

Code of Ethics Policy 2019

The purpose of the Code of Ethics Policy is to provide effective oversight and risk management of corporate culture risks that could prevent MetaBank and its Divisions from achieving its goals and objectives. This Policy provides guidance to management and staff when implementing the operations and administration of its Code of Ethics Program. The Policy includes the following key sections: Overview, Program Control Principles, and Roles and Responsibilities.

The Risk Executive, in conjunction with the Risk Sponsor, is responsible to review, revise, and submit this Policy to the Board of Directors on an annual basis for approval, and more frequently if changes occur.

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1.0 Overview of the Code of Ethics Policy

1.1 Statement and Explanation

It is the policy of MetaBank and its Divisions (Meta, the Bank, or the Company) to implement and maintain a comprehensive Code of Ethics Program (Program) that is designed to encourage a corporate culture of ethical and honest behavior.

The reputational integrity of Meta relies upon the ethical and honest actions of its directors, officers, and employees. Accordingly, all conduct undertaken on behalf of the Company must be done in a manner that reflects positively upon the Bank. Understanding that proper ethical behavior is an essential component of the Company's success and is, in many cases, required by applicable law and regulation, this Program is intended to (i) help you in your efforts to avoid actions that involve ethical risk, (ii) provide guidance when ethical issues arise, and (iii) ensure that all activities undertaken in the Company's name are done so in compliance with all applicable laws and regulations and with the highest degree of professionalism and integrity. In addition, the Program provides a mechanism by which you shall report potential or actual ethical violations or other violations.

Principles, Values or Beliefs and Intent to Accomplish

Our reputation of integrity is the cornerstone of the public's faith and trust in our Company. Many companies offer similar products; it is Meta's employees who distinguish our Company from others. A single employee's misconduct can do much to damage a hard-earned reputation. This Policy is presented to assist you in guiding your conduct to enhance the reputation of our Company.

You should understand that this Code of Ethics Policy (Policy or Code), with respect to the Company's officers and employees, does not alter the employment-at-will relationship between you and the Company. It is the Company's intent to exceed the minimum requirements of the law and industry practice.

It is the expectation of the Board of Directors (Board) that all applicable Meta employees are familiar with this Policy as it applies to their positions. If, at any level of responsibility, these guidelines are not understood and followed, it may lead to Meta violating the law, providing poor service to customers, and being in financial, legal, and/or reputational risk.

1.2 Authority

Key stakeholders of the Code of Ethics Policy are as follows. See 3.0 Roles and Responsibilities for further information.

Stakeholders

- **Owners:**
 - SVP Human Resources (Risk Sponsor)
 - Human Resources Business Partner (Risk Owner)
- **Approvers:**
 - MetaBank Board of Directors
 - Chief Human Resources Officer (Risk Executive)
 - SVP Human Resources (Risk Sponsor)

1.3 Exception Management

Any exceptions to this Policy require formal management oversight, review, and approval using the Enterprise Risk Management (ERM) Risk Acceptance framework. This framework requires all Policy exceptions be documented, approved, and reviewed periodically to determine whether they are still needed or warranted.

Business units requesting an exception must do so utilizing Meta's Archer eGRC software application to document requests, provide a business justification for exceptions, and identify any mitigating controls that are in place to reduce the risk posed by the request. All Policy exceptions are subject to a formal workflow which requires Risk Sponsor/Executive review and approval, credible challenge from applicable second line of defense business units, and Enterprise Executive Risk Committee (EERC) review and approval.

1.4 Applicability

The Human Resources (HR) Department management and employees are accountable to understand, apply, define, and address the responsibilities and general working processes applicable to this Policy.

Each director, officer and employee of the Company must comply with this Policy. It is not possible, however, for the Policy to contemplate every possible ethical situation that may arise. As such, the Code should also be viewed as setting forth the principles by which directors, officers, and employees should undertake their business-related activities. An employee covered by this Policy should bring any questions or concerns they may have about particular conduct to their manager. If the situation involves their

manager or for confidentiality reasons, an employee may discuss the potential issue with Human Resources.

The Company will not tolerate any illegal or unethical behavior by directors, officers or employees which may result in losses for the Company or its customers. As set forth more fully in the *MetaBank Employee Handbook*, employees involved in any illegal or unethical activities of this nature will be subject to disciplinary action, up to and including termination, and will be prosecuted in accordance with established laws and regulations.

2.0 Program Control Principles

To ensure HR activities are consistent with the Bank's overall business strategy and risk tolerance, management shall implement appropriate risk management objectives to identify, measure, monitor, and control risks. The Company establishes the following principles to assist with execution of a comprehensive Code of Ethics Program.

2.1 Risk Identification and Measurement

Risk Assessment

Management must perform risk assessments on material Bank activities at least annually, or more frequently if warranted. Risk assessments shall measure inherent risk, which is the risk that an activity would pose if no controls or other mitigating factors were in place. A residual risk rating will be assigned after controls are taken into account. The risk assessment process should be candid and self-critical. At a minimum, all business units are required to utilize the ERM Operational Risk Management framework to document risks. Meta encourages additional risk assessment processes to improve business unit risk management and/or to meet regulatory expectations.

2.2 Manage and Control Risk

Meta shall develop and implement an appropriate corporate culture that does not condone or encourage imprudent risk taking, unethical behavior, or the circumvention of laws, regulations, or safe and sound policies in pursuit of profits or business objectives. In consultation with the Board, management must ensure the design and execution of the following internal control topics.

2.2-01 Control Processes

Management must establish appropriate control processes to implement the Bank's policies. Control processes are the programs, standards, and practices that impose order on Meta's pursuit of its objectives. Significant control processes shall be documented within formal corporate documentation, shall be established with clear lines of authority and responsibility, and shall be communicated to stakeholders. Control processes require implementation of an effective risk management system and internal controls to ensure compliance with applicable laws and regulations, Board-approved policies, prudent ethical standards, and contractual arrangements.

Control processes include:

Conflicts of Interest

Employees are expected to devote their best efforts to the interests of the Company and the conduct of its affairs and must avoid any situation that could possibly give rise to an actual conflict of interest or even the appearance of such a conflict. In any situation where a reasonable person might question your actions with respect to ethical and honest conduct, full disclosure must be made by you and all interested individuals to the Company.

Corporate Opportunities

You owe a *duty of loyalty* to the Company and must advance the Company's interests when such opportunities arise. You are prohibited from (i) taking for yourself opportunities that belong to the Company or are discovered through employment with the Company; (ii) using Company property, information or position for personal gain; and (iii) competing with the Company.

Self-Dealing

You may not do business, whether directly or indirectly, on behalf of the Company or any of its subsidiaries, with any customer or vendor in which you or a member of your family owns a significant interest or holds a position of authority without prior disclosure.

Loans to officers, directors or members of their immediate families must be subject to the same review extended to the general public and should be made only pursuant to statutory and regulatory requirements and Company policy.

Similarly, loans to and certain other transactions with entities which own, are owned by or are under common control with the Company are subject to federal law and

stringent qualitative and quantitative guidelines. All officers and employees active in these transactions are obligated to ensure that the regulatory guidelines and Company policy are followed.

It is illegal and unethical to participate in material transactions involving the stock of Meta Financial Group, Inc., while possessing confidential, nonpublic information. It is also illegal and unethical to participate in transactions with respect to the stock of other companies because of confidential, nonpublic information that comes into your possession as a result of your work with the Company.

Fiduciary Obligations

Consult with your supervisor before assuming any fiduciary relationship outside your immediate family.

A fiduciary position may require you to administer property or affairs on behalf of another person or entity. Fiduciary obligations arise, for example, when you are appointed a guardian, trustee or administrator. Moreover, any time you act as a fiduciary, such conduct clearly must be separate from your employment with the Company.

Responsible Sales and Servicing Activities

Responsible sales and servicing practices are the cornerstone of the Bank's relationship with its customers. Treating our customers fairly and responsibly establishes a relationship of trust. To develop this trust, you may only offer products to customers based on their needs or request. The products must be explained in a way that the customer understands and should never be explained 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 strictly prohibited and will not be tolerated. Vendors and third parties are also prohibited from participating in deceptive sale practices in support of Bank customers or potential customers.

Referrals

Our Company encourages employees to refer customers to the Company. Such referrals represent an important part of our business development. All personnel must remain watchful for two problems which may arise in the context of referrals. First, potential customers should not be promised preferential treatment as an inducement for bringing business to the Company. The employee should merely emphasize the services provided by the Company. Second, there are limits on the

incentives the Company may offer for referrals by directors, officers, employees and others affiliated with the Company. Any incentive or bonus paid for referrals must be reviewed and approved.

Outside Activities

The directors, officers and employees of the Company owe a duty to preserve the Company's name and reputation in the community. Participation in civic organizations and philanthropic causes is encouraged. In connection with such activities, individuals must be sure that such commitments do not create excessive demands upon their time and attention and do not create a conflict of interest that prevents the use of independent judgment in the Company's best interests.

Political Activities

Political activity should be an exercise of individual discretion. The Company encourages all personnel to participate actively in the political process. However, directors, officers and employees should take two precautions with respect to such political activity. First, the activity should not interfere with work at the Company. Second, all employees should be careful not to associate the Company with their political activity. Any contributions to political candidates by the Company will be made in compliance with applicable law.

Speeches and Writings

Speeches, writings, or conference presentations that discuss the Company's business should be reviewed by the appropriate Senior Vice President or above, prior to use and/or publication.

Employment

Examples of such conflicts include the sale of real estate or insurance, employment with a competitor, or other work with a competing financial institution. Under no circumstances should a Company director, officer or employee accept employment from, or perform services for a Company customer, vendor or potential Company customer or any competitor of the Company while employed by the Company without first obtaining permission.

Directorships

Any officer or employee invited to join a corporate board of directors (whether for profit or not-for-profit) must obtain approval. The Company must be comfortable that safeguards have been put in place to ensure no reasonable person could allege

any improprieties with respect to such directorship.

**Gifts,
Gratuities, and
Entertainment**

General

The *Bank Bribery Amendments Act of 1985* provides that employees, officers and directors of the Company are generally prohibited from soliciting or accepting for themselves or for a third party (other than the Company) anything of value from anyone in return for any business, service or confidential information of the Company; or accepting anything of value (other than the normal authorized compensation) from anyone in connection with the Company's business, either before or after a transaction is discussed or consummated.

Certain exceptions are allowed as follows:

- Acceptance of gifts, gratuities, amenities or favors based on obvious family or personal relationships (such as those with the parents, children or spouse of an employee, officer or director) when the circumstances make it clear that it is those relationships, rather than the business of the Company that are the motivating factors
- Acceptance of meals, refreshments, travel arrangements or accommodations, or entertainment, all of reasonable value, in the course of meetings or other occasions, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided that the expense would be paid for by the Company as a reasonable business expense if not paid for by another party
- Acceptance of loans from other financial institutions on customary terms to finance proper and usual activities of the employee, officer or director, such as home mortgage loans, except where prohibited by law
- Acceptance of advertising or promotional material of reasonable value such as pens, pencils, note pads, key chains, calendars and similar items
- Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers
- Acceptance of gifts of reasonable value: for example, under \$300.00 in value related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, Christmas
- Acceptance of civic, charitable, educational, or religious organizational awards for recognition of service and accomplishment

Other exceptions may be approved on a case-by-case basis after a full written disclosure of all the relevant facts. If an employee, officer or director is offered, receives, or anticipates receiving something from a customer of a value exceeding \$300.00, this fact must be disclosed.

**Gifts,
Gratuities, and
Entertainment**

Never offer a government official anything of value in an effort to seek a favorable result for the Company.

**Relations with
Government
Officials**

Bribery of government officials can lead to serious sanctions. Such charges can end your career. Thrift regulators have settled bribery charges in the past with consent decrees which bar the defendants from employment with any savings or banking institution without regulatory approval. Since such bribery also can lead to significant criminal penalties, all personnel coming into contact with government officials must maintain the highest professional standards.

**Confidentiality
of Consumer
and Customer
Information**

The confidential treatment of consumer and customer information includes identifying information such as name, social security number, or tax identification number, product selection information, financial information, and any other information that the Company possesses with respect to consumers and customers that is not available to the public at large: this includes the fact a consumer has inquired about a relationship with the Company as well as a customer who has an on-going relationship with the Company. The safeguarding of this information is important to the competitive position of the Company and is also required by federal and state laws. Failure to adequately safeguard this information could result in liability of a serious nature both for you and for the Company that includes, but is not limited to dismissal or civil lawsuits.

All directors, officers and employees are required to comply with all policies, procedures and safeguards used by the Company to protect its consumers' and customers' nonpublic personal information. Under no circumstances should a staff member discuss any information provided to the Company by a consumer or customer with non-company personnel or any other staff member who does not have a legitimate business need to know such information.

**Protection of
the Company's
Assets**

You have a responsibility to comply with all of the Company's policies and procedures with respect to its personal property, real property and other Company assets. All efforts should be taken to conserve the Company's assets and equipment and to use such assets only for legitimate purposes. Company equipment should not be used for purely personal uses. Company computers and telephones should be used only when you are sure that such use is undertaken on behalf of the Company

and can be done so securely.

It should be noted that the Company's assets also include proprietary information, such as intellectual property and business and meeting plans and ideas, records, Company and customer information. Any prohibited use of such information violates this Code and could result in civil or criminal penalties.

Personal Finances

Since the financial industry is in the business of helping people handle their financial affairs, the Company considers the proper and prudent handling of personal finances to be a necessary and important attribute of its personnel.

Employee financial infractions can lead to cancellation of financial service benefits and progressive discipline. Examples of infractions include: overdrawing a Bank checking account or the delinquent payment of a Bank loan. If bankruptcy ever becomes a realistic possibility for you or if you file for bankruptcy, you must contact the HR Department.

Illegal or Unethical Activities

The Company will not tolerate any illegal or unethical behavior by employees which may result in losses for the Company or its customers. As set forth more fully in the *MetaBank Employee Handbook*, employees involved in any illegal or unethical activities of this nature will be subject to disciplinary action, up to and including termination, and will be prosecuted in accordance with established laws and regulations.

Company employees who discover or suspect any illegal or unethical activities by other employees or customers should notify their supervisor, the Market President, HR Department, or Internal Audit of such activities immediately. It shall be the responsibility of the HR Department, to coordinate the investigation of any suspected illegal or unethical activities.

Antitrust

Antitrust laws help preserve a competitive economy. Those laws are supported by multiple civil and criminal penalties. Individual mistakes can have a serious long-term impact on the Company.

The Company requires that employees avoid any behavior which would have even the appearance of an effort to limit competition. Of course, agreements with competitors on any of these items are strictly forbidden. Employees 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 section.

Disparaging Competitors

Never disparage the Company's competitors.

This Code represents the Company's effort to preserve a reputation for integrity. To safeguard that integrity, we prefer to compete by offering superior service and personal attention. At no time should employees disparage our competition.

Gambling

A director, officer or employee shall not participate in any gambling activity while on property owned or leased by the Company or while conducting his/her duties on behalf of the Company. This provision shall not 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.

The Company is prohibited by law from dealing in lottery tickets or any substitute for a lottery or using its offices for lottery purposes. Further, the Company cannot announce, advertise or publicize the existence of any lottery or the identity of any participant or winner in a lottery.

These prohibitions do not apply to accepting funds from or performing any lawful services for, any state operating a lottery, or any officer or employee of such a state who is charged with administering the lottery.

Tying Arrangements

Do not enter into "tying" arrangements with Company customers.

"Tying" agreements represent a specific issue closely related to antitrust concerns. Our Company may not offer credit, property or services on the condition that the customer obtains additional credit, property or services from the Company. The provision also forbids conditioning services on an agreement that the customer will not obtain credit, property or services from another Company.

Reporting Violations of this Code and Non- Retaliation

Directors, officers and employees have an obligation to report known or suspected breaches of this Code by other directors, officers or employees to Human Resources. If there is no response, the filer of such report should feel free to contact a member of the Executive Team. If the filer is still unsatisfied, a complaint should then be sent to any member of the Board of Directors. To the extent the issue raised must be treated confidentially, such confidentiality will be provided in accordance with

applicable law.

Meta also maintains an Ethics Hotline **(866-782-0840)** that provides an additional avenue for directors, officers and employees to anonymously report activities that may be unethical, illegal, or otherwise inconsistent with the Code of Ethics.

Retaliation against directors, officers or employees who make reports of known or suspected breaches of this Code or other laws or regulations will not be permitted.

2.2-02 Audit Program

Management must establish a risk-based audit program that consists of an internal audit function and external audits. Audits shall be completed by qualified staff or audit firms that are independent of audited activities and have sufficient stature, authority, and Board support to carry out its assignments objectively. Audit reports must provide an overall opinion on the design and effectiveness of risk management activities.

2.3 Monitoring and Reporting

Management must develop accurate and reliable information and reporting systems to oversee Program activities and risk monitoring. These management information systems (MIS) should produce timely and relevant information that allows the Board and/or designated Committees to provide periodic and ongoing appraisal of risk/performance metrics and overall Program effectiveness.

2.3-01 Risk and Performance Management

Management must establish risk limits for specific risk categories, business units, and lines of business, and to establish performance measurements that monitor the effectiveness of its strategies. Effective oversight of this process requires the HR Department to develop key risk indicators (KRIs) and key performance indicators (KPIs). Metrics shall highlight important performance measures, risk thresholds, trends, and variances rather than presenting the information as raw data.

The HR Department has identified relevant KRIs/KPIs to support Meta's Risk Appetite Statement, and follows established ERM Program Principles for risk monitoring and treatment.

2.3-02 Reporting

Reporting must identify exceptions to anticipated business or operating conditions, and prompt the Board or delegated Committee(s) to take appropriate action to adjust the Program, risk appetite, or strategy. To function effectively MIS reporting should include the following key elements: timeliness, accuracy, consistency, and completeness. The effectiveness of MIS is hindered when one or more of these elements is compromised.

The HR Department has deployed its own monitoring and reporting processes, but must also align its efforts with ERM Program Principles for reporting.

3.0 Roles and Responsibilities

3.1 Three Lines of Defense

MetaBank uses a Three Lines of Defense Model in its approach to improving risk management. Each of the three lines plays a distinct role within the Company-wide governance framework. The responsibilities of each line are as follows:

The first line of defense is top management and the front office/business units. They are responsible to **own, measure, and manage** the risk and controls within their functions.

The second line of defense is the risk management functions within Meta. They are responsible to **monitor** risk and controls in support of management.

The third line of defense is the independent audit function. It is responsible to **provide independent assurance** to the Board and senior management concerning the effectiveness of management of risk and controls.

Any learnings from the completion of this assurance and review process are then installed into the proper line of defense accountabilities and the cycle continues. This provides MetaBank with a methodology of continuous process improvement and risk management through a strong Three Lines of Defense Model.

2.2 Policy Stakeholders

The Board of Directors, Executive Management team, and related first line of defense Committees/Sub-Committees have an integral role in the Three Lines of Defense Model. While not considered to be part

of one of the three lines, these entities have responsibility and accountability for establishing Meta's objectives, defining high-level strategies to achieve these objectives, and establishing governance structures to best manage risk.

Board of Directors

The Board of Directors is responsible to:

- Promote a sound corporate culture that:
 - Sets the expectations for desired behaviors, conveys the expectations, and ensures those behaviors are linked to performance reviews and compensation practices
 - Promotes clear lines of authority and accountability
 - Holds management accountable for the transparent and timely flow of information
- Ensure existence of a confidential reporting system of actual and/or potential Code of Ethics violations
- Review any potential conflict of interest situations that may come into play with insider activities
- Review and approve the Policy on an annual basis

Board Audit Committee

The Board Audit Committee is responsible to:

- Apply and interpret the Code of Ethics to specific situations in which questions are presented to it
- Establish and oversee procedures for the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters, including procedures for confidential, anonymous submissions by Company employees regarding questionable accounting or auditing matters
- Oversee the Company's systems of disclosure controls and procedures, internal controls over financial reporting, and compliance with ethical standards adopted by the Company

- Set the appropriate tone at the top and communicating intolerance for acts that violate the Code of Ethics

Executive Management

The Executive Management Team is responsible to:

- Reinforce the corporate culture with all employees
- Integrate the culture into the Bank's strategic planning process and risk management processes
- Ensure continuous employee communication and training regarding risk management practices and standards of conduct

Risk Executive

Chief HR Officer

The Risk Executive is responsible to:

- Provide direction and guidance to the Company to oversee effective Program management
- Provide thought leadership and guidance regarding overall Program direction
- Advise the HR Department on business strategies
- Review identified policy exceptions and provide decisioning on risk acceptance
- Review and approve the Policy on an annual basis, or more frequently if changes occur

3.2-01 First Line of Defense

Risk Sponsor

SVP HR

The Risk Sponsor is responsible to:

- Collaborate with the Risk Executive and related business unit Risk Sponsors to effectively monitor and mitigate the Program's critical and operational risks as identified by the Company
- Oversee implementation of HR roles and responsibilities
- Serve as HR's Ethics Officer from whom employees can seek advice regarding ethics questions
- Review identified policy exceptions and provide initial decisioning on risk acceptance

	<ul style="list-style-type: none">• Review and approve the Policy on an annual basis, or more frequently if changes occur
Risk Owner	The Risk Owner is responsible to:
HR Business Partner	<ul style="list-style-type: none">• Collaborate with business units or department owners across the Company• Administrate ongoing tasks to support the Program• Maintain the Employee Relations Log in the HRIS system to document reported Code of Ethics concerns
HR	The HR Department is responsible to:
	<ul style="list-style-type: none">• Support the Company and Executive Management Team, in conjunction with the Board of Directors, to administer the Code of Ethics Policy• Work with the respective internal leadership team members within the Company, and take appropriate action to investigate any violations reported to them. If a violation has occurred, the Company will take such disciplinary or preventive action as deemed appropriate. For cases involving a Company executive officer or director, the Board Audit Committee will also be consulted• Compile and maintain a list of disclosures presented to the HR Team as it applies to the Code. Determine action based on the disclosed information• Ensure the Code of Ethics Policy is reviewed by the Board annually and directors, officers, and employees sign off their acknowledgement of the Code responsibilities on a regular basis, no less than annually• Ensure no one is retaliated against for bringing forth a potential violation of the Code in good faith
Learning and Development	The L&D Department is responsible to:
L&D	<ul style="list-style-type: none">• Establish and implement an effective Regulatory and Compliance Training Program• Document and retain all employee annual Code of Ethics Policy acknowledgements

Officers and Supervisors

All Divisions and Departments

Officers and Supervisors are responsible to:

- Serve as professional role models and apply the Code in all of their business dealings
- Ensure they have controls in place that mitigate risk and foster an ethical environment for customers, vendors, and employees
- Report any existing or potential violations of this Code to HR

Employees

All Divisions and Departments

Employees are responsible to:

- Understand and comply with the Code
- Report potential or actual fraud or wrongful acts to their immediate supervisor or HR
- Complete an annual acknowledgement of the Code of Ethics Policy via the Company's Regulatory and Compliance Training Program

3.2-02 Second Line of Defense

Legal Department

The Legal Department is responsible to:

- Upon request, assist in interpreting the laws and regulations that apply to the Code
- Consult with and advise management as requested on any significant potential or actual fraud and/or code of ethics violations
- Oversee compliance with the laws and regulations governing the Code on an as-needed basis

Risk and Compliance Business Units

The following business units provide significant risk management and compliance review functions. Program control principles, core business processes, and detailed roles and responsibilities can be found within each business unit's Policy(s) and Program Standard(s).

- Portfolio Risk
- BSA/AML
- Compliance
- ERM
- Third Party Risk and Vendor Management

3.2-03 Third Line of Defense

Internal Audit

The Internal Audit Department is responsible to:

- Administer the Meta Ethics Hotline, and maintain an Internal Fraud and Investigation Program which outlines and establishes the practices, standards, and oversight methodologies utilized to oversee internal fraud investigations
- Perform risk-based internal audits to ensure the effectiveness of internal controls and compliance with applicable laws and regulations
- Coordinate external audit activities, if applicable
- Produce timely reporting of unethical behavior to appropriate department/business unit management for review/comment
- Provide the Board Audit Committee with reporting of audit scope, findings, and management responses

4.0 Administration

4.1 Review Frequency

The Risk Sponsor and Owner must review and update this Policy at least annually and submit it to the Risk Executive and Board for formal review and approval.

4.2 Communication of Changes

Communication of Policy and changes thereof must take place in a timely manner upon approval from the authorized approvers of the Policy. The Policy Owners are responsible to ensure that all impacted parties are notified and trained on Policy requirements as necessary.

4.3 Acronyms and Definitions

For acronyms and their accompanying definitions pertaining to this Policy, refer to the MetaBank Glossary on the Company intranet.

4.4 Related Authoritative Sources

Authoritative Sources

The following significant authoritative sources are related to the Code of Ethics Policy: This list may not encompass all sources that may apply in limited circumstances.

Federal Acts

- Sarbanes-Oxley Act of 2002
- The Dodd-Frank Act
- Regulation O

OCC Comptroller's Handbooks

- Corporate and Risk Governance (July 2016)
- Insider Activities (November 2013)