Steele Bancorp, Inc.

Whistleblower Policy

Effective Date	**October 20, 2025**
Board Approved:	**October 16, 2025**
Last Revision:	**October 2025**
Department Responsibility	**Risk Management** **SVP/Chief Risk Officer**

PURPOSE

The purpose of this Whistleblower Policy (the "Policy") is to provide for the detection, reporting, investigation, evaluation and remediation of illegal or unethical conduct in the operations and services of Steel Bancorp, Inc., its subsidiary, Central Penn Bank and Trust, and their affiliated companies, referred to collectively herein as "CPBT". CPBT prohibits discrimination, retaliation or harassment against anyone submitting a good faith report of illegal or unethical conduct (a "Report"), or anyone participating in an investigation of such conduct (an "Investigation").

REPORTING RESPONSIBILITY

All directors, officers and employees of CPBT are responsible to comply with all applicable laws and CPBT's Code of Ethics, and to report violations or suspected violations of law or the Code of Ethics ("Violations") in accordance with this Policy. A Report should be made immediately at the time an individual (a "Whistleblower") becomes aware of a Violation or suspected Violation. Violations for which a report should be made include, but are not limited to:

- Conduct that is illegal under federal, state or local law;
- Material deviance from internal accounting or other controls;
- The mismanagement or gross misuse of resources
- Any violation of the CPBT Code of Ethics or actions that otherwise amount to serious improper conduct, including conflicts of interest;
- Any attempt to conceal a Violation or evidence of a Violation; and
- Any retaliation for making a Report or participating in an Investigation.

This Policy is intended to be used for serious and sensitive issues rising to the level of illegal or unethical conduct. Employee-related concerns should continue to be reported through the Human Resources Department.

WHISTLEBLOWER

A Whistleblower is a person disclosing a Violation or suspected Violation. It is important that a Whistleblower feels safe and protected from retaliation when a good faith report of known or suspected Violations is made. Whistleblowers should not act on their own in conducting investigative activities, and they do not have a right to participate in any Investigation other than as requested.

Whistleblowers do not determine the appropriate corrective or remedial action that may need to be taken, if any, in response to a Report. Whistleblowers should not attempt to obtain evidence for which they do not have a right of access.

CONFIDENTIALITY

A Whistleblower may make a Report anonymously and request confidentiality. To the extent possible within the limitations of law and the need to conduct an Investigation, CPBT will attempt to maintain confidentiality and anonymity. Complete confidentiality, however, cannot be guaranteed due to CPBT's obligation to conduct an Investigation and respond to Reports.

In some cases, it may not be possible to proceed with a thorough Investigation unless the Whistleblower identifies himself or herself. In some circumstances beyond the control of CPBT, it may be impossible to maintain the anonymity of Whistleblowers.

The identity of any person(s) participating in an Investigation, as well as the confidentiality of information provided shall be maintained subject to the same limitations.

NON-RETALIATION

The intent of this Policy is to encourage and enable employees and others to raise serious concerns about Violations. A Whistleblower who makes a good faith Report and/or an employee who participates in good faith in an Investigation will not suffer harassment or retaliation. Employees who retaliate against a Whistleblower or an employee who participates in good faith with an Investigation is subject to discipline up to and including termination of employment. Whistleblower protection from retaliation does not extend to immunity for any complicity in matters that are the subject of a Report or discovered during an Investigation.

GOOD FAITH

In some instances, it may not be possible for a Whistleblower or employee participating in an Investigation to know whether information being provided is true or not or whether certain conduct rises to the level of illegal or unethical. Employees should not be reluctant to submit a Report or fully participate in an Investigation because they are uncertain of who will be believed and whether the allegation can be proved. However, in making a Report, a Whistleblower must be acting in good faith. Good faith means that a person has a reasonably held belief that the disclosure made is true and has not been made out of malice, jealousy, for personal gain or for any ulterior motive. The intentional filing of a false Report or failing to participate in good faith with an Investigation will subject employees to disciplinary action.

WHISTLEBLOWER IMMUNITY

Employees should note that in raising any questions or concerns they may have about potentially illegal conduct, pursuant to the 2016 Defend Trade Secrets Act (DTSA):

- No individual will be held criminally or civilly liable under federal or state trade secret law for disclosure of a trade secret (as defined in the Economic Espionage Act) that is:
    - Made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney, and made solely for the purpose of reporting or investigating a suspected violation of law; or
    - Made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal so that it is not made public; and

- An individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order.

REPORTS

Any person with knowledge or good faith concerns about a Violation must make a Report to one or more of the following (Contact information can be located in section XI.):

- CPBT Audit Committee Chairman
- CPBT Board of Directors Chairman
- CBPT SVP/Chief Risk Officer
- CBPT Audit Firm – YHB, CPA's & Consultants

Any employee who receives or becomes aware of a Violation from another employee should refer the information received to one of the contacts listed above. All reports will be logged on the Whistleblower Tracking Matrix (Appendix A).

Whenever possible, Reports should be submitted using the "Whistleblower Report" form (Appendix B). To assist with an Investigation, the Report should be factual rather than speculative, providing as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the Report. It is less likely that CPBT will be able to conduct a thorough and meaningful Investigation and address Reports based on unspecified wrongdoing or vague allegations. To the extent possible, Reports should contain the following information:

- The allegedly illegal or unethical conduct or practice(s);
- The name(s) of the person(s) involved;
- If the Report involves a specific event or events, the approximate time and location of each event;
- Any additional information, documentation, or other evidence available to support the Report.

HANDLING REPORTS/INVESTIGATIONS

The SVP/Chief Risk Officer will notify the Audit Committee Chairman of any Reports that have been received.

The SVP/Chief Risk Officer shall conduct an Investigation of any Report, unless the Audit Committee determines, in its sole discretion, that other individuals should be involved in the Investigation in addition to or instead of the SVP/Chief Risk Officer. In such an event, the Audit Committee shall designate such individual(s).

Individuals conducting an Investigation shall gather relevant documents and interview individuals as needed to complete the Investigation. If appropriate and necessary under the circumstances, the Audit Committee may authorize the engagement of outside professionals to assist with the Investigation.

Until such time as a Report is formally closed under this Policy, the individual(s) conducting an Investigation shall provide a periodic status update to the Audit Committee Chairman.

The results of every Investigation shall be provided in a written report to the Audit Committee, and the Chairman of the Board. The Investigation Report must include recommendations to the Audit Committee regarding appropriate corrective action, if necessary. The Audit Committee shall review the results of the Investigation and determine the corrective action, if any, to be taken. All documents and materials compiled during an Investigation, together with the Investigation Report, shall be retained with the Report and handled in accordance with Retention portion of this Policy.

At the conclusion of the Investigation and after corrective action (if any) has been taken, the Audit Committee shall direct a designated person to prepare a written response to the Whistleblower (a “Response”). If appropriate, the Whistleblower may be informed of any corrective action that has been taken. However, at a minimum, the Whistleblower should be informed that there has been an Investigation and that the Report is being closed. The Response shall be submitted to the Audit Committee for review and approval prior to sending it to the Whistleblower. A copy of the Response shall be maintained with the Report and documentation compiled during the Investigation. Upon completion of these procedures, the Whistleblower Report form and Whistleblower Tracking Matrix will be updated.

INVESTIGATION PARTICIPANTS

Employees who are asked to provide information or otherwise participate in an Investigation (“Participants”) have a duty to fully cooperate with the Investigation. Participants should not discuss or disclose the Investigation, or the information shared with anyone not connected to the Investigation. In no case should Participants discuss with any person(s) being investigated the nature of evidence requested or provided or information given to investigators. Requests for confidentiality by Participants will be honored to the extent possible within the legitimate needs of law and the Investigation. Participants are entitled to protection from retaliation for having participated in an Investigation.

RETENTION OF REPORTS

All Reports, together with supporting documentation, Investigation Reports, and Responses shall be kept in a Report file under the control of the SVP/Chief Risk Officer, unless it is appropriate under the circumstances that such files be kept by another employee or officer of CPBT. Such files shall be maintained for a period of 5 years after closure of the Report unless a statute, regulation, or CPBT policy requires a longer retention period.

TRAINING & EMPLOYEE AWARENESS

Training relative to Whistleblower Policy requirements, internal control objectives, and assigned responsibilities is achieved through the cooperative effort of the Human Resource Department and the Risk Management Department.

The Whistleblower Policy shall be presented to every new employee as part of the Human Resources Department's new employee orientation. The person conducting the orientation session shall provide the new employee with a brief explanation of the Whistleblower Policy and its importance and shall answer any questions regarding the policy.

All employees and officers of the Bank will be asked to review and acknowledge the policy electronically or sign the policy certification/acknowledgments (*see Appendix C*), at their time of hire and they will recertify their acceptance of this policy annually thereafter. Certifications will be maintained by the Human Resource Department as appropriate for future reference, and the Risk Management Department may reference these certifications from time-to-time as part of the compliance monitoring process.

Director acknowledgement will be noted during the annual policy review and approval.

The Risk Management Department will coordinate with Human Resources for the placement of "soft" reminders, such as a Whistleblower Poster, in employee lunch areas or other designated locations, as an added reminder of the importance of complying with the Whistleblower Policy.

WHO TO CONTACT

Mail: Mark your correspondence "**PERSONAL AND CONFIDENTIAL**" in large letters on the front of the envelope and mail to one or more of the following individuals:

Audit Committee Chairman	Chairman of the Board
Robert Pierce CFO Baylor-Hamm Companies 545 Escape Lane Mifflinburg, PA 17844 Email: robert@baylor-hamm.com Phone: 570.412.6913	J Donald Steele, Jr. Central Penn Bank & Trust 250 E. Chestnut Street Mifflinburg, PA 17844 Email: jdsteelejr@yahoo.com Phone: 570.778.0239
SVP/Chief Risk Officer	**Audit Firm**
Thomas E. Beck Central Penn Bank & Trust 250 E. Chestnut Street Mifflinburg, PA 17844 Email: tbeck@centralpennbank.com Direct Phone: 570.966.8119	Luke Gore, Partner YHB, CPAs & Consultants 160 Exeter Drive Suite 200 Winchester, VA 22603 Email: Luke.Gore@yhbcpa.com Direct Phone: 540.662.3417

Appendix A

Whistleblower Tracking Matrix

Report Date	Whistleblower	Nature of Report	Status Updates	Corrective Action (if applicable)	Closure Date

Appendix B

Steele Bancorp, Inc.
Whistleblower Report Form

General Information (Optional)

Name: ____

Address: ____

Telephone: ____

Email: ____

Report

Date: ____________________

Report: (*With as much detail as possible, describe the alleged event, conduct, practice, matter or issue that is the subject of this Report, the name(s) of the person(s) involved, the date and location of any event(s), and, if available, identify documentation related to the Report – use additional paper if necessary)*

____

____

____

____

____

____

Administrative

Date Received: ____________________

Date of Notice to
Audit Committee: ____________________

Person Assigned to
Investigation: ________________________________

Date of Response: ____________________

Appendix C

Acknowledgment of Receipt of the Whistleblower Policy

The following **Whistleblower Policy** contains important information about Steele Bancorp, Inc., Central Penn Bank & Trust and their affiliated companies. The information described herein is subject to change at any time. By signing below, I acknowledge that I have read, understand and accept the terms of the **Whistleblower Policy** and also understand that it is my responsibility to comply with the policies and any procedures contained in this **Whistleblower Policy.**

________________________________ ____________________
Signature of Employee Date

____
Employee's Name – Printed