



# Navigating Our Code of Ethics

 First Fed





## A Message from our President and CEO

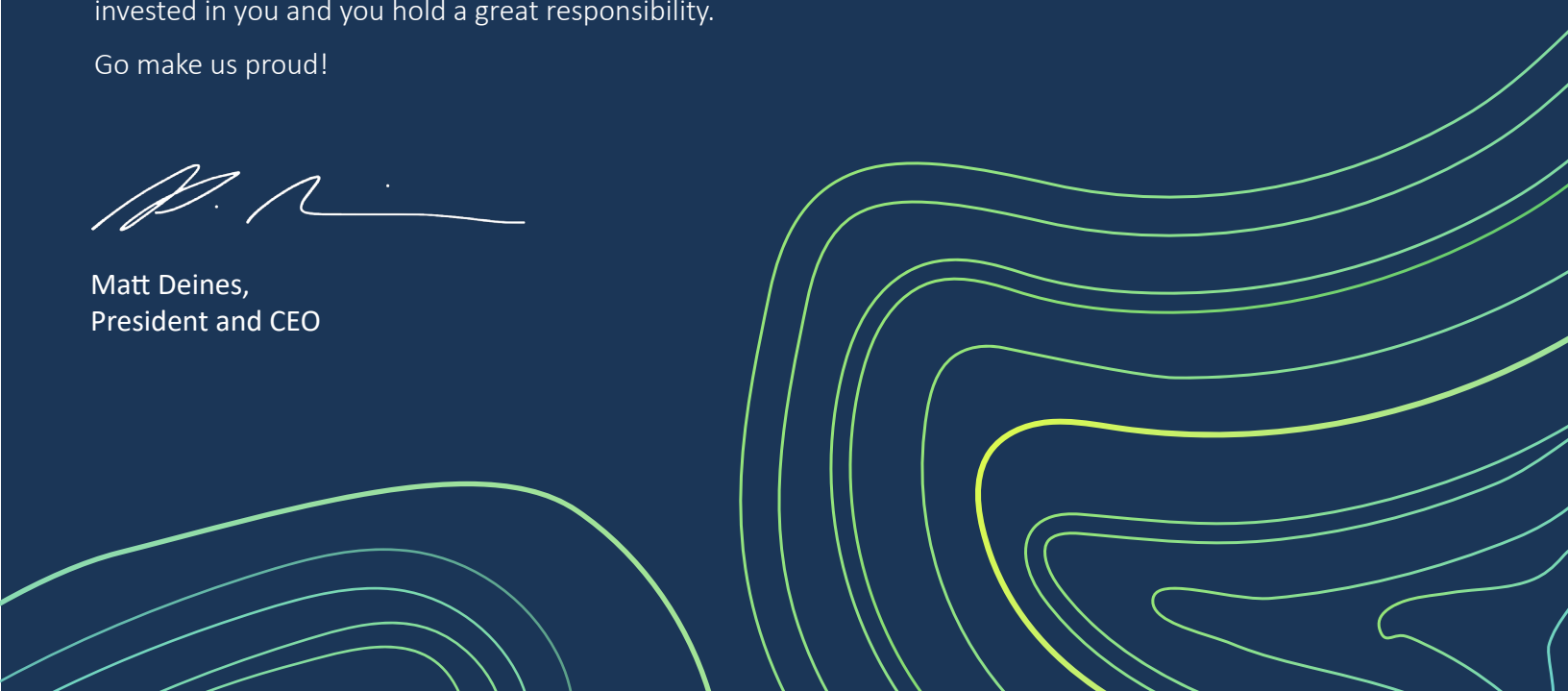
Our Code of Ethics define our First Principles about how we operate the Bank. They establish the foundation for our activities: Customer Service, Business Development, Community Involvement, Financial Strategies and Risk Management. You are the face of the Bank to the public. Therefore, your behavior represents all of us, including the Management Team, the Board and all of those who have come before us to represent First Fed in our communities and the world. The Code of Ethics described in this document provides insights and direction on how we approach day to day and long term situations grounded in our shared foundation.

We are striving to find win-win scenarios that are in the best interests of the company, but also in the best interests of our customers, our communities and our employees. We believe in transparency, honesty, and inclusion. We act with integrity so as to maintain the trust of those who keep their financial resources and information in our hands.

Our Code of Ethics is a guideline for our behaviors and personal conduct. Please familiarize yourself with this information and use it to guide the decisions you make in your daily work. This document cannot possible anticipate every situation you may encounter. You have an obligation to make decisions guided by a strong sense of personal accountability to the Bank, our communities, your co-workers, our customers and to yourself. If you have any questions about how to respond to a specific situation, seek guidance from your manager, the Human Resources team, or our corporate counsel. We are in this together. By working collaboratively, we can achieve more than by acting alone. Thank you for being a part of First Fed. Your decisions reflect on all of us. We have invested in you and you hold a great responsibility.

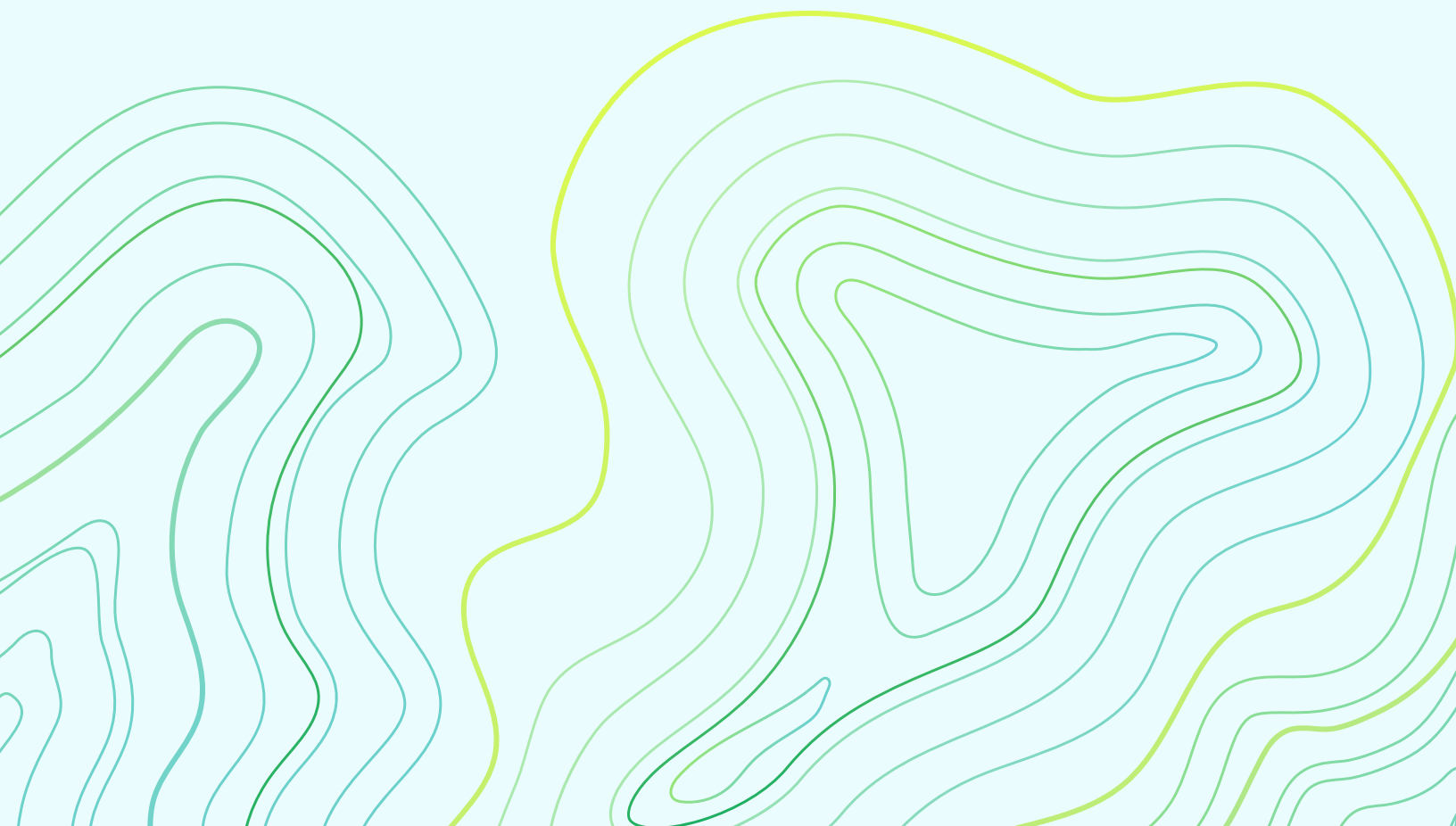
Go make us proud!

Matt Deines,  
President and CEO



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# Introduction

First Fed Bank (“First Fed”) and First Northwest Bancorp (“First Northwest”) are evaluated by the individual actions of our employees and directors. Establishing and protecting our reputation is critical to our success and is accomplished through consistent fair and honorable business practices and creates trusted and durable relationships with our customers, stakeholders, regulators, vendors, and employees.

The purpose of this Code of Ethics is to communicate standards of conduct supportive of ethical business practice expected of our directors, officers, and employees. It serves as a set of principles and guidelines. It is not intended to specifically and exhaustively address all potential circumstances that may arise. Circumstances not specifically addressed in this document should not be viewed as beyond the scope of the Code. Instead, the following fundamental principles are provided as guidance:

- Conduct First Fed business in full compliance with both the letter and spirit of the law and these guidelines.
- Avoid conduct that may create unsafe or unsound conditions.
- Avoid conduct that may create a conflict of interest or the appearance of a conflict.
- Avoid affiliations that may be incompatible with duties as directors, officers or employees of First Fed.
- Refrain from self-enrichment at the expense of First Fed or clients.
- Protect the confidentiality of protected customer or employee information.
- Interact honestly with regulators, auditors, investigators, employees, and clients.
- Report instances when you suspect deviations from this code.
- Adhere to the spirit of this Code.

You will find this document organized into sections covering our responsibilities, our people, and our company.

# Our Responsibilities

## EVERYONE'S RESPONSIBILITIES

As employees and representatives of First Fed, we share a common responsibility to ensure that our decisions are in our customers' interests, create economic value, and are responsible. In doing so, we protect our reputation, adhere to the law, and maintain our customers' trust. We demonstrate ethical and professional behavior in our dealings with our customers, business colleagues, shareholders, communities, and each other. To do this, we:

- Comply with the laws, regulations, and policies that govern our business.
- Know, understand, and act in accordance with the values and principles expressed in this Code and apply them in our business activities.
- Conduct business responsibly and in a manner that is transparent, prudent, and dependable.
- Take personal responsibility for our actions and hold each other accountable. We have a shared duty to act ethically as individuals and to expect the same of our colleagues.
- Ensure our conduct and decisions are prudent, protect our customers, and are consistent with laws and regulations.
- Raise concerns and ask questions.

We each have an obligation to immediately report unacceptable conduct. If you believe that your own or another employee's behavior contravenes the values and principles of conduct outlined in this Code, is unethical, or if you have a genuine concern that something is not right, it is important that you raise and escalate the matter immediately.

Abiding by the standards outlined in this Code and related bank policies is a condition of continued employment. Failure to follow this Code or applicable bank and regulatory policies may result in disciplinary action, which could include termination of employment or other relationship with the bank.

## RESPONSIBILITIES OF MANAGERS

Our managers are responsible for establishing engaging, positive, and ethical work environments. Managers demonstrate ethical behavior, create accountability for their teams, and address unprofessional or unethical business activities. To fulfill these responsibilities, managers:

- Openly discuss the requirements of our Code with their team members.
- Regularly reinforce the importance of understanding and following the standards contained in the Code and related policies.
- Encourage employees to feel comfortable raising concerns, especially about potential legal or ethical issues.

Managers must be alert to situations or actions that may violate the letter or spirit of our Code, policies, or procedures. Where violations arise or are suspected, managers have a duty to report their concerns. Managers who fail to report misconduct that they are aware or should have been aware of may be subject to disciplinary action.

## RESPONSIBILITIES OF SENIOR FINANCIAL OFFICERS

While all employees are expected to work ethically and professionally, Senior Financial Officers must also:

- Create complete, timely, accurate, and understandable financial reports and disclosures.
- Honestly reflect the financial position of First Fed.
- Establish and maintain disclosure controls, internal controls, and financial reporting procedures.
- Prepare and provide timely, complete, and accurate public and regulatory financial reports and documents.
- Report to the Board Audit Committee Chair any material transaction or relationship that may reasonably present a conflict or the appearance of a conflict of interest.

## ESCALATING CONCERNS

We are all responsible to conduct our business ethically and professionally, following the letter and spirit of this Code. If you have reason to believe that anyone engaged in the business of the bank may have acted unethically, you have a duty to promptly report your concerns. Quick resolution to these issues is critical to maintaining our strong relationships with our customers, business colleagues, employees, and stakeholders.

## SEEKING ADVICE

This Code provides an overview of standards of behavior applicable to all employees. However, the Code cannot anticipate every issue you may encounter. Situations in the workplace may arise in which the proper course of action may not be clear or in which you may feel uncomfortable. If you know of circumstances incongruent with the spirit and letter of this Code or may be unethical, you should consult your manager, a senior manager, Human Resources, Corporate Counsel or EthicsPoint.

## PROHIBITION OF WORKPLACE RETALIATION

First Fed prohibits any form of retaliatory action against anyone who raises concerns or questions in good faith regarding ethics, discrimination, or harassment matters; requests a reasonable accommodation for a disability, pregnancy, or religious belief; reports suspected violations of laws, regulations, or policies; or participates in a subsequent investigation of such concerns. Retaliation is a serious issue and includes any adverse action taken because an employee has engaged in such activity. As part of any investigation, we respect the rights that are afforded under applicable laws and regulations to all parties related to the matter.

Employees who engage in retaliation against a colleague because they have raised a concern or question in good faith, asked for a reasonable accommodation, reported a violation, or been involved in an investigation are subject to disciplinary action, which may include termination of employment. Managers are responsible for creating a work environment free of discrimination, harassment, and retaliation.

## DECISION MAKING FLOWCHART



## INVESTIGATIONS

When concerns are raised with respect to possible misconduct or unethical behavior, First Fed conducts investigations thoroughly, fairly, with discretion, and in a timely. If you are asked to participate in an investigation, you must:

- Cooperate fully with the investigation process.
- Not withhold relevant information.
- Maintain the confidentiality.
- Not make false statements to or otherwise mislead investigators. Doing so may result in termination of employment.

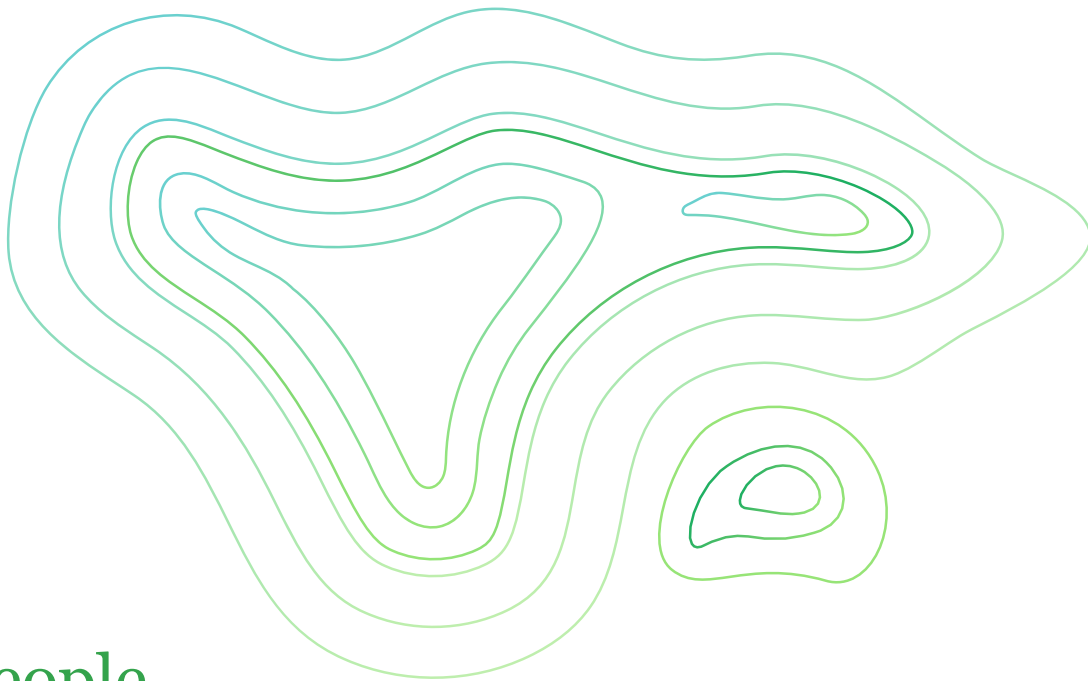


## DISCIPLINARY ACTION

Violations of our Code, laws, regulations, policies, or procedures may result in disciplinary action which could include termination of employment. Misconduct that may result in discipline includes:

- Violating or asking others to violate this Code.
- Failing to raise a known or suspected violation of this Code.
- Retaliating against another employee for raising a concern in good faith or for participating in an investigation.

Additionally, you may be held responsible for the misconduct of others if you knew or should have known about their misconduct and failed to report or address. In some circumstances, your activities may also be reported to regulators, which could result in civil or criminal penalties, disqualification from serving in certain capacities, or a permanent bar from employment in the financial services industry.



## Our People

We achieve our best results when employees, customers, and other business partners can focus their energies in an environment of respect. Promoting a respectful work environment includes:

- Preventing discrimination and harassment, whether based on a person's race, sex, gender, pregnancy, gender identity or expression, color, creed, religion, national origin, nationality, citizenship, age, physical or mental disability or medical condition, sexual orientation, culture, ancestry, military status, veteran's status, or any other basis prohibited by law.
- Notifying your manager, any member of Senior Management, Human Resources, Corporate Counsel, or EthicsPoint if you feel harassed or discriminated against or observe discriminatory or harassing behavior. You are not required to report your complaint to anyone who is the subject of the complaint.
- Notifying your manager, Human Resources, Corporate Counsel, or EthicsPoint if you receive a complaint about discriminatory or harassing behavior or retaliation for reporting such behavior.
- Cooperating fully with investigations of allegations of discrimination or harassment.



First Fed is committed to promptly investigating allegations of harassment or discrimination, handling investigations with sensitivity, and enforcing appropriate disciplinary action. Further, retaliation against individuals for raising claims or concerns regarding discrimination, harassment, or intimidation, or for participating in the investigation of a claim or concern, is prohibited.

## **DIVERSITY, EQUITY, AND INCLUSION**

Diversity in our workforce is critical to our success as a community bank and to fulfilling our commitment to each other. Establishing a respectful, fair, and inclusive workplace includes the following:

- Maintaining a workplace of mutual respect and dignity.
- Creating an environment where differing perspectives are respected.
- Making people decisions objectively and without bias.
- Comply with the letter and spirit of the law regarding fair employment practices.

## **SAFE, SECURE, AND HEALTHY WORKPLACES**

Everyone has the responsibility to maintain a safe and healthy workplace, including potential or threatened violence. This includes:

- Never making verbal or physical threats or commit acts of violence that impact the work environment, either inside or outside the workplace.
- Resolving conflicts respectfully, always.
- Immediately reporting any workplace verbal or physical threats or acts of violence.

## PROTECTING THE PRIVACY OF OUR WORKPLACE

First Fed prioritizes information security and the privacy of our customers and employees. We seek to protect the personal and confidential information we collect, use, and maintain about our employees, which may include medical information, government-related information, and background-check information. We are all responsible to safeguard such information by:

- Complying with all policies related to security and privacy of personal or confidential information.
- Using or sharing information only for the purpose for which it was collected and only with authorized people.
- Sharing personal or confidential information, including if requested by subpoena, court order, or other official requests, only as permitted by policy, law, or regulation.
- Requiring vendors to protect the personal and confidential information they receive about our workforce.
- Follow policies when collecting, sending, storing, and using protected information.

## BACKGROUND CHECKS

We are required to comply with regulatory policies governing employment with financial institutions, which prohibit those convicted of certain crimes from working in an insured financial institution. Because of this requirement, First Fed completes background checks as part of the employment process.

## COMMUNITY ENGAGEMENT

First Fed has a long history of supporting our communities and encourage employees are encouraged to engage personally with their community. Examples may include joining a non-profit board, speaking at community events, joining service clubs or school committees, or participating in local politics. When considering community engagement, you must:

- Discuss participation on a non- profit board with your manager.
- Evaluate the demands of your work with your community commitments.
- Gain approval from Marketing prior to any public speaking engagement where you are representing or may be perceived as representing First Fed.
- Inform the Chief Executive Officer of plans to seek political office.

# Our Company

## PROTECTING PERSONAL, PROPRIETARY, AND CONFIDENTIAL INFORMATION

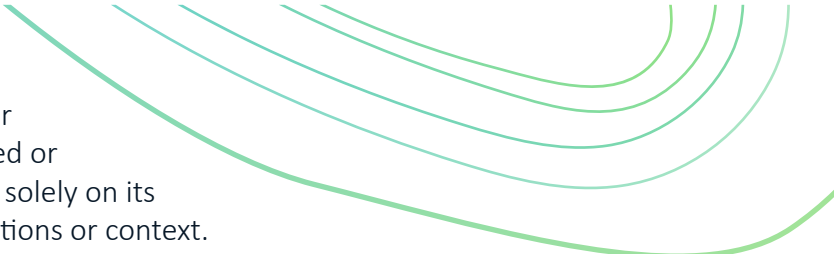
We value our confidential business information, our intellectual property, and the personal financial information about our customers and protect them from unauthorized disclosure or misuse. Protecting this information includes:

- Do not disclose personal, proprietary, or confidential information about any First Fed client, supplier, vendor, shareholder, business partner, former or current employee to any unauthorized person, including another employee. Your obligation to safeguard such information includes, but is not limited to, protecting it from misuse, using information only to the extent necessary to perform your assigned job duties, and not using such information or permitting such information to be used for unauthorized purposes. You must not share or discuss such information outside First Fed, except as permitted or required by applicable law or regulation, or pursuant to a subpoena.
- Do not bring to First Fed any proprietary or confidential information from former employers or use such information to advance the business of First Fed.
- Take steps to ensure that business- related documents are produced, copied, transmitted, transported, stored, and disposed of safely.
- Secure access to work areas and computers in accordance with the Information Security policy.
- Refrain from discussing sensitive matters or proprietary or confidential information in public places or on the Internet or any other electronic media.
- Exercise caution when using mobile phones or other communication devices.
- Recognize that your obligation to safeguard personal, proprietary, and confidential information extends to all situations in which you may use such information, including when you are away from work.
- Inform your manager, Corporate Counsel, Information Security Officer, or Compliance Officer immediately if you believe you have received confidential information inappropriately.
- Return all means of access to First Fed information and all copies of such information when your employment or association with First Fed ends. Return all company property when your employment or association with First Fed ends.

## MANAGING OUR INFORMATION AND RECORDS

Our clients and other stakeholders rely on us to maintain accurate records. You are responsible for the integrity of the data and information you handle. To ensure the integrity of our records, you must:

- Comply with internal financial controls.
- Maintain records in sufficient detail as to accurately reflect First Fed transactions.
- Create, collect, access, identify, classify, share, use, manage, retain, and dispose of data, records, and information in accordance with the Records Management Policy.
- Observe professional standards and use common sense regarding content and language when creating business records and other documents including e-mail, or text messages that may be viewed or retained by First Fed or a third party.

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- When handling or creating business records or other documents, remember that at a future date, First Fed or a third party may rely on or interpret the document solely on its literal content, without the benefit of other recollections or context.
  - Not destroy or alter any record that is potentially relevant to a violation of law, a legal claim, any pending, threatened, or foreseeable internal or external investigation or audit, or any records you have otherwise been directed to retain.
  - Not use First Fed stationary or logo for personal use.

## **MANAGING OUR EXPENSES**

You must use First Fed funds responsibly and make spending decisions supportive of the strategic objectives of the bank, including:

- Follow bank policies regarding expense management.
- Submit every expense for managerial review and approval.
- Review expenses to ensure they adhere to company policies and are processed timely.
- Not approve your own expenses.
- If you are a manager, review your employee expense requests. Although you may delegate this responsibility, you remain accountable.

Any false or fraudulent submission or approval of expenses is grounds for disciplinary action which may include termination of employment. We are also required to manage our personal finances responsibly, including keeping personal accounts with First Fed in good standing.

## **PROTECTING OUR REPUTATION**

First Fed is a celebrated community bank with a long history of serving our customers and communities. Our reputation is one of our most valuable assets. Each of us is responsible for protecting it through our decisions and actions, including online and social media. If you are authorized to post content on social media on behalf of First Fed, you must comply with applicable guidelines and policies governing the site. Personal use of social media must follow applicable laws and regulations, First Fed policies, not embarrass or present any person or company negatively. This includes:

- Ensuring your personal use of external social media sites does not interfere with your work.
- Remembering that social media platforms are public forums.
- Never acting as a spokesperson for First Fed.
- Never disclosing any confidential information regarding First Fed, or our customers, shareholders, vendors, suppliers, or business partners.
- Never using language that is harassing, discriminatory, or retaliatory.
- Not producing or sharing content that violates copyrights, trademarks, or other intellectual property rights.



## COMMUNICATIONS EQUIPMENT AND SYSTEMS

First Fed provides equipment, systems, and services that enable each of us to perform assigned work. Using these tools responsibly means that you:

- Understand that you have no expectation of personal privacy when using company equipment. To the extent permissible by policy, First Fed may monitor and record your use of its equipment, systems, and services, and may intercept any information you send or receive at any time.
- Never use company equipment for any inappropriate or unauthorized purpose or in a manner that would jeopardize network or equipment security or violate laws or regulations.
- Never use company equipment in a manner that could be embarrassing or harmful to First Fed or detrimental to its reputation or interests.
- Never use First Fed Internet servers to download, stream, or use any material in violation of copyright or intellectual property rights or that is inappropriate for a respectful workplace.
- Never access the Internet from a First Fed device for any purpose that conflicts with First Fed policies covering unlawful discrimination and harassment.

## AVOIDING CONFLICTS OF INTEREST

First Fed is best able to create value for customers and shareholders when we put stakeholder interests ahead of individual personal gain, avoid real and perceived conflicts of interest, and act transparently. This allows us to remove bias from our decision making and conduct business in a manner that instills confidence. To prevent actual or perceived conflicts of interest, you must:

- Be alert for situations in which your personal activities, interests, or relationships could interfere with, or be perceived to interfere with, your objectivity.
- Recognize when actual or potential business conflicts may arise between First Fed or its employees, and customers or others.
- Disclose to your manager and Human Resources any situation in which you believe there is a conflict between your personal interest and the interests of First Fed. The Chief HR and Marketing Officer will maintain records of notifications and report to the Board of Directors as appropriate.
- In any situation where there may be a potential conflict, you must seek advice when you are not sure how to proceed.

## EXPECTATIONS OF DIRECTORS

Our Board of Directors must exercise caution in any matter or circumstance before the Board when they may personally receive benefits or perceived benefits. In such circumstances, Directors are required to:

- Inform the Board Chair of the conflict.
- Disclose all relevant, non-privileged information related to the matter to the Board Chair.
- Recuse themselves from any vote or discussion on the matter.
- Avoid influencing or creating the appearance of influencing directors on the matter.
- Leave any meeting where the matter is discussed.

## BRIBERY AND CORRUPTION

First Fed conducts business fairly and ethically and prohibits employees, Directors, or other stakeholders from engaging in bribery or any corrupt practices. These practices can unnecessarily inflate the cost of doing business and can have serious legal consequences for the bank and its employees. They may also be destructive to bank, such as undermining employee confidence and creating an atmosphere in which other types of corporate misconduct can become prevalent, including self-dealing, fraud and embezzlement.

First Fed and its employees are responsible for adherence to anti-bribery and anti-corruption laws and regulations which prohibit companies and persons from offering to pay, paying, promising to pay or authorizing payment of money or “anything of value” to anyone for the purpose of improperly influencing that person. Even if the payment did not take place or the advantage was not won, a violation has occurred due to its intention.

These laws and regulations also apply to third parties conducting business for First Fed such as vendors, suppliers and consultants. The consequences of violating anti-bribery/anti-corruption laws and regulations are severe, including possible civil and criminal penalties for both First Fed and the individual(s) involved.

Giving gifts is appropriate at times; however, many laws regulate such gifting, especially to government officials. Employees must comply with all laws regarding giving gifts. Employees also must never give a gift with the intent to improperly influence a business decision.

## EMPLOYMENT OF RELATIVES

We avoid situations in which our personal relationships could interfere with our ability to create the best outcomes for First Fed and our customers. To prevent actual or perceived conflicts of interest:

- Follow applicable policies with respect to hiring or managing relatives.
- Notify Human Resources if you become aware that First Fed may be hiring or internally transferring a relative of yours, as soon as reasonably possible before the person is hired or transferred.
- Notify Human Resources as soon as reasonably possible if you become the “immediate family member” or other “relative” of another First Fed employee or a directly managed worker during the course of your employment.

## PERSONAL BUSINESS DEALINGS

First Fed relies on employees to exercise sound judgment and protect our reputation in our personal business dealings. We must avoid circumstances that conflict, or appear to conflict, with the interests of First Fed, its customers, shareholders, or the responsibilities of our employment. To appropriately manage real and potential conflicts of interest:

- Notify your manager, any member of the Executive Management Team, Corporate Counsel or Human Resources of any business relationship or proposed business transaction with First Fed in which you have, or someone related to you has, a direct or indirect interest, or from which you or a related party may derive a benefit.
- Use First Fed products and services on the same terms that are typically offered to other parties. First Fed extends credit to employees and other internal stakeholders on the same terms available to other parties.
- Obtain pre-approval for any non- standard business arrangements you pursue with First Fed.

## ACCEPTING GIFTS AND ENTERTAINMENT

We avoid accepting gifts or entertainment under circumstances that would compromise, or appear to compromise, our business judgment. Sustaining strong business relationships can include exchanging gifts and hospitality with our customers and partners, but we cannot allow such actions to jeopardize our reputation.

In general, you must not accept gifts, entertainment, or other things of value from current or prospective customers or vendors. Accordingly, you must:

- Not accept or allow a close family member to accept gifts, entertainment, services, loans, or
- preferential treatment from anyone under circumstances that may appear unethical to others.
- Not accept cash gifts or their equivalent, such as gift cards, gift certificates, or vouchers.
- Accept non-cash gifts only if they are nominal in value or appropriate, customary, and reasonable for the industry or situation, and clearly not meant to influence business decisions.
- Accept invitations only to appropriate, customary, and reasonable meals and entertainment at which the provider is present, such as an occasional business meal or sporting event.

## PROVIDING GIFTS AND ENTERTAINMENT

We do not provide gifts and entertainment or other things of value that may be seen by others as an actual or perceived conflict of interest. You must offer only appropriate gifts and entertainment of nominal value or that is usual and customary. You must not provide any gift that could be seen as consideration in exchange for favorable business decisions or dealings.

## OUTSIDE ACTIVITIES

We always act in the best interests of our customers and our bank, which means never taking advantage of a business opportunity for personal gain at the expense of a client or the bank. Employees must not accept outside employment that conflicts with their work at First Fed and may never compete with the bank. Prior to accepting outside employment, employees must notify their supervisor and seek approval from Human Resources. At no time may an employee work at another financial institution while employed by First Fed.

## HONEST AND FAIR BUSINESS PRACTICES

We are committed to dealing fairly with our customers, vendors, competitors, and employees. Conducting business honestly and ethically is critical to our success. Accordingly, you are expected to:

- Not take advantage through manipulation, concealment, abuse of confidential information, misrepresentation, or other unfair dealings or practices.
- Provide fair access to credit and make credit decisions based on objective criteria.
- Comply with the laws and regulations that specifically prohibit discrimination against employees, customers, or prospective customers based on race, sex, religion, or other unlawful factors.
- Not offer bribes or extend quid pro quo offers to anyone.
- Avoid providing legal advice to customers or others.
- Respond to customer requests for referrals by providing several options with no indication of preference and without a statement of quality or reliability.

## INSIDER TRADING

We safeguard our reputation and preserve public trust in First Fed by not engaging in insider trading. Our policy and laws prohibit trading in First Northwest securities while in possession of material nonpublic information or during established blackout periods. To protect against insider trading, you must:

- Not use nonpublic information about First Fed or First Northwest for the purpose of buying or selling securities.
- Not trade First Northwest securities during an established blackout period.
- Not share inside information with anyone.

## ANTI-MONEY LAUNDERING

Money laundering is the process of converting illegal proceeds so that funds are made to appear legitimate and thereby enter the stream of commerce. It is not limited to cash transactions and can include monetary instruments and other proceeds of illicit activity, including terrorist financing. Terrorist financing may involve proceeds from both illegitimate and legitimate sources. First Fed is committed to combating money laundering, terrorist financing, and other criminal activities and to adhering to the legal and regulatory requirements that govern the prevention of these crimes. We all must act diligently to prevent our products and services from being used to further money laundering and terrorist financing. To do so, you must:

- Know and follow the regulations, laws, and First Fed policies that establish a framework for prevention, detection, and reporting of money laundering and terrorist-financing risk.
- Escalate unusual or suspicious activity.
- Apply the appropriate level of due diligence when entering client relationships and, where applicable, individual transactions. No client relationship is worth compromising our commitment to combating money laundering, terrorist financing, and other crimes.



## ADMINISTRATION OF THIS CODE

We must serve the needs of our customers transparently and honestly, which includes operating within laws and regulations that govern our industry. To ensure continued compliance, First Fed will regularly review and appropriately update this Code. The Chief HR and Marketing Officer is responsible for updating the Code, and presenting it to the Board of Directors for review and approval.

## DIRECTORS, OFFICERS AND EMPLOYEES MUST:

- Confirm and document their receipt of this Code, electronic or otherwise.
- Read, understand, and comply with this Code.
- Report all known or suspected conflicts of interest.

## HOW TO REPORT CONCERNS

If you know about a violation or perceived violation of this Code, you should report it via any of the following:

- Your manager
- Any member of the Executive Management Team
- Human Resources
- Corporate Counsel
- Ethics Point:
  - [ourfirstfed.ethicspoint.com](https://ourfirstfed.ethicspoint.com)
  - Toll-Free 855-458-8346

It is safe for you to report violations of this Code and expected. As a reminder, First Fed has no tolerance for retaliation. Employees who engage in retaliation against a colleague because they have raised a concern or question in good faith, reported a violation, or been involved in an investigation are subject to disciplinary action, which may include termination of employment.



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