reporting act, right to financial privacy act, maintaining confidentiality.
BSA/AML/OFAC Training	Bank Secrecy Act, Anti-Money Laundering, Office of Foreign Assets Control - monitoring new account and/or other high-risk service relationships, large currency transaction reporting, and other recordkeeping reporting to assist in fighting

	corruption and other criminal activity.
Information Security Basics	The risks, employee's role, daily precautions, data disposal, password protection.
Effectively Responding to Sexual Harassment	Equal Employment Opportunity Commission – awareness, GBCI policies and procedures.
Safety Training	Following MT Safety Culture Act – example: responding to an active shooter situation.
Business Continuity Plan	GBCI policies and procedures for emergency preparedness and protecting employees, customers, assets, and records.
Complaints Training	Following FDIC requirement – review of GBCI policies and procedures to address complaints.

Employees may be required to complete additional courses specific to their job or department. Examples include but are not limited to:

<b>Course Name</b>	<b>Target Employees</b>
The Supervisor and Sexual Harassment	Supervisors / Managers
Battling Discrimination in Banking	Collections, Mortgage Loan Servicing
Unfair, deceptive, or abusive acts or practices (UDAAP)	Commercial Lending, Deposit Operations, Marketing, Real Estate and Consumer Lending
Children Online Privacy Protection Act (COPPA)	Marketing
First Line of Defense (FLOD) Fraud Training	Front-line Employees, Supervisor / Managers

The Corporate Training Manager and Coordinator(s) are responsible for facilitating additional training when necessary. Internal and external avenues will be explored to meet training needs when requested.

Assignment of web-based training is the responsibility of each Division's Learning Management System Administrator with the assistance of the Corporate Compliance Department. Training and completion tracking is the responsibility of each Division's Human Resources Department. This includes tracking of new employees and transfer employees to ensure courses are completed in a timely manner and within policy.

## **Educational Opportunities**

The Educational Opportunities Policy is established to provide employees and Supervisors/Managers with increased opportunity to improve their knowledge and skills

utilized in their current position. Qualifying educational expenses may be eligible for reimbursement.

## **Certification and Licensure Programs**

Eligible expenses may be reimbursed for employees seeking certifications/licensures utilized in their current position. Examples of eligible expenses include but are not limited to cost of the exam, approved study manuals, and/or official training directly related to the exam.

## **University/College Courses**

Officers and employees are eligible to apply for tuition reimbursement when completing coursework from an accredited institution. Courses eligible for reimbursement include:

- University/college courses toward a degree up to an undergraduate level in a field related to banking or finance and/or that is directly related to the employee's job function; and
- Specialty courses that are not included in degree programs, but are considered to have a direct bearing on the individual's career development.

## **Career Advancement at GBCI**

GBCI is committed to providing internal career opportunities for our employees. The internal job portal is designed to help facilitate promotions and transfers and make information about job vacancies available to all employees.

## **Code of Vendor Conduct**

GBCI operates under this Code that serves as a guideline to ensure high ethical standards. "Doing the right thing" is at the heart of our mission, vision, and values. GBCI strives to conduct business with vendors who share our commitment for doing the right thing while ensuring compliance with applicable laws and regulations and maintaining high ethical standards.

GBCI is committed to protecting the environment and our communities and we expect all vendors to comply with environmental laws and regulations.

Vendors conducting business with GBCI must observe all labor laws, including those related to affirmative action, child labor, fair wages, working hours, and forced or involuntary labor.

Vendors are expected to follow all applicable work place laws and regulations regarding

employee pay, work hours, work environment, and safety.

Respect for human rights is a fundamental value of GBCI and we expect that all vendors follow this example and demonstrate the highest level of respect for human rights. GBCI stands ready to assist any supplier in improving their performance in the area of human rights.

Product safety and information security are of paramount importance to GBCI and we expect all vendors to exercise all necessary care and diligence in this regard.

GBCI maintains a robust vendor management program. Annual vendor due diligence reviews monitor vendor performance in areas including:

- Human rights
- Product safety
- Affirmative action
- Information security controls
- Compliance with applicable laws and regulations

